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## **Chhatrapati Shahu Institute of Business Education and Research (CSIBER)**

# South Asian Journal of Management Research (SAJMR) Special Issue

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### Standard Operating Procedures for Corruption Risk Assessment (CRA) Studies of Selected Global Public Agencies

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#### **Abstract**

The global anti-corruption movement has paid close attention in recent years to the potential application of risk management as a tool in the battle against corruption. However, to date, no standards have been developed outlining precise and thorough procedures to be followed while conducting corruption risk assessment. The aim of this study was to evaluate the Standard Operating Procedures for Corruption Risk Assessment (CRA) studies. Further, the study aims to make appropriate recommendations on the corruption risk identification stage to the mitigation plan and implementation stage to the anti-corruption agencies (Federal Ethics and Anti-Corruption Commission of Ethiopia, FEACC). This study used secondary sources of data documents (UNDP, Methodology for Corruption Risk Assessment; Transparency International Hub, Corruption Risk Assessment Topic Guide; World Custom Organization, Guide to Corruption Risk Assessment Mapping; Council of Europe, Rationale and outline of Corruption Risk Assessment; UNODC, A Guide on Conducting Corruption Risk Assessment in Public Organizations). A document analysis can be a valuable source of information in qualitative research, and the analysis approach was content analysis. The study findings show that, to date, no standards have been developed outlining precise and thorough procedures to be followed while conducting corruption risk assessment. Therefore, the study found that, the types of corruption Risks are different in the public and private sectors and within the sectors. CRA approach is different in terms of the methodology, focus, and context. To identify corruption risks, most of the time the organizations used both secondary sources. The effective implementation of corruption risk assessment studies (mitigation plan) is determined by its contents. The study also recommends that any organizations (public and private) that conduct corruption risk assessments (CRA) should prepare the standards based on their own context. Finally, the study set the limitations and recommendations for future research.

Keywords: Standard Operating Procedures, Corruption, Risk Assessment, Governance, Organization.

#### Introduction

The types and understanding of corruption have expanded over time in tandem with technological breakthroughs and newly emerging/evolving human endeavors (Misra, 2016; Hijal-Moghrabi & Sabharwal, 2018; Kernaghan, 2003). Designing and understanding anti-corruption policies, strategies, and SOPs are prerequisites for determining the reasons for performance failures and finding ways to amplify the effectiveness of AC work, policies, and strategies, which are now in the spotlight and have become a global issue (Mauritius, 2018). In this regard, many scholars have been studying the driving factors of corruption and mostly mentioned the legal, institutional, and administrative systems (Brusca, Manes, Rossi, & Aversano, 2018).

Finding potential corruption-prone areas within a system and estimating the possibility and repercussions of such misconduct are the two main objectives of a corruption risk assessment study. Following that, the organizations can implement preventative measures and carry out anti-corruption initiatives. To be exact, its diagnostic technique called "corruption risk assessment" looks for systemic flaws that could provide room for corruption to flourish. It is different from other instruments for assessing corruption; it concentrates on the possibility of corruption rather than its perception, presence, or degree. Fundamentally, a risk assessment entails assessing the possibility of corruption happening and its consequences (McDevitt, 2011). Thus, ineffective institutional controls, weak laws, ineffective public spending management, a lack of transparency, conflicts of interest, and the misuse of authority and influence all contribute to corruption (Shakespeare, 2017

#### **Problem Statement**

The global anti-corruption movement has paid close attention in recent years to the potential application of risk management as a tool in the battle against corruption. This concept's underlying premise is that corruption is a possibility in each activity that public and private sector entities engage in. Therefore, these organizations need to recognize and manage the risks that endanger their company in order to effectively prevent corruption (Petkov, 2018).

There has been much written about the advantages and justifications for why companies should implement and use risk management plans and assessments of corruption risk. In order to further urge its members to embrace and include risk management into their anti-corruption initiatives, numerous international organizations have also created their own guidelines or methodologies. Despite these initiatives, many nations continue to have difficulties when implementing risk-based strategies for preventing corruption.

