

Corruption and Transparency as Development Issues



Philippines

Photo by Claudia Kuric, 2005

Training Modules for Staff and Volunteers (Pre-Service and In-Service Training)



October 2007

Corruption and Transparency as Development Issues

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust.

To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training sessions and the publication *Greaseless* [ICE No. CD060], by Loretta Graziano Breuning, Ph.D., raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

The training modules were designed at Peace Corps headquarters and piloted in the Europe, Mediterranean and Asia (EMA). They consist of a staff training module of three sessions that should be used at post prior to training Volunteers. There are two Volunteer modules: three pre-service training sessions to be presented in conjunction with development and cross-cultural topics; and four in-service training sessions, which draw upon the Volunteers' experiences in their initial months in-country exploring cross-cultural issues and their projects with community members. An overview of the training modules follows.

Facilitators/Technical Expertise

Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting any of these sessions, it is important that the facilitator/trainer read the final section of this introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and one local, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Staff Training Overview

Why staff training?

The larger purpose of the staff and Volunteer training modules is to develop the knowledge, skills, and attitudes of both Peace Corps post staff and Volunteers so that they may safely accomplish project goals in challenging environments in which corruption is present. However, if staff do not first examine their own beliefs and strategies for addressing corruption, then they will not be able to guide and support the Volunteers in addressing corruption. It is highly recommended that all Peace Corps staff (administrative staff, drivers, medical officers, program managers, secretaries, etc.) at post participate, as all are faced with these issues in their own jobs, and many hear about them directly from Volunteers.

Goal and Objectives

Goal: To develop staff skills and knowledge so they can help Volunteers be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of the training, staff will be able to

1. Define corruption and transparency and describe how they affect development, the lives of host country individuals, and Volunteers.
2. Identify three ways that the Peace Corps' expectations about corruption differ from some local practices.
3. Identify and explain how five Peace Corps resources suggest models of and strategies for non-corrupt practices.
4. Choose an appropriate strategy for helping Volunteers to meet project goals without engaging in or condoning corruption.
5. Choose an appropriate strategy for helping Volunteers to live effectively and safely within the culture without engaging in or condoning corruption (such as dealing with intimidation, pressure, threats, enticements, and so on.)

Target Audience

It is highly recommended that *all* Peace Corps staff (administrative staff, drivers, medical officers, program managers, secretaries, etc.) at post participate, as all are faced with these issues in their own jobs, and many hear about them directly from Volunteers.

Key materials are identified and may need to be translated, depending upon the proficiency of English of staff members. Many sessions include group work in which discussions can either be in English or in the local language.

Duration

This module contains four 1½ -2½ hour sessions. A suggested sequence is one session per week for four consecutive weeks. Other options: one session per day for four consecutive days; or one full day of training, alternating session time and individual work.

Outline of Staff Sessions

Session I: Introduction

- A. Corruption exists in all societies. Why discuss it? It can affect the Peace Corps office, its programs, and the effectiveness and safety of Volunteers.
- B. *Corruption and Transparency as Development Issues* provides context to discuss what corruption, transparency, and development are and how definitions relate to Peace Corps' roles and regulations. It sets a nonjudgmental tone that corruption exists in all cultures.
- C. Personal or Volunteer stories about experiences with corruption (with back-up vignettes/case studies—including one from the United States) prompt discussion. When is something corrupt as opposed to just being disorganized? How can you tell?
- D. *Assignment: Read Greaseless using "Questions to consider as you read Greaseless" as a guide. (For non-English readers, provide translation of "Questions to consider" from the handout only; they contain the main idea of each chapter and related reflection questions.) The questions are meant to guide discussion in Session II; readers do not need to answer all questions as part of the assignment.*

Session II: Greaseless and System Integrity

- A. Discuss *Greaseless*, with a review of the big ideas and their relevance and applicability to Peace Corps staff and Volunteer roles and responsibilities.
- B. *Assignment: Ask everyone to bring an example/case study/scenario to the next session of a personal or professional experience of being faced with corruption.*

Session III: Staff Support with Checks and Balances

- A. Discuss Peace Corps—and possibly U.S. government or United Nations—examples of checks and balances, guidelines, and posters/documents that promote system integrity and describe the agency's expectations related to corruption, approved processes for financial management, partnership development, U.S. government employee behavior, etc.
- B. In groups, share personal experiences and possibly design scenarios that cover common practices affecting staff in the country.
- C. Together, discuss support systems. How do the systems support each other? Revisit the official guidance and resources from the Peace Corps perspective to share strategies. Discuss how staff has used, or could use, them in their work to support each other better.
- D. *Assignment: Think about your relationships with Volunteers and how you do, or could, support them as they encounter corruption in their community life or work.*

Session IV: Volunteer Support

- A. Staff share how they currently support Volunteers. In a categorizing exercise, each staff person writes up encounters with Volunteers that might provide opportunities for support, and places them on a wall. The facilitators and/or

- participants then look at these and try to group them in categories with titles (such as project related, site selection, travel and safety, etc.). Provide a list of possible headings, so if a key topic like “site selection” is missing, they can add it.
- B. Review the groupings and individual entries and discuss things that could be done in advance to help Volunteers (e.g., site selection, training, etc.) deal with challenges they face in their work (e.g., a principal telling a Volunteer to give an A grade because the principal has taken a bribe; or a Volunteer watching a clinic worker take medicine and subsequently sell it for personal gain, etc.).
 - C. Introduce the Volunteer pre-service training framework/curriculum so staff know what training Volunteers receive. Discuss helping Volunteers develop appropriate relationships (e.g., setting boundaries, learning cross-cultural cues, making the time commitment to integrate, and not relying on corrupt behavior such as bribery to make something happen faster). Specifically address how Volunteer integration into the community is part of the safety and security paradigm; cross-cultural adjustment; and a strategy for minimizing the impact of corruption on them. Review Peace Corps policies for Volunteers that also support their safety and ability to counteract corrupt practices.

If there is time, other activity ideas:

An exercise such as a matching game, true/false possibilities, or a values clarification activity, in which a list of actions requires staff to determine if the statement is “Corruption or Aggravation?” For example: A host mother asks for sugar every time a Volunteer goes to the market and does not pay for it—corruption or aggravation? Or: A policeman/beggar holds up a car until money is paid and though it is not said, clearly the American is expected to pay—corruption or aggravation?

- D. Facilitate an action-planning exercise that brings everything back together with how staff as individuals can do one or two things to better support Volunteers and each other. Collectively or in groups provide responses to key scenarios they discussed in Sessions I and III. Put those together as a post resource and revisit it in a follow-up meeting in three or six months to see if all is going well or whether other efforts might be needed.

An alternative is to individually identify scenarios and action areas in a more post-level strategic planning session resulting in a formal plan with action items, people responsible, milestones, and periodic follow-up (monitoring).

- E. Summarize the training module and evaluate it.

Volunteer Pre-Service Training Overview

Purpose

This training frames corruption and transparency as development issues. Prior to these training sessions, trainees should have had sessions on the Peace Corps’ approach to development and development issues in the host country. As well, trainees should have

been in-country for at least four to five weeks to have gained some minimal exposure to the local culture, and they should understand the policies and procedures under which Volunteers must operate, e.g., the *Volunteer Handbook*.

Goal and Objectives

Goal: To develop trainees' skills and knowledge so they can be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of the training, trainees will be able to

1. Define corruption and transparency and describe how it affects development, the lives of host country individuals, and Volunteers.
2. Identify one example of how the Peace Corps' expectations about corruption and transparency differ from some local practices they have encountered.
3. Choose an appropriate strategy for living effectively and safely within the culture without engaging in or condoning corruption (such as dealing with intimidation, pressure, threats, enticements, and so on).
4. Describe any safety considerations and correctly identify what their roles and obligations are for reporting corruption to the Peace Corps.
5. Create, with Peace Corps staff and other Volunteers, a strategy for dealing with situations that are beyond their control, and assess the strategy based on their roles and responsibilities, and personal safety.

Target Audience

These modules are designed to be used with trainees during pre-service training. They are based on the premise that trainees have minimal experience addressing corruption in-country. It is highly recommended that *all* trainees participate as most will be faced, either directly or indirectly, with these issues in their project work and everyday lives.

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training module. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Thus, before conducting these sessions, it is important that the facilitator/trainer read the final section of this introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and one local, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

Duration

This module contains three 1½ -2 hour sessions. Due to assigning take-home work between Session I and Session II, we recommend that you review the assignment options provided and plan session flow accordingly. To avoid losing the discussion and idea flow from one session to the next, it is suggested that all three sessions be completed within one week's time.

Outline of Volunteer Pre-Service Training Sessions

Session I: Challenges in Development

- A. *Corruption and Transparency as Development Issues* provides context to discuss what corruption, transparency, and development are and how definitions relate to Peace Corps' roles and regulations. Set a nonjudgmental tone that corruption is in all cultures.
- B. Participants reflect on their individual experiences with corruption. (These experiences may be from home or other countries, if they don't have local examples yet.) What did they learn from the situation? Could what they learned be applied to their upcoming Volunteer experience?
- C. *Assignment: Read Greaseless using "Questions to consider as you read Greaseless" as a guide. The questions are meant to guide discussion in Session II—readers do not need to answer all questions as part of the assignment. See Session I, part III for assignment options (e.g., assign Greaseless **before** Session I and focus on chapter 3 in Session II; assign Greaseless **after** Session I and allow some time to digest it before discussing in Session II—with special attention to chapter 3; or assign small groups to read one chapter each for a summary and report-out exercise at the beginning of Session II).*

Session II: Is it Corruption?

- A. Discuss *Greaseless* with a review of big ideas and their relevance and applicability to Peace Corps staff and Volunteer roles and responsibilities. Focus discussion on chapter 3, "Don't I Have to Respect Their Culture?" See Session I, part III regarding optional flow of discussions. Depending upon the delivery option chosen, the format and content of this discussion may change.
- B. Explore issues of corruption in the regional (Africa, EMA, IAP) context. Participants form small groups to discuss supplied vignettes. Is this corruption? Why or why not? What could you do in this situation?

Session III: How to Avoid Difficult Situations

- A. Discuss how the Peace Corps provides support and resources to address corruption. Participants divide into small groups to review and discuss Peace Corps resources (e.g., the *Peace Corps Manual*, site selection process, the *Volunteer Handbook*, etc.); community integration and personal safety; language and cross-cultural training; transparency models for managing projects (e.g., *The New Project Design and Management Training Manual*, small project assistance guidelines, etc.); and other Peace Corps-developed resources.
- B. Participants take what they have learned throughout the training and form their own personal action plan for addressing situations related to corruption. Participants share their action plans.
- C. Review this session. Address any questions participants may have on any of these sessions. Explain that this topic will be revisited during in-service training. Emphasize how Peace Corps staff can continue to be resources to Volunteers once in their sites.

Volunteer In-Service Training Overview

Purpose

By the first in-service training, Volunteers have encountered a number of confusing and (perhaps) annoying situations. This in-service training module helps them discuss their observations and frustrations and identify issues of corruption and transparency that affect system integrity. They explore issues from the point of view of their roles as Volunteers and within their specific project areas, and develop strategies for working safely and effectively within Peace Corps guidelines to model behavior and share resources.

Goal and Objectives

Goal: To develop skills and knowledge to be effective and safe, and accomplish project goals in challenging environments.

Objectives

By the end of the training, Volunteers will be able to

1. Identify how the absence of transparency and system integrity impacts their project activities and goals.
2. Identify one example of how the Peace Corps' expectations about corruption and transparency differ from some local practices they have encountered.
3. Explain how at least two Peace Corps' resources suggest models of, and strategies for, non-corrupt practices.
4. Describe a continuum of strategies that could be used and when and how different strategies can be applied appropriately. Choose an appropriate strategy for meeting project goals without engaging in or condoning corruption.
5. Identify and describe the resources, tools, and strategies available to create and incorporate secondary projects in appropriate ways.
6. Develop appropriate strategies within the context of their project.

Target Audience

These modules are designed to be used with Volunteers during in-service training. It is highly recommended that *all* Volunteers participate as most are faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

This module contains three 1½-2 hour sessions and an optional fourth session of one hour. It is suggested that the in-service training sessions be presented as one full day of the first in-service training that Volunteers attend.

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training module. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting these sessions, it is important that the facilitator/trainer read the final section

of this introduction, “Trainer Preparation: Conducting Staff and Volunteer Training in Corruption.” Ideally, two staff, one American and one local, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

Outline of Volunteer In-Service Training Sessions

Session I: Experiences and Solutions

- A. Through the GARBAGE[©] simulation game, participants explore the trade off between personal gain and common good. Participants are asked to draw parallels between the game and what they may have experienced at site concerning corruption and transparency.
- B. Participants share individual experiences with corruption, discussing what they saw, their immediate reaction, and any analysis after the fact. Participants consider their experiences through a cultural lens. Finally, participants discuss which of the experiences they have had that can be ignored and which they can actually do something about. Potential solutions or courses of action are considered.
- C. *Assignment: Ask participants to review brainstormed solutions and think about whether they could apply any to their work at site—consider which are particularly relevant. Session II will further address these solutions.*

Session II: System Integrity and Peace Corps Projects

- A. Discuss what system integrity means and what happens when systems break down. Use information from the previous session’s discussions to explore examples of a lack of system integrity. Explore the Peace Corps’ rules and systems to assure transparency and system integrity as related to staff, Volunteer, and community activities. Further discuss how these systems affect Volunteers while in their sites.
- B. In small groups (one if the in-service training is for only one sector area), explore common challenges to system integrity in specific project areas and discuss potential ideas for addressing these challenges. Reinforce the idea that Volunteer behaviors have real consequences.
- C. *Assignment: In Session III, Volunteers will have the opportunity to hear solutions and experiences from a panel of Volunteers and staff members. Ask participants to come to that session with situations or questions that they would like to have addressed.*

Session III: Strategies for Effective Peace Corps Experiences and Projects

- A. In this session, a panel of carefully selected Volunteers, the safety and security coordinator (or the country director), and a selection of program managers (or the program and training officer) present possible solutions, resources, and the context for addressing issues of corruption and transparency. Use information

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- generated in previous sessions to prepare the panel for its role. Following the panel presentation and any questions-and-answers, the participants discuss how they can apply what they learned to their project areas.
- B. Review what has been addressed in the in-service training modules (Volunteer experiences, the Peace Corps' framework for system integrity, and resources). Debrief what they feel are the most important lessons learned. Reiterate that if something affects their well-being, their safety, or their effectiveness, it is important for them to address the issue in a safe way. Emphasize that staff will continue to be resources for Volunteers.

Session IV: Corruption and Transparency Themes Within Project Areas (Optional)

- A. Through group discussion and brainstorming, explore potential ways Volunteers can address corruption, transparency, and system integrity through their project areas. Staff and Volunteers discuss which possibilities fit within post's safety and security parameters and which are feasible for implementation.
- B. Participants take what they have learned throughout the training and form an action plan for addressing corruption and transparency from within their projects.

Trainer Preparation: Conducting Staff and Volunteer Training in Corruption

Components of a Successful Training

Training on the topic of corruption is best when:

- It is clearly linked to the issues Volunteers face at post—such as project success, safety and security, Volunteer morale, and effective interactions with host country nationals.
- It does not focus solely on awareness of corruption, but fosters awareness as a means to building the skills needed to effectively interact with others and to accomplish one's goals.
- It is experiential and encourages participants to acknowledge their own cultural conditioning about corruption.
- It openly addresses issues of cultural interpretation, what can and cannot be changed, and emphasizes responsibility for one's own conduct and attitudes.
- It is co-facilitated by a pair (or team)—one of whom is American and the other a local staff person. This allows the co-facilitators to model effective behaviors and cultural approaches.
- It is facilitated by trainers who have previous experience in conducting training related to values; are skilled at handling emotions and potential conflicts brought up by the content of the training; and are well-versed in how issues of corruption relate to the Peace Corps.

Are you ready?

Conducting a workshop on corruption may be unlike conducting other workshops you have led. Unlike other workshops, there are issues of power that are present and strong emotions such as anger, defensiveness, and denial can occur. Not every trainer, no matter how good, is suited to conduct a corruption workshop. This is not a commentary on someone's effectiveness as a trainer. Rather, it is directly related to the person's ability to facilitate a productive, emotionally charged workshop by using skills in group dynamics, conflict management, and cross-cultural communication skills.

Honestly analyze your personality and training style. Due to the issues mentioned above, if you do not feel comfortable training without a script, discussing emotional issues, or conducting an interactive workshop, you may not be the best person to conduct a corruption session. While this training manual is largely scripted, effective corruption workshops should be driven by the participants. Trainers need to react to the input of the participants and relate their comments and experiences to the learning points. Trainers who are most comfortable when they are in control or who confront trainees rather than asking thoughtful questions may not be able to create a safe space for corruption training. This sometimes causes participants to withdraw and shut down, rather than open up and stretch their abilities.

Facilitation and Training

Corruption workshop leaders serve as facilitators rather than traditional trainers.

Traditional trainers tend to impart specific knowledge or skills and are often viewed as

experts. Facilitators, on the other hand, lead exercises and discussions to help make sure that certain content or ideas are covered. While they may share new information, a facilitator's primary role is to ask questions, provoke discussion, and support the sharing of experiences that make participants look at subjects in new ways. Typically, a facilitator will not stand up and lecture to a group. The sessions in these training modules provide plenty of opportunity for the facilitator to ask participants for input.

Facilitators help the participants share and process thoughts, experiences, and feelings. Ultimately, much of the learning will come from participant interaction, not lectures. Though the facilitator should always remain neutral, he or she should also be ready to pull out facts, feelings, and unasked questions from the participants.

Behaviors of Successful Facilitators

- Set ground rules for behavior and participation (with the group's input).
- Establish and maintain a supportive group atmosphere.
- Create a safe environment for sharing and exploring ideas and feelings even if they are contradictory.
- Avoid sustained one-on-one individual interaction.
- Clarify points of view and points of agreement and disagreement.
- Observe and act on nonverbal behaviors.
- In difficult situations, handle the problem before it gets out of hand and without embarrassing people.
- Approach conflict in a firm, positive, and constructive way.
- Encourage participation from everyone.
- Ask open-ended questions.
- Encourage the group to ask questions of each other.
- Provide summaries, conclusions, and continuity throughout the course of the workshop.

Co-Facilitation

Whenever possible, one American and one host national staff member should co-facilitate corruption workshops. Co-facilitation means that neither individual is dominant. They work together and divide the material appropriately. Each supports the other by taking notes, catching raised hands that the other may not see, adding a different perspective when appropriate, and serving as a back-up. The use of two facilitators is especially encouraged if the workshop has more than 20 participants. By working in tandem, co-facilitators can point out and reinforce desired behavior. And, in the case of this content, the two facilitators can raise cross-cultural perspectives of the behaviors being discussed.

Setting Ground Rules

Corruption workshops can deal with personal and emotional issues. Facilitators need to create a safe environment so that participants can share their feelings and experiences. Create this type of environment by setting group norms or ground rules that will govern behavior during the sessions. To save time, write a few basic ground rules on a flip chart and post for all to see. Review each one at the start of the workshop and ask the group for

any additional rules. After reading them and asking for suggestions, ask the group to agree to the ground rules listed. Let them know that everyone has the right to respectfully remind the group of the ground rules throughout the training session. You may wish to do this yourself at some point to show that it really is acceptable.

Choose a few of the following commonly used ground rules to write on a flip chart.

