WHEN IMPLEMENTATION FAILS: THE CASE OF ANTI-CORRUPTION COMMISSION (ACC) AND CORRUPTION CONTROL IN BANGLADESH

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Introduction
Economics may have earned the sobriquet of the ‘dismal science’, but the study of policy implementation is no sunnier. Pressman and Wildavsky captured the mood of early implementation research with inimitable flair in the subtitle to their classic text Implementation: “How Great Expectations in Washington are Dashed in Oakland; Or, Why It’s Amazing that Federal Programs Work at All”. Due to such seemingly depressing rendering of the great gaps between policy intentions and field-level realities, implementation research came to be characterized as “misery research, a pathology of the social science, if you will” (Rothstein, 1998: 62).

The study of implementation as ‘misery’ has since been criticized as too concerned with the often contradictory priorities and unreadable intentions of elite policy-makers in far-off capitals. Alternative methodologies that begin from the dynamic situation faced by ‘street-level bureaucrats’ have been added to the range of tools open to the study of implementation. Yet concern over ‘implementation gaps’ is still a relevant starting point for cases where there is a strong normative appeal and urgency to the policy content under consideration.

Anti-corruption policies and programs are a good example. Corruption – almost everyone agrees – is a serious problem affecting nearly all developing countries. If ‘governance matters’ (Kaufmann et al., 1999) – to the private sector, to poor and vulnerable populations and to the viability of democratization efforts – then anti-corruption efforts are essential to improved development outcomes.

If various indices of corruption are to be believed, Bangladesh should be a country where the outcomes of anti-corruption policies should matter nearly the most. According to Transparency International’s well-known corruption perception index, Bangladesh ranks 156th (third worst corrupt country) this year (2006) after being ranked as the most corrupt country for the last five consecutive years. Bangladesh presents a typical case where corruption has found a remarkably fertile ground, despite the ‘existence’ of several mechanisms, albeit ineffective, for tackling it. Presently, corruption in Bangladesh is so pervasive that it has evoked widespread condemnation from within the country as well as from outside. Externally, it has already caused a national embarrassment due to Bangladesh’s ranking in Transparency International’s corruption perception index in the last six years (2001-2006). Internally, reports and evaluations prepared and commissioned by local think tanks have already painted an ominous picture of public sector integrity. The media and civil society groups are vociferous in denouncing the present level of corruption in Bangladesh.

THE PROBLEM OF IMPLEMENTATION IN ANTI-CORRUPTION PROGRAMS
Corruption, as rampant decades ago as today, has over the past ten years exercised the imaginations of developing country donors, non-governmental organizations (both national and international in scope), and senior leaders in governments (both authoritarian and democratizing) as never before. And there are good reasons for this. Corruption can be seen as central to various agendas that can make strange ideological bedfellows, such as the promotion of the private sector and as the watchdog role of civil society.

What are anti-corruption strategies meant to accomplish? The answer partly depends on the diagnosis of the root problem. Two broad lines of research can be distinguished. In the first,
corruption is viewed in terms of individual decision-makers – either senior or field level – with limited accountability for their actions and monopoly decision-making power in a particular field. Robert Klitgaard (1988) famously concluded that corruption results from the confluence of decision-making discretion and monopoly power of an agency minus accountability \( C = D + M - A \). To address the determinants of corruption in this view requires tighter controls on administrative procedures, rule-based decision-making and the introduction of competitive markets for public services.

A second category of anti-corruption strategies looks at state capture, when “corrupt people control the regulatory process and, from the top, make laws, policies and regulations that specifically benefit them” (Tarling, 2005: 118). Governance is more centrally implicated in the corruption problems, and governance reforms that introduce more substantive democracy and citizen control as a counterweight to the power of elites take centre stage.

Support for comprehensive national-level policies to combat corruption, as opposed to agency- or sector-specific work, has become a donor growth industry. National-level strategies are intended to weaken in a coordinated way by addressing multiple, interlocking props supporting corrupt behaviour in the public-sector environment. In theory, an overarching anti-corruption strategy would provide a legal framework, introduce new institutions to tackle corruption and provide incentives for civil society to take up a watchdog function (World Bank, 1999: 49). Governments of the developing countries responded both to multilateral advice/pressure and to popular pressure with anti-corruption commissions of various types. Many have passed legislation in the past few years meant to reduce the risks of corruption (Bologaita, 2001: 11).

