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Pursuing Reforms thru Integrity Development
Thru Integrity Development Review

Overview of the Project

Integrity development is a process of building and sustaining an agency's ability to prevent corruption from happening. It is about integrating corruption resistance strategies into the various organizational facets of an agency so that factors that contribute to corrupt behavior can be checked and those that discourage corrupt acts or malfeasance are reinforced. As the old adage goes, "an ounce of prevention is worth a pound of cure."

There are various approaches to prevent corruption. One tested formula is that of Robert Klitgaard's---averting corruption by demonopolizing power, circumscribing discretion, and raising accountability. Another is a four-point approach i.e. limiting opportunities for corrupt transactions, decreasing the gains, increasing the probability of being caught, and raising the magnitude and severity of penalties. In any case, a thorough diagnosis is a logical first step in order to establish activities that are vulnerable to corruption, check availability of control mechanisms that can detect and deter wrongdoings and evaluate effectiveness of penalty and reward systems.

Diagnosis can be done objectively by external parties. But self-assessment would be ideal especially for reform-oriented agencies. This is the idea behind the Integrity Development Review Project otherwise known as PRIDE: Pursuing Reforms through Integrity Development which was initiated by the leadership of the Department of Budget and Management and the Office of the Ombudsman with the support of the United States Agency for International Development in 2002.

The Integrity Development Review (IDR) is intended to assist the Office of the Ombudsman, together with its key partners[2] in the corruption prevention program of the government, in establishing a culture of professionalism and integrity in government, raising consciousness on corruption prevention and providing practical corruption prevention tools to improve organizational and systems integrity in public sector agencies.

Under the European Commission – Office of the Ombudsman Corruption Prevention Project, sixteen (16) public sector agencies are scheduled to undergo the IDR, five of which started in October 2005. These are the Bureau of Customs (BOC), Bureau of Internal Revenue (BIR), Department of Public Works and Highways (DPWH), Philippine National Police (PNP) and the Land Transportation Office (LTO). The Development Academy of the Philippines is undertaking the review of these selected agencies.

The integrity development framework builds on the Corruption Resistance Review (CRR) approach developed by the Independent Commission Against Corruption (ICAC) of New South Wales and the Corruption Vulnerability Assessment (CVA) tool adapted by DAP from the US Office of Management and Budget. The CRR helps agencies assess their level of corruption resistance and progressively develop and implement corruption prevention measures to meet certain standards of organizational integrity. CVA determines the susceptibility of agency systems to corruption and examines the adequacy of safeguards to forestall wrongdoings.

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[2] Namely the Presidential Anti-Graft Commission (PAGC), Civil Service Commission (CSC), Commission on Audit (COA), Department of Budget and Management (DBM) and the Department of Education (DepEd, a pilot IDR agency)

The IDR process that evolved in this project consists of two stages. Stage 1 involves corruption resistance review via guided self-assessment, indicators research and a survey of employees. Stage 2 demands a detailed corruption vulnerability analysis.

OVERVIEW OF THE AGENCY

History. The present Philippine National Police (PNP) traces its beginning on August 8, 1901 when the Philippine Constabulary or the PC was inaugurated as an insular police force under the American regime. During the Martial Law years, the once fragmented and diverse local police units were integrated into a national police force known as the Philippine Constabulary / Integrated National Police or the PC/INP. After the People Power Revolution of 1986, a new Constitution was promulgated providing for a police force, which is national in scope and civilian in character. Subsequently, R.A. 6975[3] established the Philippine National Police or PNP from selected members of the different major services of the Armed Forces of the Philippines.

Vision and Mission. The PNP envisions an organization of men and women who are committed to the vision of a professional, dynamic and highly motivated Philippine National Police working in partnership with a responsive community towards the attainment of a safe place to live, invest, and do business in. Its mission is to enforce the law, prevent and control crimes, maintain peace and order, and ensure public safety and internal security with the active support of the community.

Powers and Functions. Pursuant to Republic Act No. 6975, the PNP is vested with the following powers and functions:

1. Enforce all laws and ordinances relative to the protection of lives and properties;

2. Maintain peace and order and take all necessary steps to ensure public safety;

3. Investigate and prevent crimes, effect the arrest of criminal offenders, bring offenders to justice and assist in their prosecution;

4. Exercise the general powers to make arrest, search and seizure in accordance with the Constitution and pertinent laws;

5. Detain an arrested person for a period not beyond what is prescribed by law, informing the person so detained of all his rights under the Constitution;

6. Issue licenses for the possession of firearms and explosives in accordance with law;

7. Supervise and control the training and operation of security agencies and issue licenses to operate security agencies, and to security guards and private detectives for the practice of their professions; and

8. Perform other duties and exercise all other functions as may be provided by law.

Organizational Structure. In the discharge of its powers and functions, the PNP has an organizational structure described below.

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[3] An Act Establishing the Philippine National Police under a Reorganized Department of the Interior and Local Government, and for Other Purposes. R.A. 6975 was signed into law on December 13, 1990 and became effective on January 1, 1991.

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The Chief PNP heads the PNP Command Group assisted by the Deputy for Administration, Deputy for Operations, and the Chief of the Directorial Staff. The other offices directly under him are the Internal Affairs Service (IAS) and the Internal Audit Office (IAO).

The Directorial Staff consists of ten (10) Directorates, namely:

1. Directorate for Personnel and Records Management (DPRM), assists the Chief PNP in the management of PNP Uniformed and Non-Uniformed Personnel;

2. Directorate for Intelligence (DI), assists the Chief PNP in attaining intelligence objectives through effective management of all intelligence and counter- intelligence activities of the PNP;

3. Directorate for Operations (DO), assists the Chief PNP in the exercise of the command, control and direction, coordination and supervision of all activities concerning PNP operations such as deployment/employment of personnel;

4. Directorate for Logistics (DL), assists the Chief PNP in administration and management of logistics to support PNP operation;

5. Directorate for Plans (DPL), assists the Chief PNP in the areas of planning and programming operations most of which are strategic;

6. Directorate for Comptrollership (DC), assists the Chief PNP in the administration and management of financial resources;

7. Directorate for Police-Community Relations (DPCR), assists the Chief PNP in formulating and implementing of PCR programs, projects and activities;

8. Directorate for Investigation and Detective Management (DIDM), assists and advises the Chief, PNP in the coordination, control and supervision of investigation activities;

9. Directorate for Human Resource and Doctrine Development (DHRDD), assists the Chief PNP in formulation of policy and in the planning, coordination, direction, and supervision of all matters pertaining to human resource and doctrine development, and;

10. Directorate for Research and Development (DRD) assists the Chief PNP in matters of research and development, test and evaluation of self-reliant projects.

The National Support Units consist of nine (9) administrative support units and ten (10) operational support units. The Administrative Support Units are the following:

1. Logistics Support Service (LSS) provides logistics support services to all PNP units;

2. Computer Service (CS) provides IT services necessary in pursuit of the PNP mission and objectives;

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3.   Finance Service (FS) is responsible for the disbursement of funds, the accounting of the same and other fiscal duties;

4.   Health Service (HS) provides medical/dental services for PNP personnel and their direct dependents;

5.   Communications and Electronics Service (CES) provides communications electronics services and support to PNP units;

6.   Chaplain Service (CHS) provides spiritual and other counseling services for the moral growth/enhancement of PNP personnel and dependents;

7.   Legal Service (LS) serves as the legal arm of the PNP;

8.   Headquarters Support Service (HSS) provides administrative and technical support to NHQ; and

9.   Engineering Service (ES) is in charge of the overall planning, implementation, supervision, and evaluation of all PNP engineering programs, land utilization and housing activities.

On the other hand, the Operational Support Units are the following:

1.   Maritime Group (MG) performs all police functions over the Philippine Territorial waters and rivers;

2.   Intelligence Group (IG) serves as the intelligence and counterintelligence operating unit of the PNP;

3.   Police Security and Protection Office (PSPO) provides security to government officials, visiting dignitaries and private individuals authorized to be given protection;

4.   Criminal Investigation and Detection Group (CIDG) undertakes the monitoring, investigation and prosecution of all crimes involving economic sabotage, and other crimes of such magnitude and extent as to indicate their commission by highly placed or professional criminal syndicates and organizations; Its functions include among others, the conduct of organized crime-control, anti-car napping and anti-kidnapping operations;

5.   Special Action Force (SAF) functions as a mobile strike force or a reaction unit to augment regional, provincial, municipal and city police forces for civil disturbance control, internal security operations, hostage-taking rescue operations and other special police operations; such as anti-hijacking, anti-terrorism, explosives and ordnance disposal. Recently, the PNP Air Unit was placed under the supervision of SAF;

6.   Aviation Security Group (ASG) is responsible for the security of all airports throughout the country;

7.   Traffic Management Group (TMG) enforces traffic laws and regulations;

8.	Police-Community Relations Group (PCRG) implements the plans and programs that promote community and citizen participation in the maintenance of peace and order;

9.	Civil Security Group (CSG) regulates business operations and activities of all organized private detectives, watchmen, security guards/agencies and company guard forces. It also supervises the licensing and registration of firearms and explosives; and

10.	Crime Laboratory Group (CLG) provides scientific and technical investigation.

There are seventeen (17) Police Regional Offices nationwide corresponding to the regional subdivisions of the country. Directly under each regional office are Regional Mobile Groups (RMGs), Police Provincial Offices, and City Police Offices (CPOs) in highly urbanized cities. Under the Provincial Police Offices are the City and Municipal Police Stations, which serve as the main operating arm of the PNP for anti-criminality campaign.

