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FROM FOOD TO CASH RELIEF: HOW PREPARED ARE UGANDA'S ANTI-CORRUPTION AGENCIES TO COUNTER CORRUPTION IN COVID-19 CASH TRANSFERS?

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ABSTRACT

In July 2021, Uganda commenced the disbursement of telephonic cash transfers to the vulnerable urban poor, most adversely affected by the COVID-19 pandemic, marking a policy shift from food relief to cash transfers to the vulnerable. Accountability hurdles had previously beset food relief interventions with allegations that the funds meant for food relief had been misappropriated. Some of these allegations led to the arrest of officials from the Office of the Prime Minister by the State House Anti-Corruption Unit. Whereas some of the previous studies have indicated cash transfers by telephone to be less prone to the fraud risks and challenges commonly associated with the bureaucracies of procurement, storage, transportation and distribution of in-kind items, there is also evidence that cash transfers may be susceptible to other risks such as political manipulation, ghost beneficiaries, and kickbacks from the local elites who may seek undue benefit from the cash transfer schemes. Therefore, the anti-corruption agencies needed to assess the associated risks entailed in using these cash transfers to disburse COVID-19 relief if they were to succeed in mitigating them. Since Uganda's anti-corruption agencies are known to typically employ reactive rather than proactive strategies to counter corruption, there were doubts about their preparedness to counter the fraud risks in telephonic cash transfer schemes that are a relatively novel form of handing relief to the poor for the government of Uganda. Accordingly, this paper seeks to undertake a doctrinal assessment of the capability of Uganda's anti-

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corruption agencies to address the risks associated with cash transfers and propose appropriate strategies for possible future action.

1. BACKGROUND

On 8 July 2021, the Prime Minister of Uganda, Hon Robinah Nabbanja launched the disbursement of telephonic cash transfers to the vulnerable urban poor, most adversely affected by the COVID-19 pandemic.¹ Every beneficiary was to receive Uganda shillings 100 000 (US\$28) and the government targeted about 500 000 beneficiaries.² The beneficiaries included an array of urban dwellers employed mainly in the informal sectors.³ This followed President Yoweri Kaguta Museveni's earlier announcement of plans by the government to remodel its COVID-19 interventions from food distribution to cash relief.⁴ As a gesture of transparency, the Prime Minister phoned the first supposed recipient of the COVID-19 cash relief at the launch of the government intervention.⁵ The recipient who claimed to be a *Boda Boda* rider (motorcyclist) at the time, confirmed receipt of the money, in a moment that was marked with ululations.⁶

Meanwhile, officials in the government indicated that the move from food to cash relief by mobile telephone was due to the problems that had been associated with food relief.⁷ The Auditor General reportedly implicated the Office of the Prime Minister (OPM) for the non-accountability of food relief items worth shillings 55.8 billion (approximately US\$15.8m).⁸ Besides, the State House Anti-Corruption Unit arrested some officials of OPM on suspicion of misappropriating COVID-19 food and other supplies.⁹

1 Mukhaye D (8 July 2021) "Ajuna DJ Covid Relief payments launched, Kampala cash pending" *Monitor*, available at <https://www.monitor.co.ug/uganda/news/national/covid-relief-payments-launched-kampala-cash-pending-3465748> (visited 15 September 2021).

2 Ibid.

3 Ibid.

4 Ibid.

5 Mukhaye D (9 July 2021) "53,000 receive Covid Cash" *Monitor*, available at <https://www.monitor.co.ug/uganda/news/national/53-000-receive-covid-cash-3466852> (visited 15 September 2021).

6 Ibid.

7 Karugaba M (25 July 2021) "COVID-19: LCs to Identify Relief Cash Beneficiaries", available at <https://www.newvision.co.ug/articledetails/106992> (visited 15 September 2021).

8 Ibid.

9 Uganda Media Centre (9 August 2020) "OPM Officials Arrested over Inflating COVID19 Food Prices", available at <https://www.mediacentre.go.ug/media/opm-officials-arrested-over-inflating-covid19-food-prices> (visited 15 September 2021).

