

Integrity: an age-old problem for Customs that demands a new approach

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Abstract

The role of the World Customs Organization (WCO) in providing a mechanism for its 179 Member administrations to discuss matters of common interest and to seek solutions is outlined, including an overview of the WCO's Integrity Program. Reference to the 1993 Arusha Declaration, and its later revised version, provides background to the WCO's continuing efforts to combat corruption. Australian Customs and Border Protection Service's (ACBPS) efforts to improve its corporate image through a concerted series of initiatives aimed at staff ethics, anti-corruption and other related factors are discussed. Examples are provided of the efforts being made at the international level by the WCO and at a national level by the ACBPS to divine a new and more effective approach. It is concluded that the price to be paid if integrity is to be maintained is eternal vigilance and the quest for new, more effective practices. Without integrity there can be no proper border management, no effective revenue collection and no public trust in customs agencies. The task is not simple but it remains essential for all agencies to adopt the kinds of measures outlined in this article if they are to maintain public trust.

Introduction

The great 18th century English critic and author Samuel Johnson once said that 'integrity without knowledge is weak and useless, and knowledge without integrity is dangerous and dreadful'. Today, we live in an era of unprecedented access to information and knowledge and this applies as much to Customs as it does elsewhere. On that basis, the first part of Johnson's quote bears little relevance to today's world. However, the second part remains a powerful statement that resonates throughout the world, not least amongst the approximately one million individuals employed globally in customs administrations.

The historical connection between Customs, revenue and valuable cargo has proved to be a rich source for the temptation and opportunity for corrupt practices. This remains the case even today given the unparalleled amounts of illegal money flowing around the world associated with such trades as narcotics, arms, endangered species, counterfeit goods and the illegal movement of people. No country is exempt from this scourge and a successful remedy must be fully inclusive, determined and properly thought through.

The World Customs Organization (WCO) is the international voice of Customs through its convention established more than sixty years ago that provides a mechanism for today's 179 Member administrations to discuss matters of common interest and to seek solutions. Integrity has been a high profile topic since the 1980s, culminating in the well-known Arusha Declaration that was tabled in 1993 and set the benchmark for a consolidated position by global customs leaders against corruption at all levels within their agencies. The WCO has continued its efforts to combat corruption in the twenty years since Arusha and this article is partially devoted to a description of that work.

The writer worked for Australian Customs for many years before working for the WCO, hence the other main focus of this article being the recent efforts by Australian Customs and Border Protection Service (ACBPS) to improve its corporate image through a concerted series of initiatives aimed at staff ethics, anti-corruption and other related factors. This has been done in Australia partly in response to a high profile infiltration of ACBPS by criminal gangs that threatened to severely damage the image of one of Australia's oldest and best known government agencies.

The WCO's Integrity Program

The Arusha Declaration was a dramatic symbol of the international determination to acknowledge the importance of integrity to Customs. Without integrity and ethics, all the standards, best practices and other initiatives put in place by national administrations will achieve little. Readers can look up the Arusha Declaration easily enough and they will discover that it is a deceptively simple single page of text; nonetheless, that single page contains several critically important issues that have dominated efforts to counter corruption and foster ethical behaviour amongst customs officers everywhere.

The document begins with an acknowledgment that 'Customs is an essential instrument for the effective management of an economy and that it performs simultaneously the vital roles of combating smuggling and facilitating the flow of legitimate trade' which is the apparent dichotomy facing all those working in or alongside Customs, but its repetition in the declaration underlines the importance of a properly run administration to any economy. The document goes on to further acknowledge that 'corruption can destroy the efficient functioning of any society and diminish the ability of the Customs to accomplish its mission', adding that a corrupt agency will not properly collect revenue, fight criminal activity nor assist in national economic development. Given its great importance therefore, the declaration states that the only way to combat corrupt practices is through a concerted national effort to promote high levels of integrity throughout the civil service, taking account of some key factors, namely:

1. Customs legislation should be clear and precise. Import tariffs should be moderated where possible. The number of rates should be limited. Administrative regulation of trade should be reduced to the absolute minimum. There should be as few exemptions to the standard rules as possible.
2. Customs procedures should be simple, consistent, and easily accessible, and should include a procedure for appealing against decisions of the Customs, with the possibility of recourse to independent adjudication in the final instance. They could be based on the Kyoto Convention and should be so framed as to reduce to a minimum the inappropriate exercise of discretion.
3. Automation (including EDI) is a powerful tool against corruption, and its utilisation should have priority.
4. In order to reduce the opportunities for malpractice, Customs managers should employ such measures as strategic segregation of functions, rotation of assignments and random allocation of examinations among Customs officers and, in certain circumstances, regular relocation of staff.
5. Line managers should have prime responsibility for identifying weaknesses in working methods and in the integrity of their staff, and for taking steps to rectify such weaknesses.
6. Internal and external auditing are essential, effective internal auditing being a particularly useful means of ensuring that Customs procedures are appropriate and are being implemented correctly. The internal auditing arrangements should be complemented by an internal affairs unit that has the specific task of investigating all cases of suspected malpractice.
7. The management should instil in its officers loyalty and pride in their service, an "esprit de corps" and a desire to co-operate in measures to reduce their exposure to the possibility of corruption.

8. The processes for the recruitment and advancement of Customs officers should be objective and immune from interference. They should include a means of identifying applicants who have, and are likely to maintain, a high standard of personal ethics.
9. Customs officers should be issued with a Code of Conduct, the implications of which should be fully explained to them. There should be effective disciplinary measures, which should include the possibility of dismissal.
10. Customs officers should receive adequate professional training throughout their careers, which should include coverage of ethics and integrity issues.
11. The remuneration received by Customs officers should be sufficient to afford them a decent standard of living, and may in certain circumstances include social benefits such as health care and housing facilities, and/or incentive payments (bonuses, rewards, etc.).
12. Customs administrations should foster an open and transparent relationship with Customs brokers and with the relevant sectors of the business community. Liaison committees are useful in this respect (Declaration of the Customs Co-operation Council, 7 July 1993).

It is more than twenty years since these words were written, however few would argue that the message contained in this short document remains highly relevant and arguably, its concision adds to the power of its delivery. The world moves on of course and, in 2002, in Maputo, Mozambique, another communiqué was issued under the auspices of the WCO, building upon the principles espoused in Arusha. This so-called Maputo Declaration was limited in application to Africa, although the concepts are universal. There was a clear affirmation of all aspects of the Arusha Declaration but, in addition, the authors highlighted the need for strong input from the private sector, reflecting the growing partnership approach that is evident in the framing of the *WCO SAFE Framework of Standards to Secure and Facilitate Global Trade*, for example. Another clear message from Maputo was the need in Africa for technical assistance and capacity building, with particular emphasis on technology and overall modernisation.

The following year, at the 2003 WCO Council sessions, the gathered leaders of global customs administrations issued a revised Arusha Declaration that reflected the various new ideas and progress that had materialised in the ten years since the original declaration was made. This document remains the pre-eminent source of guidance for customs administrations to install anti-corruption systems. It went further into enumerating the various adverse effects of corruption, listing the following:

- a reduction in national security and community protection;
- revenue leakage and fraud;
- a reduction in foreign investment;
- increased costs which are ultimately borne by the community;
- the maintenance of barriers to international trade and economic growth;
- a reduction in public trust and confidence in government institutions;
- a reduction in the level of trust and co-operation between Customs administrations and other government agencies;
- a reduction in the level of voluntary compliance with Customs laws and regulations; and
- low staff morale and “esprit de corps” (Declaration of the Customs Co-operation Council, June 2003).

Having outlined the negative potential impact, this revised declaration went on to describe the various issues that a customs integrity program should take into account, inter alia:

1. **Leadership and Commitment:** As is the case with any major organisational issue, the prime responsibility for corruption prevention and the implementation of integrity measures resides with the Customs head and his/her executive. Beyond that, all managers and supervisors must accept an

appropriate level of responsibility and accountability and set an example to staff consistent with the agency's stated integrity program.