- Be open to new ideas
- Everyone participates actively
- No personal attacks
- No blaming, dumping, or put-downs (no blaming an entire group, dumping responsibility, or insults to others)
- Maintain confidentiality (what we say here does not leave the room)
- Assume that others have good intentions
- If something upsets you, say so
- Put relationships first and being right second
- Address comments and questions to all the people in the workshop, not to specific individuals who are assumed to represent the views of his/her country

Techniques and Tools

Training on corruption requires facilitators to pay special attention in the following areas:

- **Rapport**
Create a positive and constructive relationship so that all participants feel comfortable. Start by considering the room setup carefully. If the content allows, arrange chairs in a circle or semi-circle so that all participants are face to face and the facilitator can be part of the circle to encourage dialogue.
- **Difficult Questions**
At times, difficult questions will be asked, and there will be no easy answers. It is acceptable for facilitators to admit not knowing all the answers. Take these opportunities to engage the group in brainstorming possible answers. First, paraphrase the question so that the question is understood. Ask the group: “What do you think about that?” Summarize responses and remind the group that there are no easy answers. Add questions to further the discussion or steer it in a new direction. Asking for the group’s input is a great way to deal with biased, destructive comments because it gets the group to take responsibility for its learning; it also gives a great opportunity to practice speaking up against bias.
- **Silence**
Silence can be an effective tool for any facilitator. However, many people—especially some Americans—are uncomfortable with silence in a group. But do not worry—if a group is slow to respond, silently count to 10 or 15. Someone is likely to speak up. Also, remember that corruption training raises emotional topics, and it may take time for participants to put feelings into words.

- **Discussion**

Asking questions is at the heart of facilitation. While there is no magic formula for sculpting a good question, try to provoke discussion by asking open-ended questions as opposed to those that simply require yes or no answers. Ask questions one at a time. Don't forget to give people time to answer, but if necessary, reword a question, or give examples for clarity. Use follow-up questions to get participants to elaborate. When charting information, use participants' own words or ask permission to reword.

Some great ways to encourage discussion:

- Notice what is not being said and ask questions that pull those issues out.
- Refer back to earlier comments and questions (jot them down to remind yourself).
- Draw parallels between comments.
- Invite feedback from specific individuals: "We haven't heard from you in a while John, what do you think?"
- Most importantly, give positive feedback.
- Ask: "Are there any last comments before we move on?"

Training Series: Corruption and Transparency as Development Issues— Staff Training

Session I: Introduction

Purpose

This introductory session describes corruption and transparency as universal issues and puts them in a development context to set a nonjudgmental tone for the training module. Participants begin to identify experiences with corruption and transparency that have affected them, their work, or the lives and work of Volunteers they know.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps staff at post (administrative staff, drivers, medical officers, program managers, secretaries, etc.) participate as all are faced with these issues in their own jobs and many hear about them directly from Volunteers.

Duration

1 hour, 30 minutes

Goal and Objectives

Goal: To develop staff skills and knowledge so staff can help Volunteers be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of the session, participants will be able to

1. Define corruption and transparency and how they affect development.
2. Identify specific examples of corruption that affect staff and Volunteers.

Session Outline

- I. Introduction (10 minutes)
- II. Corruption and Transparency as Development Issues (40 minutes)
- III. Personal and Volunteer Corruption Stories (30 minutes)
- IV. Wrap-Up/Debrief and Assignment (10 minutes)

Facilitators/Technical Expertise

Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the accompanying handout: *Trainer Preparation: Conducting Staff and Volunteer Training in Corruption*. Ideally, two staff, one American and one local, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- ❑ Blank flip charts
- ❑ Chart stand
- ❑ Markers
- ❑ Copy of *Greaseless* [ICE No. CD060] for each participant
- ❑ Tape or tacks to hang flip charts
- ❑ Handouts:
 - A. Goals and Objectives
 - B. Peace Corps' Development Philosophy
 - C. Working Definitions
 - D. *Greaseless* reader's guide (translated, if necessary)

Preparation Checklist

- ❑ Prepare the meeting room. If possible have participants sit in a semi-circle around a flip-chart stand, or around a large table. Make sure people can see each other to enable good conversation.
- ❑ Determine if you will distribute the handout of working definitions or just use it for your own reference.
- ❑ If some staff members do not read English, translate the reader's guide for *Greaseless*
- ❑ Make handouts
- ❑ Copy handouts
- ❑ Prepare flip charts

Methodology

I. Introduction (10 minutes)

- Step 1:** Welcome participants and introduce yourself.
- Step 2:** If it is a large staff and everyone does not know each other, have participants introduce themselves and tell what they do.
- Step 3:** Explain that the topic of the training is corruption and transparency. Explain that corruption exists in all societies, and ask them why they should discuss it. Further elaborate that corruption can affect the Peace Corps office, its programs, and the effectiveness and safety of Volunteers. Tell them that in this training, they will learn how to better understand and deal with corrupt practices when encountered; support transparency and transparent partners; and learn how to better support Volunteers in this area.
- Step 4:** Reveal flip chart and review the goals and objectives of the entire module, as well as those objectives of this first session.

II. Corruption and Transparency as Development Issues (40 minutes)

- Step 1:** Ask the participants: “What is corruption?” Take suggestions. Arrive at a definition and write it on a flip chart. Discuss what is/is not corruption.

Trainer’s note: This definition should include the idea that “corruption is a violation of public trust for personal gain.” For example, it may be police stopping a car just to get a bribe; the head of an organization taking some of the grant funds for him/herself; government officials taking funds that are allocated for roads; or one member of a cooperative keeping some of the profits owed to the group or taking jointly owned machinery for sole use.

- Step 2:** Ask the participants: “What is transparency?” Take suggestions. Arrive at a definition and write it on a flip chart. Ask the participants for examples that show transparency and examples that show a lack of transparency.

Trainer’s note: Transparency includes the idea that there are written rules and procedures that everyone knows and everyone follows, and that there are consequences for not following them. Transparency, and its manifestation in clear systems and rules, sets the stage for a corruption-free environment. Clear (transparent) procedures and guidelines set the benchmark by which to measure the extent and quantity of corruption in an organization.

- Step 3:** Ask the participants how their definitions relate to the Peace Corps' roles and regulations. Review with the participants that the Peace Corps is a development agency. Ask them what the Peace Corps is trying to do for the host country. Reveal the flip chart with the Peace Corps' development philosophy. Discuss how corrupt practices can interfere with the Peace Corps' work. Ask how they, as staff members with their particular responsibilities, support transparency.

Trainer's note: You can distribute the handout with working definitions of corruption and transparency at this point, and compare them with the discussion you have had above. Or, you can use the definitions solely for your own guidance in the discussion.

- Step 4:** Ask participants what harm corruption might do. Note their ideas on a flip chart and discuss, if not clear.

Trainer's note: Ideas may include poor roads because funds are taken; lenders unwilling to give loans if funds are not used as promised; extra costs for organizations if people use cars for private use or telephones for private business, etc.

- Step 5:** Ask the participants how they feel about these definitions. Discuss the difference between definitions that seem to be black and white versus the ambiguity of real-life situations.

III. Personal and Volunteer Corruption Stories (30 minutes)

- Step 1:** Ask the participants for some of their personal experiences dealing with corruption. Ask if they have any stories to share. Provide a corruption story, perhaps from another country, or from the U.S. as an example. Encourage others to present their stories, or to relay ones that Volunteers have told to them.
- Step 2:** As stories are shared, or after several have been shared, raise the question of whether the situations are corrupt or not. Ask them: "When is something corruption?" and "Do we all share the same perceptions?" Discuss why or why not.

IV. Wrap-Up/Debrief and Assignment (10 minutes)

- Step 1:** "What happened?" (Reflection/Discussion)
Review the definitions of corruption and transparency with the participants. Ask if they have further thoughts about those definitions.

- Step 2:** “*So what?*” (Generalization)
Ask the participants if their discussion clarified or made the definitions more ambiguous? How and why?
- Step 3:** “*Now what?*” (Applications)
Ask them how the issues of corruption and transparency affect the work of the Peace Corps.
- Step 4:** Introduce the book *Greaseless* to the participants and distribute copies of the accompanying reader’s guide:
- a. Explain that *Greaseless* was written by an American professor of international business with a Ph.D. in international trade. She has worked in various countries and has written this book to help explain the issues of corruption and transparency. The reader’s guide will give them a couple of key questions to think about as they read each chapter. Ask the participants to read the book and make any notes or questions they may have before the next training session.

Trainer’s note: For those who do not read English, you can read and consider just the questions on the translated reader’s guide.

- Step 5:** Learning Points (*points to be brought up if they do not occur naturally in the discussion*):
- a. Corruption and transparency are universal issues, and corruption exists in all societies.
 - b. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust.
 - c. The Peace Corps uses development in human terms, i.e., development is building human capacity.
 - d. The crucial issues regarding corruption for us in the Peace Corps are:
 - i) Public/corporate/community funds/goods/values are subverted for private benefit.
 - ii) Private gain is unlawfully sought over public/corporate/community trust good.
 - iii) The Peace Corps prohibits any activities by staff and Volunteers that condone corrupt practices or compromise the agency’s integrity.

- e. The crucial issues regarding transparency for us in the Peace Corps are:
- i) Projects and programs are run in such a way that their operations are clear and verifiable.
 - ii) The public/corporate/community benefits from open operations that are clearly demonstrated to participants and interested parties.
 - iii) The Peace Corps promotes activities by staff and Volunteers that support transparency.

Step 6: Thank participants for attending and sharing their ideas.

Handout A**Goals and Objectives**
(for the entire training module)

Goal: To develop staff skills and knowledge so they can help Volunteers be effective, safe, and accomplish project goals in challenging environments.

Learning Objectives for Staff

By the end of the training, staff will be able to

1. Define corruption and transparency and describe how they affect development, the lives of host country individuals, and Volunteers.
2. Identify three ways that the Peace Corps' expectations about corruption differ from some local practices.
3. Identify and explain how five Peace Corps resources suggest models of, and strategies for, non-corrupt practices.
4. Choose an appropriate strategy for helping Volunteers to meet project goals without engaging in or condoning corruption.
5. Choose an appropriate strategy for helping Volunteers to live effectively and safely within the culture without engaging in or condoning corruption (deal with intimidation, pressure, threats, enticements, and so on).

Objectives for Session I

1. Define corruption and transparency and describe how it affects development, the lives of host country individuals, and Volunteers.
2. Identify specific examples of corruption and lack of transparency that affect staff and Volunteers.

Handout B**The Peace Corps' Development Philosophy**

The Peace Corps uses the word “development” in human terms:

Development is building human capacity: helping people learn to identify what they would like to see changed, use their own strengths, and learn new skills to achieve what they believe is most important.

Development happens at a number of levels:

- Individual members of the community
- Professionals and service providers
- Organizations
- Communities

Development is sustainable if it is

- Culturally sustainable
- Politically sustainable
- Economically sustainable
- Managerially sustainable
- Environmentally sustainable

Excerpted from *Programming and Training Booklet 1: The Basics* [ICE No. T0113], pages 5–7.

Handout D**Working Definitions of Corruption and Transparency****Corruption:**

- According to New World College Dictionary, it is:
 1. the act or fact of making, becoming, or being corrupt
 2. evil or wicked behavior; depravity
 3. bribery or similar dishonest dealings
 4. decay; putridity; rottenness
 5. something corrupted, as an improperly altered word or text
 6. [Rare] a corrupting influence
- According to the author of *Greaseless*, Dr. Loretta Breuning:
 - “Corruption is a substantial violation of public office for personal gain.”
 - She also refers to it as violating the public trust, such as taking a bribe to certify building inspection of an unsafe building.
- The crucial issues regarding corruption for us in the Peace Corps are:
 - Public/corporate/community funds/goods/values are subverted for private benefit
 - Private gain is unlawfully sought over public/corporate/community trust/good
 - The Peace Corps prohibits any activities on the part of staff and Volunteers that condone corrupt practices or compromise the agency’s integrity

Transparent:

- To be transparent is more than just “non-corrupt” or absence of corruption.
- According to New World College Dictionary, it is:
 1. transmitting light rays so that objects on the other side may be distinctly seen; capable of being seen through; neither opaque nor translucent
 2. so fine in texture or open in mesh that objects on the other side may be seen relatively clearly; sheer; gauzy; diaphanous
 3. easily understood; very clear
 4. easily recognized or detected; obvious
 5. without guile or concealment; open; frank; candid
- The crucial issues regarding transparency for us in the Peace Corps are:
 - Projects and programs are run so that their operations are clear and verifiable.
 - Public/corporate/community benefits from open operations that are clearly demonstrated to participants and interested parties.
 - Peace Corps promotes activities on the part of staff and Volunteers that support transparency.

Handout B**Questions to consider as you read *Greaseless*****Chapter 1**

The author defines corruption as a violation of public trust for personal gain.

- How do individual acts of corruption combine to create a system that exists at multiple levels of society?
- Why is corruption so difficult to end even when governments change?
- Is it corrupt for Volunteers to give small gifts to, or receive them from, host country family members? What about service providers or officials?

Corruption exists in all societies. It affects the everyday life of individuals at all levels of society, though they may not be aware of it or may just consider it “how things are done.”

- Are the wealthy more likely to be corrupt than the poor?
- Why do you think Volunteers notice corruption in their host culture so quickly?

System integrity is the sum of support systems, checks, and balances that causes the social infrastructure to work for the public good.

- Who benefits when public resources are used for their intended purposes?
- How does integrity bring prosperity?
- What happens when system integrity breaks down? How do people survive?
- How do you rely on system integrity in meeting your major job requirements?

Chapter 2

Pausing to gather information, observe and compare your knowledge of the situation can help determine the difference between corruption and disorganization.

- Though they may sometimes be equally frustrating, why is corruption so much more damaging than disorganization?
- Where can you go to find out more about international standards in fighting corruption?
- Can Volunteers always tell the difference between disorganization and corruption while living and working in their host culture? Can you?

Chapter 3

In some cultures personal loyalty is valued more highly than responsibilities to institutions or organizations, but every culture has a sense that stealing from the public is wrong.

- While it has valid benefits in relationships and must be respected in cultures, how can personal loyalty harm the stability and effectiveness of an organization if there are no checks and balances?
- How can transparency in systems and accounting promote accountability?
- When is trading favors acceptable, and when is it not acceptable?
- Is the exchange of favors common in the host culture? If yes, think about how you can help Volunteers to understand the accepted boundaries in this process.

Chapter 4

According to the author, corruption undermines accountability and trust, eats away at the fabric of societies and individuals' lives, and it is the biggest obstacle to development.

- How do people come to accept corruption as necessary or acceptable? How can change begin?
- What are some of the consequences of corruption on infrastructure, public health, and economic prosperity?
- What are examples of corrupt systems that don't involve money directly?

- Think about how to help Volunteers and others focus on setting examples of integrity, promoting positive solutions and modeling behavior on principles of respect rather than trying to “catch” individuals engaged in corruption.

Chapter 5

It is often hard to determine who is and is not participating in corruption, but if everyone was doing it, nothing would work at all.

- Even when there is obvious corruption, how can you tell that the majority of people probably do not participate in that corruption? What does that mean for the future?
- What are some of the ways international organizations have tried to eliminate bribery? Are there local laws against bribery?
- Whether legal systems protect contracted agreements or not, why should you avoid paying bribes?
- Would it help Volunteers to know host country laws regarding bribery and other forms of corruption?
- Can you think of historical figures from the host country who are examples of integrity and positive values in this culture?

Chapter 6

Building friendship takes time, but creates the space to say no to corruption and develop an alternative relationship.

- What are strategies for minimizing the likelihood that someone might be asked to participate in or ignore others engaged in corruption?
- Do you know the internal controls and standards set by the Peace Corps and U.S. Government that guide all employees' and contractors' professional behavior? Can you communicate this to others if needed?
- Does your post have systems in place to reduce the possibility of negotiating prices for services or goods (gasoline for site visits, hotel rates for a conference, etc.)?
- For Volunteers, part of adjusting to a new culture is being patient with the different pace at which personal interactions and business may be conducted. Think about how relationship building, boundary setting, and adaptation already being done in cross-cultural and other training can prepare Volunteers to be positive examples while minimizing miscommunication and misunderstanding related to corruption.

Chapter 7

Many people across all cultures are tempted to engage in corruption if there is no legal consequence.

- What is the difference between influence and corruption?
- How do accountability and enforcement of rules reduce corruption?
- Do Volunteers know how to build capacity around transparency, accountability, standards of conduct, and enforcement of self-identified rules with nongovernmental organizations? How can they help groups manage project funds wisely?

Chapter 8

One person can have a large impact as a role model and capacity builder over time.

- How can one person make a difference in reducing corruption?
- How does sustainable change occur?
- How can you encourage Volunteers who may never see the long term changes they influence? Is the issue of corruption any different than all sustainable development work?

Training Series: Corruption and Transparency as Development Issues—Staff Training

Session II: System Integrity

Purpose

Building on the general description of corruption in the first session, this session looks more closely at how corruption breaks down system integrity. Participants discuss the main ideas in the resource *Greaseless* and apply them to the Peace Corps setting.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps staff at post (administrative staff, drivers, medical officers, program managers, secretaries, etc.) participate as all are faced with these issues in their own jobs and many hear about them directly from Volunteers.

Duration

1 hour, 20 minutes

Goal and Objectives

Goal: To develop staff skills and knowledge to help Volunteers be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of the session, participants will be able to

1. Define corruption and transparency and how they affect development by violating the public trust.
2. Explain the concept of system integrity and how the Peace Corps provides it for staff and Volunteers.
3. Discuss the difference between disorganization and corruption, and how they can help Volunteers deal with both.

Session Outline

- I. Introduction (15 minutes)
- II. Group Discussions of *Greaseless* (30 – 45 minutes)
- III. Key Learning Points (15 minutes)
- IV. Wrap-Up/Debrief and Assignment (5 minutes)

Facilitators/Technical Expertise

Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section of the Introduction, “Trainer Preparation: Conducting Staff and Volunteer Training in Corruption.” Ideally, two staff, one American and one host national should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- ❑ Blank flip charts
- ❑ Chart stand
- ❑ Markers
- ❑ Tape or tacks to hang flip charts
- ❑ Prepared flip charts:
 - Objectives
 - Assignment
- ❑ Handout: reader’s guide to *Greaseless* (translated, if necessary; (handed out as assignment at end of Session I)

Preparation Checklist

- ❑ Copy handouts
- ❑ Prepare flip charts
- ❑ Consider how to form discussion groups. Some considerations: 1) Determine how many groups of four or five members you will have; 2) Determine how many groups need to work in a language other than English; 3) Select discussion leaders for the groups—English and non-English. If possible, have discussion leaders for the non-English speakers who are able to read *Greaseless* as they can help fill in the details for those who were only able to use the translated reader’s guide.

Methodology

I. Introduction (15 minutes)

Step 1: Welcome participants back to the training. Review Session I by asking what were some significant things they remember from that session.

Step 2: Introduce today's session as being a discussion of the book *Greaseless*. Reveal the flip chart with the objectives.

Trainer's note: Participants will need their reader's guide and copies of Greaseless.

II. Group Discussions of *Greaseless* (30 – 45 minutes)

Step 1: Describe the groups they will be working in, and identify the discussion leaders.

Trainer's note: See preparation checklist above for information on forming discussion groups.

Step 2: Ask the participants to gather in their individual groups and begin discussion of *Greaseless*.

III. Key Learning Points (15 minutes)

Step 1: Ask the individual groups to return to the original, larger group.

Step 2: Identify key learning points:

a. *“What happened?”*

Ask the participants what discussion questions got them most interested or engaged.

Trainer's note: Note the discussion topics on a flip chart.

b. *“So what?”*

Ask the participants which topics they did not agree on or argued about. Then, follow up by asking them what different points of view were expressed, whether they could “see” each others' views, and how/why not.

c. *“Now what?”*

Ask the participants how their discussion of *Greaseless* related to the

discussion they had in the first session. Ask them if they now have any new ideas about the meanings of corruption or transparency.

Trainer's note: Record any points that should be remembered for the next sessions.