The food distribution primarily targeted the urban poor who were considered to be most adversely affected by the nationwide lockdown that was imposed to curb the COVID-19 spread.¹⁰ The distribution prioritised groups in Central Uganda, especially the country's capital Kampala. Small business proprietors who earn hand to mouth, the elderly, sick and lactating mothers were particularly earmarked as the principal target beneficiaries.¹¹ Rations that included 6kgs of maize flour and 3kgs of beans per beneficiary were handed out. Lactating mothers and the sick received an additional 2kgs of powdered milk and 2kgs of sugar per beneficiary.¹² The security forces were handed the responsibility to distribute the rations from house to house.¹³ Besides the challenges of non-accountability that emerged there were other constraints that were associated with food relief.

President Yoweri Kaguta Museveni banned private individuals and organisations from distributing food.¹⁴ Ostensibly, this was due to the health concerns that arose when some politicians and organisations set up food distribution points where the vulnerable converged in lengthy queues to get the food relief contrary to stipulated social distancing guidelines.¹⁵ However, some political commentators viewed the President's move as a pretext to gag political activity leaving him as the sole political player. He was perceived to be using the food distribution exercise to gain further political mileage at the expense of his political opponents.¹⁶ The other concern was with the quality of food stuffs which in some cases was poor. Some of the food stuffs were compromised with various impurities that included aflatoxins, soil and sand particles due to poor crop methods and poor post-harvest handling.¹⁷ The Uganda National Bureau of Standards sampled checks on some of the food supplied. It established that 18 per cent of maize flour and 23 per cent of dry beans supplied, based on the samples used, did not pass quality checks.¹⁸ Other challenges included the slow food distribution and an underestimation of the

10 Nathan I & Benon M (2020) "COVID-19 Relief Food Distribution: Impact and Lessons For Uganda" 35(Suppl 2) *The Pan African Medical Journal* 142 – 719.

11 *Ibid.*

12 *Ibid.*

13 *Ibid.*

14 Nicholson NK & Esseks JD (1978) "The Politics of Food Scarcities in Developing Countries" 32(3) *International Organization* 679 – 719.

15 *Ibid.*

16 *Ibid.*

17 Nathan & Benon (2020).

18 Musisi F (5 July 2021) "Inside OPM, UPDF and Police covid-19 cash deals" *Monitor*, available at <https://www.monitor.co.ug/uganda/special-reports/watch-inside-opm-updf-and-police-covid-19-cash-deals-3461878> (visited 18 August 2022).

numbers of those who were vulnerable with the majority of intended beneficiaries not benefitting.¹⁹

There is evidence that cash transfers by telephone are less prone to the fraud risks and other challenges commonly associated with the bureaucracies of procurement, storage, transportation and distribution of in-kind items.²⁰ However, the evidence also suggests that there are other unique risk profiles associated with cash transfers such as:

1. Susceptibility to political manipulation based on inclinations to reward political support.
2. Possibilities of ghost beneficiaries.
3. Demands for kickbacks from the local elites who may seek for undue benefit from the cash transfer schemes.²¹

Moreover, the capability of the anti-corruption agencies to mitigate these risks is also questioned. Several scholars have highlighted deficiencies in their institutional capacity which are believed to be a recipe for encouraging public malfeasance.²² There is also a belief that the deficiencies are compounded by the defective anti-corruption measures that the institutions adopt.²³ The anti-corruption measures have been faulted for being predominantly “post mortem” or rather reactive even when some forms of corruption may require more proactive interventions to be effectively dealt with.²⁴

To explain these institutional deficiencies some have blamed it on the lack of political commitment to the fight against corruption.²⁵ This lack of political commitment is largely thought

19 Nathan & Benon (2020).

20 Chêne M (2010) “Corruption Prevention Strategies in Cash Transfer Schemes” CMI U4 Expert Answer, available at <https://www.u4.no/publications/corruption-prevention-strategies-in-cash-transfer-schemes> (visited 16 September 2021).

21 Amundsen I (2020) “Covid-19, Cash Transfers, and Corruption Policy Guidance for Donors” CMI U4 Brief, available at <https://www.u4.no/publications/covid-19-cash-transfers-and-corruption> (visited 16 September 2021).

22 Kakumba, U (2012) “Assessing the institutional capacity of external agencies in holding local governments accountable in Uganda” 10 *Commonwealth Journal of Local Governance* 86 – 103. Gumisiriza P & Robert M (2018) “Anti-corruption institutional multiplicity façade in Uganda” 15(1) *The Ugandan Journal of Management and Public Policy Studies* 91 – 105.