2. **Regulatory Framework:** 'Customs laws, regulations, administrative guidelines and procedures should be harmonized and simplified to the greatest extent possible so that Customs formalities can proceed without undue burden. This process involves the adoption of internationally agreed conventions, other instruments and accepted standards. Customs practices should be reviewed and redeveloped to eliminate red tape and reduce unnecessary duplication. Duty rates should be moderated where possible and exemptions to standard rules be minimized. Systems and procedures should be in accordance with the revised International Convention on the Simplification and Harmonization of Customs Procedures (Revised Kyoto Convention)'.
3. **Transparency:** All parties involved with Customs should experience optimal predictability in their business interactions. Statutory law, procedures and administrative guidelines should be in the public domain, applied uniformly and consistently. The right to exercise discretion by officers must be clearly understood and simple appeal or administrative review mechanisms should be established. All of this ought to be set out in client service charters or similar mechanisms.
4. **Automation:** The adoption of modern IT systems to automate customs functions will improve efficiency and effectiveness while increasing accountability. IT systems provide audit trails that empower Customs to review discretionary decision-making by individuals at all levels.
5. **Reform and Modernisation:** Obsolete and cumbersome practices provide an ideal environment for incentives to circumvent official channels through bribes and other 'unofficial fees'. Reform must focus on all aspects of customs operations and performance, that is, it cannot be simply outsourced to the application of modern IT.
6. **Audit and Investigation:** Monitoring and control mechanisms such as internal check, internal and external auditing and rigorous investigation/prosecution regimes will encourage an environment hostile to corrupt practices therefore fostering higher levels of corporate integrity.
7. **Code of Conduct:** This mechanism is now an established component of most national integrity programs. Successful examples must be very practical and unambiguous, explaining the behaviour expected of all customs officers.
8. **Human Resource Management:** The implementation of sound human resource management (and human resource development) including merit-based selection, adequate remuneration, staff rotation and appraisal systems are examples of the kinds of practice that should characterise a modern customs administration, thereby minimising the potential for corruption.
9. **Morale and Organisational Culture:** Experience has shown that corruption proliferates when staff morale is low and where there is little or no pride in work practices or organisational image. The obvious corollary is that customs administrations must work towards improvements in all of these elements by creating fair and rewarding workplaces.
10. **Relationship with the Private Sector:** It is important to have open and transparent dealings with the private sector at all levels of Customs. Industry players must also play their respective roles in this and be aware that bribing officials or other corrupt practices will attract severe penalties for those industry parties as well as for the customs staff involved.

By 2003, the WCO had already documented a wide range of measures that its worldwide membership committed to adopt and the revised Arusha Declaration set the benchmark for all customs administrations worldwide as they developed their respective anti-corruption measures. The transformational events of September 11, 2001 caused a tremendous reaction within the customs community culminating in the creation of the SAFE Framework that was finally mandated in 2005. That framework implies a number

of strategic approaches to manage the security and facilitation of the international trade supply chain which are documented as a series of standards. Of these, Standard 10 reads:

The Customs administration and other competent authorities should establish programmes to prevent lapses in employee integrity and to identify and combat breaches in integrity to the extent possible (*WCO Safe Framework of Standards* 2012, p. 9).

As is the case with all strategic responses by Customs, if integrity is not intrinsic to the process, then there is little chance that it shall succeed. This applies most significantly to the WCO's Columbus Program, the ongoing capacity building initiative aimed at enabling the global implementation of the SAFE Framework. This is an excellent example of the extent to which integrity is interwoven with the fabric of the WCO's instruments, tools and priorities. However, the SAFE Framework is by no means the sole example of that relationship. For example, the revised Arusha Declaration makes specific mention of the revised Kyoto Convention as the basis for customs procedural modernisation, and integrity itself is one of the ten pillars of the 2008 'Customs in the 21st Century' strategic blueprint for the WCO that remains valid to the present day.

At about the same time that the SAFE Framework was grasping the imagination of customs leaders globally, the WCO released its Integrity Development Guide (Self-assessment for Revenue Authorities) tool in 2007 that was based on three phases for each administration – self assessment, the development of an action plan and finally, an evaluation. Other instruments and declarations were developed and promulgated around this time (for example, the Nairobi Resolution, the Almaty Resolution and the WCO Compendium of Integrity Best Practices, all published in 2007) and the reader is invited to peruse these and other sources at the WCO website. The site also has an integrity e-Learning module.

In December 2012, the WCO released an upgraded Integrity Development Guide. The process is based on organisational self-assessment, action planning and review. The foundation stones for that process remain the ten key issues that form the basis of the revised Arusha Declaration that are listed above. The guide acknowledges the range of international organisations that have published useful literature devoted to the fight against corruption, including the United Nations, Organisation for Economic Co-operation and Development, European Union, Organization of American States, and the World Bank. However, it also reaffirms that the conceptual basis of the guide remains the revised Arusha Declaration and it goes on to add that it 'goes a step further by providing guidance to assist in the implementation of a range of practical strategies specifically designed to be used by administrations' (WCO Integrity Development Guide 2012, p. 4).