Proponents for various anti-corruption strategies acknowledge (in their more sober moments) the potential difficulties of implementation. The key difficulty here is what might be termed a kind of ‘orthodox paradox’ of anti-corruption work, following Nelson’s (1990: 14) term for the difficulties of implementing neoliberal reforms. The successful implementation of anti-corruption reforms where there is heavy resistance implies autonomy of government action and high levels of political will to overcome resistance; yet there are exactly the conditions that are hampered by systematic corruption. Nevertheless, there are few studies of the implementation of a national anti-corruption programs or strategies, in part because those are new initiatives and in part because the focus in donor circles arguably remains tied to a ‘cook-book’ approach, reflecting the can-do culture of the ‘positive practitioner’ (Chambers, 1984).

MODELLING IMPLEMENTATION IN NATIONAL ANTI-CORRUPTION POLICIES

Top-down and Bottom-up Explanations of ‘Misery’

What can the implementation literature teach us about implementing national anti-corruption programs? Why do outcomes on the ground differ so greatly from policy intentions? In other words, how can we explain the ‘misery’ of implementation, both from the perspective of policy-makers and implementers?

Two macro-perspectives on implementation have dominated the field since its emergence in the 1950s. Although several attempts at a synthesis have been made (Hill and Hupe, 2002), analysts often gravitate towards ‘top-down’ or ‘bottom-up’ styles of explanation. The first stylized perspective adopts the metaphor of ‘implementation-as-control’. This so-called ‘top-down’ view is concerned with how the intentions of policy-makers are implemented at the grassroots. It can be described as a ‘correspondence’ theory of implementation ‘gap’ or ‘deficit’. Theorists adopting this perspective look for deficiencies in the way policies are communicated, and standards of implementation enforced, by policy-makers to field-level implementers.

‘Bottom-up’ analysts (Lipsky, 1980), in contrast, begin with the assumption that ‘street-level’ bureaucrats often face an impossible task. Policy ambiguity, limited resources, and time pressures make it impossible to implement policies as intended and to fulfil the sense of public service with which most of them
began their careers. Their response to this untenable situation is to “develop conceptions of their work and to their clients that narrow the gap between their personal and work limitations and the service ideal” (Hill and Hupe, 2002: 52). To the extent that outcomes are deemed less than satisfactory from a policy-maker’s point of view, this perspective would look for the reasons in the lack of resources and in the incentives embedded in the institutional environment faced by street-level bureaucrats.

Towards a Synthesis

How can we adapt recent advances in implementation research to the diagnosis of implementation problems in national anti-corruption programs? The goal of the analysis would be one shared by top-downers – to improve implementation. Yet I assume that local institutional conditions will be particularly binding on implementers of anti-corruption programs, faced with the ‘orthodox paradox’ of anti-corruption work defined above.

Figure 1 presents a model of implementation drawing on both bottom-up top-down perspectives. It outlines five categories of variables linking policy formation on the left side to implementation outputs and outcomes on the right. It places great emphasis on the ‘disposition of implementers’, i.e., the cognitive maps, incentives, and resources available to those ultimately responsible for implementing the most important provisions of the policy. Each of the following categories can be expressed as a set of questions aimed at identifying implementation problems:

1) **Policy Design**: Within the policy design category, we can distinguish between policy content and resources available for implementation. Are clear, consistent statements of objectives and criteria for successful implementation provided in the legal framework underpinning the policy? And are resources sufficient for successful implementation made available, or a plan for resource mobilization in place?

2) **Inter-organizational communication and enforcement activities**: This category asks how the policy is communicated to lower levels, and within what framework of accountability? What levels of communication and enforcement effort are present?

3) **Characteristics of the implementing agencies/disposition of implementers**: The institutional characteristics of implementing agencies have a profound effect on how lower levels perceive and act on upper level directives. The disposition of individual implementers is closely linked to the characteristics of agencies in which they are embedded. It is also affected by other factors, such as their potential for incentives from non-agency sources (including corruption transactions). This category thus delineates key aspects of agency culture and accountability relationships.

4) **Implementation outputs and outcomes/impacts**: The three categories above jointly determine implementation outputs, which are linked, more or less tenuously, to impacts on the defined problem via their ‘policy logic’. In other words, are there logically substantiated links between policy outputs – assuming perfect implementation – and the problems the policy is meant to address?