23 Gumisiriza P & Mukobi R (2019) “Effectiveness of anti-corruption measures in Uganda” 2 *Rule of Law and Anti-Corruption Center Journal* 8 – 16.

24 Muhumuza W (2016) “The politics of anti-corruption reforms and reversals in Uganda’s changing political terrain” 4(1) *Economic and Political Studies* 62 – 84.

25 Tangri R & Mwenda AM (2006) “Politics, donors and the ineffectiveness of anti-corruption institutions in Uganda” 44(1) *The Journal of Modern African Studies* 101 – 124. Muhumuza (2016).

to be the cause of the resource constraints of the agencies, as it is believed that keeping the institutions resource constrained is a political means through which the politicians keep the anti-corruption agencies perpetually weak.²⁶ Similarly, this lack of political commitment is also said to be the cause of the selective prosecution of the “small fish” or low profile public officials, given that the “big fish” especially the politically exposed persons can use their political clout and connections to escape punishment when they engage in corruption.²⁷ These politically motivated challenges are then believed to be compounded by the unrealistic donor expectations which are usually oblivious of the other circumstances that constrain institutional performance.²⁸ The other problems cited for the persistence of corruption are the inadequacy of the laws and respective legal limitations on the powers of the anti-corruption institutions among others.²⁹

This paper therefore takes cognisance of the multiplicity of problems that have constrained the anti-corruption fight, or to use the language of the crusaders derailed the war against corruption as documented in the literature which may not be disregarded. However, other than dwell on these well-known problems, the paper highlights the value that anti-corruption institutions may derive from increased use of technology in the fight against corruption, how technology can help them deal with some of the existing problems and how ignoring the emerging technological trends in the anti-corruption response could potentially undermine the strides, that Uganda’s anti-corruption institutions have probably made in the endeavour to fulfil their rather ambitious mandate to eliminate corruption.

Using the example of the telephone cash transfer schemes, the paper reviews the preparedness of the anti-corruption agencies to counter the fraud risks entailed in cash transfers, a relatively new technological means of giving relief to the poor, and based on the deductions drawn from the arguments, there are propositions made on appropriate strategies for possible future action.

However, before delving into the main discussion, the paper provides some brief insights on the definition and conception of corruption.

2. THE DEFINITION AND CONCEPTION OF CORRUPTION

26 Muhumuza (2016).

27 Burnett ME (2013) “Letting the Big Fish Swim’: Failures to Prosecute High-level Corruption in Uganda” Human Rights Watch.

28 De Sousa L (2010) “Anti-Corruption Agencies: Between Empowerment and Irrelevance” 53(1) *Crime, law and social change* 5 – 22.

29 Gumisiriza & Mukobi (2019) at 8.

The conception of corruption is said to be prone to definitional and ontological misconstructions.³⁰ It has been suggested that there is possibly no understanding of what corruption is and this could be the reason for the abstract interpretations of corruption as the “abuse of entrusted power for private gain”.³¹ This paper will however not dwell on the definitional problems that have arisen in trying to ascribe meaning to the phenomenon of corruption.

Nevertheless, it is still notable that corruption appears to mean different things to different people.³² Sociologists and anthropologists regard corruption to be an issue of morals and social norms. Corruption is then presumed to be a consequence of moral decay.³³ Traditionally, corruption has been associated with decay and regression, or rather is believed to be synonymous with a gradual loss of the potency of virtuousness.³⁴ This conception of corruption has, as a result, bred the movement towards the quest for morality in the anti-corruption cause and the so called ethical globalisation.³⁵

From the moralist perspective, it then seems that the “war” against corruption has now transposed into a mass tragedy with heroes, villains and victims.³⁶ The heroes are the anti-corruption crusaders who continue to advocate against corruption. The principal villains are the corrupt officials who take bribes and plunder state resources. The legislators, who apparently, refuse to enact forceful legislation, as well as the bureaucrats and donors who are accused of not being as forceful in their demand for ethical behaviour are then considered to be complicit in the transgressions.³⁷ The victims are the ordinary citizens,³⁷ some of whom continue to wallow in

30 Basheka BC (2017) “Public administration and corruption in Uganda” in Basheka BC & Tshombe L-M *Public Administration in Africa* Routledge at 45 – 81.