The guide makes the important new qualification that integrity is often seen today as more than just combatting corrupt practices and encompassing adherence to service delivery targets as espoused in service charters and the like. The WCO defines integrity as: 'a positive set of attitudes which foster honest and ethical behaviour and work practices' (WCO 2010; 2013). In the guide, the WCO expands on that definition, adding that '... integrity is more than simply the absence of corruption. Rather, it involves developing and maintaining a positive set of attitudes and values which give effect to the organization's aims, objectives, and the spirit of its integrity strategy' (WCO Integrity Development Guide 2012, p. 5). In other words, as has been the overriding theme of this paper, integrity issues go to the heart of organisations – to corporate plans, recruitment and other staffing strategies and the public image they project. It is more than anti-corruption.

The WCO formulated an Organizational Development Package (ODP) in 2003 that is regularly updated and is a comprehensive package in all important aspects of customs modernisation. Integrity is one of the cornerstones of the ODP implying, once again, that it is fundamental for effective administration.

The WCO is extremely active in the fight to improve integrity amongst its 179 Members. Despite that, the WCO is an international organisation, not an agency operating within a sovereign government with all the implications that such status implies. That is why the reader is invited to move from the international

to a domestic perspective. The underlying philosophy will be similar, but the means of getting the job done are quite different.

Australian Customs and Border Protection Service (ACBPS)

ACBPS is one of the few national agencies to have survived, more or less as originally set up, since the formation of the Commonwealth of Australia in 1901. There have been name changes, administrative connections to many other federal agencies (from 1901 until 1956 it was ‘Trade and Customs’, for example) and it has operated as a standalone agency, enjoying its Minister being part of the Cabinet until 1972. As is the case with most developed nations, revenue collection has diminished in importance in the post-war years while border security has become arguably the prime focus, particularly since September 2001.

In the last year or so, certain revelations of corrupt practices within the organisation have shed an unwelcome light on its integrity programs. As a result, the recently departed head and the new Chief Executive Officer (CEO) have been extremely active in putting in place a range of new measures aimed at enhancing the administration’s credentials as one of high ethical standards and commitment to its service obligations. This flurry of activity makes the recent ACBPS experience worthy of examination.

Recently, the agency has created an Integrity and Professional Standards Branch, headed by a senior executive who reports directly to the CEO, that has offices in the national capital, Canberra, as well as in the two largest cities, Melbourne and Sydney. The ACBPS public website describes some features of this branch but, in general, it is responsible for the strategic awareness and penetration of integrity standards throughout Customs, for investigation of breaches, security clearances and liaison with the various Australian Government agencies with legal and policy coverage for integrity and anti-corruption matters. Of particular importance is its close relationship with both the Australian Commission for Law Enforcement Integrity (ACLEI) and ACBPS’s main partner law enforcement agencies, including the Australian Federal Police.

ACBPS has, as a major aspect of its published governance policy, a ‘Practice Statement Framework’ that outlines the way in which all its administrative policies and procedures must be managed. This framework is consistent with the Australian Government’s overall ‘Building Better Governance’ policy. It contains rules and policies for all customs officers and further states that ‘... public sector governance covers “the set of responsibilities and practices, policies and procedures, exercised by an agency’s executive, to provide strategic direction, ensure objectives are achieved, manage risks and use resources responsibly and with accountability’ (Australian Public Service Commission 2007, p. 1). The framework is made up of a series of so-called Practice Statements, Chief Executive Instructions, Instructions and Guidelines and Associated Documents.

Practice statements set out the legal framework under which all officers are bound as well as other obligations, rights and service standards that are expected. The Chief Executive Instructions outline the financial and asset management policies that apply to all ACBPS staff and finally, the Instructions and Guidelines outline the general principles and procedures to assist in the implementation of the Practice Statements. They can include (in the words of the official ACBPS framework itself) standard operating procedures and processes, boundaries and parameters, operating manuals, guidelines, assessments and plans. In total, this framework incorporates everything that applies to staff acting in their official capacity in ACBPS, including integrity and anti-corruption obligations.

In 2012, ACBPS published an internal ‘Ethics and Integrity Handbook’ incorporated within the very broad framework just described. It is written in a manner entirely consistent with the very broad Australian Public Service Code of Conduct that sets out principles for ethical behaviour amongst all Australian public servants even when they are away from their usual place of work and outside official working hours. This informative document provides great depth of coverage in all aspects of integrity

and ethics: there are the expected topics such as a discussion of ethical behaviour, the code of conduct and values framework, asset management, other financial rules, fraud, leave, whistleblowing, gifts, use of official vehicles and other Australian Government property, and so on. Some issues have attracted significant internal debate such as mandatory drug and alcohol testing, a subject that is explored a little more later on.