It is believed that one of the primary causes of this problem is that the resources that are now available are frequently overly complex, employ erroneous techniques and strategies, and are replete with technical vocabulary. This can impede the effective execution of risk management and lead to more misunderstanding among the personnel in charge of it, along with a lack of ability, knowledge, and training. Furthermore, academics have given relatively little thought to the function of corruption risk management; as a result, anticorruption practitioners have not had much theoretical assistance in the development of the instruments that are essential for anticorruption risk management. Prior research on the subject has observed that there is little literature currently available on corruption risk assessment to help organizations successfully apply these techniques (Sharma et al., 2016). Moreover, there is a dearth of trustworthy information regarding the ways in which nations and companies enforce corruption risk management, suggesting that there may be some disparities between the current theoretical frameworks and their actual application.

To date, no standards have been developed outlining precise and thorough procedures to be followed while conducting corruption risk assessment (Transparency International, 2019). Therefore, there is a need for setting standard operating procedures for CRA studies.

#### Objective of the Study

The goal of this study was to evaluate the Standard Operating Procedures for Corruption Risk Assessment (CRA) studies. Further, the study aims to make appropriate recommendations on the corruption risk identification stage to the mitigation plan and implementation stage to the anti-corruption agencies and other organizations.

#### **Research Questions**

- What types of corruption Risks the public and private sectors faces?
- Does the approaches to sector level corruption risk Assessment Standards are similar?
- How anti-corruption Agencies identify the potential risks?
- How the organizations Deal with corruption Risks Mitigation?

#### Motivation for the Study

This study was motivated by the need to promote a clear direction for any organization, particularly anticorruption agencies, to prevent corruption through corruption risk identification in both public and private organizations by implementing appropriate corruption risk assessment standards and procedures.

#### The Significance and Contribution of the Study

The findings of this study are helpful in expanding the understanding and knowledge of corruption prevention through corruption risk assessment (CRA) studies, which resulted in a corruption-free and clear working environment and the promotion of advancement of good governance in both public and business institutions. To be exact, the findings of this study are valuable for anti-corruption agencies efforts in advancing knowledge in the area.

#### Literature Review

#### What is the Corruption Risk Assessment?

A risk is the possibility of something going wrong and causing harm. The mere uncertainty of the result constitutes a risk. Everyone agrees that the study of risks is extremely important in public sector management because of this element of uncertainty in policy decisions. Governments often confront two types of risks: those that compromise the proper execution of their mandates and those that harm their reputation, which are political risks. Public risks are generally classified as trading (i.e., daily or operational swings) or strategic (i.e., expressing the fundamentals; also termed "policy risks"). The likelihood and possible impact of a risk are used to quantify it (Bhatta, 2008).

Moreover, risk assessment is a systematic process to quantify or qualify the level of risk associated with a specific threat or event to enrich the risk intelligence available to the institution. The main objective of risk assessment is to help the institution prioritize the important risks.

#### **Anti-corruption Agency**

It is a "long-term public body with the specific mission of combating corruption and reducing the opportunity structures conducive to its occurrence in society through preventive and/or repressive measures" (Makowski, 2016, p. 61). On the other hand, the OECD defines them as "permanent agencies whose primary function is to provide centralized leadership in one or more of the core areas of anti-corruption activity, including policy, analysis, and technical assistance in prevention, public outreach, and information, monitoring, investigation, and prosecution" (Makowski, 2016). Anti-corruption agencies are commonly defined as permanent legal state bodies with a specific mission and corresponding preventive and/or law-enforcing functions to counter corruption and its underlying structures (Meagher, 2005, p. 70).

#### Governance

Governance as a broad term encompasses the way states function, structural and institutional arrangements, decision-making procedures, policy-making, implementation capacity, information flow, leadership effectiveness, and the nature of the relationship between the rulers and the ruled. Therefore, governance affects not only the integrity, efficiency, and profitability of the state but also its effectiveness in meeting the needs toward which the organization and activities of the state are oriented (Misra, 2003). The design of the governance system is also an important aspect. Creating a network of people with distributed power, decision-making, and information flows creates a variety of independent channels of communication and supervision that facilitate localized decision-making, internal competition and cross-checking in a well-designed system. The reliability of the information needed for management and governance purposes flows through the organization (Renn, 2009).