IV. Wrap-Up/Debrief and Assignment (5 minutes)

Step 1: Ask participants for their comments on the session. Ask them what they liked, what they learned, etc.

Learning Points (*points to be brought up if they do not occur naturally in the discussion*):

- a. Corruption is a violation of public trust for personal gain, and it exists in all societies. It affects the everyday life of individuals at all levels of society, though they may not be aware of it.
- b. System integrity is the sum of support systems, checks, and balances that causes the social infrastructure to work for the public good.
- c. Pausing to gather information, observe, and compare your knowledge of the situation can help determine the difference between corruption and disorganization.

Step 2: Reveal the flip chart with the next session's assignment:
"For the next session, bring an example/case study/scenario of a personal or professional experience of being faced with corruption."

Flip Charts

Objectives

By the end of the session, participants will be able to

1. Define corruption and transparency and how they affect development by violating the public trust.
2. Explain the concept of system integrity and how the Peace Corps provides it for staff and Volunteers.
3. Discuss the difference between disorganization and corruption, and how they can help Volunteers deal with both.

Assignment for Next Session

For the next session, bring an example/case study/scenario of a personal or professional experience of being faced with corruption.

Handout**Questions to consider as you read *Greaseless*****Chapter 1**

The author defines corruption as a violation of public trust for personal gain.

- How do individual acts of corruption combine to create a system that exists at multiple levels of society?
- Why is corruption so difficult to end even when governments change?
- Is it corrupt for Volunteers to give small gifts to, or receive them from, host country family members? What about service providers or officials?

Corruption exists in all societies. It affects the everyday life of individuals at all levels of society, though they may not be aware of it or may just consider it “how things are done.”

- Are the wealthy more likely to be corrupt than the poor?
- Why do you think Volunteers notice corruption in their host culture so quickly?

System integrity is the sum of support systems, checks, and balances that causes the social infrastructure to work for the public good.

- Who benefits when public resources are used for their intended purposes?
- How does integrity bring prosperity?
- What happens when system integrity breaks down? How do people survive?
- How do you rely on system integrity in meeting your major job requirements?

Chapter 2

Pausing to gather information, observe and compare your knowledge of the situation can help determine the difference between corruption and disorganization.

- Though they may sometimes be equally frustrating, why is corruption so much more damaging than disorganization?
- Where can you go to find out more about international standards in fighting corruption?
- Can Volunteers always tell the difference between disorganization and corruption while living and working in their host culture? Can you?

Chapter 3

In some cultures personal loyalty is valued more highly than responsibilities to institutions or organizations, but every culture has a sense that stealing from the public is wrong.

- While it has valid benefits in relationships and must be respected in cultures, how can personal loyalty harm the stability and effectiveness of an organization if there are no checks and balances?
- How can transparency in systems and accounting promote accountability?
- When is trading favors acceptable, and when is it not acceptable?
- Is the exchange of favors common in the host culture? If yes, think about how you can help Volunteers to understand the accepted boundaries in this process.

Chapter 4

According to the author, corruption undermines accountability and trust, eats away at the fabric of societies and individuals' lives, and it is the biggest obstacle to development.

- How do people come to accept corruption as necessary or acceptable? How can change begin?
- What are some of the consequences of corruption on infrastructure, public health, and economic prosperity?
- What are examples of corrupt systems that don't involve money directly?

- Think about how to help Volunteers and others focus on setting examples of integrity, promoting positive solutions and modeling behavior on principles of respect rather than trying to “catch” individuals engaged in corruption.

Chapter 5

It is often hard to determine who is and is not participating in corruption, but if everyone was doing it, nothing would work at all.

- Even when there is obvious corruption, how can you tell that the majority of people probably do not participate in that corruption? What does that mean for the future?
- What are some of the ways international organizations have tried to eliminate bribery? Are there local laws against bribery?
- Whether legal systems protect contracted agreements or not, why should you avoid paying bribes?
- Would it help Volunteers to know host country laws regarding bribery and other forms of corruption?
- Can you think of historical figures from the host country who are examples of integrity and positive values in this culture?

Chapter 6

Building friendship takes time, but creates the space to say no to corruption and develop an alternative relationship.

- What are strategies for minimizing the likelihood that someone might be asked to participate in or ignore others engaged in corruption?
- Do you know the internal controls and standards set by the Peace Corps and U.S. Government that guide all employees' and contractors' professional behavior? Can you communicate this to others if needed?
- Does your post have systems in place to reduce the possibility of negotiating prices for services or goods (gasoline for site visits, hotel rates for a conference, etc.)?
- For Volunteers, part of adjusting to a new culture is being patient with the different pace at which personal interactions and business may be conducted. Think about how relationship building, boundary setting, and adaptation already being done in cross-cultural and other training can prepare Volunteers to be positive examples while minimizing miscommunication and misunderstanding related to corruption.

Chapter 7

Many people across all cultures are tempted to engage in corruption if there is no legal consequence.

- What is the difference between influence and corruption?
- How do accountability and enforcement of rules reduce corruption?
- Do Volunteers know how to build capacity around transparency, accountability, standards of conduct, and enforcement of self-identified rules with nongovernmental organizations? How can they help groups manage project funds wisely?

Chapter 8

One person can have a large impact as a role model and capacity builder over time.

- How can one person make a difference in reducing corruption?
- How does sustainable change occur?
- How can you encourage Volunteers who may never see the long term changes they influence? Is the issue of corruption any different than all sustainable development work?

Training Series: Corruption and Transparency as Development Issues—Staff Training

Session III: Staff Support with Checks and Balances

Purpose

Building on the general description of corruption in the first session and the examination of the roles of individual people and system integrity in the second, this session looks at the roles and responsibilities of staff in the Peace Corps. The steps to ensure system integrity are examined from a Peace Corps agency point of view using examples of ethics and other policy guidance, processes for financial management, etc.

In this session, participants share examples of situations when, according to Peace Corps guidelines, they, as staff, have been faced with corrupt practices. They discuss what their own support system is for dealing with those practices. For an assignment, they begin to think about Volunteer stories they have heard in which the Volunteer has had to deal with corruption.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps staff at post (administrative staff, drivers, medical officers, program managers, secretaries, etc.) attend as all are faced with the issues in their own jobs and many hear directly from Volunteers.

Duration

2 hours, 30 minutes

Goals and Objectives

Goal: To develop staff skills and knowledge to help Volunteers be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of the session, staff will be able to

1. Describe the Peace Corps' expectations about corruption and transparency, and how they affect staff conduct and operations.
2. Identify three ways that the Peace Corps' expectations about corruption differ from some local practices.
3. Explain at least one policy that helps Peace Corps staff and Volunteers avoid corrupt practices and one that helps protect staff and Volunteers from getting put in difficult positions.

Session Outline

- I. Introduction (5 minutes)
- II. Peace Corps Policy Documents and Procedures (60 minutes)
- III. Where Is Staff Likely to Encounter Corruption and What Is Their Support? (45 minutes)
- IV. Report from Group Work (30 minutes)
- V. Wrap-Up/Debrief and Assignment (10 minutes)

Facilitators/Technical Expertise

Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section of the Introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and one host national, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- | | |
|--|--|
| <ul style="list-style-type: none"> ❑ Blank flip charts ❑ Chart stand ❑ Markers ❑ Sample U.S. government ethics poster from office ❑ Handouts: Copy of ethics poster | <ul style="list-style-type: none"> ❑ Tapes or tacks to hang flip charts ❑ Prepared flip charts: <ul style="list-style-type: none"> Objectives Small group tasks #1 and #2 Assignment for next session Description of the inspector general's office Car use rules and regulations Sections from the <i>Peace Corps Manual</i> |
|--|--|

Preparation Checklist

- ❑ Select handouts to use
- ❑ Copy handouts
- ❑ Prepare flip charts

Methodology

I. Introduction (5 minutes)

- Step 1:** Ask participants to recall the last session, the discussion of *Greaseless*. Ask them which points from that session they recall.
- Step 2:** Reveal the flip chart with the objectives of this session, and go over them. Emphasize that this session will be about the systems and support that the Peace Corps provides to its staff.

II. Peace Corps Policy Documents and Procedures (60 minutes)

- Step 1:** Ask participants what helps agencies, such as the Peace Corps, maintain system integrity.

Trainer's note: Some suggestions include clear procedures—including checks and balances—guidelines, documents, etc. List and discuss any suggestions.

- Step 2:** Have participants form groups. Provide them with a procedure, guideline, or policy to read and discuss.

Trainer's note: The number of groups should match the number of the handouts you wish to use. Handouts are included at the close of this module.

- Step 3:** Ask each group to briefly report out on what they read and ask them how it helps to maintain system integrity.

- Step 4:** Briefly discuss how policies and procedures help staff say “no” when approached with an offer or request that would compromise the system. Give a few examples (e.g., policy for use of vehicles, etc.).

III. Where Is Staff Likely to Encounter Corruption and What Is Their Support? (45 minutes)

- Step 1:** Explain to the participants that this is a small group activity and that they will be asked to work on two separate tasks. Reveal small group task #1 on a flip chart:

Discuss and list examples in which staff may encounter corrupt practices/problems in their work.

Step 2: Have participants break into discussion groups. Provide each group with a flip chart and a marking pen. Tell them they will have 20 minutes to work.

Trainer's note: Mix groups for greater cross-fertilization. There should be a minimum of two groups.

Step 3: After 20 minutes, ask participants to stop working. Reveal flip chart with small group task #2 and explain that they will again have 20 minutes to work. Remind participants to note their ideas on the flip chart:

Give your flip chart to the group to your right. For the list you receive, think about how Peace Corps policies and procedures address (or should address) the situations. How do these policies and procedures act to protect staff as well as to set an ethical standard?

IV. Report from Group Work (30 minutes)

Step 1: Ask groups to post their flip charts around the room. Ask one group to report on one item they worked on in task #2. See if anyone else worked on the same item and had different conclusions.

Step 2: Ask another group to report on one of their items, and so on, until each group has had a chance to present at least one item, and all items have been discussed.

V. Wrap-Up/Debrief and Assignment (10 minutes)

Step 1: *“What happened?”*
Ask participants for a few comments about the session. Ask them what they liked and what they learned.

Step 2: *“So what?”*
Ask the participants if their discussion regarding the agency's policies, guidelines, etc. helped to clarify how the Peace Corps maintains its system integrity. How and why?

Step 3: *“Now what?”*
Ask the participants how a better understanding of the agency's policies and procedures can support them when confronted with corrupt practices or other difficult situations.

Learning Points (points to be brought up if they do not occur naturally in the discussion):

Corruption and Transparency as Development Issues

- a. *Corruption and transparency are universal issues, and corruption exists in all societies.*
- b. *The Peace Corps maintains clear policies, procedures, guidelines, etc. to support its own system integrity.*
- c. *A clear understanding of these guidelines helps to protect staff from getting put in difficult situations as well as supporting Volunteers if they, in turn, are faced with corrupt practices.*

Step 4: Introduce the next assignment and reveal the corresponding flip chart:

Think about your relationship with Volunteers and how you do, or could, support them as they encounter corruption in their life or work. Be prepared to share your ideas in the next session.

Flip Charts

Objectives

By the end of the session, staff will be able to

1. Describe the Peace Corps' expectations about corruption and transparency, and how they affect staff conduct and operations.
 2. Identify three ways that the Peace Corps' expectations about corruption differ from some local practices.
 3. Explain at least one policy that helps Peace Corps staff and Volunteers avoid corrupt practices and one that helps protect staff and Volunteers from getting put in difficult positions.
-

TASK #1

Discuss and list examples in which staff may encounter corrupt practices/problems in their work.

TASK #2

Give your flip chart to the group to your right. For the list you receive, think about how Peace Corps policies and procedures address (or should address) the situations. How do these policies and procedures act to protect staff as well as to set an ethical standard?

Assignment for Next Session

Think about your relationship with Volunteers and how you do, or could, support them as they encounter corruption in their life or work. Be prepared to share your ideas in the next session.

Handout



Code of Ethics

Principles of Ethical Conduct for Government Officers and Employees

1. Public service is a public trust, requiring employees to place loyalty to the Constitution, the laws and ethical principles above private gain.
2. Employees shall not hold financial interests that conflict with the conscientious performance of duty.
3. Employees shall not engage in financial transactions using nonpublic Government information or allow the improper use of such information to further any private interest.
4. An employee shall not, except as permitted by subpart B of this part, solicit or accept any gift or other item of monetary value from any person or entity seeking official action from, doing business with, or conducting activities regulated by the employee's agency, or whose interests may be substantially affected by the performance or nonperformance of the employee's duties.
5. Employees shall put forth honest effort in the performance of their duties.
6. Employees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Government.
7. Employees shall not use public office for private gain.
8. Employees shall act impartially and not give preferential treatment to any private organization or individual.
9. Employees shall protect and conserve Federal property and shall not use it for other than authorized activities.

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10. Employees shall not engage in outside employment or activities, including seeking or negotiating for employment, that conflict with official Government duties and responsibilities.
11. Employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
12. Employees shall satisfy in good faith their obligations as citizens, including all just financial obligations, especially those—such as Federal, State, or local taxes—that are imposed by law.
13. Employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.
14. Employees shall endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards set forth in this part. Whether particular circumstances create an appearance that the law or these standards have been violated shall be determined from the perspective of a reasonable person with knowledge of the relevant facts.

Excerpted from **STANDARDS OF ETHICAL CONDUCT FOR EMPLOYEES OF THE EXECUTIVE BRANCH**, Final Regulation Issued by the U.S. Office of Government Ethics, October 2002. See: http://www.usoge.gov/pages/forms_pubs_otherdocs/fpo_files/reference/rfsoc_02.pdf (accessed July 26, 2007).

Handout

Excerpts from Federal Circular A-123

SUBJECT: Management Accountability and Control

1. **Purpose and Authority** As Federal employees develop and implement strategies for reengineering agency programs and operations, they should design management structures that help ensure accountability for results, and include appropriate, cost-effective controls. This Circular provides guidance to Federal managers on improving the accountability and effectiveness of Federal programs and operations by establishing, assessing, correcting, and reporting on management controls.

The Circular is issued under the authority of the Federal Managers' Financial Integrity Act of 1982 as codified in 31 U.S.C. 3512. The Circular replaces Circular No. A-123, "Internal Control Systems," revised, dated August 4, 1986, and OMB's 1982 "Internal Controls Guidelines" and associated "Questions and Answers" document, which are hereby rescinded.

2. **Policy Management** accountability is the expectation that managers are responsible for the quality and timeliness of program performance, increasing productivity, controlling costs and mitigating adverse aspects of agency operations, and assuring that programs are managed with integrity and in compliance with applicable law.

Management controls are the organization, policies, and procedures used to reasonably ensure that (i) programs achieve their intended results; (ii) resources are used consistent with agency mission; (iii) programs and resources are protected from waste, fraud, and mismanagement; (iv) laws and regulations are followed; and (v) reliable and timely information is obtained, maintained, reported and used for decision making.

3. **Actions Required** Agencies and individual Federal managers must take systematic and proactive measures to (i) develop and implement appropriate, cost-effective management controls for results-oriented management; (ii) assess the adequacy of management controls in Federal programs and operations; (iii) identify needed improvements; (iv) take corresponding corrective action; and (v) report annually on management controls.
4. **Effective Date** This Circular is effective upon issuance.
5. **Inquiries** Further information concerning this Circular may be obtained from the Management Integrity Branch, Office of Federal Financial Management, Office of Management and Budget, Washington, DC 20503, 202/395-6911.

Corruption and Transparency as Development Issues

Note to Internet Users: This document, with associated explanatory material, was published in the Federal Register on June 29, 1995, Volume 60, Number 125, pages 33876-33872. This can be accessed from the Federal Register Online via GPO Access [wais.access.gpo.gov].

Handout

Excerpts from the Peace Corps Manual

The proper stewardship of Federal resources is a fundamental responsibility of agency managers and staff. Federal employees must ensure that government resources are used efficiently and effectively to achieve intended program results. Resources must be used consistent with agency mission, in compliance with law and regulation, and with minimal potential for waste, fraud, and mismanagement.

To support results-oriented management, the **Government Performance and Results Act** (GPRA, P.L.103-62) requires agencies to develop strategic plans, set performance goals, and report annually on actual performance compared to goals. As the Federal government implements this legislation, these plans and goals should be integrated into (i) the budget process, (ii) the operational management of agencies and programs, and (iii) accountability reporting to the public on performance results, and on the integrity, efficiency, and effectiveness with which they are achieved.

Excerpts from MS 784—Internal Control System (*the complete text may be found by using the link to the agency Intranet below*)

http://inside.peacecorps.gov/index.cfm?viewDocument&document_id=809&filetype=htm

(accessed July 26, 2007).

1.0 Purpose

This Manual Section describes Federal policies, standards, and procedures for establishing, assessing, correcting, and reporting on management controls for the purpose of improving the accountability and effectiveness of Peace Corps programs and operations.

2.0 Background

Management controls are the organization, policies, and procedures used to reasonably ensure that (i) programs achieve their intended results; (ii) resources are used consistent with agency mission; (iii) programs and resources are protected from waste, fraud, and mismanagement; (iv) laws and regulations are followed; and (v) reliable and timely information is obtained, maintained, reported, and used for decision making.

OMB Circular A-123 (see Attachment A), sets forth regulations, policies, and procedures to help ensure that Federal programs are accountable and include appropriate, cost-effective controls. It was issued under the authority of the Federal Managers' Financial Integrity Act of 1982 as codified in 31 U. S. C. 3512 (FMFIA) and it replaces Circular No. A-123, dated August 4, 1986, and OMB's 1982 "Internal Controls Guidelines" and associated "Questions and Answers" documents.

Other statutes and executive documents address the importance of management controls, including the Government Performance and Results Act (GPRA, P. L. 103- 62); the Chief Financial Officers Act (P. L. 101-576, as amended); the Inspector General Act (P. L. 95-452, as amended); FMFIA and OMB Circular A-127.

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3.0 Policy

The Peace Corps has adopted by reference the Office of Management and Budget (OMB) policies, procedures, and standards related to management accountability and controls set forth in Circular A-123 (see Attachment A).

4.0 Role of Senior Management etc.

4.1 Roles

The following are specific responsibilities of Peace Corps management as they relate to maintaining and/or improving the Agency's management controls.

4.1.1 Director, Peace Corps

The Director of the Peace Corps is responsible for ensuring that the design, installation, evaluation, and improvement of internal controls, and issuance of reports on the agency's internal control systems are in accordance with the FMFIA and the guidance contained in Circular A-123. These responsibilities include determining that systems are established, functioning, or modified, as appropriate, in accordance with the standards prescribed by Circular A-123. The Director is also responsible for ensuring that the Peace Corps' internal controls meet the objectives of Circular A-123. By December 31 of each year, the Director shall transmit a statement to the President and the Congress regarding the status of Peace Corps' internal controls, as required by the FMFIA.

4.1.2 Deputy Director, Peace Corps

The Deputy Director of the Peace Corps is responsible for coordinating the overall Agency-wide effort of evaluating, improving, and reporting on internal control systems in accordance with Circular A-123 and this Manual Section. The Deputy Director shall establish and chair the Internal Control Committee (ICC). The Deputy Director, or the Deputy Director's designee, will ensure that the ICC receives adequate technical, administrative, and clerical support necessary to function in an effective, efficient manner. The Chief Financial Officer (CFO), or in the CFO's absence, the Director of Planning, Policy, and Analysis, shall chair the ICC in the absence of the Deputy Director.

4.1.3 Office Heads

The heads of each office of the Peace Corps are responsible for the systems of internal control within their office(s). This responsibility includes demonstration of an awareness of the importance of management controls; cooperation with the Agency's formal evaluation process; and prompt implementation of improvements recommended by the ICC. For purposes of this Manual Section, office heads shall include all Associate Directors, Regional Directors, Chief Financial Officer, Chief Information Officer, Country Directors, Office Directors, and Regional Managers.