5) **Policy learning**: in reading Figure 1, the feedback loops on the borders are important, as they make the model dynamic. The lower feedback loop concerns policy learning. The assumption is that programs may be redesigned both at key intervals in a formal process (the loop leading to policy redesign) and in a more informal, iterative process as local implementers adjust their expectations and behaviour to the actual implementation situation they face (the arrow leading to implementer disposition).

6) **Action environment**: The upper feedback loop is via the action environment to all three of the determinants of implementation noted above. The action environment is here broken into components such as the public-sector institutional environment, political support, and social and economic factors (All these must be defined within the parameters of the policy at hand). The influence of this environment lies in two areas. It structures or influences the formation of the policy in the first place. But there is a more dynamic sense as well. As policies work themselves out in a given environment, they may affect the environment in ways that change for the better or worse, depending on the perspective taken, and in intended or unintended ways — those action environment influences on implementation. For example, a program may over time empower a previously marginalized group to have a greater stake in a particular policy, changing the stakeholder alignment in ways that create new support or opposition to a policy.

The conceptual framework presented here is a way of structuring inquiry into observed implementation patterns of a particular policy. It incorporates some elements of both classically ‘top-down’ and ‘bottom-up’ approaches. The framework can be used to identify specific implementation constraints (as the top-down model stresses), but focuses much attention onto the institutional environment at the local level and the dynamic impacts (often unpredicted) of implementation.

The framework may be particularly relevant to anti-corruption programs for several reasons. Since anti-corruption efforts are politically sensitive, they are likely to be closely monitored by powerful political stakeholders in the ‘action environment’, intensifying the feedback loops from implementation outputs to redesign. Moreover, the policy logic underlying anti-corruption programs is often tenuous, given the multifarious potential types and causes of the phenomenon. Finally, the bottom-up perspective, emphasizing constraints embedded in the local institutional environment, may be particularly relevant for anti-corruption work and its ‘orthodox paradox’.
CONTROLLING CORRUPTION IN BANGLADESH: POLICY DISASTER OR IMPLEMENTATION AT STAKE!

The negative impact of corruption on development is no longer questioned. Evidence from across the globe confirms that corruption disproportionately impact the poor. Corruption hinders economic development, reduces social services, and diverts investments in infrastructure, institutions and social services. Moreover, it fosters an anti-democratic environment characterized by uncertainty, unpredictability and declining moral values and disrespect for constitutional institutions and authority. Corruption, therefore, reflects a democracy, human rights and governance deficit that negatively impacts on poverty and human security.

Corruption undermines governance, economic growth, and ultimately the stability of countries and regions. Corruption is a problem of poor governance. Corruption is principally a governance issue – a failure of institutions and a lack of capacity to manage society by means of a framework of social, judicial, political and economic checks and balances. When these formal and informal systems break down, it becomes harder to implement and enforce laws and policies that ensure accountability and transparency. From an institutional perspective, corruption arises when public officials have wide authority, little accountability and perverse incentives, or when their accountability responds to informal rather than formal forms of regulation.

Corruption is likely to appear on every conscious citizen’s list of factors that threaten to obstruct Bangladesh’s path towards economic growth, good governance and sustainable development. Corruption kills the development spirit – nothing is as destructive to a society as the rush to quick and easy money that makes fools of those who can work honestly and constructively. It is important to note that corruption is not limited to the actions and attitudes of politicians and public servants. Rather, the problem is widespread.

The effect of corruption in Bangladesh has seriously constrained development of the national economy and has significantly inhibited good governance in the country. Bangladesh has recorded impressive economic and social gains in the past decade. The country has doubled per capital growth and taken strides towards reaching many of the Millennium Development Goals (MDGs). It outperforms most low-income countries as well as its South Asian neighbours with the exception of Sri Lanka across a range of social indicators. Gender parity in school enrolment at both primary and secondary level has been achieved, child mortality has been halved and life expectancy has increased significantly since 1990s. Among governance successes, Bangladesh has shown important gains in public accountability, with three successive free elections, an assertive Supreme Court, sound public procurement regulations, an active civil society, and a relatively free media. Successive governments have allocated substantial budget resources to areas such as health and education. Microfinance has expanded with strong Government support and financial sector governance is improving. Government has also forged strong partnerships with NGOs, especially in health, nutrition and education, which have contributed to the development gains. There are also serious governance weaknesses across sectors and in core government functions. Addressing these is critical for improving the investment climate, enhancing growth, increasing access to information, and improving delivery of government services. The Bangladesh Poverty Reduction Strategy Paper (PRSP) recognizes these challenges and highlights good governance as a main thrust.