On the other hand, the UNDP policy document defined governance as the exercise of political, economic, and administrative powers to regulate the affairs of a country. It includes the processes, mechanisms, and institutions that allow groups and individuals to express their well-being, exercise their rights, fulfill their obligations, and mediate their disagreements (UNDP, 1997). Therefore, improving the governance system's ethics, accountability, justice, and fairness is critical to the anti-corruption campaign. Moreover, in spite of rules and regulations in the governance system, the problem of corruption and unethical behavior cannot be resolved unless human commitment and good will, above all morality, are in place (Misra, 2016). According to Renn (2009), governance in general is a goal-oriented ethical concern that is management-focused. Therefore, corruption prevention is about all the features of good governance that are implemented in various agencies (OECD, 2008). Organizational culture is mainly shared beliefs and assumptions among constituents of the organization (Schein, 1985). Organizational culture is a normative construct of shared behavior guided by policies, procedures, and systems that guide the ethical actions and decisions of organizational members (Agarwal & Malloy, 1999). Moreover, the power of civil society is vital to the governance process.

Thus, strong integrity policies both in normative and structural approaches are needed in order to put into practice the power of civil society in the process of fighting corruption (Bruce, 2001). To be exact, promoting integrity in public administration means, applying norms, values, and ethical principles to the day-to-day operations of public service organizations in order to prevent unethical behavior and corruption. So, integrity is central to promoting good governance (Evans, 2012). In this connection, in the last two decades, corruption and its control have become a central agenda item in the debate on good governance (Fritzen & Basu, 2011).

When the term "governance" is preceded with the connotation "good", some value-assumptions and attributes such as efficiency, accountability, transparency, participation, rule of law, justice, and control of corruption are added to it (Drake, Malik, Xu, & Kotsioni, 2003). The recent concern for good governance and building public confidence in the administration has resulted in the need to adhere to moral and ethical principles that emphasize "fairness," "conscience," and moral clarity, and they give the idea a prominent place by admitting that officials are ultimately accountable to the people. In an effort to preserve high standards of moral and ethical behavior by public administrations, government organizations rely on a number of enforcement mechanisms, such as legal regulations, professional rules, codes of ethics, and ombudsmen, to monitor ethical standards (Misra, 2016). Strengthening institutions to promote good governance is the best strategy to prevent corruption in the public sector. In other words, strengthening the governance system means straightening moral and ethical values. Institutions must be free of interference and have autonomy in order to function effectively (Misra, 2016; Huberts, 2018). Independence and autonomy are most important to anti-corruption agencies.

On the other hand, the term "integrity violation" broadly encompasses various corrupt practices such as improper use of power and official information for private gain; potential conflicts of interest; favoritism and bribing; and terrorization and discrimination. As a result, acts that violate ethical values and norms are considered integrity violations. Integrity is becoming the central topic in governance and public policy making. This idea is crucial in understanding government ethics and corruption (Huberts, 2018). Because corruption involves misuse of power, nepotism, and favourism, which is against acceptable oral standards, norms, and values. Integrity identifies the acceptable standard of behavior from the opposite one. Therefore, the present position of multidisciplinary public governance studies warrants greater attention to "ethics and integrity" Moral values and norms are often lacking when academics describe, explain, and understand the reality of governance and administration. The predominant focus is on goals and interests; prejudice and irrationality; institutions; power and context. A change of ethics and integrity is required" in the prevailing fields of study." But also, for integrity and ethics researchers, standard scientific articles should be the center of attention. Moral values and norms are assumed to play a significant role in day-to-day politics and administration, and researchers, in this sense, are part of the ethics industry (Huberts, 2018).