Ethics is defined as ‘doing the right thing’ and made to apply to all aspects of employee behaviour, above and beyond simple adherence to official rules and guidelines. Fraud is defined as ‘dishonestly obtaining a benefit, or causing a loss, by deception or other means’ to the Australian Government. It is an important element of integrity and this document views fraud in its widest possible sense, involving not simply money, but any form of entitlement such as educational and other allowances, misuse of attendance records, misuse of vehicles, IT and any other Australian Government property. The agency has a Fraud Control and Prevention Plan which is updated every two years in order to help manage the risk of fraud and, ideally, to ensure that anti-fraud measures are part of organisational culture.

Having had a general discussion of ethics, the Handbook contains a more targeted section devoted to the personal implications of an ethical framework to individual staff. This includes, inter alia, the handling and disclosing of official information, standards of dress, drugs and alcohol, and conflicts of interest. As is typical of this very practical guide, actual examples of conflicts of interest are provided, for example:

Situation: You engage a family member as an employee of the agency or as a contractor to the agency.

Risk: Colleagues, potential employees and suppliers may argue that the decision was not made on merit or on the basis of the agency receiving value for money.

Situation: You are making a decision on a tariff concession order (a type of duty exemption) lodged by a family member or friend.

Risk: Others may view any decision you make as biased or influenced by your association with the applicant.

Situation: You are making a decision on whether to inspect importations from a community organisation of which you are a member.

Risk: Others may view any decision you make as biased or influenced by your association with the community organisation.

These typical real-world examples have applicability far beyond Australia’s borders. They portray the simple and seemingly innocent situations where ethics can be tested, where fraud can occur and where personal and organisational integrity can be severely questioned. In each of the above examples, the approach to be taken will vary according to myriad personal circumstances but, in all cases, the framework ethics and integrity put in place by ACBPS will provide the context within which individual staff can assess the risk and work out for themselves the appropriate and ethical course of action.

Importantly, the guide includes a public service-wide definition of corruption which is quoted from legislation known as the *Law Enforcement Integrity Commissioner Act 2006*. It defines corruption as conduct that involves:

Abuse of office

- using powers and discretions inappropriately
- using position to support or assist criminal activity

Perverting the course of justice

- sabotaging the detection, investigation or prosecution of crimes

Corruption of any other kind

- placing the agency's reputation at risk
- being an accessory to corruption.

There is further explanation of ACBPS's partnership with the ACLEI which is an independent government body able to 'investigate corrupt conduct relating to all Customs and Border Protection functions'.

The ACBPS's Professional Integrity and Standards Branch (mentioned above) works closely with the ACLEI and has a corporate mission 'to shape our environment to be resistant to criminal infiltration and corruption, consistently support and reduce border risks with the assurance that our staff, information, security and operations are not compromised'. Note that the generic wording about corruption is augmented in this mission statement by specific references to risk management at the border, thus providing staff with a logical connection to their day-to-day functions. There follows a comprehensive guide to conduct and criminal activities that are of the kind the branch has the responsibility to investigate. This list allows ACBPS staff to have a completely unambiguous understanding of what types of behaviour can lead to a breach of the rules, or much more serious breaches of the law.

An example of a conduct issue is:

'Inadequate service – includes repeated and/or wilful instances of failure to provide a service or facility in an adequate, professional or appropriate manner.'

An example of a more serious misconduct and criminal matter is:

'Excessive force (on property) – includes the use of force against property that was not authorised by a warrant or the law.'

All such matters reflect upon the integrity of individual officers and, as such, upon ACBPS as a whole.

Following the high profile criminal breaches in 2012, the ACBPS implemented new and more stringent anti-corruption, anti-fraud and other measures aimed at further addressing integrity issues within the agency. In 2013, the new CEO released the 'Fraud Control and Anti-Corruption Plan' which is yet another comprehensive description of the many factors an agency must address in this complex subject. The plan best describes the environment that led to its creation in its Executive Summary:

The Service is continually refining its operating model to respond to changes in the environment as new challenges emerge at the border. It is important to consider anti-corruption as well as fraud control to best meet threats to our Service's integrity. Program Integrity Risk Assessments (PIRAs) conducted at the branch and divisional level throughout 2011 and 2012 identified risk exposure, current mitigations and additional treatment options for each Service program. PIRAs are intended to form the basis of Integrity Risk Management Plans.