31 Ledeneva A, Bratu, R & Köker P (2017) “Corruption Studies for the Twenty-First Century: Paradigm Shifts and Innovative Approaches” 95(1) *Slavonic & East European Review* 1 – 20.

32 Basheka (2017).

33 Bardhan P (2006) “The economist’s approach to the problem of corruption” 34(2) *World Development* 341 – 348.

34 Pauw J (2017) *The President’s Keepers: Those Keeping Zuma in Power and Out of Prison* Tafelberg, Cape Town, South Africa at 72.

35 Sampson S (2005) “Integrity Warriors: Global Morality and the Anti-Corruption Movement in the Balkans” in Haller D & Shore C *Understanding Corruption: Anthropological Perspectives* Pluto Press at 103 – 130.

36 Ibid.

37 Ibid.

poverty as result of corruption, and the legal clients who must pay bribes to get access to justice and public services.³⁸

On the other hand, economists emphasise incentives and organisations as the central determinants in the anti-corruption agenda. As a consequence, they advocate for incentivised institutional interventions to counter corruption.³⁹

Accordingly, economists frame anti-corruption strategies by creating positive or negative institutional incentives for rule-abiding behaviour.⁴⁰ Through various policies and institutional reforms, they seek to reduce opportunities for corruption and possibly increase its cost.⁴¹ To the economists, it may then be required that anti-corruption efforts are focused on disrupting undesirable institutional tendencies rather than countering individual misbehaviour.⁴²

3. NEW WINE IN OLD WINE BOTTLES: ASSESSING THE IMPLICATION OF THE EMERGING TECHNOLOGICAL ADVANCEMENTS ON THE FIGHT AGAINST CORRUPTION

The United Nations Convention against Corruption enjoins parties to adopt effective measures and strategies to prevent corruption.⁴³ In Uganda, the Inspectorate of Government Act mandates the institution to develop measures to detect and prevent corruption in public offices through examining practices and procedures of public institutions and ascribing appropriate controls where potential risks of corruption are spotted.⁴⁴

The Zero Tolerance to Corruption Policy 2019, which was enacted to streamline anti-corruption policy interventions in Uganda and which aims at ensuring transparent, accountable, efficient and effective use of public resources includes the Inspectorate of Government among the “proactive anti-corruption institutions”.⁴⁵ However, the problems arise from the conception of what proactive anti-corruption responses should entail. For instance, Akinola and Ozodike define

38 Ibid.

39 Bardhan (2006).

40 Hamilton-Hart N (2001) “Financial Regulation, Crisis and Policy Response” In Jomo KS (ed) *Malaysian Eclipse: Economic Crisis and Recovery* Zed Books: London at 67 – 89.

41 Akinola AO & Uzodike UO (2014) “Combating or condoning corruption? The two faces of anti- corruption agencies” 3(1&2) *Ubuntu: Journal of Conflict and Social Transformation* 35 – 61.

42 Ceva E & Ferretti MP (2017) “Political corruption” 12(12) *Philosophy Compass*.

43 Art 5(2) of the UN General Assembly, United Nations Convention Against Corruption, 31 October 2003, UN Doc A/58/422.

44 Sec 8(l)(i) of the Inspectorate of Government Act, 2002.

45 Directorate of Ethics and Integrity Office of the President (2019) “Zero Tolerance to Corruption Policy” at 12.

proactive anti-corruption strategies as actions that seek to prevent corruption through a cultural inculcation of ethical consciousness and awareness using various publicity initiatives.⁴⁶ A synonymous conception is reflected in the National Anti-Corruption Strategy which was developed to guide the implementation of the Zero Tolerance to Corruption Policy in 2019.⁴⁷ The key actions on corruption prevention under the Strategy in the medium term are largely moralistic focusing on promotion and entrenchment of ethics in the governance structures.⁴⁸ Accordingly, there are no provisions for early fraud detection mechanisms as key preventive actions in the Strategy.⁴⁹ It therefore seems that the National Anti-Corruption Strategy is oblivious of the value of early fraud detection. This is reflective of the tendency to limit interpretation of corruption prevention to the inculcation of ethics into what is often presumed to be a morally decayed society and in effect ignoring the practical institutional interventions such as early fraud detecting mechanisms which when well implemented are likely to be much more effective in preventing organisational fraud.⁵⁰