Therefore, in the last couple of decades, anti-corruption campaigns and projects have comprised the elements of good governance by different organizations, ranging from international, national, and NGOs (Moroff & Schmidt-Pfister, 2010). Good governance and ethics policies share the following in common, i.e., fighting corruption, accountability and transparency, and participation of all stakeholders and citizens at large (Demmke & Moilanen, 2011). Therefore, organizations should focus on workplace policies that are intended to create employees who arrive on time day in and day out, do their job, work hard, strive to do the right thing, and often produce breakthroughs that promote the interests of the company (Renn, 2009). Good governance further involves processes, institutions, and effective mechanisms that serve the interests of citizens and ensure that citizens exercise their rights and obligations. In the process of governance, transparency, accountability, participation, and the rule of law are also essential for the governance system to be open and effective (Misra, 2016; Nabatchi, 2012).

More importantly, the phrase "good governance" is increasingly being used to call attention to the need for "governance" to operate according to the rule of law and, above all, in a corruption-free manner. Good governance is agreement-oriented, accountable, transparent, participatory, responsive, efficient, effective, fair, and inclusive, and it pursues the rule of law (Anello, 2008). Good governance is about enacting and implementing proper policies and procedures that guarantee ethical management as well as efficiency and effectiveness. More importantly, the goal of good governance is to minimize corruption by establishing an accountable and transparent system, sustaining the rule of law, and minimizing corruption (Anello, 2008). In other words, the art of "good governance" is to have adequate processes in place to prevent mistakes while promoting effective growth and innovation to realize the strategic goals of the organization. Procedures, processes, and rules are essential and valuable as long as they contribute to the general objectives described above. When rules start to undermine these goals, they quickly become obstacles to good governance (Renn, 2009). In this regard, Englebert (2002) defines good governance as a set of qualities including institutions, government accountability, and property rights stability free of corruption. When donors initiate the agenda of good governance, the aim is to place more focus on anti-corruption, accountability, and efficient governance (Randall & Theobald, 1998).

There has been much debate on good governance and integrity in relation to corruption and ethics. With advancements in technology, the concepts of governance and ethics are involved in the realm of digital ethics. There is also much to be said about digital governance, and even more to understand and theorize, but one thing is clear: digital governance is digital ethics, also known as information, computer, or data ethics (Floridi & Taddeo, 2016). The practice of developing and implementing policies, procedures, and standards for the proper development, use, and management of the information sphere is known as "digital governance" (Milakovich, 2012). It is also a matter of convention and good coordination, which are not always moral or immoral, legal or illegal. For example, through digital governance, a government agency or a company can (a) determine and control the processes and methods used by data stewards and custodians to improve the data quality, reliability, access, security, and availability of its services and (b) design effective decision-making and accountability procedures for data-related processes. (Florida, 2018). Furthermore, "digital governance" includes specific guidelines and recommendations for digital regulation. Furthermore, digital regulation includes a system of rules and legislation that apply and are elaborated and implemented through social or government institutions to regulate the behavior of related agents in the info-sphere. And compliance is an important link through which "digital regulation" shapes "digital governance" (Floridi, 2018). Digital ethics, as a branch of "ethics", studies and assesses moral issues related to data and information (including its generation, capture, preservation, processing, dissemination, sharing, and use), algorithms (including artificial intelligence, artificial assets, machine learning, and robots), and associated practices and infrastructure (including responsible innovation, hacking, programming, and professional codes and standards) to formulate and support morally sound solutions (e.g., good behavior or good values). Therefore, "digital ethics shapes digital regulation and digital governance through the relationship of moral evaluation" (Floridi, 2018, pp. 1–7).