Excerpts from MS 641—Employee Standards of Conduct
(the complete text may be found by using the link to the agency Intranet below)

http://inside.peacecorps.gov/index.cfm?viewDocument&document_id=15725&filetype=htm
(accessed August 13, 2007).

This manual section sets out standards of conduct for Peace Corps employees.

§307.735-201 Proscribed Actions - Executive Order 11222

As provided by the President in Executive Order No. 11222, whether specifically prohibited by law or in the regulations in this part, no U.S. regular or special Government employees shall take any action which might result in, or create the appearance of:

- a. Using public office or employment for private gain, whether for themselves or for another person, particularly one with whom they have family, business, or financial ties.
- b. Giving preferential treatment to any person.
- c. Impeding Government efficiency or economy.
- d. Losing complete independence or impartiality.
- e. Making a Government decision outside official channels.
- f. Affecting adversely the confidence of the public in the integrity of the Government.
- g. Using Government office or employment to coerce a person to provide financial benefit to themselves or to other persons, particularly anyone with whom they have family, business or financial ties.

§307.735-202 General conduct prejudicial to the Government.

An employee may not engage in criminal, infamous, dishonest, immoral, or notoriously disgraceful conduct prejudicial to the Government (5 CFR 735.209).

§307.735-203 Criminal Statutory Prohibitions: Conflict of Interest.

- a. Regular Government employees. Regular employees of the Government are subject to the following major criminal prohibitions:
 1. They may not, except in the discharge of their official duties, represent anyone else before a court or Government Agency in a matter in which the United States is a party or has an interest. This prohibition applies to both paid and unpaid representation of another (18 U.S.C. 205).
 2. They may not participate in their governmental capacity in any matter in which they, their spouse, minor child, outside business associate, or persons with whom they are negotiating for employment have a financial interest (18 U.S.C. 208).
 3. They may not, after Government employment has ended, represent anyone other than the United States in connection with a particular matter in which the United States is a party or has an interest and in which they participated personally and substantially for the Government (18 U.S.C. 207).
 4. They may not for 2 years after their Government employment has ended, represent anyone other than the United States in connection with a matter in which the United States is a party or has an interest and which was within the boundaries of their official responsibility during their last year of Government service. This temporary restraint gives way to the permanent restraint described in subparagraph (2) of this

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paragraph if the matter is one in which the employee participated personally and substantially (18 U.S.C. 207).

5. They may not receive any salary, or supplementation of their Government salary, from a private source as compensation for services to the Government (18 U.S.C. 209).
- b. Special Government Employees. Special Government employees are subject to the following major criminal prohibitions:
1. They may not, except in the discharge of official duties, represent anyone else before a court or Government Agency in a matter in which the United States is a party or has an interest and in which they have at any time participated personally and substantially for the Government (18 U.S.C. 205).
 2. They may not, except in the discharge of official duties, represent anyone else in a matter pending before the Agency they serve unless they have served there no more than 60 days during the past 365. They are bound by this restraint despite the fact that the matter is not one in which they have ever participated personally and substantially (18 U.S.C. 205). (See §307.735-3O3(b) for additional nonstatutory Agency restrictions on a special employee representing any other person or organization in a matter pending before the Agency.) The restrictions described in sub-paragraphs (1) and (2) of this paragraph apply to both paid and unpaid representation of another.
 3. They may not participate in their governmental capacity in any matter in which they, their spouse, minor child, outside business associate, or persons with whom they are negotiating for employment have a financial interest (18 U.S.C. 208).
 4. They may not, after their Government employment has ended, represent anyone other than the United States in connection with a particular matter in which the United States is a party or has an interest and in which they participated personally and substantially for the Government (18 U.S.C. 207).
 5. They may not, for 2 years after their Government employment has ended, represent anyone other than the United States in connection with a matter in which the United States is a party or has an interest and which was within the boundaries of their official responsibility during their last year of Government service. This temporary restraint gives way to the permanent restriction described in subparagraph (4) of this paragraph if the matter is one in which they participated personally and substantially (18 U.S.C. 207).
- c. Senior Employees. Employees in positions for which the basic rate of pay is specified in subchapter II of Chapter 53 of title 5, United States Code, (Executive Schedule Pay Rates), or a comparable or greater rate of pay under other authority; and employees in positions which involve significant decision-making or supervisory responsibility for which the basic rate of pay is equal to or greater than the basic rate of pay for GS-17, are Senior Employees.

Within 2 years after his or her employment has ceased, no Senior Employee may knowingly represent or aid, counsel, advise, consult, or assist in representing any other person (except the United States) by personal presence at any formal or informal appearance before

1. any department, Agency, or court, or any officer or employee thereof,
2. in connection with any judicial or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, or other particular matter involving a specific party or parties in which the United States or the District of Columbia is a party or has a direct and substantial interest, and

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3. in which he or she participated personally and substantially as an officer or employee.

No Senior Employee, other than a special Government employee who serves for less than 60 days in a calendar year, who, within one year after his or her employment has ceased, knowingly acts as an agent or attorney for, or otherwise represents, anyone other than the United States in any formal or informal appearance before, or, with the intent to influence, makes any oral or written communication on behalf of anyone other than the United States, to

4. the Peace Corps, or any of its officers or employees,
5. in connection with any judicial, rulemaking, or other proceeding, application, request for a ruling or other determination, contract, claim, controversy, investigation, charge, accusation, or other particular matter, and
6. which is pending before the Peace Corps or in which the Peace Corps has a direct and substantial interest shall be fined not more than \$10,000, or imprisoned for not more than 2 years, or both.

Subpart C - Outside Employment, Activities, and Associations

§307.735-301 In General.

- a. There is no general prohibition against Peace Corps employees holding outside employment, including teaching, lecturing, or writing, but no employee may engage in outside employment or associations if they might result in a conflict or an appearance of conflict between the private interests of the employee and his or her official responsibility.
- b. An employee shall not receive any salary or anything of monetary value from a private source as compensation for his or her services to the Government (18 U.S.C. 209).
- c. An employee shall not have a direct or indirect financial interest that conflicts substantially with his or her Government duties and responsibilities. Nor may an employee engage in, directly or indirectly, a financial transaction as a result of or primarily relying on information obtained through his or her Government employment.

§307.735-302 Association with Potential Contractor prior to Employment.

- a. No employee, or any person subject to his or her supervision, may participate in the decision to award a contract to an organization with which that employee has been associated in the past 2 years. When an employee becomes aware that such an organization is under consideration for or has applied for a contract with the Agency, the employee shall notify his or her immediate supervisor in writing. The supervisor shall take whatever steps are necessary to exclude the employee from all aspects of the decision processes regarding the contract or agreement.
- b. When the Director, Deputy Director, or an Associate Director becomes aware that an organization with which he or she has been associated in the past 2 years is under consideration for or has applied for a contract with the Agency, he or she shall refrain from participating in the decision process and immediately notify the Director of the Office of Compliance, who shall select an independent third party, not in any way connected or associated with the concerned official. The third party shall participate in and review the decision process to the extent he or she deems necessary to insure objectivity and the absence of favoritism. Said third party shall preferably be a person

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experienced in the area of government contracts. The third party shall file a report in writing with the Committee on Conflict of Interest stating his or her conclusions, observations, or objections, if any, to the decision process concerning the contract or agreement, which document shall be attached to and become a part of the official file.

§307.735-303 Association with Peace Corps Contractor or Potential Contractor while an Employee.

- a. No regular employee may be associated with any Peace Corps contractor or potential contractor. Any organization that is associated with a regular employee shall be suspended from consideration as a contractor.
- b. No regular or special employee, except in his or her official capacity as a Peace Corps employee, shall either participate in any way on behalf of any organization in the preparation or development of a contract proposal involving Peace Corps or represent any other organization in a matter pending before Peace Corps. In the event that a regular or special employee participates while an employee of Peace Corps in any aspect of the development of a contract or agreement proposal on behalf of an organization, or represents another organization in a matter pending before Peace Corps, that organization shall be suspended from consideration for the contract or other agreement. If the employee's prohibited participation is discovered after award of the contract, appropriate disciplinary action shall be taken, including, but not limited to, the placement of a letter describing the violation in the employee's official personnel file.
- c. No regular or special employee who, prior to his or her employment at Peace Corps, participated in the development of a contract or other agreement proposal on behalf of another organization, shall participate as a Peace Corps employee in any aspect of the decision process regarding that contract or other agreement, or, if the contract or other agreement is awarded, in any oversight or management capacity in relation to that contract or other agreement. In addition, any such contract or other agreement shall only be awarded through a competitive process. In the event a regular or special employee who participated in the development of the contract or other agreement proposal prior to being employed at Peace Corps does participate as a Peace Corps employee in the decision process for such contract or other agreement, the organization shall be suspended from consideration.
- d. If a special employee participates as an employee of Peace Corps in any aspect of the development of a proposal, whether or not such participation is minimal or substantial, any organization with which he or she is associated shall be suspended from consideration for the contract or other agreement.
- e. If an organization with which a special employee is associated submits a proposal for a contract or other agreement, and the special employee did not participate either as an employee of Peace Corps or an associate of the organization in any aspect of the proposal or the application therefor, the matter shall be referred to the Committee on Conflict of Interest for determination. The Committee shall consider the following factors and any others it deems relevant:
 1. The nature, length, and origin of the special employee's relationship with the Agency, the nature and scope of the employee's duties and responsibilities, the division or office to which the employee is assigned, and whether the employee's duties are in any way related to the proposed contract or other agreement.
 2. The nature, length, and type of the employee's relationship with the organization, whether the employee's position involves policy making or supervision of other employees and the relationship of the position with the organization to the work to be performed under the proposed contract or other agreement.

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3. Whether awarding the contract or other agreement to the organization would result in the appearance of or the potential for a conflict of interest.
4. The process to be used in awarding the contract or other agreement.
- f. If a special employee wishes to become or remain associated with a Peace Corps contractor while he or she is an employee of Peace Corps, subject to the restrictions (b) through (e) of §307.735-303, the matter shall be referred to the Committee on Conflict of Interest for determination. The Committee shall consider the following factors and any others it deems relevant:
 1. The nature, length, and origin of the special employee's relationship with the Agency, the nature and scope of the employee's duties and responsibilities, the division or office to which the employee is assigned, and whether the employee's duties are in any way related to the contract or other agreement.
 2. The nature, length, and type of the employee's relationship with the organization, whether the employee's position involves policy making or supervision of other employees and the relationship of the position with the organization to the work to be performed under the proposed contract or other agreement.
 3. Whether such a relationship would result in the appearance of or the potential for a conflict of interest.
- g. Any suspension involving proposed contracts under this rule shall be in accordance with procedures set forth in the applicable Federal Procurement Regulations, 41 CFR 1-1.600 et seq.

§307.735-307 Gifts, Entertainment, and Favors.

- a. From donors dealing with Peace Corps.
 1. No regular or special employees may solicit or accept, directly or indirectly, for themselves, for any member of their family, or for any person with whom they have business or financial ties, any gift, gratuity, favor, entertainment, or loan or any other thing of value, from any individual or organization which:
 - i. Has, or is seeking to obtain, contractual or other business or financial relations with Peace Corps;
 - ii. Has interests that may be substantially affected by the performance or nonperformance of the employee's official responsibility;
 - iii. Is in any way attempting to affect the employee's exercise of his or her official responsibility; or
 - iv. Conducts operations or activities that are regulated by Peace Corps.
 2. Subparagraph (1) of this paragraph does not prohibit, even if the donor has dealings with Peace Corps:
 - i. Acceptance of things of value from parents, children, or spouse if those relationships rather than the business of the donor is the motivating factor for the gift;
 - ii. Acceptance of food and refreshments of nominal value on infrequent occasions in the ordinary course of breakfast, luncheon, or dinner meetings or other meetings;
 - iii. Solicitation and acceptance of loans from banks or other financial institutions to finance proper and usual activities of employees, such as home mortgage loans, solicited and accepted on customary terms;
 - iv. Acceptance on behalf of minor dependents of fellowships, scholarships, or educational loans awarded on the basis of merit and/or need;

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- v. Acceptance of awards for meritorious public contribution or achievement given by a charitable, religious, professional, social, fraternal, nonprofit educational and recreational, public service, or civic organization.
3. Regular or special employees need not return unsolicited advertising or promotional material, such as pens, pencils, note pads, calendars, and other things of nominal intrinsic value.
- b. From other Peace Corps employees. No employees in superior official positions may accept any gifts presented as contributions from employees in lower grades. No employees shall solicit contributions from other employees for a gift to an employee in a superior official position, nor shall any employees make a donation as a gift to an employee in a superior official position. However, this paragraph does not prohibit a voluntary gift of nominal value or donation in a nominal amount made on a special occasion such as marriage, illness, or retirement.
- c. From foreign governments. No regular employee may solicit or, without the consent of the Congress, receive any present, decoration, emolument, pecuniary favor, office, title, or any other gift from any foreign government. See 5 U.S.C. 7342; Executive Order 11320; and 22 CFR Part 3.
- d. Gifts to Peace Corps. Gifts to the United States or to Peace Corps may be accepted in accordance with Peace Corps guide-lines.
- e. Reimbursement for expenses. Neither this section nor 307.735-310(a) precludes an employee from receipt of bona fide reimbursement, unless prohibited by law, for expenses of travel and such other necessary subsistence as is compatible with this part and for which no Government payment or reimbursement is made. However, this paragraph does not allow an employee to be reimbursed, or payment to be made on his or her behalf, for excessive personal living expenses, gifts, entertainment, or other personal benefits. Nor does it allow an employee to receive non- Government reimbursement of travel expenses for travel on official business under Peace Corps orders; but rather, such reimbursement, if any, should be made to Peace Corps and amounts received should be credited to its appropriation. If an employee receives accommodations, goods, or services in kind from a non-Government source, this item or items will be treated as a donation to Peace Corps and an appropriate reduction will be made in per diem or other travel expenses payable.

§307.735-308 Economic and Financial Activities of Employees Abroad.

- a. Prohibitions in any foreign country. A U.S. citizen employee abroad is specifically prohibited from engaging in the activities listed below in any foreign country:
 1. Speculation in currency exchange;
 2. Transactions at exchange rates differing from local legally available rates, unless such transactions are duly authorized in advance by the Agency;
 3. Sales to unauthorized persons whether at cost or for a profit of currency acquired at preferential rates through diplomatic or other restricted arrangements;
 4. Transactions which entail the use, without official sanction, of the diplomatic pouch;
 5. Transfers of funds on behalf of blocked nationals, or otherwise in violation of U.S. foreign funds and assets control;
 6. Independent and unsanctioned private transactions which involve an employee as an individual in violation of applicable control regulations of foreign governments;
 7. Acting as an intermediary in the transfer of private funds for persons in one country to persons in another country, including the United States;
 8. Permitting use of one's official title in any private business transactions or in advertisements for business purposes.

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- b. Prohibitions in country of assignment.
 - 1. A U.S. citizen employee shall not transact or be interested in any business or engage for profit in any profession or undertake other gainful employment in any country or countries to which he or she is assigned or detailed in his or her own name or through the Agency of any other person.
 - 2. A U.S. citizen employee shall not invest in real estate or mortgages on properties located in his or her country of assignment. The purchase of a house and land for personal occupancy is not considered a violation of this subparagraph.
 - 3. A U.S. citizen employee shall not invest money in bonds, shares, or stocks of commercial concerns headquartered in his or her country of assignment or conducting a substantial portion of business in such country. Such investments, if made prior to knowledge of assignment or detail to such country or countries, may be retained during such assignment or detail.
 - 4. A U.S. citizen employee shall not sell or dispose of personal property, including automobiles, at prices producing profits which result primarily from import privileges derived from his or her official status as an employee for the U.S. Government.

§307.735-312 Use of Government Property.

A regular or special employee shall not directly or indirectly use, or allow the use of, Government property of any kind, including property leased to the Government for other than officially approved activities. All employees have a positive duty to protect and conserve Government property, including equipment, supplies, and other property entrusted or issued to them. By law, penalty envelopes may be used only for official U.S. Government mail.

Handout

Excerpts: MS 704 - Administrative Control of Funds *(the complete text may be found by using the link to the agency Intranet below)*

http://inside.peacecorps.gov/index.cfm?viewDocument&document_id=265&filetype=htm

(accessed August 13, 2007).

1.0 Purpose

Section 1517 of Title 31 of the U.S. Code (part of The Anti-deficiency Act) and Office of Management and Budget (OMB) Circular A-34 require the head of each Executive Agency, subject to the approval of OMB, to prescribe, by regulation, a system of administrative control of funds. The Peace Corps has established a system of financial control to meet this requirement. The purpose of this system is to:

- Restrict obligations and expenditures against each appropriation or fund to the amount of appropriations, apportionments or reappropriations, and
- Enable the Director of the Peace Corps to fix responsibility for over obligations and over-expenditures of appropriations, apportionments, and allotments subject to the Anti-deficiency Act as well as violations of non-statutory restrictions and requirements.

2.0 Scope

The provisions of the Manual Section apply to all Peace Corps employees with responsibilities for administering, controlling and/or otherwise overseeing obligations and expenditures of funds.

This Manual Section is designed to restrict obligations and expenditures against each appropriation or fund to the amount of the Operating Budget Advice, allotment, apportionment or reappropriation. It enables the Peace Corps Director to fix responsibility for the creation of unauthorized obligations or expenditures and for any obligation or expenditures in excess of an apportionment, allotment or budget advice amount.

3.0 Background

The Peace Corps' system of administrative control of funds has been established under the authority of, and consistent with, the requirements of:

- The Anti-deficiency Act (31 U.S.C. §1341, §1342, §1350, §1351 and §1511-1519)
- The Budget and Accounting Act of 1921, as amended (31 U.S.C. §1104)
- Section 1311 of the Supplemental Appropriations Act of 1955 (31 U.S.C. §1108, §1501 and §1502)
- The Congressional Budget and Impoundment Control Act of 1974 (31 U.S.C. §681-688 and §1102)

The Peace Corps' system of administrative control of funds applies to all funds or appropriations available to the Agency.

Handout

Foreign Gifts Given by Peace Corps Staff to Foreign Individuals During Fiscal Year XXXX

MEMORANDUM (Sample)

DATE:

November 8, 20XX

TO:

Senior Staff, Country Directors

FROM:

Tyler Posey, General Counsel

Foreign Gifts Given by Peace Corps Staff to Foreign Individuals During Fiscal Year 2000

Peace Corps staff are asked to report to the Office of the General Counsel all tangible gifts purchased with appropriated funds that were given by Peace Corps staff to any foreign individual during **fiscal year 20XX** (October 1— September 30), with a retail value in the United States of more than \$260.00. Please note that any official gift from the Peace Corps to a foreign individual must be reported, even though donated or purchased with non-appropriated funds, if it is valued at more than \$305.00.

For each gift reported, the information submitted should include:

- A. A brief description of the gift;
- B. The date when the gift was given;
- C. The name and title of the gift recipient;
- D. The cost of the gift (please provide a specific dollar amount); and
- E. The actual or estimated retail value of the gift in the United States (please provide a specific dollar amount).

The Department of State requests this information by November 15...

Handout

Excerpts: MS 522: Vehicle Use

(the complete text may be found by using the link to the agency Intranet below)

http://inside.peacecorps.gov/index.cfm?viewDocument&document_id=214&filetype=htm

(accessed August 13, 2007).

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2.0 Purpose

This manual section sets out Peace Corps policies and procedures for the use of Peace Corps vehicles overseas and in the United States. It provides mandatory penalties, including suspension and removal from employment, for willful violations of Peace Corps vehicle policies. It also sets out Peace Corps policy regarding private ownership and use of vehicles by employees and Volunteers overseas.