In a country where corruption is so prevalent that people are said to engage in corruption just to fit in with their peers,⁵¹ prosecuting a few hundred individuals in a year should generate questions on why only a few of those culpable are punished and why the fraud is always detected after rather than before. When the estimates of money lost through illicit financial flows is in trillions of shillings,⁵² the recovery of a few billion shillings should ideally, not be highlighted as a mark of success in the fight against corruption and questions on effectiveness remain legitimate in that regard. Reports of anti-corruption institutions that usually contain the rhetoric of how much money has been recovered and how many corrupt individuals have been prosecuted and convicted must be scrutinised.⁵³ Accordingly, questions on how much more money has been lost,

46 Akinola & Uzodike (2014).

47 Directorate of Ethics and Integrity Office of the President 2019. National Anti-Corruption Strategy 2019/2020-2023/2014 Strategic Intervention 4.

48 Ibid.

49 Directorate of Ethics and Integrity Office of the President (2019) "National Anti-Corruption Strategy 2019/2020-2023/2014: Strategic Intervention" at 4.

50 Ceva & Ferretti (2017).

51 Persson A, Rothstein B & Teorell J (2010) "The Failure of Anti-Corruption Policies a Theoretical Mischaracterization of the Problem" (19) *QoG WORKING PAPER SERIES* 19.

52 Ladu IM (2020) "Illicit financial flows cost Uganda Shs 2 Trillion" *Daily Monitor*, available at <https://www.tralac.org/news/article/12890-illicit-financial-flows-cost-uganda-shs2-trillion.html> (visited 16 September 2021).

53 For example see Inspectorate of Government (2020) "Bi-annual Inspectorate of Government Performance Report Popular Version July to December 2021". See also Uganda Media Centre (28 April 2020) "Achievements by the State House Anti-Corruption Unit since Inception", available at

that has not been recovered, and how many more people continue engaging in corruption unabated are pertinent.

These examples may help illustrate the point further. In December 2017, it was reported that the Government of Uganda had recovered Uganda shillings 71.4 billion (US\$ 18.9m) from corrupt officials for the first nine years of the existence of the Anti-Corruption Court, a court that was specially set-up as a Division of the High Court to try corruption related offences.⁵⁴ Yet, in the three months of the COVID-19 food distribution in the year 2020, the officials of the Office of the Prime Minister, only one of the numerous ministries, departments and agencies of Government, had spent Uganda shillings 55.8 billion (Approximately US\$ 15.8m) on food distribution which according to the Auditor General was largely misappropriated.⁵⁵ Relatedly it was also reported that the Defence Ministry irregularly used single sourcing for COVID-19 related procurements worth shillings 14.7 billion (approximately US\$ 3.8m) and had some contracts that were signed after payment was made.⁵⁶ The police were equally reported to have had questionable procurements worth shillings 21 billion (approximately US\$5.5m) at the time.⁵⁷ Later, it emerged that the Inspectorate of Government instituted an investigation into several COVID-19-related cases involving misappropriation of about shillings 300 billion (approximately US\$78.3m) across various ministries, departments and agencies of government but was yet to report on the outcomes of the investigations.⁵⁸ These examples seem to suggest that much more money continues to be lost through corruption regardless of the existing anti-corruption efforts and they should act as an eye opener for the anti-corruption institutions regarding the work that still lies ahead.

Moreover, it has since emerged that the COVID-19 cash transfer scheme by telephone was equally fraught with several irregularities that were reported soon after the exercise.⁵⁹ Mr Oloya

<https://www.mediacentre.go.ug/media/achievements-state-house-anti-corruption-unit-inception> (visited 15 September 2021).

54 Gumisiriza & Mukobi (2019).

55 Karugaba M (25 June 2021) "COVID-19: LCs to Identify Relief Cash Beneficiaries" *New Vision*, available at <https://www.newvision.co.ug/articledetails/106992> (visited 15 September 2021).

56 Musisi F (5 July 2021) "Inside OPM, UPDF and Police Covid-19 Cash Deals" *Monitor*, available at <https://www.monitor.co.ug/uganda/special-reports/watch-inside-opm-updf-and-police-covid-19-cash-deals-3461878> (visited 18 August 2022).

57 Ibid.

58 Alliance for Finance Monitoring (12 July 2022) "The Question of 'Where Did the Covid-19 Money Go' Remains Unanswered", available at <https://politicalfinanceafrica.org/the-question-of-where-did-covid-19-money-go-remains-unanswered/> (visited 18 August 2022).