#### Corruption

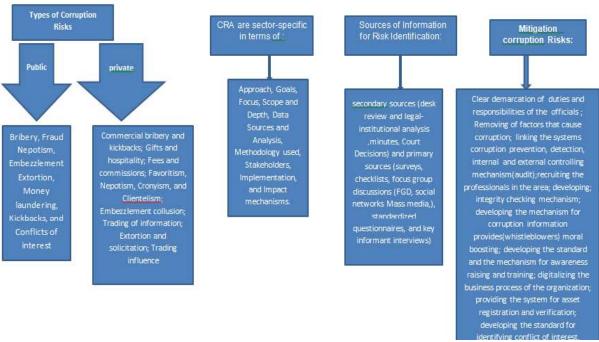
Since the 1990s, the conceptual landscape of corruption has changed. The international community agrees on the political, moral, and economic threats of corruption (Fritzen & Dobel, 2018). In general, the term "corruption" is defined as the abusing of public power (authority) for personal interests (Rothstein, 2011). Following the American 9/11 terrorist attack, the international community conceptualized corruption as a security issue, and corruption was also understood as an environmental danger through the depletion of natural resources and people smuggling (Shelley, 2014). The concept of corruption and corrupt acts are defined differently by various organizations, so it limits the efforts of anti-corruption advancement at the national level (Mungiu-Pippidi, 2016). Therefore, an inclusive definition for corruption and related offenses is crucial and timely. Moreover, understanding the prevailing determinants of corruption prior to anti-corruption strategy design is paramount (Veresha, 2018); in this regard, the most important determinant can be the culture of "government favoritism" (Doroftei, 2016), other "non-financial" aspects of corruption (Vargas & Schlutz, 2016), and "confidential criminal cases," for example, the September 11 terrorist attack in the US is also an act of corruption (Martin, 2017). Yet, as a general rule, deviating from accepted standards of behavior by public officials for private gain is corruption (Haque & Mohammad, 2013). Therefore, corruption is commonly defined as the misuse or abuse of power by public authorities for private interests (WB, 1997). Transparency International defines corruption as the improper and unlawful behaviors of public officials intended to enrich themselves (Haque & Mohammad, 2013).

#### The Types of Risks Organizations Face in Anti-Corruption Context

Even though the great majority of public employees carry out their work honestly, corruption is a possibility in all businesses and government establishments. There is always a possibility that a public official will commit corruption by abusing their unique abilities, knowledge, and access to information, whether through the granting of public contracts, the collecting of taxes or other revenues, the provision of social benefits, or any other way that a government interacts with its citizens. Similarly, people who deal with public authorities and government organizations may attempt to utilize corruption to influence or get around policies, guidelines, and decisions, among other things. Finding the points in an organization's operations where corruption is most likely to happen, creating and putting into practice strategies to stop it from happening again, and making sure that every employee acts honorably to fulfill the organization's mission are the challenges that most organizations face (UNODC, 2020).

Corruption risk assessment and management can improve service delivery to people that is impartial and objective, decrease loss of income, and protect the rule of law and law enforcement operations (UNODC, 2020).

#### **Conceptual Framework**



Source: Researchers Own Conceptualization, 2024

#### Research Methodology

To date, no standards have been developed outlining precise and thorough procedures to be followed while conducting corruption risk assessment, despite the significance and advantages of a risk-based approach and, in particular, corruption risk assessment, in the prevention of corruption. The Compliance and Technical Guide to UNCAC mentions corruption risk assessment as a necessary condition for the successful combat of corruption, but it does not provide a methodology. As a result, assessments are typically conducted as one-time tasks, each with a unique methodology framework, leading to significant variations in the terminology and methods used. Given this, developing a sound approach that can assess corruption risk in various settings while allowing for some flexibility to tailor the specifics of each exercise is crucial. In addition, the Standardized language and methodological decisions would be necessary for such an approach to establish common procedures among various national anti-corruption authorities as well as players inside a nation (Transparency International, 2019).

Therefore, this study used secondary sources of data (Documents). A document analysis can be a valuable source of information in qualitative research, and the analysis approach was content analysis; it included the documents are: UNDP, Methodology for Corruption Risk Assessment; Transparency International Hub, Corruption Risk Assessment Topic Guide World Custom Organization, Guide to Corruption Risk Assessment Mapping; Council of Europe, Rationale and outline of Corruption Risk Assessment; UNODC, A Guide on Conducting Corruption Risk Assessment in Public Organizations

#### **Result and Discussion**

A corruption risk assessment is typically used to supplement evidence of actual or perceived corruption in a given context in order to inform anti-corruption strategies and policies or for advocacy purposes. It can be applied at various levels, including government and its institutions, donor support programs, sectoral programs, and individual organizations or units. It can also be used as a starting point for anti-corruption efforts to monitor how risks evolve over time (Selinšek, 2013).