Recent years have witnessed a heightened awareness about the venality and scale of corruption. Yet, attempts at combating the vice are by no means new. As elsewhere, successive governments in Bangladesh have expressed their commitment to wipe out corruption from every sphere of administration and proclaimed executive orders, introduced rules and regulations, enacted anti-corruption legislation and installed institutional mechanisms. A plethora of rules and regulations framed from time to time in order to deter public officials from undesired
behaviour and action is now extant. The Government Servants (Conduct) Rules, 1979, Government Servants (Discipline and Appeal) Rules, 1986 are among the rules that allow disciplinary actions against errant civil servants for inefficiency, misconduct, desertion, corruption, deviance from ‘expected’ behaviour and subversive activities.

One of the most significant measures to counter corruption in Bangladesh is the Bangladesh Anti-Corruption Act, 1974 that provides for the Bureau of Anti-Corruption (BAC). This Act (modified over years), along with the Prevention of Corruption Act, also enacted in 1974, provides detailed framework for dealing with and controlling bribery and other forms of corruption. Also, there is a range of other mechanisms (e.g., Comptroller and Auditor General, legislative committees) designed to stamp out corruption in administration. Nonetheless, despite the prevalence of all these measures, corruption seems to have outpaced fairness in the disposal of business in the public sector.

Until the enactment of the Anti-Corruption Commission Act 2004, which established the Anti-Corruption Commission, Bureau of Anti-Corruption (BAC) was the most important mechanism responsible for combating corruption. Being authorized to investigate into and prosecute cases of corruption, BAC was expected to play a significant role in curbing malfeasance and abuse of power in government administration. However, the performance of the agency has been far from satisfactory. Despite several decades of its existence and changes brought about in its statues and structure, BAC has failed to emerge as an effective body in controlling and combating administrative corruption. As it stood as a toothless organization lacking adequate authority to effectively discharge its responsibilities. Due to BAC’s overall failure as an anti-corruption agency, the Government of Bangladesh, under the pressure from donors and civil society in Bangladesh took the measure to enact the Anti-Corruption Commission Act in 2004 that provided for the establishment of Anti-Corruption Commission abolishing the Bureau of Anti-Corruption (BAC).

WHY HAS THE ANTI-CORRUPTION COMMISSION (ACC) INITIATIVE FAILED?

Political will is of utmost importance in implementing any sort of policy decision. Since the establishment of ACC is not a result of ‘home grown’ decision and the government did not have any positive political will, the decision failed at the implementation stage. Brinkerhoff (2000: 242) rightly argues that “home-grown initiative for anti-corruption activities demonstrates that reformers themselves perceive corruption as a salient issue, that they have ownership for doing something about it, and that they are willing to champion the efforts necessary to fight it.” On the other hand, imported or imposed initiative confronts the perennial problem of needing to build commitment and ownership and there is always the question of whether espousals of willingness to pursue reform are genuine or not.

In its Bangladesh section of the Global Corruption Report, 2006, Transparency International (TI) appears to have focused on the Anti-Corruption Commission (ACC)’s genesis and its dysfunctional state since inception a year and a half ago. The TI, obviously, is of the view that if the ACC had worked effectively, corruption would have been, to a large extent, curbed in the country. This report this year concentrates on ‘why’ and ‘where’ the Bangladesh government has actually failed in containing the persistent malady.

The report made three points: first, the Anti-Corruption Commission (ACC) was formed not out of any ‘political will’ but as a ‘concession’ to donor and civil society pressures. In other words, the government was not spontaneously motivated to constitute the commission, which is the other way of saying that the government did not carry any conviction with the formation of the body. It has become a fixation with the powers that be that once a body is formed, no matter with whom and with what authority through delegation of powers, the government can jolly well wash its hands off any further responsibility in seeing it work. There we come to the second point in the TI report suggesting that government retains the
wholesale control of the commission: its budget, staff recruitment and organizational structure. The third reason for the ACC debacle has been pinpointed in the decision having been imposed by the government to ‘rehire’ the staff of the erstwhile Anti-Corruption Bureau, which was, in the first place, dissolved for its ineffectiveness, making room for the ACC.