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INTEGRITY DEVELOPMENT ASSESSMENT

The Integrity Development Assessment (IDA) is an approach to objectively assess an agency's level of achievement in instituting measures to enhance organizational integrity and to strengthen its resistance to corruption. IDA provides a set of standards or levels of accomplishment by which an agency can benchmark itself. The assessment does not elicit exact and quantifiable levels of institutional integrity. Rather, it is intended to trigger discussions that can lead to the identification of gaps in the agency's systems, policies and procedures. The IDA examines ten dimensions of institutional integrity, namely:

1. Leadership

2. Code of Conduct

3. Gifts and Benefits Policy

4. Recruitment, Selection and Movement of Personnel

5. Performance Management

6. Procurement Management

7. Whistleblowing, Internal Reporting and Investigation

8. Corruption Risk Management

9. Financial Management

10. Interface with the External Environment.

The level of achievement of the agency for each dimension is assessed vis-à-vis a five-point scale, with level one as lowest and level five, the highest. In each dimension, the evaluation is based on two items: approach and deployment. An approach is generally considered good if systematic and documented thus can be easily replicated. Deployment is generally good if the approach is applied and/or observed in all concerned units and offices within the agency. Level one represents the minimum standards. The scaling is cumulative i.e., to achieve a level three ranking an agency should also meet the standards set for levels one and two. Thus, the assessment easily yields possible steps that the agency can undertake to advance to the next level.

The Integrity Development Assessment for the Philippine National Police is a result of a guided self-assessment of key management and employee representatives.   Through a focus group discussion, management representatives of the various directorates, administrative and operations support units, and police offices and stations rated the PNP's level of achievement and deployment in each dimension. FGD participants include the senior management and process owners of the dimensions covered in the IDA.

Highlights of the PNP Integrity Development Assessment (IDA) Process

The Integrity Development Assessment (IDA) was conducted in the form of a Focused Group Discussion (FGD) in four camps of the Philippine National Police; namely: Camp Crame, Camp Olivas, Camp Osmeña, and Camp Catitipan.

During the conduct of the Integrity Development Assessment, the participants in the focus group discussion facilitated by the assessors, identified the corruption resistance mechanisms in place in the Philippine National Police and evaluated the levels of achievement of the organization in each of the ten (10) dimensions under review, using a guided self-assessment template.

Following the IDA scales, the participants initially rated each dimension individually. After tallying the individual ratings, they were allowed to discuss among themselves the justification for each rating until they arrived at a consensus rating for each dimension.

The IDA exercises in the PNP General Headquarters, Camp Crame, were held on April 25, 2006. Twenty-one ranking officers and representatives of heads of offices participated in the focus group discussions. The IDA exercises for the three (3) identified regional offices were held much earlier. Those for Region VII (Camp Osmeña) and Region XI (Camp Catitipan) were simultaneously held on February 13, 2006. Those for Region III (Camp Olivas) were held on February 20, 2006. Region VII (Camp Osmeña) IDA had 61 participants headed by the Regional Director, Region XI (Camp Catitipan) IDA had 19 participants, and Region III (Camp Olivas) IDA had 44 participants headed by the Deputy Regional Director.

1. LEADERSHIP

The role that leadership plays in promoting integrity in the organization cannot be overemphasized. In a society where institutions need to be strengthened, leadership in most cases determines the way an organization deals with the issue of integrity building. This dimension considers the equal importance of what a leader does and with what he or she professes.

Senior leaders and officials are key in setting values and directions, promoting and rewarding good governance, using performance management in proactively addressing ethical and accountability requirements. Many times resoluteness of the leadership determines the success of corruption prevention initiatives. Given the wide scope given to them, opportunities for abuse of authority should be carefully monitored. The agency should set clear organizational policies and structure in decision-making and accountability for senior leaders and officials.

The table below shows the criteria used by the participants of the Focus Group Discussion (FGD) in coming up with their self-rating for the agency.

Rating	Levels of Achievement
1	▪ Senior leaders or officials set organizational values, short and longer-term directions, and performance expectations. ▪ Senior leaders/managers articulate the importance for everyone in the organization to be ethical in their behavior and dealing with all stakeholders. ▪ Senior leaders/managers have clearly defined authorities and accountabilities.
2	▪ Senior leaders deploy organizational values, short and longer-term directions, and performance expectations. ▪ Senior leaders/managers take proactive steps to discourage staff from engaging in corrupt practices.
3	▪ Senior leaders/managers have specific responsibilities for prevention and detection of corruption. ▪ Senior leaders/managers are trained on corruption prevention and detection.
4	▪ Practices and performance of senior leaders/managers in preventing and detecting corruption are reviewed /evaluated. ▪ Decisions/actions of senior leaders/managers are randomly checked for possible abuse of authority/discretion, conflict of interest. ▪ Integrity enhancement/corruption prevention are integrated in management functions (planning, leading, organizing, controlling)
5	▪ The agency reviews the effectiveness of senior leadership in enhancing integrity of the organization.

PNP Leadership

The Philippine National Police is headed by the Chief PNP who in this assessment period is in the person of Gen. Arturo Lomibao. In the regions, the PNP leadership rests on the Regional Director. As such, he has operations and services groups working under him. The Regional Director has Police Provincial Offices and City Police Offices under his command as well as the Regional Mobile Group. On the other hand, the Police Provincial Offices have the Component City and Municipal Police Stations under them that serve as the main operating arm of the PNP for anti-criminality campaign. They also have the Provincial Mobile Groups to be used primarily for internal security operations.

The leadership of the Philippine National Police follows the chain of command. This hierarchical arrangement is shown on the PNP organizational Chart.

Assessment

The consensus ratings in the four sites for this dimension and the assessors' rating are shown below:

Table 1: IDA Rating on Leadership

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Leadership	3	3	3	5	2
Level of Deployment	90-100%	70-80%	90-100%	70-80%	

PNP National Headquarters, Camp Crame. For the leadership dimension, the focus group discussants arrived at a consensus rating of three (3) and pegged its deployment at 90-100%. However, they said this rating does not count in the participants' level of internalization of training programs attended.

The discussion about whether training is formal or not when referring to formal training on corruption resulted in agreement that having a completion certificate makes a training program formal. The PNP provides formal training programs to its officers and men whereby corruption is a subject. Furthermore, officers cannot be promoted to Superintendent level unless they pass OSEC. Since corruption prevention is a subject in the officers' training course, it is assumed that all PNP officers have had training in preventing corruption.

To further bolster their rating of three (3), the participants explained that during agency seminars and sermons, they always talk about doing good and value formation.

Based on the validation done, the PNP has a mandate. The PNP vision and mission, which are prominently displayed in offices and conference areas, are seen by and known to agency employees. The PNP values are likewise prominently displayed and documented.
The areas for improvement that the participants identified are on the need to gauge participants' internalization of the training they have undergone and identifying and implementing proactive steps to discourage staff from engaging in corrupt practices.

Given this self-rating, for them to advance to the next level, there is a need to monitor and evaluate the practices and performance of senior leaders in preventing and detecting corruption. This will also provide opportunity for checking of possible abuses of senior leaders in the exercise of their functions. In addition, these efforts in corruption prevention and detection must be integrated in the other systems of the agency, e.g., Performance Appraisal, Financial System, and Corruption Risk Management.

Region III, Camp Olivas. The consensus rating arrived at by the participants for this dimension was three (3) and its deployment, they said was at 70-80%. During the discussion, the participants thought at first that bullet 2.2, which states that senior leaders/managers take proactive steps to discourage staff from engaging in corrupt practices was not fully satisfied, however this was refuted by those who gave this rating to the satisfaction of the other FGD participants. Likewise, they agreed that the frequently received memoranda, issuances, and messages from the GHQ to prevent their staff from engaging in corrupt activities (e.g. Jueteng), which they in turn implement in their own groups, could satisfactorily address this requirement.

On the question of senior leaders' training on corruption prevention and detection, the participants have identified corruption prevention training as part of their executive course. In addition, the participants claimed that corruption prevention is secondary to performing missions or lending their men to accomplish missions.

When considering whether they could up their self-rating to four, there was a general agreement that they cannot yet fully satisfy 4.1 that says, "*Practices and performance of senior leaders/managers in preventing and detecting corruption are reviewed/evaluated.*" Although there are spot checks done by the National Headquarters officials in the regions, especially for jueteng operations (an official could be relieved from his post if such a case is found in his area), the participants said this would not entirely satisfy the requirement of 4.2. Thus, these requirements for the achievement of level four rating could be their areas for improvement.

The indicators research done yielded the presence of the sources for validation for this dimension, namely: agency mandate, organizational structure/functional chart, agency Manual of Operations, and Staff Handbook. It was seen that the regional office has the agency mandate prominently displayed together with the organizational chart. Each office has its organizational chart on display with the names (and pictures for some) of the personnel in that office tagged with their position and job description. For some offices, there are flow charts of the office operations and documented manual of operations but for others they only have the latter. All the handbooks on personnel originating from National Headquarters may be found in the HR Office.

Region VII, Camp Osmeña. The FGD participants came out with diverse individual ratings that spanned the range of Ratings 1 to 5. After the discussion of each rating level of the dimension starting from the first level to the highest level of achievement, the participants arrived at a consensus rating of three (*3*) in the Leadership dimension with 90-100% deployment. According to the group, there is a built-in system of leadership in the PNP- that is, the chain of command. Furthermore, they said PNP officers are schooled on leadership.

There was also a consensus that *Rating 4-Level 1 Achievement*, which states, "*Practices and performance of senior leaders/managers in preventing and detecting corruption are reviewed/evaluated",* is regularly done in the PNP. Its deployment was given 80% only because the main communication channel is letter of instruction/memorandum from management. This practice, they said, contributes to *Rating 5,* which states, "*The agency reviews the effectiveness of senior leadership organization in enhancing integrity of the organization".*

One of the steps they undertook to discourage staff from engaging in corrupt practices is the Regional Director's issuance of a memorandum entitled *Intensified Campaign Against "Kotong" and Other PNP Corrupt Practices* dated Oct. 11, 2005. This memorandum enumerates the most common corrupt practices of the PNP and directs its personnel to undertake nine measures to address these problems.