Creating "adequate procedures" for proper anti-corruption measures and a robust compliance program both depend on conducting a corruption risk assessment. Any anti-corruption compliance program that aims to "mitigate," or lower, a business's risk of liability for unlawful activity must include this. A corporation can ensure that it manages critical risks effectively by recognizing and assessing all of its corruption risks. After it is finished, efforts can be directed toward creating and putting into action policies that are designed to solve those issues. This is because no policies or processes can identify and prevent all bribery and achieve the goals of anti-corruption; instead, the institution and/or program must decide where to focus its compliance efforts given the limited resources available to it.

#### The Types of Corruption Risks the Public and Private Sectors Face

The most common forms of corruption in public sectors, according to the literature, are bribery, fraud nepotism, embezzlement extortion, money laundering, kickbacks, and conflicts of interest. On the other hand, commercial bribery and kickbacks; gifts and hospitality; fees and commissions; favoritism, nepotism, cronyism, and clientelism; embezzlement collusion; trading of information; extortion and solicitation; trading influence are most common in the private sector.

#### The Approaches to Sector-level Corruption Risk Assessment Standards

Anti-corruption initiatives tailored to a certain sector are strongly advised. The majority of CRAs typically take an institutional approach. The precise objectives, data and methodology employed, stakeholders, and effect mechanisms of CRAs, however, vary greatly. Thus, one of the main causes of the variety of techniques is the institutional setting and limitations faced by CRAs. Different public agencies that create and administer CRAs have varying degrees of authority to require centralized data collection and processing. The extent and breadth of a CRA are also determined by the institutional mandate, political limitations, and the accompanying resources allotted.

In terms of the methodology: There are three main approaches to assessing corruption risks: i) a centralized approach, known as a systematic assessment approach, mostly carried out by the auditors and other regulatory bodies such as anti-corruption agencies; ii) a decentralized approach, in this approach, the public or private sector carries out self-assessment; and iii) a transparency-oriented approach, its broad when we compare to other approaches and mostly conducted by NGO and civil society organizations.

In terms of the focus: mostly focus on corruption risks in laws and regulations; organizational policies. Others aim to identify corruption risks in policy implementation in specific issues such as human capital management, procurement, government subsidies, etc.

#### How Anti-corruption Agencies Identify the Potential Risks

To identify corruption risks, most of the time ACA's used both secondary sources (desk review and legal-institutional analysis, minutes, court decisions) and primary sources (surveys, checklists, focus group discussions (FGD, social networks, mass media), standardized questionnaires, and key informant interviews).

#### The ways of Dealing with Corruption Risks Mitigation

At this stage, the organizations deal with the identified potential risks that emanate from the corruption risk assessment (CRA) studies of their specific area. In this case, the leadership commitment is central in dealing with potential risks of corruption in the organization. The leader of the organization (public and private) must make the anti-corruption action part of your organization's business by adapting a zero-tolerance anti-corruption policy, including the legal ground in managing and preventing conflicts of interest. Furthermore, the leaders must provide training for the management and employees of the company on ethics and anti-corruption.

The leadership commitment is crucial in dealing with the threats of corruption. Both public and private organization leaders need to integrate anti-corruption measures into their business operations. This can be achieved by implementing a zero-tolerance anti-corruption strategy that covers all relevant legal aspects, including managing and preventing conflicts of interest. In addition, the company's executives are required to train the management and staff in ethics and anti-corruption.

The identification of certain actions targeted at removing or reducing the sources of corruption risks in the organization's operations is a necessary step in developing measures to reduce corruption risks. Some of the measures include: developing the standard operating procedure document during implementation. (it contain clear demarcation of duties and responsibilities of the officials; removing of factors that cause corruption; linking the systems of corruption prevention, detection, internal and external controlling mechanisms (audit); recruiting the professionals in the area; developing an integrity checking mechanism; developing the mechanism for corruption information provides whistleblowers) moral boosting; developing the standard and the mechanism for awareness raising and training; digitalizing the business process of the organization; providing the system for asset registration and verification; developing the standard for identifying conflict of interest.