3.0 Definitions

- 3.1** "Home-to-work use" means use of a Peace Corps vehicle between the operator's residence and place of employment.
- 3.2** "Employee" means U.S. direct-hire employees and Foreign Service National Employees, but does not include contractors.
- 3.3** "Staff" means employees and contractors.
- 3.4** "Use of a vehicle" means operating a vehicle or being a passenger in a vehicle, whereas "operating a vehicle" is limited to driving a vehicle.
- 3.5** "Vehicle" means a motorized vehicle with four or more wheels or an enclosed motorized three-wheeled vehicle clearly intended for use as a truck.
- 3.6** "Volunteer" means a Peace Corps Volunteer or Trainee.

4.0 Use of Vehicles Overseas

4.1.3 Vehicle Pool

Peace Corps vehicles shall be operated on a pooled basis and assigned in accordance with the provisions of this manual section. Vehicles should be garaged centrally, where practicable.

Each post is responsible for ensuring that on-call medical personnel have safe, reliable transportation readily available so they can respond promptly to medical emergencies at all times. The vehicle available for medical emergencies must be appropriate for transporting sick or injured Volunteers.

4.1.4 License Requirement

Individuals authorized to operate a Peace Corps vehicle must obtain, at their own expense, a local driver's license as required under local law and pay any applicable fees or costs.

4.1.5 Staff Drivers

Drivers hired by the Peace Corps overseas may operate Peace Corps vehicles for Peace Corps personnel in connection with uses authorized by this manual section only. They may not be used as personal chauffeurs.

4.1.6 Passengers

No passengers shall be transported in a Peace Corps vehicle unless such use is permitted by this manual section.

4.1.7 Daily Vehicle Log

Each trip taken with a Peace Corps vehicle overseas must be recorded by the driver in the daily vehicle log. See Attachment B, "Form 1490 B" (Form 1490 B supersedes Form 1490 in MS 527). Such log shall be reviewed by the administrative officer on a weekly basis and maintained for review by the Country Director on a monthly basis.

4.2 Business Use

"Business use" means use directly related to the official business of the Peace Corps and includes the uses described in paragraphs 4.2.1 through 4.2.4.

4.2.1 Day-to-Day Operations

Use of a vehicle for the day-to-day operation of the post is a business use.

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Written authorization: Not required.

Chief of Mission concurrence: Not required.

Reimbursement to Peace Corps: Not required.

4.2.2 Home-to-Work Use: On-Call Medical Officer

If the Country Director determines that the ready availability of a Peace Corps vehicle at the on-call medical officer's residence is necessary to assure safe, reliable transportation to respond promptly to after-hours emergencies, the Country Director may authorize home-to-work use of the vehicle as a business use.

Such use may be authorized for medical officers serving as personal services contractors only if their contracts provide that they may be authorized to use a Peace Corps vehicle to perform their contract.

Written authorization: Required in advance of use. Authorization must be for a defined time period, not to exceed one year. The Country Director is the authorizing official.

Chief of Mission concurrence: Required in advance of use.

Reimbursement to Peace Corps: Not required.

4.2.3 Home-to-Work Use: Field Work

If the Country Director determines that departure from the employee's residence will allow the employee more working time to conduct Peace Corps business or will reduce the number of miles a Peace Corps vehicle is driven, the Country Director may authorize home-to-work use of the vehicle as a business use for Peace Corps employees engaged in field work.

"Field work" means official Peace Corps work performed by an employee whose job requires the employee's presence at various locations that are at a distance from the employee's duty station or at a remote location that is accessible only by government-provided transportation. "Field work" does not include work assignments in which the employee's work day begins and ends at the employee's duty station.

Written authorization: Required in advance of use. The Country Director is the authorizing official for post employees, except that the Regional Director is the authorizing official for the Country Director.

Chief of Mission concurrence: Not required.

Reimbursement to Peace Corps: Not required.

4.2.4 Home-to-Work Use: Rotating Duty Officer

If the Country Director determines that the rotating duty officer needs to use a Peace Corps vehicle to respond to Volunteer emergencies and urgent after-hours official business and that no safe, reliable, and reasonably quick alternative transportation exists, the Country Director may authorize home-to-work use of a vehicle by rotating duty officers as a business use.

Written authorization: Required in advance of use. Authorization must be for a defined time period, not to exceed one year, and may be given only if the duty officer position is rotated among senior staff at post and no blanket authorization is given to any particular staff member, including the Country Director. The Regional Director is the authorizing official for the Country Director.

Chief of Mission concurrence: Required in advance of use.

Reimbursement to Peace Corps: Not required.

4.3 Other Authorized Use

Peace Corps staff are expected to use privately owned vehicles or public transportation for personal, non-business transportation. There are, however, certain limited circumstances, set out in paragraphs 4.3.1 through 4.3.3, in which non-business use of a Peace Corps vehicle may be permitted because public transportation is unsafe or not available or because such use is advantageous to the agency (hereinafter referred to as "other authorized use").

4.5 Operation of Vehicles by Non-Employees

Due to the strict legal limitations on the government's liability for actions of persons who are not Peace Corps employees, non-Peace Corps employees may not operate Peace Corps vehicles except as provided below:

4.5.1 Operation of Vehicles by Contractors

4.5.2 Operation of Vehicles by Dependents

4.5.3 Operation of Vehicles in an Emergency

Any person may operate a Peace Corps vehicle in an emergency if personal health or safety or protection of life or government property requires such use.

4.5.4 Insurance for Non-Employees

Contractors, contractors' employees, and employees' dependents shall not operate Peace Corps vehicles unless they have provided evidence

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to the Country Director that they have vehicle liability insurance coverage. Such insurance must meet the minimum recommendations of the American Embassy for personal vehicles owned by mission employees, but in any case must include at least \$25,000 bodily injury and property damage coverage. This requirement may be waived only if the Peace Corps has procured vehicle liability insurance in accordance with MS 526 and such insurance covers any operator of the insured vehicle.

Contractors and their employees are not Peace Corps employees, and the Peace Corps cannot assume liability for any claim against contractors or their employees arising out of their use of Peace Corps vehicles. Contractors must acknowledge this condition in writing before being authorized to operate a Peace Corps vehicle. (See Attachment A for specific language to include in a contract or separate acknowledgement form.)

4.7 Operation of Vehicles by Volunteers

Operation of vehicles by Peace Corps Volunteers raises a number of concerns. The safety and security of Volunteers can be jeopardized by unsafe roads or vehicles, lack of familiarity with local conditions, or other circumstances. In addition, it is an essential part of the Peace Corps mission that a Volunteer's standard of living comports with local community standards. Accordingly, Peace Corps Volunteers shall not operate vehicles overseas except when they are outside of their site on approved leave, or when their operation of a vehicle is specifically authorized by paragraphs 4.7.1 or 4.7.2.

4.7.1 Peace Corps Vehicles

Volunteers may be authorized to operate Peace Corps vehicles when necessary and appropriate for official Peace Corps business, and when the criteria set out in paragraph 4.3 (a) through (c) are satisfied. For example, Volunteers may be authorized to operate a Peace Corps vehicle when acting as Volunteer leaders or during pre-service training. Except when justified by exceptional circumstances, Volunteers shall not be authorized to use Peace Corps vehicles for purposes related to their Volunteer assignments.

Written authorization. Required in advance of use. Authorization must be for a defined time period, not to exceed one year. The Country Director is the authorizing official.

Chief of Mission concurrence: Not required.

Reimbursement to Peace Corps: Not required.

4.7.2 Other Agency Vehicles

In general, Volunteers shall not operate vehicles owned by other government or non-government agencies (hereinafter referred to as

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"another agency vehicle"). Accordingly, Volunteer assignments requiring Volunteer operation of another agency vehicle should ordinarily not be approved. In some cases, however, a Country Director may authorize a Volunteer to operate another agency vehicle for a limited period of time and specific purpose if the Director determines that (1) operation of the vehicle is necessary to the Volunteer's assignment; (2) no practical transportation alternative exists; (3) the vehicle to be used meets local safety standards and laws; (4) the Volunteer is adequately insured under the other agency's vehicle liability policy; and (5) the Volunteer is licensed to operate a vehicle in the relevant jurisdiction(s).

Written authorization: Required in advance of use. The Country Director is the authorizing official.

Chief of Mission concurrence: Not required.

Reimbursement to Peace Corps: Not required.

4.7.3 Volunteer Ownership of Vehicles

Volunteers are not permitted to own vehicles or to rent or lease vehicles for long-term use in their country of assignment.

6.0 Safety and Other Operator Regulations

6.1

The authorizing official shall take reasonable steps to ensure that any individual authorized to operate a Peace Corps vehicle:

- a. Has provided certification that he or she is licensed to operate the vehicle under local laws and regulations;
- b. Is familiar with the operating characteristics of the vehicle, local driving laws and customs, procedures to be followed in case of an accident, and other applicable provisions of this and related manual sections;
- c. Is not permitted to operate a vehicle that has known mechanical defects or is otherwise unsafe to operate;
- d. Is instructed to use seat belts at all times when the vehicle is in operation;
- e. Is instructed not to carry passengers for purposes that do not relate to official Peace Corps business or the authorized use of the vehicle, and not to use or allow the use of the vehicle for unauthorized purposes;
- f. Is advised that any traffic law violations and fines, including parking violations, are the personal responsibility of the driver;
- g. Maintains an accurate record of vehicle use on the vehicle log forms (see Attachment B); and

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h. Is instructed to properly secure the vehicle when not in use to avoid theft.

6.2

The authorizing official shall ensure that each vehicle includes a safety (first aid) kit.

6.3

All operators of and passengers in a Peace Corps vehicle shall use seat belts at all times when the vehicle is in operation.

7.0 Misuse of Vehicles

7.1 Penalties

Employees who violate this manual section are subject to administrative sanctions and to the sanctions mandated by 31 U.S.C. 1349(a), which provides as follows:

Any officer or employee who willfully uses or authorizes the use of a passenger motor vehicle or aircraft owned or leased by the Government (except for an official purpose authorized by Section 1344 of this title), or otherwise violates Section 1344, shall be suspended without pay by the head of the agency. The officer or employee shall be suspended for at least one month, and when circumstances warrant, for a longer period or summarily removed from office.

7.2 Reporting Violations

Violations of the vehicle policies set out in this manual section should be reported to the Regional Director or Chief of Staff.

Handout

The Peace Corps Office of Inspector General

<http://inside.peacecorps.gov/index.cfm?branch=17> (accessed August 13, 2007).

What is the Office of Inspector General (OIG)?

In 1978, Congress established an Office of Inspector General (OIG) in large federal agencies. The purpose of the OIG is to prevent and detect fraud, waste, abuse, and mismanagement and to promote economy, effectiveness, and efficiency in government. In 1988, Congress extended the law to most other federal agencies, including the Peace Corps. In February 1989, the Peace Corps established its OIG. Because it was established under the Inspector General Act and not the Peace Corps Act itself, the OIG is an independent entity within the Peace Corps. The Inspector General (IG) reports directly to the Peace Corps Director. In addition, the IG reports to Congress semiannually with data on OIG activities.

What are the major functions of the OIG?

The OIG is authorized by law to review all programs and operations of the Peace Corps. The OIG professional staff has a range of skills:

- Auditors review functional activities of the Peace Corps, such as contract compliance and financial and program operations, to ensure accountability and to recommend improved levels of economy and efficiency.
- Evaluators analyze the management and program operations of the Peace Corps at both overseas posts and domestic offices. They identify best practices and recommend program improvements and means to comply with Peace Corps policies.
- Investigators respond to allegations of criminal or administrative wrongdoing by Peace Corps personnel, including experts and consultants, and by those who do business with the Peace Corps, including contractors.

In their on-site visits, OIG staff encourage post self-evaluations, identify problem areas, and recommend corrective actions. They conduct inspections focused on administrative compliance with rules and regulations. In addition, they review the safety and security of Volunteers and staff. More broadly, OIG staff identify common problems and trends from post to post and offer guidance for quality improvements agency-wide.

Training Series: Corruption and Transparency as Development Issues—Staff Training

Session IV: Volunteer Support

Purpose

This fourth and final staff session focuses on how the Peace Corps can and does support Volunteers when they face corrupt practices in their daily life and in their projects.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps staff at post (administrative staff, drivers, medical officers, program managers, secretaries, etc.) attend as all are faced with the issues in their own jobs and many hear directly from Volunteers.

Duration

2 hours, 30 minutes

Goal and Objectives

Goal: To develop staff skills and knowledge to help Volunteers be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of the session, staff will be able to

1. Describe five different ways staff can support Volunteers faced with corrupt practices in their projects and life in their communities.

2. Discuss how pre-service training helps future Volunteers develop skills that will be useful when confronted with corrupt practices.
3. Identify at least one way they can, in their specific role on the staff, support Volunteers and other staff members.

Session Outline

- I. Introduction/Sharing Ideas (30 minutes)
- II. Types of Activities In Which Corruption Is Likely and Potential Support (30 minutes)
- III. Volunteer Training Framework/Curriculum and Resources (30 minutes)
- IV. Action Planning (30-45 minutes)
- V. Wrap-Up/Debrief and Evaluation (15 minutes)

Facilitators/Technical Expertise

Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section of the Introduction, “Trainer Preparation: Conducting Staff and Volunteer Training in Corruption.” Ideally, two staff, one American and one host national, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- ❑ Blank flip charts
- ❑ Chart stand
- ❑ Markers
- ❑ Sticky notes or small pieces of paper (about five per participant)
- ❑ Tacks or tape
- ❑ Handouts:
 - Annotated ICE list
 - Peace Corps Volunteer Policies
 - Evaluation

Preparation Checklist

- ❑ Make handouts, as needed for section III
- ❑ Copy handouts
- ❑ Ask trainer, language and cross-cultural coordinator(s), and program managers to prepare section III
- ❑ Prepare flip charts
- ❑ Determine which option will be used for section IV; prepare any needed materials
- ❑ Determine if additional evaluation questions are to be added by the post
- ❑ Translate the evaluation, if necessary

Methodology

I. Introduction/Sharing Ideas (30 minutes)

- Step 1:** Review the three previous sessions to show progression of ideas and support.
- Step 2:** Ask for two or three examples from the assignment from Session Three: *“Think about your relationship with Volunteers and how you do, or could, support them as they encounter corruption in their life or work.”* Distribute sticky notes or small pieces of paper for staff to write the individual ways they support Volunteers. Have them write one idea per sticky note.
- Trainer’s note: Examples of how staff could support Volunteers include:*
- ❑ *Select a counterpart that has a reputation for being honest and hardworking.*
 - ❑ *Provide language/cross-cultural training about how to appropriately say “no.”*
- Step 3:** Have staff put their sticky notes up on a large wall.
- Step 4:** Ask staff (all or only a few) to read the different notes and group together those that seem to be related. Then, ask them to title the groupings (e.g., project related, site selection, travel and safety, etc.).

II. Types of Activities In Which Corruption Is Likely and Potential Support (30 minutes)

- Step 1:** Review the group and individual entries, discussing
- a. Things staff can do in advance to help Volunteers (site selection, training), and
 - b. Ways staff can support Volunteers when they encounter challenges in their work. For example, a principal asks a Volunteer to give an A grade because the principal has taken a bribe; or a Volunteer sees a clinic worker take medicine and subsequently sell it for personal gain.
- Step 2:** Put additional ideas on the wall as they occur. If not thoroughly explored, consider the kinds of challenges that particular types of projects might have, such as working with nongovernmental organizations, cooperatives, etc. Encourage staff members to look at issues from their own expertise: drivers, administrative staff, program managers.

III. Volunteer Training Framework/Curriculum and Resources (30 minutes)

- Step 1:** Ask training staff (at least the training manager and language and cross-cultural coordinator) to describe the training framework for pre-service

training, including blocks of time for language/cross-cultural, health and safety, and technical training.

- a. Identify at which points in the training the issues of corruption and transparency are/could be addressed. Solicit suggestions from other participants.
- b. Discuss helping Volunteers develop appropriate relationships (setting boundaries, learning cross-cultural cues, and making the time commitment to integrate and not rely on corrupt behavior, such as bribery, to make something happen faster).
- c. Specifically address how integration is a part of the “safety and security” paradigm/acceptance model.

Step 2: Ask program managers to show some of the ICE resources in which Volunteers learn how to work with participatory methodologies and model transparency. Distribute the annotated ICE list, if appropriate.

Step 3: Distribute the Peace Corps policies for Volunteers. Review them, showing that they also support Volunteer safety and ability to counteract corrupt practices.

IV. Action Planning (30 – 45 minutes)

Step 1: Facilitate an action-planning exercise that brings all the key points of the staff training together with how staff as individuals can do one or two things to better support Volunteers and each other. Alternatives:

- a. Collectively or in groups provide responses to key scenarios discussed in Sessions I and III. Put them together as a post resource. Make plans to revisit them at a follow-up meeting in three or six months to see if all is going well or if other efforts might be needed.
- b. Individually identify scenarios, action areas, and resources in a more post-level strategic planning activity—resulting in a formal plan with action items, people responsible, milestones, and periodic follow-up (monitoring).

Step 2: Together, agree to next steps.

V. Wrap-Up/Debrief and Evaluation (15 minutes)

Step 1: *“What happened?”*
Ask participants to think back over the four sessions as you (facilitator) recall some highlights of each.

Step 2: “*So what?*”
Ask the participants to determine one important idea/action they learned during this training.

Step 3: “*Now what?*”
Quickly go around the room and ask each participant to relay his/her important lesson.

Learning Points (points to be brought up if they do not occur naturally in the discussion):

- a. *Corruption and transparency are universal issues, and corruption exists in all societies.*
- b. *Staff can support Volunteers in dealing with corruption through regularly scheduled training and individual support. Support can be proactive; it does not have to be reactive.*

Step 4: Thank everyone for their participation and important planning on behalf of the Volunteers and the work they all can do in avoiding corrupt practices and modeling transparency.

Step 5: Distribute evaluations and provide time for participants to complete them before leaving.

Handout

ICE Resources Useful for Anti-Corruption and Transparency Efforts

A Community Economic Development (CED) Training Guide for Peace Corps Volunteers [ICE No. M0069]—synergy of working with an entire community rather than individual businesses to leverage economic benefits (transparency, accountability)

An NGO Training Guide for Peace Corps Volunteers [ICE No. M0070]—NGO governance principles and capacity profile (organizational development tool for functional systems)

Culture Matters [ICE No. T0087]—relationship building across cultures

Greaseless [ICE No. CD060]—definition and examples of corruption and transparency as development issues; how to avoid becoming involved in corruption

Host Families Matter: The Homestay Manual [ICE No. T0106]—samples of how to determine amount of pay and how to pay host families, orientation of host families; orientation of trainees to host families (rules, procedures)

Learning Local Environmental Knowledge [ICE No. M0071]—methods for learning about local practices related to economic and social environments

Microenterprise Training Guide for Peace Corps Volunteers [ICE No. M0068]—methods and services to help families move out of the poverty cycle (access to nonexploitive credit and savings services; nonformal financial services, etc.)

PACA Idea Book [ICE No. M0086] and ***PACA: Participatory Analysis for Community Action Training Manual*** [ICE No. M0053]—participatory tools for working with a community (transparency and ensuring projects with genuine community desire or need)

Promoting Powerful People [ICE No. T0104]—participatory tools for working with a community (transparency and ensuring projects with genuine community desire or need)

Small Project Assistance Program: Supporting Sustainable Community Development [ICE No. M0082]—how projects can be done transparently

The New Project Design and Management Workshop Training Manual (PDM) [ICE No. T0107]—developing a project with participants (transparency); monitoring and evaluation (accountability)

Working with Supervisors and Counterparts [ICE No. T0121]—relationship building; sharing the Peace Corps' standards

Handout

Peace Corps Volunteer Policies

(Use post listing of policies as they will include any additions/variations to worldwide policies.)