The reader will appreciate the speed at which ACBPS has reacted to its changing external environment and the enormous effort that has gone into the production of plans and other literature aimed at minimising corruption and improving integrity throughout the organisation within the structure of a risk management framework. Given the urgency of the situation at the time in Australia where integrity breaches had been on the front page of national newspapers, there was a need to introduce new measures. These include integrity testing and drug and alcohol testing. The ACBPS's literature defines integrity testing as:

operations designed to test whether a public official will respond to a simulated or controlled situation in a manner that is illegal or would contravene an agency's standard of integrity. For example, a test may involve the insertion of false information into a database to test whether an official, acting corruptly, may seek to unlawfully disclose that information to organised crime figures.

This testing does not apply only to Customs, but to other comparable law enforcement officials such as the Australian Federal Police. The fact sheet from which this quote is taken also describes the mandatory

drug and alcohol testing and other innovative practices that ACBPS is now undertaking as part of its anti-corruption policies and procedures.

Finally, the Fraud Control and Anti-Corruption Plan provides a slight linguistic variation on the definition of corruption, although it is from the same source as that quoted above:¹⁴

...conduct that involves, or that is engaged in for the purpose of, the staff member abusing his or her office as a staff member of the agency; or conduct that perverts, or that is engaged in for the purpose of perverting, the course of justice; or conduct that, having regard to the duties and powers of the staff member as a staff member of the agency, involves, or is engaged in for the purpose of, corruption of any other kind.

ACBPS has embarked on a 'Blueprint for Reform' over the next five years and, as would be expected, integrity is intrinsic to the strategic direction that is envisaged. Within the integrity track of that blueprint, ACBPS specifically sees itself focusing on:

- building a professional culture
- growing leaders at all levels
- appointing a Special Integrity Adviser
- strengthening Professional Standards capability
- enhanced integrity measures
- enhancing organisational suitability assessments
- secondary employment review
- continued enhancements to the integrity framework.

In June 2013, one of ACBPS's deputies addressed the WCO Policy Commission (executive advisory body to the Council) about the recent corrupt practices within Sydney Airport and the agency's range of responses. This important address is available for all to read and is included in the references below. Those interested in the ways a modern customs administration has reacted to a major corruption incident are strongly advised to read this address.

ACBPS has been extremely active in the field of anti-corruption and integrity. As can be seen from what they have already done as well as the determination to improve on all aspects, the task is daunting, yet there is no obvious finish line.

Summary and conclusion

The by-line to this short article reads 'an age-old problem for Customs that demands a new approach'. The examples provided at the international level by the WCO and at a national level by the ACBPS show that tremendous efforts are being made within the world of Customs to divine a new and more effective approach. The only conclusion that can be made is that the price to be paid if integrity is to be maintained is eternal vigilance and the quest for new, more effective practices. There is no other possible course for modern customs administrations to follow. Without integrity there can be no proper border management, no effective revenue collection and no public trust in the agency. The task is not simple but it remains essential for all agencies to adopt the kinds of measures outlined in this article if they are to maintain that trust.

This article began with a quote from Samuel Johnson, an Englishman of the 18th century, and it ends with President John F Kennedy, an American of the 20th.

There are risks and costs to a program of action. But they are far less than the long-range risks and costs of comfortable inaction.

All customs administrations will be well aware of the wisdom of Kennedy's words. None can ignore the threats implicit in the ever-present risk of corruption.

References

World Customs Organization (WCO) 2010, 'What is integrity?', presentation by Patricia Revesz, Capacity Building Directorate, at the Regional Conference on Promoting Integrity in Customs and in Border Services in Central Asia and South Caucasus', Almaty, Kazakhstan, 12-13 July 2010.

World Customs Organization (WCO) 2012, *WCO SAFE Framework of Standards to secure and facilitate global trade*, June, WCO, Brussels.

World Customs Organization (WCO) 2013, 'Integrity: no reform without integrity' [pamphlet], WCO, Brussels.

Author's note: The first link below is to the section of the WCO public website devoted to integrity matters. Readers can peruse this site and they will discover the various instruments and documents mentioned in this article and more. The second link is to WCO's Organizational Development Package. All ACBPS links are to information that is in the public domain from the agency's website. Similarly, the final link to the USAID document is public and added here for comparison and contrast.