The possible sources for validation of this dimension are: Agency mandate, Organizational Structure/functional chart, Agency Manual of Operations, and Staff Handbook.

At the time of the assessment, Feb. 13-18, 2006, all these sources were present in the Regional office. The agency mandate was prominently displayed on the wall of the building. This was also found in the offices of the officials visited by the Assessment Team, e.g., Regional Director's Office, Bohol Provincial Director's Office, Office of the Deputy Regional Director for Operations, and Office of Chief of the Regional Operations and Plans Division. There was a gallery by the stairs going to the second floor of the building showing the pictures of the officers of the Regional office and the photo-documentation of some PNP Region VII events. Written on the driveway wall were the PNP Vision, PNP Mission, *Panunumpa sa Watawat*, Police Officer's Creed, and Police Officer's Pledge.

On the ground floor facing the stairs, a blackboard that provides details about Flag Ceremony and Flag Retreat could be seen. Alongside this were posters that remind police officers of their mandate, e.g., Police Challenge, Have you committed your random act of service today? A quote from the writings of Dr. Jose Rizal. At the entrance, a Directory of HQS PNP PROVII could also be found.

The present Strategic Plan of Region VII is patterned after the PNP Central Office but the Plans and Programs are, according to the FGD participants, tailored to the priority concerns and needs of the region. A copy of this was given to the Assessment Team. The plans and programs pertain to anti-criminality, Internal Security Operations, and Anti-Terrorism.

The 2005 Accomplishment Report of the PNP Region VII provides an update on above-mentioned plans and programs as well as an accounting of significant operational accomplishment. It was also noted that the Agency Manual of Operations is not a single-bound manual but each major area of operation has a manual of its own.

Given all these, it is suggested that to move PNP Region VII to the next level (Level 4) they should complete the requisites of Levels 4 completely. Since "practices and performance of senior leaders/managers in preventing and detecting corruption are reviewed/evaluated" is supposedly being done already, this could be continued and or enhanced. On the other hand, the Region's implementation of the PNP Anti-Corruption Plan, the PNP C.A.R.E. Program and the O.N.E. PNP Program could further strengthen the agency's campaign against corruption.

The PNP Anti-Corruption Plan is the output of the PNP Anti-Corruption Workshop in DAP-Tagaytay, January 19-20, 2005. The then PNP Chief Edgar Aglipay ordered its immediate implementation. The plan identifies abuse of authority for personal gains as one of the corrupt practices in the agency. Under this the following corrupt acts are identified: bribery, extortion, theft during conduct of police operations, and granting of permit to carry firearms outside residence (PTCFORS) to unqualified applicants. The counter measures identified are:

- Strict implementation of rules and regulations, policies, projects, programs, guidelines, and procedures;
- Effective monitoring and supervision of PNP mandated functions;
- Enhancement of Reward and Incentive System;
- Strengthening of the Internal Affairs Service down to the provincial level;
- Extensive dissemination and internalization of existing PNP policies, plans, and programs;
- Emphasis on discipline, values, and leadership enhancement in trainings and seminars;
- Strict application of the punitive sanctions for violation of PNP rules and regulations;
- Speedy disposition/resolution of cases; transparency in all police transactions and operations; Intensified counter-intelligence effort against illegal activities of personnel;
- Improved community reporting system-encourage citizens to report and file formal complaints (PNP Text 2920, Patrol 117, and various fora); and
- Tapping of Anti-Crime watchdogs and NGOs.

The successful implementation of this Plan is a challenge to the PNP leadership. Moreover, this could help the agency attain a higher IDA rating because this addresses the requirement of 4.3, which states that integrity enhancement/corruption prevention are integrated in management functions (planning, leading, organizing, and controlling). This will further lead them to level 5, which requires agency to review the effectiveness of senior leadership organization in enhancing the integrity of the organization.

Region VII could go up the next level (4) if all the criteria from Levels 1-3 and the ff. are achieved:

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1. Practices and performance of senior leaders/managers in preventing and detecting corruption are reviewed/evaluated

2. Decisions/actions of senior leaders/managers are randomly checked for possible abuse of authority/discretion, conflict of interest

Region XI, Camp Catitipan. The FGD participants reached a consensus rating of five (5) for the Leadership dimension in the Regional Office. However, they also agreed that its deployment is only 70-80%. The participants believe that their region has already fully satisfied the requisites of all the levels.

The indicators' research conducted revealed the presence of agency mandate and organizational structure/functional chart for these were prominently displayed in the building. Likewise, the agency manual of operations and staff handbook may be found in the HR Office.

According to the survey results, managers in the PNP inspire other employees to be "professional" (a high rating of 1.70). There was also a moderately positive response to the statement that "Managers in our agency do not abuse their authority". However, the respondents suggested the following to improve the leadership's contribution in preventing corruption in the agency: (1) leadership by example, (2) more training and value formation seminars/moral discipline, (3) leaders to have mastery of job, professional, fair, and observe transparency, (4) enforcement of policies, performance evaluation, discipline and punishment of the guilty, and (5) increase in salary, benefits, and promotion.

Assessors' Rating. The Team of Assessors gave the Leadership dimension of PNP an over all rating of two (2). A rating of three was not possible because 3.2 has not been fully satisfied- *"Senior leaders/managers are trained on corruption prevention and detection"* in all assessment sites. The introduction of corruption prevention and detection as a subject in Officers Training is fairly recent hence, not all officers could have been formally trained on this.

2. CODE OF CONDUCT

A code of conduct sets the standards of behavior expected of officials and staff of the agency. It defines desirable behavior for all types of work in the agency. Yet, to be an effective measure, the code of conduct must be communicated, understood and integrated in appropriate aspects of agency's operations.

The table below shows the criteria used by the participants of the Focused Group Discussion (FGD) in coming up with their self-rating for the agency:

Rating	Levels of Achievement
1	- The agency has a general code of conduct (RA 6713). - Disclosure is promoted by monitoring employees' compliance with annual submission of Statement of Assets and Liabilities and Net Worth (SALN) and Disclosure of Business Interest and Financial Connection.
2	- The agency has a customized code of conduct that includes concrete examples of ethically acceptable/non-acceptable practices and situations of conflicts of interests relevant to the different types of work carried out by the agency. - The agency Code of Conduct is actively promoted inside the agency. - All employees undergo orientation of the agency Code of Conduct and other training programs to strengthen commitment to public service.
3	- The agency Code of Conduct is consistently enforced, with managers having clear tasks of promoting and monitoring compliance. - Violations of the Code of Conduct are sanctioned. - Rewards are given to employees who consistently exhibit behavior consistent with the Agency Code of Conduct.
4	- The Code of Conduct has been integrated in key agency systems or mission critical functions. Applicable provisions of the Code of Conduct are included in contracts with external parties (e.g. suppliers). - Employees' record of adherence to or violation of the agency Code of Conduct is used as basis for promotion. - Disclosures of employees from SALN are analyzed and appropriate actions are taken.
5	The agency code of conduct is regularly reviewed for effectiveness in specifying and promoting the desired behavior of employees and in preventing corruption.

The PNP Code of Conduct

The Philippine National Police adheres to RA 6713 and customized this to cover the operations unique to the organization. This comes in the form of a handbook given out to all personnel.

Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors.

Table 2: IDA Rating on Code of Conduct

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Code of Conduct	3	2	3	3	3
Level of Deployment	90-100%	50-60%	90-100%	50-60%	

PNP National Headquarters, Camp Crame. During the Focused Group Discussion (FGD), the participants agreed to a consensus rating of three (3) for this dimension, with a level of deployment at 90-100%. Right off the bat, the participants informed the assessors that the PNP customized Code of Conduct has been recently reviewed and revised, which would entitle them to a rating of 5. However, since a bullet in rating 4 is unsatisfied, particularly 4.3, the group agreed to a rating of 3. The bullet 5.1 which PNP has achieved can be considered as their strength.

The PNP has a customized Code of Conduct and it is actively promoted inside the agency. According to the participants, their Code of Conduct is integrated in the course outline and is discussed in the Basic Training, the Officer's Training, and it is also considered in their performance appraisal or the Performance Evaluation Rating (PER). The (PICE) also helps in promoting the agency Code of Conduct.

The Commanders are held liable for 3.1, *i.e.* the agency Code of Conduct is consistently enforced, with managers having clear tasks of promoting and monitoring compliance. According to the participants, the Commanders conduct regular dialogue with their men on the Code of Conduct.

The PNP gives awards every week for good behavior. The fifty-two (52) weeks in a year is divided among the PNP offices, wherein each office will host the giving of the award. This gives the host office to recognize their model officers and employees. Every Monday, the host office would invite a distinguished guest to give an inspirational talk. Aside from the weekly award, there are other awards given out to PNP personnel such as the CSC Awards, the Soroptimists' award, the TOPP and COPP awards given by Metrobank and the Jaycees, among others.

As to bullet 4.1, the participants said that the PNP adheres to the new Procurement Law, and that all suppliers of PNP undergo accreditation. If a supplier is not accredited, then it is impossible for that supplier to win any contract with the PNP. The participants suggested that the Anti-Dummy law should be strengthened to hinder the occurrence of ghost projects with ghost suppliers.

As mentioned above, the PNP could not achieve a rating of 4 because bullet 4.3 is not met, as there is no unit in the PNP who analyzes the SALN submitted by its personnel.