Needless to say, the above drawbacks are contrary to the provisions of the ACC Act. The points made in the TI report are extremely cogent, unassailable and worthy of endorsement. If we are serious in creating a proper institution against rampant corruption, then there would be no alternative but to reorganize the existing body wholesale and give it the teeth it needs to function. The government should cease placing the blame at the doorstep of the internal conflict-ridden ACC because it cannot hide the fact that it had not fundamentally empowered the body to be effective? It lies with the government to change things around now. Now, let’s discuss the issue of implementation from the perspective of the theoretical framework discussed at the beginning of the paper.

**Policy Design**

Since the ACC is a result of pressure and not of utmost sincerity, the then ruling party was not in favor of making it an effective institution based on legal building blocks and resources. The Act is vague in many respects, for instance, accountability, chain of commands and so on. It is not clear how the new ACC is different from the previous BAC. At the very beginning, the members and chairman of the ACC were appointed on political grounds, thus making it again a toothless institution. Though the country is under caretaker government now, it cannot take any positive steps in curbing corruption from different strata of the society. Besides, the government did not want it to be effective and autonomous. Therefore, there is no provision of yearly disbursement of financial resources in ACC. Rather, it has to depend directly on the different ministries all the year round.

When the situation is like this, there is no way one can ensure the effectiveness of the implementation of any policy initiative.

**Inter-Organizational Communication and Enforcement Activities**

Since the policy of establishing the ACC is communicated in a negative way to the implementing ministries or at the lower levels, there were no positive zeal to implement it. The government, from the very beginning, was active in influencing all the decisions of ACC. It took almost a year to finalize the organogram of ACC. Most importantly, the government rejected the organogram prepared by the ACC in consultation with a panel of experts. Rather, they enforced the one that is determined from the Prime Minister’s Office. Ministry of Finance and Ministry of Law were giving too much contradictory instruction to the ACC. Ministry of Finance and Ministry of Law were giving too much contradictory instruction to the ACC. Most importantly, the government rejected the organogram prepared by the ACC in consultation with a panel of experts. Rather, they enforced the one that is determined from the Prime Minister’s Office. Ministry of Finance and Ministry of Law were giving too much contradictory instruction to the ACC. The ACC was supposed to retain a certain personnel from the former BAC and dismiss the rest. But the said ministries forced ACC to retain most of the personnel who were mostly branded as corrupt officials and were partly responsible for the ineffective BAC. Finally, the accountability framework was not at all clear. While the ACC is supposed to be an autonomous agency which should be responsible and accountable only to the parliament, but the government wanted it to report to the president. Besides, the internal conflict among the members and chairman of the ACC itself is an outcome of weak implementation plan.

**Characteristics of the Implementing Agencies/Disposition of Implementers**

The implementing ministries as well as the initial ACC has not been very effective to start with a functional ACC because of poor legal framework. Besides, there were too many agencies involved in the process. If the government had political will, there were no need of too many agencies involved. Since there were coterie interest involved in the implementation process, the result of implementation was not fair. The ministries of finance and
law were in contradictory positions in the implementation process, thus did not have any profound effect on the whole process.

Implementation Outputs and Outcomes/Impacts

The outputs, outcomes and impacts of the ACC are totally negative for the implementers and policy initiators. Since the ministers themselves and the policy actors are involved in different corrupt transactions, there was no interest to implement the policy effectively.

Policy Learning

The government of Bangladesh has learnt a lot from the BAC experience as well as from the process of implementing ACC. Because of the lack of political will, no concrete initiatives were taken to sort out the associated problems and therefore remove the hurdles to implement the policy effectively.

Action Environment

The associated environment has been discussed in the following paragraphs.