Training Series: Corruption and Transparency as Development Issues— Volunteer In-Service Training Modules

Session I: Experiences and Possible Solutions

Purpose

This training frames corruption and transparency as development issues. Prior to these training sessions, Volunteers should have had sessions on the Peace Corps' approach to development and development issues in the host country. They should have been in-country long enough to have gained exposure to the local culture and understand the policies and procedures under which Volunteers operate. Preferably, they also should have participated in the corruption and transparency pre-service training sessions. If not, the trainer should review the pre-service training sessions and determine which ones should be incorporated into this in-service training series.

This first session opens with a card game that shows how easily one can get caught up in corrupt practices. It transitions into the Volunteers' sharing their own experiences in the country so far. They work with their examples to explore if, and how, they might be able to address some of the issues.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps Volunteers participate as all are faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

2 hours

Goal and Objectives

Goal: To develop Volunteers' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of this session, the participants will be able to

1. Identify one example of how the Peace Corps' expectations about corruption and transparency differ from some local practices they have encountered.
2. Choose when and how to address corruption in an appropriate manner.

Session Outline

- I. Garbage Simulation and Debrief (45 minutes)
- II. Sharing, Reflection, and Courses of Action (65 minutes)
- III. Wrap-Up/Debrief and Assignment (10 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section of the introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and one host country, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- Blank flip charts
- Chart stand
- Markers
- Tape or tacks to hang flip charts
- Sticky notes
- One deck of cards for each group of three to five participants
- Handout: Garbage game rules
- Prepared flip charts—see Preparation Checklist

Preparation Checklist

- Prepare the meeting room. If possible, have participants sit in a semi-circle around a flip-chart stand or around a large table. Make sure people can see each other to enable good conversation.
- Because of the card game, the room needs to have enough space to play comfortably.
- Prepare three flip charts, one each labeled as
 - “What I Saw”
 - “My Immediate Reaction”
 - “Analysis After the Fact”
- Prior to their arrival, ask Volunteer participants to reflect on interactions related to corruption and transparency they have had or have witnessed—what they saw; their immediate reaction; and any analysis after the fact, e.g., what they have since learned. Tell them that they should come prepared to share their experiences.

Methodology

I. Garbage Simulation and Debrief (45 minutes)¹

Step 1: Begin this session with a quick game of Garbage: a simple card game that pits personal gain over common good and introduces the effects of transparency in a system.

Number of players: three to five per table. Any number of tables may play simultaneously.

Material required: one regular deck of playing cards per table.

This simulation/game is specifically about the dumping of hazardous wastes, but in the abstract, it explores the trade-off between personal gain and common good. Garbage brings out the problems of devising a socially conscious strategy among people eager to win.

Steps of Play

Deal. Sort the deck into suits. Give each player any five red cards (diamonds or hearts), any two spades, and any one club.

In this game, the value of the cards does not matter. All red cards—whether hearts or diamonds—are regular garbage. Spades are hazardous garbage. Clubs are monitor cards, which force people to reveal what they are dumping.

Object of the game. To get rid of all the garbage cards (regular and hazardous) in your hand. You need not (and *cannot*) get rid of your monitor card.

Round without clubs. During each round, each participant plays a card face down. After everyone has done so, and if no one has played a club, all cards face down are collected, shuffled, and discarded face-up in the garbage heap. Players discover what types of garbage have been discarded—but not who discarded what.

Round with clubs. If one or more clubs have been played during this round, then all players turn their cards face up. Regular garbage cards (red cards) are thrown into the heap. Hazardous garbage cards (spades) and monitor cards (clubs) are taken back by the players. Then *each* club player gives a red card from his or her hand to each spade player.

A sample game illustrates the rules. The players are Alan, Barbara, Cathy, and David. During Round One: Alan plays a club; Barbara, a heart; Cathy, a diamond; and David, a spade. David is trying to get a head start with the spade, but Alan

¹ Sivasailam Thiagarajan, "Garbage: A Card Game that Stimulates the Trade-Off between Competition and Concern," *Simulation & Gaming*, Vol. 22, No. 1 (March 1991), pp. 112 – 115.

anticipates that. Barbara and Cathy play it safe and get rid of a red card each. Alan also gets rid of a red card—by giving it to David as a punishment.

During Round Two: Alan plays a spade; Barbara, a heart; Cathy, a diamond; and David, a spade. David correctly anticipates that no one is going to repeat a club. Alan also thinks the same. Since no one plays a club, the cards do not have to be turned over. After they are mixed up and dumped into the garbage heap, players realize that two of them got rid of hazardous garbage. But, they do not know who played what card (other than what they themselves played).

Additional red cards. In later rounds, a club player may not have enough red cards to give to spade players, especially if more than one player attempts to sneak out hazardous garbage. In this case, after passing out the red cards from the hand, the club player distributes as many red cards from the garbage heap as needed. For example, during the fifth round, Alan plays a spade; Barbara, a club; Cathy, a diamond; and David, a club. Poor Alan! He gets hit with two red cards, one each from Barbara and David. During the seventh round, Alan plays a spade; Barbara plays a spade; Cathy plays a club; and David, a spade. Cathy gets to punish the other three players. She has only one red card that she gives to Alan. She then digs up two other red cards from the garbage heap and hands them to Barbara and David.

Hazardous garbage processing. At any time during the game, a player can exchange a spade card for four red cards from the garbage heap. (This exchange can only take place if there are enough red cards in the heap.)

Ending the game. The game ends when one player has disposed of all garbage cards and is left with only the club. This player wins the game.

In the sample game, after the eighth round, Alan exchanges the single spade in his hand for four red cards from the garbage heap. However, this was a futile move because Cathy, who had disposed of all her spades earlier, plays the final red card and wins the game.

Since Garbage is a fast game, you may want to play it three or four times before debriefing.

Step 2: Debrief of Garbage Simulation

Begin your debriefing with a “how do you feel right now” inquiry. Players may report frustration, anger, or disillusionment with the selfish behavior of their cohorts. Give participants a chance to vent their feelings.

Help players to process their experiences and derive generalizations about what people do when confronted with a dilemma that requires a choice between competing and caring. Have them relate the metaphoric behavior from the game to real-life events they have experienced related to

corruption while in-country. Here are some generalizations that have been elicited during past plays of Garbage:

- a. People wait and see how others behave before deciding what they want to do.
- b. You feel foolish when you play a club and discover that no one has dumped any hazardous garbage.
- c. Excessive dumping of hazardous waste is usually followed by a zealous play of clubs.
- d. Different people react differently to getting caught—and to getting away with hazardous dumping.
- e. People focus so much on winning that they do not pay attention to the significance of the spades.
- f. You fall behind if you spend your resources monitoring other people.
- g. Most attempts at collaborative monitoring (e.g., taking turns to play a club) are futile.
- h. People say one thing and do something else in competitive situations.
- i. It is difficult to follow rules and regulations when you know that the others are not following them.

Ask participants if they can draw any parallels between this game and what they have experienced at site concerning corruption and transparency.

II. Sharing, Reflection, and Courses of Action (65 minutes)

Step 1: Ask Volunteers to share experiences they have had at site related to corruption and transparency in any of the three categories (what they saw, their immediate reaction, and any analysis after the fact). If there is a large group of Volunteers, you may want to break them into small groups for these discussions.

- a. What happened?
- b. Why did this situation arise?
- c. What would you do differently if you could do it over?

Trainer's note: Be sure that this does not turn into a complaint session.

Step 2: Post the flip charts labeled “What I Saw,” “My Immediate Reaction,” and “Analysis After the Fact.” Next, ask Volunteers to write on stickies (one incident for each sticky) a one- to two-sentence description of situations related to corruption and transparency that would fit in the categories of “What I Saw,” “My Immediate Reaction,” and “Analysis After the Fact.” Have them then place those stickies on the appropriate flip charts.

Trainer's note: Save these flip charts for use in later sessions.

- Step 3:** Process the stickies on the charts using questions that help Volunteers identify reasons for their entries. Ask if some entries that Volunteers “disliked” are really more a matter of not understanding the host culture. Identify which items:
- Seem to be a clash of values;
 - Seem to them to be “unethical” or corrupt; and/or
 - Reveal expectations that are different from their frames of reference.

Trainer’s note: This discussion is a review of Greaseless, Chapter 3.

- Step 4:** Ask Volunteers to categorize which things they don’t like and that can be ignored or set aside and which things really impact their lives and work. Record these on flip charts.

Trainer’s note: Save these flip charts for use in later sessions.

- Step 5:** Process what impacts their lives and work with the question, “Which of these are things you think you can do something about, and which are bigger picture ‘systemic’ issues beyond your control?” Record as appropriate on above flip charts.

Trainer’s note: Reinforce the concept that anything that affects your well-being or effectiveness should be something for which you need to have a strategy. Whether or not you can change the situation you need to cope/adjust, build a support network, know who you can go to for help, or take action by planning a secondary activity.

- Step 6:** Brainstorm solutions/potential courses of action for the issues that they can do something about. Record on flip charts.

Trainer’s note: Save these flip charts for use in later sessions.

III. Wrap-Up/Debrief and Assignment (10 minutes)

Ask participants to review the brainstormed solutions and think about what they could apply to their lives and work at site. Ask which they feel are particularly relevant for them. Tell them the next session will further address solutions and look at ways to address system integrity within their work and projects.

Handout

Garbage Simulation Guidelines²

Number of players: three to five per table. Any number of tables may play simultaneously.

Material required: one regular deck of playing cards per table.

This simulation/game is specifically about the dumping of hazardous wastes, but in the abstract, it explores the trade-off between personal gain and common good. Garbage brings out the problems of devising a socially conscious strategy among people eager to win.

Steps of Play

Deal. Sort the deck into suits. Give each player any five red cards (diamonds or hearts), any two spades, and any one club.

In this game, the value of the cards does not matter. All red cards—whether hearts or diamonds—are regular garbage. Spades are hazardous garbage. Clubs are monitor cards, which force people to reveal what they are dumping.

Object of the game. To get rid of all the garbage cards (regular and hazardous) in your hand. You need not (and *cannot*) get rid of your monitor card.

Round without clubs. During each round, each participant plays a card face down. After everyone has done so, and if no one has played a club, all cards face down are collected, shuffled, and discarded face-up in the garbage heap. Players discover what types of garbage have been discarded—but not who discarded what.

Round with clubs. If one or more clubs have been played during this round, then all players turn their cards face up. Regular garbage cards (red cards) are thrown into the heap. Hazardous garbage cards (spades) and monitor cards (clubs) are taken back by the players. Then *each* club player gives a red card from his or her hand to each spade player.

A sample game illustrates the rules. The players are Alan, Barbara, Cathy, and David. During Round One: Alan plays a club; Barbara, a heart; Cathy, a diamond; and David, a spade. David is trying to get a head start with the spade, but Alan anticipates that. Barbara and Cathy play it safe and get rid of a red card each. Alan also gets rid of a red card—by giving it to David as a punishment.

During Round Two: Alan plays a spade; Barbara, a heart; Cathy, a diamond; and David, a spade. David correctly anticipates that no one is going to repeat a club.

² Sivasailam Thiagarajan, "Garbage: A Card Game that Stimulates the Trade-Off between Competition and Concern," *Simulation & Gaming*, Vol. 22, No. 1 (March 1991), pp. 112 – 115.

Alan also thinks the same. Since no one plays a club, the cards do not have to be turned over. After they are mixed up and dumped into the garbage heap, players realize that two of them got rid of hazardous garbage. But, they do not know who played what card (other than what they themselves played).

Additional red cards. In later rounds, a club player may not have enough red cards to give to spade players, especially if more than one player attempts to sneak out hazardous garbage. In this case, after passing out the red cards from the hand, the club player distributes as many red cards from the garbage heap as needed. For example, during the fifth round, Alan plays a spade; Barbara, a club; Cathy, a diamond; and David, a club. Poor Alan! He gets hit with two red cards, one each from Barbara and David. During the seventh round, Alan plays a spade; Barbara plays a spade; Cathy plays a club; and David, a spade. Cathy gets to punish the other three players. She has only one red card that she gives to Alan. She then digs up two other red cards from the garbage heap and hands them to Barbara and David.

Hazardous garbage processing. At any time during the game, a player can exchange a spade card for four red cards from the garbage heap. (This exchange can only take place if there are enough red cards in the heap.)

Ending the game. The game ends when one player has disposed of all garbage cards and is left with only the club. This player wins the game.

In the sample game, after the eighth round, Alan exchanges the single spade in his hand for four red cards from the garbage heap. However, this was a futile move because Cathy, who had disposed of all her spades earlier, plays the final red card and wins the game.

Training Series: Corruption and Transparency as Development Issues— Volunteer In-Service Training Modules

Session II: System Integrity and Peace Corps Projects

Purpose

In this session, Volunteers discuss what system integrity means and what happens when systems break down. Using their experiences discussed in the last session, they explore examples of lack of system integrity. They apply Peace Corps rules and systems to see transparency and system integrity for Volunteers, staff and their communities. They explore common challenges to system integrity in their project areas.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps Volunteers participate as all are faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

1 hour, 55 minutes

Goal and Objectives

Goal: To develop Volunteers' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of this session, the participants will be able to

1. Identify how the absence of transparency and system integrity impacts the project activities and goals.
2. Choose an appropriate strategy for meeting project goals without engaging in, or condoning, corruption.

Session Outline

- I. System Integrity (45 minutes)
- II. Project Sector Challenges (60 minutes)
- III. Wrap-Up/Debrief and Assignment (10 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section of the introduction, “Trainer Preparation: Conducting Staff and Volunteer Training in Corruption.” Ideally, two staff, one American and one host country national, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- Blank flip charts
- Chart stand
- Markers
- Tape or tacks to hang flip charts
- Flip charts from In-Service Training Session I
- Check section I, step 2, to see if you need to make copies of any documents

Preparation Checklist

- Prepare the meeting room. If possible, have participants sit in a semi-circle around a flip-chart stand or around a large table. Make sure people can see each other to enable good conversation.
- Make handouts
- Copy handouts
- Prepare flip charts

Methodology

I. System Integrity (45 minutes)

Step 1: Discuss what system integrity means in specific terms and what happens when systems break down. Refer back to the flip charts used in the previous session “What I Saw,” “My Immediate Reaction,” and “Analysis After the Fact.” Relate some of their earlier “dislikes” or “don’t understand” to lack of system integrity. (Or, the “which of these can we do something about, and which are issues beyond our control?”)

Step 2: Ask: “What are the rules and systems the Peace Corps has in place to ensure transparency and system integrity?” Discuss this in the Peace Corps context with examples of what the Peace Corps does to ensure system integrity with staff, Volunteers, and community activities. Ask Volunteers to list examples of system integrity rules:

- for staff behavior (e.g., *responsibilities around use of funds or vehicle sign-in/out sheets, etc.*);
- for Volunteers (e.g., *SPA forms and budget plan documents sign-off sheets; rules against Volunteers accepting donations in the Peace Corps’ name*);
- for community activity (e.g., *savings boxes—have three locks with three committee members having the keys so funds are secure and used as intended with group approval; project design and management (PDM) process of assigning roles and responsibilities; budget accounting and evaluation processes that everyone knows so peer pressure for accountability is visible in the community*).

Ask the participants: “How do these rules and systems affect you in your site and assist (or hinder) you in dealing with situations related to corruption or transparency?”

II. Project Sector Challenges (60 minutes)

Step 1: Break into small groups based on project sectors (if the in-service training is for only one sector, stay in a large group). Ask the group to consider the following and record responses on flip charts:

- a. List the most common challenges to system integrity within respective project areas (e.g., *in education projects, students paying teachers for grades; in nongovernmental organizational*

development, agencies not being transparent with funds received from grantors).

- b. Brainstorm what could be done to address these issues.
- c. List what the Volunteers need in terms of support, information, and resources to address these project-related challenges.

Step 2: Discuss with the participants what could happen if ideas brainstormed in Step 1 are too dangerous or are inappropriate. Reinforce the idea that Volunteer behavior has real consequences.

Trainer's note: Save these flip charts for use in later sessions.

III. Wrap-Up/Debrief and Assignment (10 minutes)

Ask the Volunteers how they can apply what they have brainstormed to their projects. Tell them that in the next session they will have an opportunity to hear solutions and experiences from a variety of panel members and for them to come to that session with situations or questions they would like to address.

Training Series: Corruption and Transparency as Development Issues— Volunteer In-Service Training Modules

Session III: Strategies for Effective Peace Corps Experiences and Projects

Purpose

In this session a panel of carefully selected Volunteers, the safety and security coordinator (or the country director), and a selection of program managers (or the program and training officer) present possible solutions, resources, and the context for addressing issues of corruption and transparency. Following the panel presentation and questions and answers, the participants discuss how they can apply what they learned to their project areas. They review what has been addressed in the in-service training modules and debrief what they feel are the most important lessons learned. Staff reiterates that if something affects their well-being, their safety, or their effectiveness, it is important for them to address the issue in a safe way.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down, and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

It is highly recommended that *all* Peace Corps Volunteers participate as all are faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

1 hour, 10 minutes

Goal and Objectives

Goal: To develop Volunteers' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of this session, the participants will be able to

1. Describe a continuum of strategies that could be used and when and how different strategies can be applied appropriately.
2. Identify the resources, tools, and strategies available to create and incorporate secondary projects in culturally appropriate and personally safe ways.

Session Outline

- I. Panel Discussion (60 minutes)
- II. Wrap-Up/Debrief (10 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section in the introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and one host country national, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- ❑ Blank flip charts
- ❑ Chart stand
- ❑ Markers
- ❑ Tape or tacks to hang flip charts
- ❑ Flip charts from in-service training Session I
- ❑ Flip charts from in-service training Session II
- ❑ Optional: copies of the handout "Understanding the Peace Corps' Niche and Ideas for Action" (*if post plans to use in-service training Session IV to explore ways that Volunteers can integrate corruption and transparency themes into project areas*)

Preparation Checklist

- ❑ Prepare the meeting room. If possible, have participants sit in a semi-circle. Position chairs at the front of the room for panel members. Make sure people can see each other to enable good conversation.
- ❑ Prepare results of previous sessions' flip charts for panel members to review.
- ❑ The panel discussion should consist of the following panel members:
 1. Two (or more) carefully selected, effective, seasoned Volunteers who can give insights into how to be culturally appropriate in "getting things done."
 2. The safety and security coordinator or country director to address the safety and security issues around addressing corruption and transparency.
 3. Program managers or the programming and training officer who can address challenges and solutions related to corruption in specific projects.
- ❑ Prepare the panel beforehand by showing them the results of the flip charts from in-service training Session I (the solutions/potential courses of action for the chart of things that impact Volunteers' lives which they can do something about) and Session II (common challenges to system integrity within their respective project areas and what the Volunteers need in terms of support, information, and resources to address these project-related challenges).
- ❑ Prepare optional handout if post plans to continue to in-service training Session IV: Corruption and Transparency Themes Within Project Areas.

Methodology

I. Panel Discussion (60 minutes)

- Step 1:** Introduce the panel and explain its purpose. Let Volunteers know the format of the discussion and when they can ask questions.
- Step 2:** Ask each panel member to give a brief presentation on his or her solution. Encourage the participants to ask questions of the panel.
- Step 3:** At the end of the panel discussion, ask the participants to answer the following:
- What does today's discussion mean to you?
 - How can you apply what you have learned to your project areas?

II. Wrap-Up/Debrief (10 minutes)

Briefly review what has been addressed in these in-service training modules: the Volunteers' experiences—what they saw, their immediate reaction, and what they think about it now; the ways the Peace Corps provides a framework for maintaining system integrity within projects; and solutions to address different issues related to transparency and corruption.