Region III, Camp Olivas. The consensus rating arrived at is two (2) with 50-60% deployment. The issues that were discussed during the rating focused on the need for the approval of politicians in the appointment of Chief of Police or Provincial Director. This situation makes, for example the Chief of Police, feel indebted to the local official who selected him. The participants also said that sanctions are sometimes subjective, e.g., same offense but different sanctions due to humanitarian reasons. Hence, they expressed that they are not consistent in applying bullets 3.1 and 3.2, referring to the enforcement of agency code of conduct with

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managers having clear task of promoting and monitoring compliance and to the application of sanctions for violations of the code. However, the group asserted that they have already achieved 4.1 and 4.2. They said that the code of conduct has been integrated in key agency systems or mission critical functions and employees' record of adherence to or violation of the Agency Code of Conduct is used as basis for promotion. Both of these are considered strengths of the organization.

Region VII, Camp Osmeña. The FGD participants' consensus rating of this dimension is 3 and that it is fully deployed. They also believe that the region is already doing 4.1 and its deployment is 90%. According to the participants, they are already integrating the Code of Conduct in key agency systems or mission critical functions. Another area of strength that the group claimed was the satisfaction of 4.2. It means that the employees' record of adherence to or violation of the Agency Code of Conduct is used as basis for promotion. The group said this has 95% deployment.

Region XI, Camp Catitipan. The consensus rating is 3, with 50-60% deployment. The participants said that they are not sure if the provisions of their Code of Conduct are integrated in contracts with external parties. But they emphasized that they adhere to the new Procurement Law and that they abide by the Implementing Rules and Regulations set by R.A. 9184 (Government Procurement Act). The participants also said that although they submit their SALN religiously, they do not have a unit who analyzes the SALNs. All they do is compile it and submit it to the National Headquarters. The participants likewise mentioned that aside from the Code of Conduct, they have other mini-manuals or codes for the different functions of the PNP. Examples of these mini-codes or mini-manuals are the First Responder's Handbook, the Rules of Engagement, and the Manual on Crisis Management, among others.

Based on the survey results, a written code of ethical conduct is being followed in the PNP (a high rating of 1.67). A moderately positive rating (1.85) was given to the statement that "Adequate orientation on the code of conduct and other corruption prevention measures are provided in our agency". On the whole, the respondents rated this dimension very positively.

Assessors' Rating. The Assessors gave this dimension an over all rating of three (3) because all the requisites for its third level of achievement has been fully satisfied.

3. GIFTS AND BENEFITS POLICY

Gifts and benefits are offered innocently or as bribes. In the workplace, it is not unusual for officials and employees to be offered gifts and benefits in return for preferential treatment, promotion or access to privileged information. It is said that unwarranted gift/benefit acceptance may have the following consequences, namely: a) losing objectivity in the discharge of one's functions; b) impairment of reputation of the Office one represents; c) being stuck in a dilemma; and d) being caught in a corruption trap. It is therefore important for agencies to adopt clear policies and procedures to deal with gifts and benefits and the promotion of said policies and procedures to office personnel and clients.

The dimension on gifts and benefits aims to ensure accountability and enhance the transparency of agency officials and employees by properly reporting the offer and receipt of gifts and benefits. The table below shows the criteria used by the participants of the Focused Group Discussion (FGD) in coming up with their self-rating of the agency.

Rating	Levels of Achievement
1	▪ The agency has a written policy on receiving gifts and benefits with relevant examples that is consistent with RA 6713. ▪ The agency has written guidelines for donations. ▪ The agency has a written policy on offer of bribes.
2	▪ The gifts and benefits policy is made known to all officials, clients and suppliers of the agency. ▪ The agency has a registry of gifts, donations, and institutional tokens. (The existence of a registry does not mean the waiving of the No Gifts Policy) ▪ All gifts and benefits received by the agency or through any of its officials and staff are documented in an official register.
3	▪ The policies on acceptance of gifts and benefits and offers of bribe are consistently enforced, with managers having clear tasks of promotion and monitoring compliance. ▪ The gifts and benefits received and documented are disposed of according to procedures defined in the agency policy. ▪ Rewards are given to officials and staff who report offers of bribes. ▪ Sanctions are applied to officials and staff who fail to comply with the policy on gifts and benefits.
4	▪ The registry of gifts is available for examination by internal and external stakeholders. ▪ Bidding documents issued by the agency to inform potential suppliers/contractors that gifts and benefits should not be offered to employees. ▪ The gifts in register and reported bribes are regularly reviewed vis-à-vis treatment of agency's stakeholders.
5	▪ The agency's policy on solicitation and acceptance of gifts and benefits is regularly reviewed for effectiveness. ▪ Results of the review are considered in strengthening the gifts and benefits policy of the agency.

Gifts and Benefits Policy in the PNP

The Philippine National Police maintains that it has a written policy on solicitation and acceptance of gifts. There is also a policy on accepting donation of lands to be used for putting up police stations.

Results of Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors.

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Table 3: IDA Rating on Gifts and Benefits

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Gifts and Benefits	1	1	0	1	0
Level of Deployment	50-60% to 70-80%	90-100%		30-40%	

PNP National Headquarters, Camp Crame. The participants arrived at a consensus rating of one (1) for this dimension and they agreed to a 70-80% deployment. They said the reason for this rating is the full satisfaction of the criteria in said level. According to the participants, the PNP has a written policy on solicitation and acceptance of gifts and benefits consistent with RA 6713 (done just last week). The agency has also a written guideline on donations and a written policy on offer of bribes (anti-kotong memorandum). On donations, the participants said these are registered properties and out of 1,000 PNP lots, 80% are donated. However, they said they do not have a policy expert.

Region III, Camp Olivas. This dimension garnered a consensus rating of one (1) with a 90-100% deployment from the FGD participants. They said they could not give themselves a rating of two (2) because they do not have a registry of gifts yet although their agency has a registry for donations.

Region VII, Camp Osmeña. The FGD participants agreed to a self-rating of zero (0) because they do not have a written policy on acceptance of gifts and benefits with relevant example that is consistent with RA 6713. They said there should be a PNP policy on this and NHQ- Crame should make this and have it implemented through out the PNP. Nonetheless, there is a PNP policy on not allowing PNP to solicit gifts and benefits; this memo is absolutely against gifts. The agency has also a policy on donations; e.g., the mayor donates a police outpost, this will belong to the PNP, booking up the donation in the PNP accounts.

As an example of the region's serious regard for the above PNP guidelines, they have conducted an entrapment operation with applicants to find out if they are being asked for or giving gifts/bribes in the course of their application.

However, the participants agreed that one of the Region's strengths is the presence of 3.3- "*Rewards are given to officials and staff who report offers of bribes*." And its deployment is 95%.

Region XI, Camp Catitipan. The participants of the FGD arrived at a consensus rating of one (1) with a deployment of 30-40%. They claimed that all the criteria of level 1 have been achieved in their region. Cited as evidence of this is the existence of the policy on donations and memorandum against kotong.

The survey results showed quite a low rating although still positive (2.05) to the statement "The employees in our agency are made aware of the policy on solicitation and receiving of gifts." Many respondents (133) though refused to give an answer to this. Still a lower rating (2.20 - slightly positive) was given to the statement that "The transacting public and suppliers know the policy of our agency on gifts and benefits." And again many respondents (136) refused to answer.

Assessors' Rating. The Assessors gave this dimension an over all rating of zero (0) primarily because the agency has no explicit written policy on receiving gifts and benefits with relevant examples, guidelines for donations other than land, and written policy on offer of bribes.

4. HUMAN RESOURCE MANAGEMENT: Recruitment, Selection and Promotion of Personnel

The recruitment process provides the agency an opportunity to screen incoming employees for likelihood of corrupt behavior and conflicts of interest. The agency should be wary of nepotism or favoritism and ensure merit-based procedures in recruitment and promotion of personnel. It is highly desirable that upon entry, relevant interventions for new recruits include orientation of the Code of Conduct and work standards and training on corruption prevention and risk management. The promotion system can provide an opportunity for sanctioning corrupt behavior and rewarding people who comply with the agency's integrity measures.

Consistent with the objective of ensuring that the agency's personnel recruitment, selection and promotion system is based strictly on merit and moral fitness, the levels of accomplishment for this dimension are as follows.

Rating	Levels of Achievement
1	▪ The agency has a written guideline for recruitment, selection and promotion of personnel (e.g. Merit Selection/Promotion Plan following CSC guidelines) ▪ The agency has a Personnel Selection Board with rank and file career employee representative ▪ The agency has complete set of job descriptions and qualification standards for all positions
2	▪ Guidelines for recruitment, selection and promotion are disseminated to all employees ▪ PSB members undergo certain orientation and workshop on the selection and promotion process, CSC policies on appointments, ethical considerations in making decisions on recruitment and promotion.
3	▪ The policies/guidelines on recruitment, selection and promotion are consistently enforced ▪ The agency employs measures to prevent entry of corrupt employees (e.g. potential conflicts of interest are considered, background investigation conducted) ▪ The agency keeps records of meetings and decisions of PSB. ▪ Personnel appointments
4	▪ Basis of decisions on promotions and movements (deployment) of personnel that deviate from the recommendations of the Personnel Selection Board are documented. ▪ The agency conducts random checks of the process and decisions of the Personnel Selection Board ▪ The agency has a post employment policy for resigning/retiring personnel ▪ Blacklisting of erring personnel is practiced
5	▪ The outcomes of personnel recruitment, selection and promotion are regularly reviewed ▪ The agency's Merit Selection/Promotion Plan is regularly reviewed for effectiveness in enhancing integrity and preventing corruption ▪ Results of the review are used in enhancing the integrity of personnel recruitment, selection and promotion process.

The PNP HR Management: Recruitment, Selection and Promotion of Personnel

The PNP has specific policies and procedures for the recruitment, selection, and promotion of its personnel. Since the organization has both uniformed and non-uniformed personnel, said policies and procedures have distinct characteristics for each to obtain the best possible crop of personnel in the service.