Regime Type

Although definitive links between regime type and reform success have not been isolated, there is evidence from studies of economic reform implementation that open democratic or democratizing regimes provide more opportunities to a wider range of actors to pursue change than do authoritarian ones dominated by closed circle of elites (Brinkerhoff and Kulibaba, 1996: 125). Democratic regimes backed by effective democratic governance systems install the basic elements of rule of law, accountability, transparency and access whereas closed authoritarian, pseudo-democratic and/or non-democratic regimes are likely to have leaders whose will to tackle corruption is limited, superficial, and/or cynical. The salient factor separating the ability of democratic regimes and non-democratic regimes to combat corruption is, according to Johnston (1997 cited in Brinkerhoff, 2000: 244), the fact that in democratic regimes “active competition and accepted rules of accountability make it difficult for any person or group to dominate politics or the economy, and relatively clear distinctions between those two realms prevent the worst sorts of exploitation of each by the others. Politics and the economy are broadly participatory, and the vitality of each aids development in the other”.

Bangladesh, after becoming an independent nation in 1971, has gone through several years of military and authoritarian rules. However, with the re-emergence of so-called democracy in the early 1990s, many aspects of its governance structure have changed but many remain the same, especially the political culture that has not changed along with the regime type, therefore intensifying the ‘corruption eruption’1. Bangladesh may have few signs of democracy (e.g., regular free and fair elections) but it is in no way a democratic country. Freedom House (2005: 27) dubbed Bangladesh as a country which belongs to its ‘party free’ category examining the transition from sixteen-year long presidential authoritarian rule to democratic one. The Freedom House survey however interestingly points to the fact that for Bangladesh, the pre-transition data for political rights, civic liberties and overall status remains the same even after transition to democracy (Freedom House, 2005: 22). This however justifies that even though the transition has been made, the political culture remains the same, which is important in terms of political will for combating corruption. The Freedom in the World 2006 Report (Freedom House, 2006) also ranks Bangladesh as a party free country.

Bangladesh has been ranked 141 among 161 countries in the 2006 Index of Economic Freedom. The Wall Street Journal and the Heritage Foundation recently published this index. Bangladesh’s ranking was also the worst among five of the seven SAARC countries. Bangladesh was placed in the third of the four categories - “free, mostly free, mostly un-free, un-free” - and listed as repressed in terms of economic freedom. The Wall Street Journal and the Heritage Foundation in their report on

1 Term used by Moises Naim (quoted in Leiken, 1996-1997: 56) to exemplify the tidal wave of corruption scandals around the world.
Bangladesh said “weak rule of law ... manifesting itself in some of the world’s worst official corruption, civil crime, and political violence ... continues to burden Bangladesh’s democracy” adding “Until the government addresses Bangladesh’s many structural weaknesses, there is little reason for optimism about the country’s future”.

Bangladesh was ranked 17 in the global ranking of failed states by an American magazine *Foreign Policy*. The magazine published by the Carnegie Endowment for International Peace, based in Washington, made the observation in its July-August issue of 2005. The magazine grouped Bangladesh with 20 countries deemed most critical and vulnerable. The Failed States Index was prepared in collaboration with the Fund for Peace and used 12 social, economic, political and military indicators to rank 60 countries in order of their vulnerability to violent internal conflict. Bangladesh scored highest in the indicator of ‘uneven development’ with many other countries while ‘deligitimization of state’ is another indicator where Bangladesh’s score is quite high (The Fund for Peace and Carnegie Endowment for International Peace, 2005: 59). The report said that weak, failed, and failing states were breeding grounds for terrorism, organized crime, weapons proliferation, humanitarian emergencies, environmental degradation and political extremism that threaten everyone.

*The Economist* published an article entitled “Bangladesh: State of Denial” in its June 18 2005 issue with a caricature picture of Begum Khaleda Zia (current prime minister) and Sheikh Hasina (opposition leader), suggesting a brawl between them. It was in fact the manifestation of the belligerent politics in the country. The story in the article, however, presented a different picture altogether, and a few lines are quoted hereunder: “Bangladesh is also among the most sparsely covered by the international press. This is in part the government’s choice: it makes it hard for foreign journalists to visit. When they do, it tends not to like what they write, especially recent suggestions that Bangladesh is witnessing a rise in Islamic extremism, and becoming a haven for international terrorists”.

The intellectuals of the country often debate vigorously whether Bangladesh is a failed state or not but it would be really very difficult to deny that partisanship has come to dominate all aspects of life. The bureaucracy has been thoroughly politicized and the police has been made a political force. The election commission has come up for controversy and violated the High Court directives while preparing voter roll. Even the appointments of High Court judges are being made on a partisan basis. All these are the plain truths that the government cannot really escape from.