59 Pithua A (2 September 2021) "Gulu Leaders on the Spot as Ghosts get Covid Relief Cash" *Monitor*,

the first recipient of the COVID-19 cash relief was allegedly a district councillor and a number of other district councillors in Gulu District allegedly received this cash relief even when they were not the intended beneficiaries.⁶⁰ Also, some given trade association leaders registered beneficiaries based on political and familial inclinations rather than the stipulated guidelines and there were allegations of extortion made against some of the leaders.⁶¹ Similarly data entrants were said to have manipulated lists of beneficiaries to include their own close friends and relatives who did not qualify for the relief.⁶² Upon investigation, parliament concluded that displays of the registers were avoided to possibly cover up some of the irregularities in the exercise.⁶³

Post Bank that had collaborated with the telecoms to provide platforms for mobile money payments made double payments to 6 000 beneficiaries which translated to about shillings 614 million (approximately US\$ 160 000). Attempts to recover the funds only yielded about shillings 380 million (approximately US\$ 99 240) and the rest of the funds were lost.⁶⁴ Also Post Bank remained with shillings 1.43 billion (approximately US\$ 373 457) for failed transactions which remained lying on its accounts.⁶⁵ It was unclear what happened to the funds thereafter. Interestingly, Parliament recommended that the Auditor General undertake a forensic audit of the exercise after all was done and dusted.⁶⁶

Whereas it would have been expected that Uganda's anti-corruption institutions would have assessed the possibility of abuse of the telephone cash transfers and their fraud risk vulnerability,⁶⁷ there appears to have been no such risk assessments of the same. Ideally, anti-corruption institutions should be cognisant of the corruption prospects that technology presents for the corrupt, who are abreast with the new technologies, so much as to ably manipulate

available at <https://www.monitor.co.ug/uganda/news/national/gulu-leaders-on-the-spot-as-ghosts-get-covid-relief-cash--3535116> (visited 16 September 2021).

60 Ibid.

61 Parliament of Uganda (November 2021) "Report on the Joint Committee on Public Accounts (Central and Local Government) on the Exercise to Verify the List Of Beneficiaries of the Covid- 19 Relief Funds" at 11 – 20.

62 Ibid.

63 Parliament of Uganda (November 2021) at 11 – 20.

64 The Independent (7 August 2021) "Covid-19 Cash: Post Bank Fails to Recover Sh235 Million", available at <https://www.independent.co.ug/covid-19-cash-post-bank-fails-to-recover-sh235-million/> (visited 18 August 2022).

65 Parliament of Uganda (November 2021) 11 – 20.

66 Ibid.

67 Chêne (2010).

them.⁶⁸ Yet, Uganda's anti-corruption institutions just as it is with other law enforcement agencies continue to lag behind the criminal networks in this regard and have not kept up with the pace of the contemporary technological advancements.⁶⁹ Recent performance reports of the Inspectorate of Government have highlighted skills gaps among their staff pertaining to the use of technology in fraud detection and prevention.⁷⁰

4. THE WAY FORWARD: TECHNOLOGY AND FUTURE OF THE WAR AGAINST CORRUPTION

Yet, it is true that technology can work as an effective anti-corruption measure enabling institutions to detect fraud earlier in time. However it is recommended that to support this technologically enabled fraud detection, problems of instant accessibility to information for the anti-corruption institutions must be resolved and would in effect facilitate quick action.⁷¹ It is suggested that this instant accessibility is facilitated by the integration of government electronic systems for easier monitoring.⁷² Notably, in Uganda, the various government electronic systems are still largely disintegrated.⁷³ Ultimately, it is necessary that anti-corruption institutions advocate for policy interventions to enable integration of the electronic governance systems and which could be a mighty weapon that Uganda can use in its war against corruption.

68 Oye ND (2013) "Reducing Corruption in African Developing Countries: The Relevance of E-Governance" 3(1) *Greener Journal of Social Sciences* 6 – 13.

69 Naím M (2012) "Mafia States: Organized Crime Takes Office" *Foreign Affairs* 100 – 111.

70 See Inspectorate of Government "Bi-Annual Report to Parliament".

71 Oye (2013).

72 Ibid.

73 Inspectorate of Government "Bi-Annual Report".