Ask what they feel are the most important learning points they will take back to site with them. Reiterate that one of the most important points for them to take away from this training is that if something affects their well-being, their safety, or their effectiveness, it is important for them to address the issue in a safe way. Explain to participants that the staff will continue to be resources to them whenever they need it.

Trainer's note: If post plans to continue the training to in-service training Session IV: Corruption and Transparency Themes Within Project Areas, then explain to participants that the next session will help them take the information that they have already learned and develop appropriate strategies for integrating transparency and system integrity as themes within the context of their project areas.

Distribute copies of the "Understanding the Peace Corps' Niche and Ideas for Action" handout. If planning to do the optional session IV, ask participants to review the handout and bring it with them.

Handout

Understanding the Peace Corps' Niche and Ideas for Action

The Peace Corps' Niche

Corruption is a violation of public trust for personal gain, and, where present, it affects the everyday life of individuals at all levels of society. Corruption occurs at many different levels—when corruption occurs on a grand scale and many people throughout society participate, the entire system's integrity breaks down. This breakdown, in turn, causes many to resort to corruption on a smaller, more everyday scale. Think of it this way: In country X, long-term, widespread corruption in the national police force is an accepted reality. Individuals have lost faith in the police force as an institution, but on occasion find that they are required to interact with it. To ease this individual interaction and expedite the process, they resort to the small-scale bribery of a single police officer.

On the grand scale, the Peace Corps cannot and should not address corruption and transparency. At this level, anti-corruption and transparency efforts are more likely to include such things as training in investigative journalism, open critique of corrupt organizations and individuals, provision of civic monitoring, etc. Instead of tackling corruption on the macro level, the Peace Corps' approach should remain at the grassroots level where our strength lies: one project, one community at a time.

In *Program and Training Booklet 1* [ICE No. T0113], the Peace Corps' approach to development is defined as human capacity building; the focus of Volunteers' work is on helping people develop the capacity to improve their own lives. Volunteers touch the people with whom they work, they transfer ideas, and they model behaviors. The Peace Corps' approach to corruption and transparency should be focused here, at the person-to-person level.

Human capacity building is not a short-term process, and any results from Volunteer work in anti-corruption and transparency will be long term. However, by working at a number of different levels (individual counterparts, organizations and communities as a whole, and service clients), efforts are more likely to be sustainable after Volunteers leave. Remember, the real goal is to build the individual, organization, or community's capacity to effectively address and model anti-corruption and transparency from within their own context.

What Volunteers Can Do

Volunteers are integrated into their communities, but their presence is very much noticed. In terms of supporting anti-corruption and transparency efforts, this visibility can be a plus if we look at the Volunteer as a positive alternative role model. Instead of “catching” corruption and the corrupt, Volunteers could work to impact mentalities that tolerate this kind of behavior.

Volunteers act as role models not just in their own professional and personal conduct, but they can also model how to incorporate anti-corruption and transparency ideas into the core of their projects. This type of integration would help Peace Corps partners to build transparency and anti-corruption practices into their own projects just as it would help Volunteers to model expected behavior for their host country national counterparts. In turn, both would be able to train other partners and clients in the same way. In this way, Volunteers and counterparts practice what they advocate and simultaneously work toward long-term sustainability in their project area.

Following are potential areas in which Volunteers could integrate anti-corruption and transparency ideas into their projects. Not all are appropriate for every Volunteer. Volunteers and Peace Corps staff should consider these ideas in light of the Volunteer and staff trainings on corruption, the Peace Corps’ policies and guidelines, safety and security, and local customs and laws.

Streamline Your Project’s Systems and Processes

Corruption vs. Solid Project Management: If an organization’s systems and processes are slow, unwieldy, etc., this may lead to bribery on the part of project managers who want to reach objectives in a timely manner. Does the system itself “promote” corruption?

Potential questions to ask:

- Is the organizational structure of the project clear? Does it need to be created (set down on paper) or modified?
- Does the project have a clear accountability system? Does it work?
- Does each position in your project have a clear, understood description and list of expectations? Are workers judged against these expectations?
- What is the incentive system for the project? How does it relate to expectations? How does it impact effectiveness?
- Does the project’s leadership support the inclusion of anti-corruption and transparency practices? Are they (the leadership) also serving as models?
- Does the project have a clear code of conduct for its workers?
- Does the project have a strategic plan that describes its goals and outlines a plan to get there?
- Does the project have guidelines or “how to’s” for its bureaucratic transactions? (These could be manuals that describe how to attain goods or services provided by the project.)

- Do the project's clients have a clear understanding of what the project is? Do they understand their part—what the project expects of them and what they can expect of the project? Are procedures and rights publicized?
- Does the project survey its clients for feedback on service delivery or corruption perception? Is this feasible?

Educate Your Partners

Work with counterparts, host families, and the stakeholders of your site organization to explore alternatives to corruption. Is corruption understood—at both the macro and micro levels? Explore opportunities for education.

- Volunteers and their counterparts can work to build anti-corruption and transparency ideals into youth clubs and youth activities. The objective here would be to “end” the mis-education of youth that corruption is a desired or even healthy means to an end.
- Encourage transparency and professionalism.
- Build a model of appropriate behavior—what it should be and how to make it happen (include an action plan).
- Communicate the costs of corruption and how practices could be instituted that do not involve corruption.

Going Forward—Know Your Resources

If not already set up at post, create a system for collecting and sharing information about corruption and transparency. Explore options for learning from each other (this includes staff and Volunteers).

- If agreed, create a post-level strategy for addressing, or at least understanding, corruption and transparency in the local context.
- Incorporate any of post's anti-corruption and transparency goals across post and Volunteer projects.
- Build agency, post, and Volunteer anti-corruption knowledge. Collect Volunteer and counterpart practices in these areas. Evaluate and re-integrate. Share at post and with other programs.

Training Series: Corruption and Transparency as Development Issues— Volunteer In-Service Training Modules

Session IV: Corruption and Transparency Themes Within Project Areas (Optional)

Purpose

Volunteers explore potential ways they can address corruption, transparency, and system integrity through their project areas. Staff and Volunteers discuss which possibilities fit within post's safety and security parameters and which are feasible for implementation. Participants take what they have learned throughout the training and form an action plan for addressing corruption and transparency from within their projects.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

This optional session is designed to explore how to integrate transparency and system integrity as themes within the context of project areas. Participants should be those Peace Corps Volunteers in the projects under consideration for this change.

Duration

1 hour 15 minutes

Goal and Objectives

Goal: To develop Volunteers' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of this session, the participants will be able to

1. Develop appropriate strategies for integrating transparency and system integrity as themes within the context of their project areas.

Session Outline

- I. Projects that Focus on Transparency and System Integrity (40 minutes)
- II. Wrap-Up/Debrief/Action Plans (35 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section of the introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and host country national, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content. **As this session explores how to incorporate transparency and system integrity themes within project areas, the country director or programming and training officer should be at this session to address which alternatives are viable within the framework of the post's overall programming.**

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- ❑ Blank flip charts
- ❑ Chart stand
- ❑ Markers
- ❑ Tape or tacks to hang flip charts
- ❑ Flip charts with each project name at the top
- ❑ Extra copies of the "Understanding the Peace Corps' Niche and Ideas for Action" handout from Session III
- ❑ Optional: project plans for each of post's projects

Preparation Checklist

- ❑ Prepare the meeting room. If possible, have participants sit in a semi-circle around a flip-chart stand or around a large table. Make sure people can see each other to enable good conversation.
 - ❑ Ensure meeting room is prepared to allow for group work and a subsequent gallery walk.
 - ❑ Optional: make one copy each of each of post's project plans.
 - ❑ Review these USAID and Transparency International materials:
 - (USAID) *Fighting Corruption* (http://www.usaid.gov/our_work/democracy_and_governance/technical_areas/anti-corruption/)
 - (Transparency International) *Teaching Integrity to Youth Manual* (<http://www.transparency.org/toolkits/2004/index.html>)
- These two booklets give specific ideas on how to incorporate transparency and system integrity themes within various sectors. These publications may be printed out as references prior to the session.
- ❑ Make a few extra copies of the “Understanding the Peace Corps’ Niche and Ideas for Action” handout from Session III (participants should bring their own copies).

Methodology

I. Projects that Focus on Transparency and System Integrity (40 minutes)

Trainer's note: This last exercise is for posts that want to explore Volunteer involvement in projects that focus on the topics of transparency and system integrity. This may not be appropriate for many posts. If post is interested in this, then conduct the following steps:

Step 1: Explain that so far we have discussed corruption, transparency, and system integrity as they relate to Volunteers living and working effectively in their communities. Explain that this exercise is related to how Volunteers can design projects (primary or secondary) that relate directly to the topics of transparency and system integrity.

Trainer's note: You may want to cite examples of how this can be done. Two resources for this are: Transparency International's Teaching Integrity to Youth Manual (<http://www.transparency.org/toolkits/2004/index.html>); and USAID's, Fighting Corruption: (http://www.usaid.gov/our_work/democracy_and_governance/technical_areas/anti-corruption/).

Step 2: Place flip charts around the room—one for each project area at post (e.g., TEFL, community economic development, etc.) and one entitled “secondary projects.”

Step 3: Divide the participants into as many groups as there are flip charts and have them spend five minutes at their flip chart, brainstorming ideas for ways to integrate transparency and system integrity within the listed project area. Then, have the groups move on to the next flip chart to add their contributions to those already listed by the previous group. When all groups have listed ideas on each flip chart, have the group do a gallery walk to read all ideas.

Trainer's note: As participants consider how to integrate these topics into their project areas, have them reflect on the “Understanding the Peace Corps' Niche and Ideas for Action” handout from Session III. For reference during this brainstorm session, you may wish to provide copies of the most recent project plan for each of post's projects.

Step 4: The country director or programming and training officer should debrief this exercise and talk about which of the ideas would fit within the safety and security parameters at post. The program manager or programming and training officer should address with the Volunteers what the next steps will be in implementing these project ideas.

II. Wrap-Up/Debrief/Action Plans (35 minutes)

- Step 1:** *“What happened?”*
From the debrief of the above gallery walk, review with the participants which ideas would fit within post’s safety and security parameters and which are feasible for implementation.
- Step 2:** *“So what?”*
Ask participants to consider the role of the Volunteer in development, what they have learned from this training, the above discussion, and their experiences in-country. Then, ask them to reflect on what they could do in their own individual projects to integrate transparency and system integrity. Have participants share their reflections.
- Step 3:** *“Now what?”*
Ask participants to take the ideas generated from the above reflection and create an outline of an action plan detailing how to integrate their ideas into their own project activities.
- Trainer’s note: The “Understanding the Peace Corps’ Niche and Ideas for Action” handout and the other resources mentioned in the trainer’s notes above may be good resources for participants as they create an action plan.*
- Step 4:** Ask participants to share some of their ideas for their action plans. Other Volunteers and staff can offer suggestions. *It is important to address any actions that could cause safety and security issues for the Volunteers.*
- Step 5:** End the session with the reminder of the support that staff can provide to Volunteers.

Training Series: Corruption and Transparency as Development Issues— Volunteer Pre-Service Training Module

Session I: Challenges in Development

Purpose

This training frames corruption and transparency as development issues. Prior to these training sessions, trainees should have had sessions on the Peace Corps' approach to development and development issues in the host country. As well, trainees should have been in-country for at least four to five weeks to have gained some minimal exposure to the local culture, and they should understand the policies and procedures by which Volunteers operate, i.e., the *Volunteer Handbook*.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

These modules are designed to be used with trainees during pre-service training. They are based on the premise that trainees have minimal experience addressing corruption in-country. It is highly recommended that *all* trainees participate as all will be faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

1 hour, 40 minutes

Goal and Objectives

Goal: To develop trainees' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of this session, trainees will be able to define corruption and transparency and describe how they affect development, the lives of host country individuals, and Volunteers.

Session Outline

- I. Introduction: Corruption and Transparency as Development Issues (45 minutes)
- II. Individual Experiences with Corruption (45 minutes)
- III. Wrap-Up/Debrief and Assignment (10 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section in the Introduction, “Trainer Preparation: Conducting Staff and Volunteer Training in Corruption.” Ideally, two staff, one American and one host country national, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- Blank flip charts
- Chart stand
- Markers
- Copy of *Greaseless* for each participant
- Prepared flip charts:
 - A. Goal and Objectives
 - B. Peace Corps’ Development Philosophy
- Tape or tacks to hang flip charts
- Handouts:
 - A. Working Definitions
 - B. *Greaseless* Reader’s Guide

Preparation Checklist

- Prepare the meeting room. If possible, have participants sit in a semi-circle around a flip-chart stand or around a large table. Make sure people can see each other to enable good conversation.
- Determine if you will distribute handout A with definitions or just use it for your own reference
- Make handouts
- Copy handouts
- Prepare flip charts

Methodology

I. Introduction: Corruption and Transparency as Development Issues

(45 minutes)

Step 1: Introduce the topic by stating that one thing that may affect Volunteer effectiveness is corruption, just as other cross-cutting issues do. Ask the participants for other examples of cross-cutting issues (e.g., gender).

Step 2: Ask the participants, “What is corruption?” Take suggestions and record them on a flip chart. From these, arrive at a common definition and write it on a flip chart. Discuss what is/is not corruption.

Trainer’s note: This definition should include the idea that “corruption is a violation of public trust for personal gain.” For example, police may stop a car just to get a bribe; the head of an organization may take grant funds for him/herself; government officials may take funds that are allocated for roads; or one member of a cooperative may keep some of the profits owed to the group, or someone may take jointly owned machinery for sole use. (The difference between influence and corruption is part of the discussion questions for Greaseless, chapter 3, in Session II.)

Step 3: Ask the participants: “What is transparency?” As above, arrive at a definition and write it on a flip chart. Ask the participants for examples that show transparency and examples that show a lack of transparency.

Trainer’s note: Transparency includes the idea that there are written rules and procedures that everyone knows and everyone follows, and that there are consequences for not following them. Transparency, and its manifestation in clear systems and rules, sets the stage for a corruption-free environment. Clear (transparent) procedures and guidelines set the benchmark by which to measure the extent and quantity of corruption in an organization.

Step 4: Ask the participants: “What is integrity?” Arrive at a definition. Be sure to make the distinction between individual and system integrity.

Trainer’s note: Integrity can refer to an individual or to a system as a whole. At the individual level, integrity refers to adherence to a moral code. At a system level, integrity (or system integrity) refers to the capacity of a system to function unimpaired by corruption, i.e., the system works as designed and is free from undue influence for personal gain. While system integrity is based on a transparent, clearly defined set of rules and procedures, personal integrity is much more amorphous. An individual’s integrity is based on a conglomeration of his or her experience, culture, and viewpoint. Personal integrity is not clearly

defined and therefore what one person may identify as corrupt, another may not. For many, honoring a personal obligation—even if it is in opposition to an organization’s regulations—counts more toward a strong personal integrity than does adherence to rules and regulations.

- Step 5:** Review with the participants that the Peace Corps is a development agency. Ask them what the Peace Corps is trying to do for the host country. Reveal the flip chart with the Peace Corps’ development philosophy. Discuss how corrupt practices can interfere with the Peace Corps’ work.

Trainer’s note: You can distribute the handout with working definitions of corruption and transparency at this point, and compare them with the discussion you have had above. Or, you can use the definitions for your own guidance in the discussion only.

- Step 6:** Ask participants what harm corruption might do to citizens, or to Volunteers? Note their ideas on a flip chart and discuss, if not clear.

Trainer’s note: Ideas may include poor roads because funds are taken, lenders unwilling to give loans if funds are not used as promised, or extra costs for organizations (e.g., if people use cars for private use or telephones for private business, etc.).

- Step 7:** Ask the participants what expectations the Peace Corps has of them concerning corruption and transparency. Ask them: “How will the Peace Corps expect you to act at your site if you are faced with corrupt practices or lack of transparency?” Record their ideas on a flip chart and compare them with Peace Corps policy and guidance.

Trainer’s note: Refer to Peace Corps Manual sections (522, 641, 704, 784 outlined in Staff Session III) or any post-specific guidelines for comparing participant expectations with agency expectations.

II. Individual Experiences with Corruption (45 minutes)

- Step 1:** Ask the participants to individually reflect on a time they were affected by corruption and how they dealt with that experience. *(It may be experiences from home or another country if they have not had much time in the host country.)* In small groups, have participants take turns sharing their examples, using the following discussion questions:

- a. What was your experience?
- b. What did you do?
- c. How does this relate to your own sense of integrity?

Step 2: As a large group, ask the following:

“What happened?”

Ask: What types of issues were addressed in your discussions?

Trainer’s note: Look for common themes such as individual corruption vs. a system that was corrupt; different cultural interpretations; situations that might demand different ethics.

“So what?”

Ask: What did you learn from these situations?

“Now what?”

Ask participants to consider if what they learned in this situation could be applied to their time here at post.

III. Wrap-Up/Debrief and Assignment (10 minutes)

Step 1: Explain to participants that they bring these experiences and feelings with them into this new country experience. Further elaborate that corruption does not belong to one culture alone, but that there are more or less sophisticated ways of hiding it depending on the level of development.

Step 2: Give homework of reading *Greaseless*. Hand out the reader’s guide and ask the participants to reflect on the questions in the reader’s guide as they read the book. Clarify with the participants that they do not need to write any answers to the questions, but that they will be asked to discuss those points during the next session.

Trainer’s note: Depending upon the delivery of Sessions I and II, the take-home assignment will vary. Please see the notes below regarding possible options for session transition.

*Option #1: Have participants read Greaseless and review reader’s guide **prior to** Session I. This would ensure a basis for discussion if participants have little exposure to corruption as a topic. If this option is chosen, then Session I could be modified to include more discussion of the book and the accompanying reader’s guide. Note that much of the book will be covered in later sessions, so discussion here should not include topics already identified in later training sessions. Focus on chapter 3 in Session II. Assign participants to review chapter 3 if necessary.*

*Option #2: Assign Greaseless **after** Session I. Give participants time to digest the reading. Review Greaseless as a whole by reviewing the questions from Session I. Then, delve deeper into Greaseless chapter 3 as planned in Session II.*

Option #3: Assign only chapter 3 after Session I, or have a small group read each chapter after Session I and then summarize and report out at the beginning of Session II.

Flip Chart A

Goal and Objectives (for the entire training module)

Goal: To develop trainees' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Learning Objectives:

By the end of the training, trainees will be able to

1. Define corruption and transparency and describe how it affects development, the lives of host country individuals, and Volunteers.
2. Identify one example of how the Peace Corps' expectations about corruption and transparency differ from some local practices they have encountered.
3. Choose an appropriate strategy for living effectively and safely within the culture without engaging in, or condoning, corruption (such as dealing with intimidation, pressure, threats, enticements, etc.).
4. Describe any safety considerations and correctly identify what their roles and obligations are for reporting corruption to the Peace Corps.
5. Create, with Peace Corps staff and other Volunteers, a strategy for dealing with situations that are beyond their control, and assess the strategy based on their roles and responsibilities, and personal safety.

Flip Chart B

The Peace Corps' Development Philosophy

The Peace Corps uses development in human terms:

Development is building human capacity: helping people learn to identify what they would like to see changed, use their own strengths, and learn new skills to achieve what they believe is most important.

Development happens at a number of levels:

- Individual members of the community
- Professionals and service providers
- Organizations
- Communities

Development is sustainable if it is

- Culturally sustainable
- Politically sustainable
- Economically sustainable
- Managerially sustainable
- Environmentally sustainable

Excerpted from *Programming and Training Booklet 1: The Basics* [ICE No. T0113], pages 5 – 7.

Handout B**Questions to consider as you read *Greaseless*****Chapter 1**

The author defines corruption as a violation of public trust for personal gain.

- How do individual acts of corruption combine to create a system that exists at multiple levels of society?
- Why is corruption so difficult to end even when governments change?
- Is it corrupt for Volunteers to give small gifts to, or receive them from, host country family members? What about service providers or officials?