The above discussions clearly articulate that Bangladesh’s image and status in the world arena is not very praiseworthy. Under the guise of democracy, the regime is ruling the country in a somewhat authoritarian way. All these clearly supports the idea that such a regime in a pseudo-democratic country like Bangladesh is not going to support reform efforts that curtail its own power base and therefore corruption may persist in the society.

**Social, Political and Economic Stability**

Political, social and economic stability has been considered as one of the important factors of successful policy reform implementation. Though there are views in favour and against the idea that the presence as well as absence of stability contributes to implementation success but the situation really varies from country to country depending on the culture. While Grindle and Thomas (1991) considers “periods of crisis and shock (lack of stability) as opportune moments to embark on reforms as policy actors confront powerful pressure for changes during these periods”, others argue that “economic and political crises nearly always result in a narrowing of options, fomenting a ‘backs-against-the-wall’ mentality among the actors concerned ... the usual dynamic is to focus on short-term survival and immediate palliatives to lessen the most visible symptoms of crisis” (Kulibaba and Rielly, 1994 cited in Brinkerhoff, 2000: 245). Such situations undermine leaders’ will to consider and engage in difficult reforms such as mitigating or eliminating corruption. The establishment
of ACC in Bangladesh is done in a moment like this when there was immense pressure from donor countries, bilateral and multilateral aid agencies and civil society associations inside the country and the establishment of the ACC lessened the symptoms of the crisis.

In the context of developing countries like Bangladesh, stability is of utmost importance and creates the conditions where governments feel stronger and more confident in their capacity to deal with serious issues. But (political) culture also plays a detrimental role in taking initiatives to tackle issues like corruption control. As indicated above, policy actors in developing countries only bring those issues on the policy agenda that are not going to harm their support base. Issues like corruption control is sensitive for government of Bangladesh for reasons such as: (a) many policy actors are involved in corruption themselves; (b) civil servants’ interests will be hurt if the government let ACC work independently and as in the ‘cycle of inefficiency’ both politicians and public servants share the pie, they look after one another too; (c) though in most cases, the government claim that corruption, for instance, has been rampant during other regimes, they do not take actions against the opposition as politicians look after each other too; (d) taking actions against top officials in the government reduce the chances of getting support from them in periods like national elections when politicians need support of the civil servants; (e) taking actions against top opposition politicians may destroy the stability of the country. In a nutshell, the party in power is always reluctant in curbing corruption in Bangladesh as it hampers its chances of remaining in power.

However, even the establishment of ACC in Bangladesh has been possible as stability prevailed in the government’s tenure in 2004. The situation is changing rapidly in terms of stability and therefore in the election year (2006), the government is not willing to go ahead any further with anti-corruption initiative. The Failed States Index states that other than the 10 most at-risk countries, there are countries whose instability is less widely acknowledged and Bangladesh is one of them (The Fund for Peace and Carnegie Endowment for International Peace, 2005: 58). In the Freedom in the World 2005 report (Freedom House, 2005: 1), “Bangladesh received a downward trend arrow due to a further deterioration in the rule of law and an increase in political violence during the year”. Given the fact that the next parliamentary election is scheduled in the next nine months, government would try to keep the country in country stable not for taking major reform initiatives but to strategically maintain a calm environment ensuring a win in the next election.

Conclusion

From the discussion above, it is clear that the process of establishing an effective ACC has failed at the implementation stage. The Global Corruption Report 2006 (2006: 128) also holds a somewhat negative impression about the effectiveness of ACC:

“Despite the powers bestowed on it, the commission has failed to take specific policy measures in the past, or to convey to the public any sense of its strategy for fighting corruption. Instead, it has limited its mandate to a number of ad hoc decisions that demonstrate lack of vision and poor performance. For instance, the ACC framed charges against a number of transfer orders for government officials, but failed to follow them up. Similarly it announced it was going to investigate the unauthorized use of government vehicles, the misappropriation of public land and the importation of rotten rice. No concrete measures were taken apart from issuing letters to the relevant departments”.

It is evident from the foregoing discussion that to be successful in implementing any project and program, the process of implementation is very important. To fight a vice like corruption, this process is even more important. To be successful in curbing corruption, we must take into consideration the different factors of implementation.
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