For uniformed personnel, the PNP follows the National Police Commission (NAPOLCOM) issued Memorandum Circular No. 2005-002 - *Amending Memorandum Circular no. 2003-009 entitled "Further Amending NAPOLCOM Memorandum Circular no. 92-015 Prescribing A Standard Procedure For The Recruitment, Selection and Appointment Of PNP Uniformed Personnel Dated November 26, 1992" And Other Related Issuances.* There is also the NAPOLCOM Memorandum Circular Number 2005-006 dated

May 27, 2005 - "Rationalization of the Qualification Standards for the Initial Appointment in the PNP Uniformed Service."

These NAPOLCOM issuances set the Procedural Guidelines for the recruitment and selection of Police Officer I as follows:

A. Pre-recruitment Activities.

    The pre-recruitment activities begin with the PNP Directorate for Personnel and Records Management (DPRM), which prepares the quota allocation in consultation/coordination with the PNP Regional and NSU Directors. Once approved by the PNP Chief and the NAPOLCOM, this is distributed to the regions for them to undertake the recruitment process starting with activation of the Screening Committees down to the cities and municipalities and tri-media campaigns to attract applicants.

B. Selection of the Most Qualified Applicants at the City/Municipal Level.

    At the municipality/city level, the mayor creates an Ad Hoc Body that selects the most qualified applicants. Those applicants that pass the screening are endorsed by the mayor to the regional director through the provincial director.

C. Selection by the PNP Regional Screening Committee.

    The regional director endorses the municipal/city applicants to the Regional Screening Committee (RSC) for processing. The RSC conducts a battery of tests to the applicants and those who pass get to the Final Interview. Meanwhile, the PNP Intelligence Unit conducts character and background information on these applicants. The list of applicants who pass the Final Interview is submitted to the Regional Director who then submits it to NAPOLCOM for review and certification.

D. Certification by the NAPOLCOM.

T   he list of candidates that have been certified by the NAPOLCOM has now become the list of proposed appointees.

E. Preparation and issuance of appointment papers.

    The Regional Director directs the Regional Personnel and Human Resource Development Division to prepare the appointments of the said appointees. He then signs the appointment papers and submits these to the Regional CSC. Upon the approval of the appointments by the CSC, the Regional Office informs all concerned.

The recruitment, selection and appointment of qualified applicants to the National Office or a National Support Unit (NSU) follow the same procedure except for the Office in Charge, the composition of the Screening Committee, and the venue of the processing.

The PNP follows the revised Merit Selection Plan (MSP) for Non-Uniformed Personnel (NUP) that prescribes the Policies and Procedures in the hiring of new employees (NUP) under the approved staffing pattern issued on July 27, 2001.This Merit Selection Plan covers positions in the first, second, and third level positions of the Non-Uniformed Personnel of the PNP.

As regards the promotion of uniformed personnel, LOI 67/05 (CY 2005 Regular Promotion Program 2nd Phase) issued on Oct. 21, 2005 provides the guidelines and procedures in screening the best-qualified 2nd

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level Police Commissioned and Non-Commissioned Officers (PNP wide) for promotion to the next higher ranks. The major phases of screening and selection process for promotion are: (1) Pre-Screening, (2) Submission, evaluation, and screening of documents, (3) Board Interview, (4) Final Board Deliberation, (5) Preparation of Appointments, and (6) Civil Service Attestation, Issuance of Special Order, and Oath Taking. Likewise, there are guidelines and procedures governing the selection and placement of Police Commissioned Officers to key positions and other positions of responsibility in the PNP.

In the case of lateral entry to the PNP, the procedures followed are in keeping with the NAPOLCOM Guidelines. These are: (1) Initial Screening, (2) Conduct of Tests e.g., Physical Agility Test, Qualifying Exam, etc., (3) Final Interview with the Lateral Entry Board, (4) Chief PNP approval, and (5) NAPOLCOM Confirmation.

Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors.

Table 4: IDA Rating on Human Resource Management

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Human Resource Management	3	2	3	4	2
Level of Deployment	90-100%	90-100%	90-100%	70-80%	

PNP National Headquarters, Camp Crame. The FGD participants arrived at a consensus rating of three (3) and estimated its deployment to be at 90-100%.

Although they agreed that they consistently enforce the policies/guidelines on recruitment, selection, and promotion (3.1), the group expressed concern that adherence to these processes is sometimes compromised because of external factors (e.g., use of influence or "may reseta" from influential people). According to the participants, the PNP is handicapped because of the law (RA 8551) that gives the local executive the power to select the Provincial Director or Chief of Police (e.g., the governor to select the provincial director and the mayor for the chief of police). The participants also said that the rank is determined by the PNP but the position is dependent on the choice of the politicians.

The group also stated that they do not practice blacklisting of personnel but they mete out sanctions. Besides, service reputation is considered in assigning people to key positions, they said.

The participants also acknowledged that there is no Promotion and Selection Board below regional level. At the initial screening the candidate may be found fit but later on during subsequent screening for promotion he/she might be found unfit. However, they consider promotion as less problematic than recruitment.

As to schooling, the participants agreed that for local training and education the list is in place, but for foreign training, that is another matter.

The indicators research yielded the presence of the documents needed for validation such as the documents listing the composition of the Personnel Selection Board and record of meeting, list of new hires and newly promoted personnel, RA 6713, CSC Memo Circulars, NAPOLCOM Memo Circulars, and Agency Manual of Operations/Policies.

The rating could go up if the criteria on Level 4 would be fully achieved. Specifically, the documentation of any deviation from the recommendations of the Personnel Selection Board for decisions on promotions and movements of personnel, the conduct of random checks of the process and decisions of the Personnel Selection Board, and having a post employment policy for resigning/retiring personnel.

Region III, Camp Olivas. The participants' consensus rating was two (2) with a 90-100% deployment. They explained that the rating could not go up to three (3) because they are not sure about completely satisfying 3.1, which is the consistent enforcement of the policies and guidelines on recruitment, selection, and promotion (e.g., incidence of promotion granted without CSEE, issuance of new guidelines to fit a person, etc.).

Two of their strengths lie on the satisfaction of 4.2 and 4.3. The participants said that the PNP conducts random checks of the process and decisions of the Promotion and Selection Board. That is why deviations from guidelines are found out and addressed. They said that the agency has a post employment policy for resigning/retiring personnel (e.g. surrendering their gun, etc.)

The participants identified two areas for improvement. These are the deviations from guidelines of PSB and non-documentation of recommendations made.

Based on indicators research, the regional office has most of the documents listed under possible sources of validation, specifically:

1. Documents on composition, criteria used, frequency of meeting and records of discussions of the Personnel Selection Board
2. List of profile of new hires
3. List of newly promoted employees
4. A copy of Republic Act No. 6713:Code of Conduct and Ethical Standards for Public Officials and Employees
5. Agency manual of operations/policies

The agency could attain the high rating of 4 if these requirements are achieved:

1. The policies and guidelines on recruitment, selection, and promotion are consistently enforced (3.1)
2. Basis of decisions on promotions and movements (deployment) of personnel that deviate from the recommendations of the Personnel Selection Board are documented (4.1).

Region VII, Camp Osmeña. The participants made a consensus rating of three (3). They said that they have satisfied all the requirements of levels one and two. Moreover, the HR regularly posts the list of candidates on the bulletin board and the results of the examinations. The participants also claimed that a background check is conducted on applicants to determine their reputation and possible involvement in any questionable or criminal activities.

The group also claimed that 4.1 - the basis of decisions on promotions and movements of personnel that deviate from the recommendations of the Personnel Selection Board are documented - is 100% deployed. This is one of the strengths of the regional office. Another identified strength is the transparency of their recruitment and selection activities as evidenced by the publication of test results in a public place for everybody to see.

The indicators research yielded documents listing the composition of the Personnel Selection Board and records/minutes of meeting, list of new hires and newly promoted personnel, RA 6713, CSC Memo Circulars, NAPOLCOM Memo Circulars, and Agency Manual of Operations/Policies.

To go up to the next level, they must further strengthen the requirements of level 3 and completely satisfy the requirements of Level 4.

Region XI, Camp Catitipan. The self-rating of PRO XI participants with regard HRM is four (4) with a deployment rating of 90-100%.

PRO XI strictly follows PNP Memorandum Circular Number 2005-006, Flow Charts in pre-recruitment activities and recruitment and selection proper in the PRO and City/Municipal levels are well spelled out and easy to understand. With regards to promotions, PRO XI strictly follows the guidelines set by the NAPOLCOM and NHQ-PNP. There is a possibility though that recruitment may not be widely disseminated to the target applicants in the region.

The Assessors gave them a rating of 3 because based on validation, there is no post employment policy for resigning/retiring personnel nor is there a practice and policy on blacklisting of erring personnel.

To go up the next level, the region could focus efforts on satisfying the requirements of Level 4. Although it has already achieved all the requirements from levels 1 to 3, and practices some of the criteria in Level 4 and 5, it has no post employment policy for resigning/retiring personnel.

According to the survey results the respondents gave a moderately positive rating (1.80) to the statement that the process for recruitment and promotion in their agency follow a set of criteria. A lower rating (2.33-slightly positive) was given to the statement that says the process of recruitment and promotion in their agency is free from external influences. When asked for suggestions to improve the process of recruitment and promotion, the respondents gave these suggestions: (1) strict implementation of selection criteria, give more weight to educational qualification (from 150 respondents); (2) no political accommodation, influence peddling, and nepotism (from 99 respondents); (3) promotion to be based on merit, performance, and promote even those with pending cases; (4) promotion to be based on seniority, length of service, and (5) systems upgrade –process too tedious and follow quota.

Assessors' Rating. The Team of Assessors rated this dimension a two (2). All the assessment sites have fully completed the requirements of Levels of Achievement 1 and 2. However, they were not able to completely satisfy the criteria of Level of Achievement 3 particularly, 3.1 and 3.4.