#### Discussion

From the study analysis, we understand that the forms and types of corruption and its manifestations are different in the public and private sectors and even within the sectors, both public and private. In addition, the study found that there is no single standard for the CRA approach and methodology for all sectors, whether

private or public. Furthermore, the literatures witness that, no standards have been developed outlining precise and thorough procedures to be followed while conducting corruption risk assessment (Transparency International, 2019; Sharma et al., 2016). Therefore, the approach is mostly determined by the institutional environment for CRAs and their constraints. In this case, understanding the prevailing determinants of corruption prior to anti-corruption strategy design is paramount (Veresha, 2018); in this regard, the most important determinant can be the culture of "government favoritism" (Doroftei, 2016), other "non-financial" aspects of corruption (Vargas & Schlutz, 2016), and "confidential criminal cases (Martin, 2017).

Furthermore, based on the specific context, the organizations' environment and the level of the risk can set up the goals, focus, scope, and depth, data sources and analysis, methodology used, stakeholders, implementation, and impact mechanisms. At the risk identification stage, the data sources or sources of information for all institutions are both secondary data (desk review) and primary data sources.

At the mitigation of corruption risks stage, the organization's leaders' commitment is foundational for all successful implementation. The sources for corruption mitigation strategy are the CRA studies of the specific context. The strategy is composed of varying standards or mechanisms for eliminating or reducing corruption.

#### **Conclusions and Recommendations**

This section presents the study's conclusions and recommendations. To date, no standards have been developed outlining precise and thorough procedures to be followed while conducting corruption risk assessment. Therefore, there is a need for setting standard operating procedures for CRA studies for anti-corruption agencies, particularly the FEACC). Therefore, the study concludes that the types of corruption Risks are different in the public and private sectors and within the sectors, whether public or private, while the corruption risk assessment approach is different in terms of the methodology, focus, and context. Therefore, organizations need to set the standards for corruption risk assessment studies based on their own context. Here, the important thing is a better understanding of the context. To identify corruption risks, most of the time ACA's used both secondary sources (desk review and legal-institutional analysis, minutes, court decisions) and primary sources.

Finally, the effective implementation of corruption risk assessment and mitigation mostly depends on the leadership commitment, and the main strategy for the corruption risk mitigation plan contains the following: Developing the standard operating procedure document during implementation. (It contains clear demarcation of duties and responsibilities of the officials; removing of factors that cause corruption; linking the systems of corruption prevention, detection, and internal and external controlling mechanisms (audit); recruiting the professionals in the area; developing an integrity checking mechanism; developing the mechanism for corruption information provides whistleblowers with moral boosting; developing the standard and the mechanism for awareness raising and training; digitalizing the business process of the organization; providing the system for asset registration and verification; developing the standard for identifying conflict of interest

The study also recommends that any organizations (public and private) that conduct corruption risk assessments (CRA) should prepare the standards based on their own context (the methodology, focus, data sources, and analysis methods). In addition, at the final stage of the corruption risk assessment (CRA) study results, implementation, follow-up, and monitoring stage, the organization should design the strategy for corruption elimination based on specific findings.

#### Limitations, Recommendations, and Future Research

Academics have given relatively little thought to the function of corruption risk management; as a result, anticorruption practitioners have not had much theoretical assistance in the development of the instruments that are essential for anticorruption risk management. Therefore, the aim of this study was limited to evaluating the Standard Operating Procedures for Corruption Risk Assessment (CRA) studies in order to make appropriate recommendations on the corruption risk identification stage to the mitigation plan and implementation stage to the anti-corruption agencies. This study used secondary sources of data (documents), and the analysis approach was content analysis. It included UNDP, Methodology for Corruption Risk Assessment; Transparency International Hub, Corruption Risk Assessment Topic Guide; World Custom Organization, Guide to Corruption Risk Assessment Mapping; Council of Europe, Rationale and Outline of Corruption Risk Assessment; and UNODC, A Guide on Conducting Corruption Risk Assessment in Public Organizations.

In addition to the limitations declared in this research, further research will be needed on sector-specific standards for CRA, such as specific sector-focused approaches, methodologies, implementation standards, and monitoring standard operating procedures.

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