Corruption exists in all societies. It affects the everyday life of individuals at all levels of society, though they may not be aware of it or may just consider it “how things are done.”

- Are the wealthy more likely to be corrupt than the poor?
- Why do you think Volunteers notice corruption in their host culture so quickly?

System integrity is the sum of support systems, checks, and balances that causes the social infrastructure to work for the public good.

- Who benefits when public resources are used for their intended purposes?
- How does integrity bring prosperity?
- What happens when system integrity breaks down? How do people survive?
- How do you rely on system integrity in meeting your major job requirements?

Chapter 2

Pausing to gather information, observe and compare your knowledge of the situation can help determine the difference between corruption and disorganization.

- Though they may sometimes be equally frustrating, why is corruption so much more damaging than disorganization?
- Where can you go to find out more about international standards in fighting corruption?
- Can Volunteers always tell the difference between disorganization and corruption while living and working in their host culture? Can you?

Chapter 3

In some cultures personal loyalty is valued more highly than responsibilities to institutions or organizations, but every culture has a sense that stealing from the public is wrong.

- While it has valid benefits in relationships and must be respected in cultures, how can personal loyalty harm the stability and effectiveness of an organization if there are no checks and balances?
- How can transparency in systems and accounting promote accountability?
- When is trading favors acceptable, and when is it not acceptable?
- Is the exchange of favors common in the host culture? If yes, think about how you can help Volunteers to understand the accepted boundaries in this process.

Chapter 4

According to the author, corruption undermines accountability and trust, eats away at the fabric of societies and individuals' lives, and it is the biggest obstacle to development.

- How do people come to accept corruption as necessary or acceptable? How can change begin?
- What are some of the consequences of corruption on infrastructure, public health, and economic prosperity?
- What are examples of corrupt systems that don't involve money directly?

- Think about how to help Volunteers and others focus on setting examples of integrity, promoting positive solutions and modeling behavior on principles of respect rather than trying to “catch” individuals engaged in corruption.

Chapter 5

It is often hard to determine who is and is not participating in corruption, but if everyone was doing it, nothing would work at all.

- Even when there is obvious corruption, how can you tell that the majority of people probably do not participate in that corruption? What does that mean for the future?
- What are some of the ways international organizations have tried to eliminate bribery? Are there local laws against bribery?
- Whether legal systems protect contracted agreements or not, why should you avoid paying bribes?
- Would it help Volunteers to know host country laws regarding bribery and other forms of corruption?
- Can you think of historical figures from the host country who are examples of integrity and positive values in this culture?

Chapter 6

Building friendship takes time, but creates the space to say no to corruption and develop an alternative relationship.

- What are strategies for minimizing the likelihood that someone might be asked to participate in or ignore others engaged in corruption?
- Do you know the internal controls and standards set by the Peace Corps and U.S. Government that guide all employees' and contractors' professional behavior? Can you communicate this to others if needed?
- Does your post have systems in place to reduce the possibility of negotiating prices for services or goods (gasoline for site visits, hotel rates for a conference, etc.)?
- For Volunteers, part of adjusting to a new culture is being patient with the different pace at which personal interactions and business may be conducted. Think about how relationship building, boundary setting, and adaptation already being done in cross-cultural and other training can prepare Volunteers to be positive examples while minimizing miscommunication and misunderstanding related to corruption.

Chapter 7

Many people across all cultures are tempted to engage in corruption if there is no legal consequence.

- What is the difference between influence and corruption?
- How do accountability and enforcement of rules reduce corruption?
- Do Volunteers know how to build capacity around transparency, accountability, standards of conduct, and enforcement of self-identified rules with nongovernmental organizations? How can they help groups manage project funds wisely?

Chapter 8

One person can have a large impact as a role model and capacity builder over time.

- How can one person make a difference in reducing corruption?
- How does sustainable change occur?
- How can you encourage Volunteers who may never see the long term changes they influence? Is the issue of corruption any different than all sustainable development work?

Training Series: Corruption and Transparency as Development Issues— Volunteer Pre-Service Training Modules

Session II: Is It Corruption?

Purpose

Building on the discussion of personal experiences in Session I, this session introduces definitions and examples relevant to post. Participants explore differences between corruption and disorganization, and the importance of personal relationships in many cultures. They use this information to analyze Volunteer vignettes.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

These modules are designed to be used with trainees during pre-service training. They are based on the premise that trainees have minimal experience addressing corruption in-country. It is highly recommended that *all* trainees participate as all will be faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

1 hour, 45 minutes

Goal and Objective

Goal: To develop trainees' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objective

By the end of this session, trainees will be able to

1. Identify one example of how the Peace Corps' expectations about corruption and transparency differ from some local practices they have encountered.

Session Outline

- I. Discussion of *Greaseless*, Chapter 3 (30 minutes)
- II. Issue Exploration Using Training Vignettes (45 minutes)
- III. Wrap-Up/Debrief and Assignment (30 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section in the Introduction, "Trainer Preparation: Conducting Staff and Volunteer Training in Corruption." Ideally, two staff, one American and one host country, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- ❑ Blank flip charts
- ❑ Chart stand
- ❑ Markers
- ❑ Tape or tacks to hang flip charts
- ❑ Handout: Volunteer Vignettes (See preparation below)
- ❑ Participants should bring:
 - Copy of *Greaseless*
 - Greaseless* reader's guide

Preparation Checklist

- ❑ Prepare the meeting room. If possible, have participants sit in a semi-circle around a flip-chart stand or around a large table. Make sure people can see each other to enable good conversation.
- ❑ Make handouts (choose appropriate vignettes from samples or create some more appropriate to post)
- ❑ Copy handouts
- ❑ Prepare flip charts
- ❑ Reread *Greaseless* assignment (chapter 3 or as otherwise assigned in Session I)
- ❑ Prepare for discussion of *Greaseless* in accordance with the reading assignment chosen in Session I. Discussion questions may need to be adapted.

Methodology

I. Discussion of *Greaseless*, Chapter 3 (30 minutes)

- Step 1:** Lead a discussion of *Greaseless*, chapter 3, “Don’t I Have to Respect Their Culture?” using the following questions. (See trainer’s note below for information on discussion options.)
- What is the difference between corruption and disorganization?
 - Though they may sometimes be equally frustrating, why is corruption so much more damaging than disorganization?
 - How can you tell the difference between disorganization and corruption while living and working in a new, different culture?
 - In some cultures personal loyalty is valued more highly than responsibilities to institutions or organizations, but every culture has a sense that stealing from the public is wrong. While it has valid benefits in relationships and must be respected in cultures, how can personal loyalty harm the stability and effectiveness of an organization if there are no checks and balances?
 - Have you noticed if the exchange of favors is common in the host culture?
 - When is trading favors acceptable, and when is it not acceptable?
 - What questions about corruption and transparency in this country does this reading bring up for you?

Trainer’s note: Record discussion/questions for Greaseless on a “parking lot” flip chart to be referred back to during the next session. See Session I, part III regarding optional flow of sessions. Depending on the delivery option chosen, the format and content of the above discussion may change.

II. Issue Exploration Using Training Vignettes (45 minutes)

- Step 1:** Explore issues of corruption in region/post using the Volunteer vignettes. Have the participants break into small groups, and give each group a different vignette. Ask the groups to discuss the vignettes using the following questions:
- Is this corruption? Why or why not?
 - What could you do in this situation? What are your options?

III. Wrap-Up/Debrief and Assignment (30 minutes)

- Step 1:** “*What happened?*”
Ask the participants what types of issues were addressed in the vignettes.

Trainer’s note: Possible answers include cross-cultural misunderstanding; personality issues; corruption that is built into systems/structures.

Ask the participants what types of solutions were offered.

Trainer's note: Possible answers include learning more about the issues and how they are seen in the local culture; encouraging transparency; and providing models of alternative behavior.

Step 2: “So what?”

Ask participants to consider the role of the Volunteer in development, and then ask: “What can’t or shouldn’t be changed and what *could* you do?”

Ask participants: “What are the Peace Corps’ expectations of you concerning corruption and transparency?”

Step 3: “Now what?”

Ask the trainees to consider what will happen as they become Volunteers and go out to their sites. Ask them to think of what will help them build a strong foundation to address corruption. Record their responses on a flip chart.

Refer to this flip chart and the one generated during the *Greaseless* discussion (i.e., answers to what questions about corruption and transparency in this country does this reading bring up for you) and tell them these will be addressed at a later session.

Trainer's note: Be sure to save both flip charts for the next session.

Volunteer Vignettes

Title: *Jumping to Judgment*

Nature or Setting: *School/Community*

How has corruption affected me as a Volunteer teacher? Well, first I should address how it hasn't affected me. As this is one of the most corrupt countries in the world, I think that Volunteers tend to assume that those things that aren't immediately clear to us are unclear because of someone's ulterior motives. That isn't always the case. I have had several experiences where I jumped the gun on supervisors without fully understanding their intentions, and I honestly didn't give them much of a chance to fully explain their reasons.

For example, I had one supervisor who prohibited me from accepting students from outside the Department of Youth Development (our counterpart agency) for my English class and who said that he would choose my students. I was livid. Later, after talking some more and asking many questions (and in the process sitting through hours of unrelated stories), I learned that he thought that I would be overly pressured by people to accept them as students. He didn't think, as a newcomer, that I would be prepared to deal with the local style of "requests." Also, he feared that the response to my advertisement of an English class would be overwhelming, and it would be impossible for me to manage that number of people. In retrospect, he was totally correct, and I was rather disrespectful in my dealings with him. There are many similar examples to this. So, I would first encourage everyone to be patient and listen to what his or her supervisor has to say. They have much more familiarity with the systems than we do, and much more experience.

Title: *Newsletter Staff*

Nature or Setting: *Community*

I serve as an English editor for a local nongovernmental organization (NGO) that works in the theater arts. The NGO teaches important lessons to local villagers through the medium of theater. Every quarter, we produce a newsletter describing the work that the NGO has accomplished in the previous three months. I am the editor and co-author of the English version. Most of the NGO's employees, including the executive director, are Hindu. My counterpart, with whom I work in writing, editing, and printing the newsletter, is also Hindu. Each quarter when the newsletter is printed, the editors of the newsletter are listed on the back page along with one piece of false information.

The ethnic majority of my country is composed of Muslims and is prejudiced against Hindus. It is a known "fact" that a Hindu will never graduate higher or earn a position higher than a Muslim. If two doctors are running for a professorship, and one is Hindu and the other Muslim, the Muslim will earn the full position, and the Hindu will be granted the assistantship. If two students, one Hindu and the other Muslim, take an examination, the Muslim will earn first division, and the Hindu second division. Knowing that Muslims are skeptical of Hindus and that a majority of the financiers of my NGO's work are Muslim, the executive director decided that a Muslim name needed to be listed among the editors of the quarterly newsletter. The editors are listed as such: a Hindu name, a Hindu name, a Hindu name, and a Muslim name. Although the "Muslim name" is in fact an employee of the NGO, he never touches a pencil when it comes to writing the quarterly newsletter. No, his name is listed for the satisfaction of the skeptical Muslims, so that the organization continues to get the support it needs in order to perform its necessary and beneficial campaigns.

Title: *Shake Down at Border*

Nature or Setting: *Police Encounter*

A Volunteer decided to take annual leave for a week to visit another Volunteer in a neighboring country. She had to travel by local bus. On her way back to her country, she got on a bus that was full of locals from her “home” country (she was the only American on the bus). She quickly became known on the bus as the American girl, and the other passengers were happy to learn she was quite proficient in their language. People shared their food with her, and she received many offers of places to stay.

There was a friendly atmosphere on the bus until they got to the border. All of the passengers were made to get off at the border and show their passports. When the border guards discovered that the Volunteer was American, they allowed the other passengers back on the bus but held the Volunteer while the bus waited for her. They told the Volunteer that because she was not a resident but American she would have to pay an entry fee of \$100 to cross into her home country. She told the border guards she had left the country before and never had to pay a reentry fee. The guards insisted she pay the money. The Volunteer started yelling at the guards in their native language insisting she would not pay, but they insisted she would or they would tell the bus to leave. The Volunteer then got out her cellphone and began dialing a number. She told them: “I am friends with the American ambassador, and I am calling him now. I want you to explain to him why I have to pay this fee.” The phone began ringing a number and she handed the phone to one of the guards. He told her they would let her pass this time and handed the phone back to her. She got back on the bus and the other passengers cheered for her. Then they laughed when they found out she didn’t know the ambassador, but she had just called another Volunteer’s cell number.

Title: *Success Story*

Nature or Setting: *School*

One hot day, I was collecting applications for a new conversational English class. Students submit an application and then face an interview before they are selected for the class. Two of my former students were helping me organize and collate the new applications. Applicants had lined up in the hallway, and some were in adjacent classrooms completing their applications at the last minute. One week earlier, my students and I had been at a play together and had run into a boy from a nearby university who said he was interested in learning English. My students encouraged the boy to apply for my class. On this very day, the same boy stuck his head into my office and asked for assistance. One of my students accompanied him outside my office.

A couple of minutes later, my student marched into my classroom looking flushed and advised me not to accept the boy into my class. “Madam,” she said, “that boy just offered me a bribe to help him get into your class.” I wanted to rip up the application immediately, but she said that I absolutely could not do that. Once again, I was reminded that saving face is very important in the local culture. My students wanted me to interview the boy and simply not take him in my class.

Previous to the interview, a professor from the boy’s university called my supervisor and made a strong reference on the boy’s behalf. On the day of the interview, my supervisor fervently encouraged me to take the boy into my class. I explained to him that a bribe had been offered, that I am not corrupt, and that as far as I was concerned, the boy’s application was going in the trash. Believe it or not, I was supported in my decision. It was one small step against corruption, one giant leap toward a civilized society.

Training Series: Corruption and Transparency as Development Issues— Volunteer Pre-Service Training Modules

Session III: How to Avoid Difficult Situations

Purpose

In this final pre-service training session, trainees pull together information and explore Peace Corps resources available to them. They summarize, and then develop some action items for themselves.

Rationale

Corruption exists in all societies. Corruption is a violation of public trust for personal gain. It affects the everyday life of individuals at all levels of society, though they may not be aware of it because they have never known anything else. When many people participate in corruption, system integrity breaks down and some people resort to corruption to survive. Corruption is a development issue because it erodes the infrastructure, threatens economic competitiveness and public health and safety, and undermines accountability and trust. To be effective as a development agency, the Peace Corps, its staff, and Volunteers need to recognize corruption, and model alternative strategies, transparency, participation, and other positive behaviors.

The issue of corruption is being identified with greater frequency by Peace Corps staff and Volunteers. These staff and Volunteer training modules are designed to raise awareness of corruption and transparency as development issues; identify how the Peace Corps can avoid becoming involved in corrupt practices; and suggest ways to model corruption-free systems and practices.

Target Audience

These modules are designed to be used with trainees during pre-service training. They are based on the premise that trainees have minimal experience addressing corruption in-country. It is highly recommended that *all* trainees participate as all will be faced, either directly or indirectly, with these issues in their project work and everyday lives.

Duration

1 hour, 40 minutes.

Goal and Objectives

Goal: To develop trainees' skills and knowledge to be effective, safe, and accomplish project goals in challenging environments.

Objectives

By the end of this session, the trainees will be able to

1. Choose an appropriate strategy for living effectively and safely within their host culture without engaging in or condoning corruption (dealing with intimidation, pressure, threats, enticements, etc.).
2. Describe any safety considerations and correctly identify what their roles and obligations are for reporting corruption to the Peace Corps.
3. Create, with Peace Corps staff and other Volunteers, a strategy for dealing with situations that are beyond their control, and assess the strategy based on their roles and responsibilities, and personal safety.

Session Outline

- I. Support and Resources to Address Corruption (45 minutes)
- II. Creating a Personal Action Plan (40 minutes)
- III. Wrap-Up/Debrief (15 minutes)

Facilitators/Technical Expertise

It is strongly recommended that any person who facilitates the Volunteer corruption modules will have previously gone through the staff training. Discussions related to personal views on corruption, transparency, and integrity can be sensitive. Before conducting this session, it is important that the facilitator/trainer read the final section in the Introduction, “Trainer Preparation: Conducting Staff and Volunteer Training in Corruption.” Ideally, two staff, one American and one local, should co-facilitate the training. Facilitators should have skills in adult training, group dynamics, cross-cultural communication, and a general knowledge of the issues in the training content.

In delivering the content, some modifications and/or post-specific examples may be necessary. Allow plenty of time to prepare.

Materials and Equipment

- Blank flip charts
- Chart stand
- Markers
- Tape or tacks to hang flip charts
- Flip chart from *Greaseless* discussion in pre-service training Session I
- Handouts:
 - A. Discussion Topic Cards
 - B. Resources from Staff Session III
 - C. Annotated ICE List
- Copies of ICE publications on annotated list

Preparation Checklist

- Prepare the meeting room. If possible, have participants sit in a semi-circle around a flip-chart stand or around a large table. Make sure people can see each other to enable good conversation.
- Make handouts (prepare resources)
- Copy handouts from Staff Session III
- Make discussion topic cards (see Part I, Step 1)

Methodology

I. Support and Resources to Address Corruption (45 minutes)

Step 1: Introduce this session by explaining that the group will look at the support and resources available to address corruption. Divide participants into five groups, and assign each group one of the topics/resources below. Ask the groups to consider how their topic will help them avoid difficult situations and be more effective. Ask them to highlight their discussions on a flip chart and be prepared to report out. For each group, a – e, give participants a discussion topic card that provides guiding points and clues of where to look for each resource.

- a. What the Peace Corps (both post and agency) provides to address corruption

Trainer's note: Resources and possible answers: policies and procedures; selection of sites; staff visits and availability for discussion/help. The Peace Corps has rules. Begin with relevant sections of the Peace Corps Manual, the Volunteer Handbook, or any post-developed content. Our role is to make it easy for Volunteers to explain to their local counterparts that there are systems that govern their actions, and that they are held responsible and accountable for their actions.

- b. Community integration and personal safety

Trainer's note: Resources and possible answers: acceptance model, safety procedures, training. The acceptance model helps Volunteers to develop long-term relationships with their community. As a result, they have a source of information to help them understand the “why” of corruption in the local context.

- c. Language and cross-cultural training

Trainer's note: Possible answers: importance of knowing how to interpret a situation in the cultural context; the importance of intentional relationship building.

- d. Transparency models for managing projects

Trainer's note: Resources and possible answers: Project and Design Training Manual (PDM), small project assistance rules, SPIDER model(from PDM), and any post-developed resources that encourage participation in developing and monitoring projects, defined roles and rules, transparent accountability, etc.

- e. Other resources. *Roles of the Volunteer in Development* (RVID), etc. Annotated ICE list.

Trainer's note: Possible answers: Volunteer roles put them in situations where they are helping, assisting to create sustainability.

- Step 2:** Ask that each group (or representative of each) briefly report out on their group's discussion.

II. Creating a Personal Action Plan (40 minutes)

- Step 1:** Noting the ideas on the flip charts around the room, ask trainees to write their own personal action plan for addressing situations related to corruption.

- Step 2:** Once this is done, ask for participants to share their plans with the large group.

Trainer's note: For example: observation, reflection and journaling; previewing and reading available resources; learning about project and factors that impinge on it; learning language and developing relationships.

III. Wrap-Up/Debrief (15 minutes)

Review this session by stating that participants have looked at resources to address corruption and created their own action plan. Post the questions on the flip chart generated in Session II during the *Greaseless* discussion (i.e., what questions about corruption and transparency in this country does *Greaseless* bring up for you?). Ask if their questions have been answered and if not, answer any questions they may have.

Explain to participants that this topic will be revisited again during in-service training, but for now, emphasize that the staff can be resources to the new Volunteers once they have arrived to their sites.