5. PERFORMANCE MANAGEMENT

A key aspect governing the relationship of the managers and employees of an agency is the divergence of individual interests with that of the organization. An effective way to align individual and organizational interests is to clarify the agency's vision, mission and goals and set individual targets based on agency's goals.

Performance management ensures that agency goals are met since regular monitoring can increase the likelihood of spotting unproductive activities of employees. Efficient and effective units or agencies do not only save time and resources, but they are more resistant to corruption. Performance management can also address possible negligence of duty. A performance management system that sets incentives for honest behavior and disincentives for unethical behavior contributes to building resistance to corruption.

Relatedly, the levels of agency achievement insofar as using the performance management system to raise the institutional integrity are given below.

Rating	Levels of Achievement
1	- The agency has set organization goals, targets and performance indicators. - Performance targets and work plans at the unit and individual levels are based on these goals.
2	- The agency has a performance management and evaluation system in place. - Managers and supervisors are trained on performance evaluation and management. - The basis of performance monitoring and evaluation are made known to all employees.
3	- The agency regularly prepares reports (e.g. annual report, agency performance report) to assess accomplishment of its goals and targets. - The agency regularly evaluates individual performance. Individuals are made to report on their accomplishments vis-à-vis goals and targets. - The agency consistently rewards good performance and sanctions poor performance and negligence of duty.
4	- The agency links staff performance ratings with the attainment of their unit's targets and level of performance. - Levels of agency/individual performance are analyzed to relate with corruption incidence in the agency. - Agency annual reports made available to the public to account for what the agency has accomplished vis-à-vis targets and disclose what it plans for the future.
5	- The agency regularly reviews the effectiveness of its performance management system in enhancing integrity and preventing corruption. - Results are used to improve the agency's performance evaluation and management system.

The PNP Performance Management

The Philippine National Police has a performance management and evaluation system in place for individual personnel and the organization.

Republic Act 6975, otherwise known as "The Department of Interior and Local Government Act of 1990" provides for the establishment of a performance evaluation system which shall be administered in accordance with the rules, regulations, and standards, and a code of conduct promulgated by the National Police Commission for members of the Philippine National Police (PNP).

The National Police Commission, in line with this provision, issued Memorandum Circular No. 92-012 entitled "PNP Performance Evaluation System" on Nov. 13, 1992 to implement a PNP Performance Evaluation System for the improvement of individual efficiency, discipline and organizational effectiveness. On September 23, 1993, the NAPOLCOM issued Memorandum Circular No. 93-019 amending Memorandum Circular No. 92-012 prescribing the use of 5-point rating scale in compliance with the Civil Service Commission Memorandum Circular No. 12 series of 1993.

The PNP has a Performance Evaluation Rating System Manual that contains the declaration of policies, specific guidelines, the operational procedures, and administrative provisions. The individual rating form for Level I (POI-POIII) lists four dimensions (Output, Job Knowledge, Work Management, Interpersonal Relationship, Concern for the Organization, and Personal Qualities) each with corresponding performance indicators and point allocation. The Second Level (Chief Inspector to Superintendent up) and Third Level (Senior Superintendent up) have the same dimensions (Output, Job Knowledge, Supervisory Control, People Management, Organizational Responsiveness, and Personal Qualities) but with different assigned points. The rater is expected to give a numerical rating to be confirmed by the rate and attested by the reviewer as indicated in the form. The performance rating is done twice a year: January to June and July to December.

As for the performance management of the organization, the PNP holds itself accountable for the accomplishments of its plans and programs. Its present strategic plan is anchored on the Medium Term Philippine Development Plan. The regions adopt the strategic plan and add suitable programs to respond to the condition of the area. The regional plans and accomplishments are submitted regularly to NHQ – Directorate for Plans.

For 2006, the two major programs being pursued by the PNP are: (1) Organizational Reform in Operations and Procedures, which includes Capability Build-Up, Law Enforcement, and Support to Internal Security Operations; (2) Neighborhood Partnership for Community-Based Anti-Crime Programs, which includes Crime Prevention through Community-Oriented Policing System and Implementation and Monitoring of Integrated Area/ Community Public Safety Plan.

By end of each quarter, the regions submit a PNP Action Plan Evaluation Rating Worksheet. Based on the regional ratings, the NHQ ranks the regions from the highest to the lowest performing region. A monthly operational report is likewise submitted by the regions, the typical contents of which are: (1) An Executive Summary (2) The Situation- composition and disposition of troops and disposition and strengths of friendly forces (3) Operational Accomplishments on crime prevention and control, anti-crime campaign, implementation of special laws, special operations and public safety, coordination with other government and non-government agencies, gender and awareness development, and support to ISO and (4) Summary of Engagements. There are consequences to being repeatedly at the bottom of the list.

Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors:

Table 5: IDA Rating on Performance Management

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Performance Management	3	3	3	4	3
Level of Deployment	90-100%	90-100%	90-100%	50-60%	

PNP National Headquarters, Camp Crame. The participants of the Focus Group Discussion (FGD) gave this dimension a consensus rating of three (3) and its deployment at 90-100%. Negligence, they said, is subject to pre-charge investigation. On the Levels of Achievement, the group said 3.2 is not applicable to PNP because they do not have individual targets since the work is done by units. As to rewards and sanctions (3.3), the PNP gives awards and commendations as well as mete out disciplinary actions. They also remarked that the PNP has many disciplining bodies such as IAS, DIDM, NAPOLCOM, PLEB, and OMB and that its personnel work in an environment fraught with divergent influences and have to contend with these as well as with their individual value system.

With regard to 4.1, (*The agency links staff performance rating with the attainment of their unit's targets and level of performance.*) the participants said PNP has a rating system for the unit other than the personnel and based on this, the regions are ranked from highest to lowest. There was once a directive that the commanders of the bottom three would be relieved of their posts, but in the end this was not implemented (target then was 5%). An example for 4.2 (*Levels of agency/individual performance are analyzed to relate with corruption incidence in the agency.*) in the PNP, they said, is its one-strike policy on illegal gambling; meaning once it is proved this happened in your area, you would be relieved of your post. The participants also observed that they have already satisfied the 5th Level of Achievement because the PNP keeps reviewing its own rating system to further improve it. These accomplishments are deemed to be the strengths of the organization.

Based on indicator research the PNP has both individual performances as well as organizational performance rating systems. For organization performance, the PNP abides by the DBM OPIF. The agency was able to show performance indicators, CSC Rules and Regulations on Performance Evaluation, DBM Circulars on OPIF, and reports that assess accomplishment of its goals and targets, such as monthly, quarterly and annual reports. It has been found also that the different directorates have their own set of performance criteria. There were records to show individual performance ratings, awards and commendations (e.g., medals, recognition) as well as cases filed for neglect of duty, and other sanctions.

Region III, Camp Olivas. The consensus rating given by the FGD participants to this dimension was a three (3) with a 90-100% deployment.

When asked why they could not give a rating of four (4), the participants said it is not possible because 4.2 (Levels of agency/individual performance are analyzed to relate with corruption incidence in the agency) has not been fully satisfied yet.

However, the group believes that they have completely satisfied both requirements of rating 5's level of achievement. These are:

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- The agency regularly reviews the effectiveness of its performance management system in enhancing integrity and preventing corruption.
- Results are used to improve the agency's performance evaluation and management system.

The above accomplishments could be considered as the strengths of this Regional Office.

Based on indicators research, the Regional Office has adopted the Strategic Plan of the National Headquarters with its vision and mission statements and performance indicators. A quarterly accomplishment report on the plan is sent to the Headquarters to form part of the Regional Office's performance rating. The regional office has a copy of the CSC Rules and Regulations on Performance Evaluation, DBM Circulars on OPIF and RA 6713. The HR personnel explained that they simply follow the directives from the National Headquarters and send reports as required.

Region VII, Camp Osmeña. The participants' consensus rating for this dimension was three (3) with 90-100% deployment. They explained that PNP on the whole and the PRO 7 subscribe to DBM's OPIF and conducts regular performance review.

Another agreement arrived at was that 4.3 is a practice of their office (100% deployment), that is, agency annual reports are made available to the public to account for what the agency has accomplished vis-à-vis its targets and discloses what it plans for the future. Region VII's accomplishments are announced through the media – they have open access to all stations (e.g., radio stations) and PRO 7 also has a regular police radio program.

All these possible sources for validation were present in the regional office:

- Vision and mission statements, strategic plan, annual reports, and agency performance indicators
- Performance appraisal system, distribution of performance ratings (lowest, average, highest)
- Republic Act No. 6713-Code of Conduct and Ethical Standards for Public Officials and Employees
- CSC Rules and Regulations on Performance Evaluation, DBM Circulars on OPIF, Agency Performance Review
- Reports of agency performance evaluation

The following references were found during the indicators research:

- NAPOLCOM Resolution No. 94-050 – Directing the conduct of an overall review and audit of the 1994 performance of all levels of command of the PNP
- Memorandum Circular No. 92-012 – PNP Performance Evaluation System
- SOP on Performance Evaluation Rating
- Concept of Performance Evaluation Rating (PER) Formula
- 2005 Accomplishment Report

For the Regional Office to move to the next level, it must completely satisfy the criteria under Level 4.

Region XI, Camp Catitipan. The FGD participants gave this dimension a consensus rating of four (4) with a 50-60% deployment. They believe that they were able to satisfy all the requirements of Levels1 to 4.

The indicators research found the presence of all the possible sources for validation. It was also noted that the job description is by position and not by rank.

The survey results on performance management showed a moderately positive rating (2.09) to the statement that employees in their organization are given a yearly performance bonus. When asked whether they have a personal performance target for 2005 set by their superior, a little more than half of the respondents (56.70%) answered yes.

Assessors' Rating. The Assessors agree with the general rating of three (3) given by the three sites. Based on indicators research, the criteria for Levels 1 to 3 have been satisfied.