World Customs Organization

World Customs Organization (WCO), www.wcoomd.org/en/topics/integrity.aspx (the Integrity icon page from the WCO homepage).

World Customs Organization (WCO), Organizational Development Package, www.wcoomd.org/en/topics/key-issues/odp.aspx.

Australian Customs and Border Protection Service

Australian Customs and Border Protection Service (ACBPS), ACBPS Practice Statement, www.customs.gov.au/webdata/resources/files/C_GOV01ThePracticeStatementFramework.pdf.

Australian Customs and Border Protection Service (ACBPS), Drug and Alcohol Management Program Interim Practice Statement, www.customs.gov.au/webdata/resources/files/2013-008671_Documents_Released.pdf

Australian Customs and Border Protection Service (ACBPS), Notification of corruption allegations to the Australian Commission for Law Enforcement Integrity (ACLEI), www.customs.gov.au/webdata/resources/files/PS201086-Notification_of_corruption_allegations_to_ACLEI.pdf.

Australian Commission for Law Enforcement Integrity (ACLEI), ACLEI Integrity in Law Enforcement, www.aclei.gov.au/Pages/default.aspx.

Australian Customs and Border Protection Service (ACBPS), Integrity Support and Referral Network: The role of the Integrity Support and Referral Network and Integrity Support Officers, www.customs.gov.au/webdata/resources/files/C_LDR19IntegritySupportandReferralNetwork.pdf.

Australian Customs and Border Protection Service (ACBPS) 2013, 'DCEO Border Management Speech to the World Customs Organisation Policy Commission', 24 June, www.customs.gov.au/site/update-on-ACBPS-integrity-and-reform-measures.asp.

Commonwealth of Australia, Customs (Drug and Alcohol Testing) Amendment Regulation 2013 (No. 1), www.austlii.edu.au/au/legis/cth/num_reg_es/caatar20131n180o2013613.html.

USAID

Booz Allen Hamilton 2005, *Customs Modernization Handbook*, ‘Establishing and implementing a customs integrity program’, a publication produced for review by the United States Agency for International Development (USAID) by Robert L Holler, [http://aysps.gsu.edu/isp/files/Customs_Integrity_Handbook_\(USAID\).pdf](http://aysps.gsu.edu/isp/files/Customs_Integrity_Handbook_(USAID).pdf).

Author’s note: This last reference clearly comes from another perspective, that is, from other than WCO or ACBPS that have been the basis of this article. Even a cursory glance at this USAID publication will tell the reader that the principles are much the same as those adopted in the various guidance materials quoted in this reference section. It adds to the perception that the principles are generic, able to be applied to any administration in any part of the world.

Notes

- 1 The Customs Cooperation Council, 1952.
- 2 See References at the end of this article for a link to the Arusha Declaration.
- 3 See References for a link to the WCO’s Integrity program.
- 4 The global Customs response to the events of September 11, 2001. See the WCO website www.wcoomd.org for more information.
- 5 The WCO’s peak committee; the 179 global heads of customs administrations that make up the organisation.
- 6 See References for a link to the WCO’s Integrity program.
- 7 See the WCO website (www.wcoomd.org) for more information on this international convention.
- 8 See References for a link to the WCO’s Integrity program.
- 9 See References for a link to the WCO’s Integrity program.
- 10 See References for a link to the ODP.
- 11 See a variation of this definition in the section on the Fraud Control and Anti-Corruption Plan.
- 12 ACBPS Fact Sheet ‘Law Enforcement Integrity Measures’ based on the *Law Enforcement Integrity Legislation Amendment Act 2012*.
- 13 There are two references to this matter in the References section above.
- 14 The *Law Enforcement Integrity Commissioner Act 2006* (LEIC Act).

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Gareth Lewis began work in Customs in Port Adelaide and moved around the South Australian region ‘learning the ropes’ of customs operations in all the main areas. Later, he worked in Canberra and Melbourne in project orientated and customs core business management roles. In early 2006, he joined the World Customs Organization (WCO) in the Compliance and Facilitation Division where he worked on a range of strategic issues closely aligned with the WCO’s trade facilitation and supply chain management agenda, becoming a Senior Technical Officer in 2011. In mid-2013, Gareth returned to Adelaide and is now a customs and trade consultant.