6. PROCUREMENT MANAGEMENT

The government is the largest purchaser of goods and services; thus, the field of public procurement is understandably the most conventional battleground for corruption fighters. It is in public procurement that most of the "grand corruption" occurs with much of the damage visibly inflicted upon the development process in the financial aspect of poor countries.

The procurement system covers the process of purchasing goods and services. A poorly managed procurement system opens risks of corruption and wastage of resources due to poor quality of goods and overpricing.   Open, objective and transparent bidding, awarding of contracts, delivery and inspection procedures are essential elements in ensuring the integrity of agency's procurement. In line with this, the following levels of achievement have been adopted for this dimension.

Rating	Levels of Achievement
1	- The agency has adopted the new procurement management system (RA 9184). - The agency has an Annual Procurement Plan. - Third party observers are invited to witness procurement process (e.g. bidding evaluation, delivery, and inspection of goods).
2	- The agency has written procedures on different modes of procurement and checkpoints for receiving and inspection of goods and services procured. - Members of the BAC and other relevant personnel are trained on the different modes and processes of procurement. - BAC members are made to disclose potential conflict of interest in all transactions. - The agency has a centralized database of prices and suppliers of frequently procured items.
3	- BAC decisions and processes are well planned and documented. - The agency strictly monitors performance of suppliers and contractors against obligations (e.g. adherence to budget, price, time factors and quality standards). - Sanctions/penalties are applied for non-performing suppliers.
4	- Blacklisting of suppliers/contractors is practiced and shared to other government agencies. - Agency estimates are reviewed to reflect current/best market prices from Government e-Procurement Service. - Controls are instituted to ensure that specifications are not skewed or tailor-fitted to favor specific bidders. - The Code of Conduct is incorporated in the bidding documents. - BAC decisions and other procurement decisions and outcomes are audited.
5	- The agency plans its procurement based on its pattern of purchasing and consumption. - The agency regularly evaluates the effectiveness of its procurement management system in enhancing integrity and preventing corruption. - Results are used to strengthen the agency's procurement management system.

PNP Procurement Management: Planning, Bidding, Selection, Delivery and Inspection

The Philippine National Police follows the new Procurement Law, Republic Act 9184. In general, the procedures observed by the agency are as follows:

Step 1- Determine the logistical needs of the Unit
Step 2- Program the needs (by Directorate for Logistics)
Step 3- Submit for fund requirement (to the Directorate for Comptrollership)
Step 4- Approval by the Chief PNP
Step 5- Approval by the Secretary, Department of the Interior and Local Government
Step 6- Appropriation of Congress

With the implementation of RA 9184, the PNP observes the Standardized Bidding Procedures for Goods, which are: Pre-Procurement Conference followed by a two-week advertisement, Pre-Bid Conference, Submission of Eligibility Requirements & Bid, Opening of Bids (Opening of Eligibility Envelope &Eligibility Check, Opening of Technical Envelope & Preliminary Examination, and Opening of Financial Envelope), Bid Evaluation and Ranking, Post-Qualification, and Awarding of Contract. The Procurement Process from Opening of Bids to Award of Contract shall not exceed three months (Sec. 38).

Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors:

Table 6: IDA Rating on Procurement Management

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Procurement Management	0	3	1	3	0
Level of Deployment		70-80%	50-60%	50-60%	

PNP National Headquarters, Camp Crame. The participants arrived at a consensus rating of zero (0) primarily because the PNP has no Annual Procurement Plan (APP). The PNP has adopted the new procurement management system but as yet has no annual procurement plan, which is a requirement of the law. The agency complies with the other provisions of RA 9184 such as organizing a Bids and Awards Committee (BAC), sending the members of the BAC to the training on the new procurement law, etc. Presently though, PNP is still establishing specifications for purchases other than supplies.

According to the participants, there is blacklisting of suppliers by cancellation of orders but there is no system of sharing the information. Moreover, the screening system needs to be reviewed.

Region III, Camp Olivas. The consensus rating given to this dimension by the participants was three (3) with a deployment of 70-80%.

The participants believe PRO 3 merit a 3 because they are strictly following the Procurement Law. For example, Bids and Awards Committee (BAC) members and even suppliers are required to issue affidavit on non-relationship; BAC members attend seminars on procurement, etc.

The participants are recommending that NHQ set up a system of blacklisting unreliable suppliers and share this to the regions. Moreover, there is a need to ensure that 4.2 is strictly followed, that changes in specifications are not made midway to favor a sole supplier or that necessary features like the presence of safety mechanisms in guns are not disregarded.

A concern was raised about the perception that the performance of contractors is not strictly monitored because of limitation of resources for one. However, the participants claim that in the region they have already achieved two requirements of Level of Achievement 4. These are:

- 4.3- Code of conduct integrated in bidding documents.
- 4.4- BAC decisions and other procurement decisions and outcomes are audited.

These accomplishments could be considered the strengths of the organization.

During the indicators research, a BAC member was interviewed and the following documents were seen:

- BAC composition, frequency of meeting, records of discussion of the Bids and Awards Committee
- A sample of bidding documents with appropriate provisions on the code of conduct.
- Republic Act 6713: Code of Conduct and Ethical Standards for Public Officials and Employees
- A list of goods being subjected to a bidding process

Region VII, Camp Osmeña. The consensus rating arrived at by the group was one (1) with a deployment of 50-60%. They believe that PRO 7 has achieved all the criteria of Level 1 but not of the higher levels. The participants said that the procurement in the region is limited because they rely on NHQ for substantial procurement of needed logistics (supplies/equipment such as firepower, communication equipment, CDM equipment, and Investigative equipment).

However, the participants claimed to have achieved 2.2 with 70% deployment because they said relevant personnel are trained on procurement. Whereas 3.1 and 3.2 each have 95% deployment because the BAC invites the end-users to personally receive the procured items (they are included in the Acceptance Committee).

The PRO VII 2005 Accomplishment Report reflected the procurement activities of the region and the funds and logistics provided by the NHQ. The other sources for validation looked into which were present in the region were as follows:

- Documents with BAC composition, frequency of meeting, records of discussion of the Bids and Awards Committee
- A sample of bidding documents and check, with appropriate provisions on the code of conduct.
- Republic Act 6713: Code of Conduct and Ethical Standards for Public Officials and Employees
- List of procured items

The suggested measures to move agency/region to the next level of achievement are:

- Strict adherence to RA 9184
- The implementation of the PNP anti-corruption plans in the region.

PNP Anti-Corruption Plan: Corrupt Practices on Procurement

Corrupt Practices	Counter-measure	Indicator	Time Frame
Pre-bid malpractice Rigged bidding Manipulation of test and evaluation of delivered items for acceptance Delayed payment of claims Ghost/under delivery Delivery not according to specifications	*Prevention:* Transparency in all transactions Strict implementation of GAAM rules and RA 9184 Adoption of E-procurement system (GEPS) Strict observance of delivery acceptance procedure Strict implementation of Annual Procurement Program Strict observance of Sock Card System on Supply Issuances	No complaints from participating bidders Increase in number of participating bidders Positive feedback from end users	Starting Feb.1, 2005
	Education Issue SOP on all BAC members to discourage connivance Training of all personnel involved in procurement with RA 9184 Provide info on procedures or publication of the resolution made by test and evaluation sub-committee Establish clear-cut policies in the processing of documents by the chief of office concerned Immediate introduction of Government Electronic Procurement System (GEPS)	No. of seminars in RA 9184 conducted No. of Test and Evaluation properly conducted Dissemination of guidelines on pre-qualification and pre-acceptance	Starting Feb.1, 2005
	Deterrence Strict adherence to RA 9184 Publication of blacklisted suppliers and filing of appropriate changes Transparency by way of publishing distribution of supplies Strengthen inspection or monitoring committees	No. of vouchers disallowed by COA No. of products rejected No. of counter-intelligence activities	Starting Feb.1, 2005

Corrupt Practices	Counter-measure	Indicator	Time Frame
	Periodic conduct of counter-intelligence measures on personnel involved in procurement	conducted	
	Partnership Mobilization/involvement of NGOs in the monitoring and counting of delivered supplies/items, etc. Involvement of NGOs as observers in the conduct of public bidding	No. of NGOs invited as observers in the counting of goods/items delivered Invitations by BAC to NGOs	Starting Feb.1, 2005

Region XI, Camp Catitipan. The participants arrived at a consensus rating of three (3) with a deployment of 50-60%. They agreed as a group that the region has satisfied the criteria for Levels 1 to 3. The agency does not have an annual procurement plan but prepares a monthly program of expenditures. The latest program was for the month of December 2005 and the program for January 2006 is still for approval of the Regional Director.

The indicators research yielded the presence of documents for validation. Based on interview and documents review, the following were noted:

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- The agency has activated the Regional Bids and Awards Committee and the Regional Inspection and Acceptance Committee. General Orders were issued defining the composition of the RBAC. The NGO (accredited by PCRG), the Regional Chamber of Commerce and Industry, Philippine Institute of Civil Engineers were represented in the RBAC, as observers.

- Although not complying with Criteria 2, first bullet, the agency's use of the manuals provided by the Government Procurement and Policy Board (GPPB) would indicate that it adopts the policy guidelines on procurement, prescribed by the GPPB.

- Apparently, not all members of the BAC had undergone training on RA 9184 (Procurement Law), considering that the certificate of training submitted to the assessors showed that only one of its personnel attended the training-seminar on procurement.

For other documents, the participants referred the assessors to Camp Crame because they regularly send their reports to the Headquarters.

The survey results on Procurement Management showed a slightly positive rating on the following statements: (1) "Procurement in our agency follows the procedures as stipulated under the Procurement Law." (given a rating of 2.00) and (2) "Relevant personnel are well-trained on the entire procurement process-from bidding to inspection/utilization." (given a rating of 1.97). To improve the procurement process, the respondents suggested the following: (1) open bidding or direct canvass with transparency; (2) strict compliance to guidelines, rules and regulations; (3) survey of needs, be specific in the technical description of supplies or equipment being canvassed, quality before cost, quality control; and (4) carefully select personnel with proper training, no corruption.

Assessors' Rating. The Assessors agree with the general rating of zero (0) given by the NHQ because of the absence of an Annual Procurement Plan. The regional sites believed that the PNP Annual Procurement Plan is prepared by the NHQ and referred the assessors to Camp Crame for this document.

7. FINANCIAL MANAGEMENT

Any financial transaction is vulnerable to corruption. Issuing and receiving payments represent a significant temptation for opportunistic and potentially corrupt individuals especially if the transaction is in cash. While cash taking might represent only low value in terms of individual transactions and be only a small proportion of an organization's budget, they can represent quite considerable amounts of money annually. Even under a situation when funding is inadequate, profligate use of finances can happen due to loose controls, arbitrary setting of budgets and misallocation.

The objective of this dimension is to determine the existence and effectiveness of controls to prevent fraud and misuse of agency's finances. It also aims to enhance the agency's financial accountability. The ratings of the agency's performance under this dimension, together with the corresponding levels of achievements and standards per level are shown in the table below.

Rating	Levels of Achievement
1	- The agency adopts the prescribed government budgeting and accounting guidelines such as the New Government Accounting System (NGAS), DBM budget guidelines. - The agency has established control systems to ensure that its financial resources are protected. - Financial accountabilities are defined.
2	- Budgeting and accounting guidelines are disseminated to all concerned units. - The agency takes proactive steps to make all employees aware of their obligations not to use agency's resources for private purposes. - Management and relevant personnel are trained on budgeting, accounting, and financial management.
3	- The agency strictly/consistently enforces budgeting and accounting policies and guidelines (e.g. immediate liquidation of cash advances) - The agency regularly prepares financial reports containing actual expenditures vs. budget and explanation for variance, statement of income vs. target collection and explanation for variance, etc - The agency provides full audit trail for major financial transactions. Random audits are carried out, with reports and recommendations for action provided to management. - Reconciliation regularly conducted. Appropriate follow up action are taken on any findings as may be necessary.
4	- Computer systems have been integrated and provided with security (access codes) to ensure that fraud and other financial risks are minimized. - COA audit findings are immediately acted upon by management. - The agency's financial reports are published/made available for public inspection. - COA findings are made available to the public.
5	- Financial controls/systems are regularly reviewed to ensure effectiveness in preventing fraud. - Results of the review are used to strengthen the agency's financial management system.

PNP Financial Management

Managing the financial affairs of the Philippine National Police is principally lodged with the Directorate for Comptrollership. This function is carried out through four responsibility centers, namely, Budget and Fiscal Section, Management Section, Accounting Section, and Finance Section.

As tool for effective operations, the PNP has designed and integrated in its financial management systems framework the necessary control systems consisting of revenue/resource management system, budgeting system, cash management system and accounting system. Each system provides for sets of policies, processes and procedures to ensure the achievement of the system goals.

The revenue/resource management system deals with the efficient and effective resource planning and mobilization. The budgeting system is concerned with the planning, preparation, administration and accounting of the budget. The cash management system deals with planning and controlling the use of cash and embodies the various policies and processes for the receipts and disbursements of cash. The accounting system deals with the process of analyzing, recording, classifying, summarizing and communicating all transactions involving receipt and disposition of the overall funds and property of the organization, and interpreting the results thereof.

At the regional level or in each Police Regional Office is lodged the Regional Comptroller that functions the same as the Directorate for Comptrollership. It has also four divisions undertaking the budgeting, fiscal, accounting, and management services. Together with the Regional Finance Service, it services the financial operation requirements of the region, which covers the Provincial, District, City and Municipal Offices, as well as the different Support Units deployed in the Region.

Processes

Budget. The Regional Office prepares its own plan, called the Operational Strategic Plan (OSP), in accordance to what they deem as required in the given situation of the region. The OPS is the basis of the region in preparing its budget for the given budget year and varies from one region to another since said plans are made in particular to address the peace and order situation of the Region.

The OPS is prepared even before the planning guidance or cost estimation procedure is given by the Central Office. Once received, the Regional Office revisits its budget to conform to the procedures as well as to the budget ceiling prescribed by the Central Office. Before finalizing the budget of the regional office, the Regional Comptroller conducts a workshop with the representatives from the District, Provincial, City, and Municipal Office, so that the budget guidance with its priority programs and projects are explained in detail to all its constituents. The budget is submitted to the PNP-Headquarters and will be consolidated by the Program Directors

The budget execution for personal services and capital outlay is centralized while the MOOE is decentralized. The Region allocates the total Regional MOOE budget to the different District or Provincial Offices. The allocation is already predetermined based on the budget prepared at the start of the year. Any reduction on the budget item of the region is correspondingly deducted from the budget of the District or Provincial Offices, based on the program, which was submitted. The Provincial Regional Office Headquarters releases the MOOE monthly to the field unit under its command. The receiving unit issues an Acknowledgement Receipt, signed by the Provincial Director or his authorized representative and noted by the City Mayor and City Administrator.

Cash Management – Disbursement System. The system of disbursement at the regional office concerns the processes involved in the disbursing of funds to pay the obligations incurred and meet the requirements of its operations.

The process of disbursement commences from the time a claimant prepares a disbursement voucher. The Finance Section processes the claim when the voucher is complete with supporting documents. For control purposes, the voucher is indexed to check double payment. The Budget Section pre-audits the voucher and allocates funding before it releases the ALOBS. The Accounting Section certifies to the availability of funds and journalizes the voucher. The Finance Section issues and indexes the check. The Accounting Section posts and journalizes the entries in the books of accounts. The vouchers and check are forwarded to the Budget Section for control verification before the same are approved/signed by the RD/DRDA/TCRDS. The Chief, Finance Section also signs the check for release to the claimant.

Accounting System. The Police Regional Office adopted the New Government Accounting System in compliance with COA Circular No. 2001-004, effective January 1, 2002. The Accounting Section undertakes the system which involves the process of analyzing, recording, classifying, summarizing and communicating all transactions involving the receipt and disposition of government funds and property and interpreting the results thereof. It renders various accounting reports to monitor the financial performance of the region.

Table 7: IDA Rating on Financial Management

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Financial Management	2	3	3	4	2
Level of Deployment	70-80%	90-100%	90-100%	70-80%	

Assessment

PNP National Headquarters, Camp Crame. The FGD participants arrived at a consensus rating of two (2) with a 70-80% deployment. They said that 3.1 that states that "*The agency strictly/consistently enforces budgeting and accounting policies and guidelines.*" is not strictly enforced because of the urgency of the situation hence documents are processed although the requirements are still being completed or submission of requirements are done after the processing.

As early as 1970, some cash advances have not been liquidated yet.
Nonetheless, there are efforts to make people aware of their responsibilities such as memo circulars being given out. Likewise, Financial Training is regularly done. The PNP is about to start with Advanced Financial Management.

The indicators' research validated the participants' claim of having adopted prescribed government budgeting and accounting system such as the New Government Accounting System and DBM Budget Guidelines. Hence, they have established control systems and defined financial accountabilities. There were examples of memoranda/letters for information dissemination.

The agency has already achieved some of the criteria of Level 3 and 4 to a certain degree and these may be considered as their strengths. One weakness though that the PNP has to focus on is on Level of Achievement 3.1.

Region III, Camp Olivas. The participants came up with a consensus rating of three (3) with a deployment of 90-100%. They believe that the region has completely satisfied the requisites of this rating level and that they could have gone up to Level 4 if only 4.1 – "*Computer systems have been integrated and provided with security (access code) to ensure that fraud and other financial risks are managed and minimized.*" has been completely satisfied. The participants said COA audits them and COA findings are attended to.

Moreover, the participants claimed that the region has substantially satisfied all the other criteria of Level 4 as well as those of Level 5. These could be considered the region's strengths.

During the indicators research, the assessors saw the flowcharts of transactions clearly displayed, with timelines, and requirements. The staff yielded to some questions that validated the participants' claim regarding the presence of NGAS, DBM Circulars being followed, guidelines issued, and financial reports. Samples of these documents were shown to the assessors, including the COA report and the region's reply to the concerns brought out by COA.

Region VII, Camp Osmeña. The FGD participants arrived at a consensus rating of three (3) with a deployment of 90-100%. They proudly attest to the fact that since 2002, the region has fully implemented the National Government Accounting System (NGAS). The group, in going through each criteria of each level, found out that the region cannot get a rating of 4 because as yet, it cannot satisfy the 4.1 criterion: "*Computer systems have been integrated and provided with security (access code) to ensure that fraud and other financial risks are managed and minimized.*" However, they said they have been able to satisfy 4.2 – "*COA audit findings are immediately acted upon by management.*" The last instance took them a month to answer COA findings. In addition there was 80% deployment on this matter.

The indicators research did find the flowcharts, documents, communications and reports, which validated the claims of the respondents. It is compliant with NGAS, has a compilation of DBM Circulars (National Budget Circulars, Circular Letters, and Budget Circulars), Fiscal Directives and NAPOLCOM Resolution/Circular. The region keeps its own records and issues directives based on NHQ issuances.

Region XI, Camp Catitipan. The assessment exercise yielded ratings of 4s and 0s. But after the discussion, the FGD participants came out with a consensus rating of four (4) with 70-80% deployment. Some of the participants were not conversant with the existing financial management system, primarily because they are not part of the controllership division. During the FGD, the controllership department was represented by the chief accountant and controller.

After the assessment, a validation of the levels of achievement was conducted. This process was done through documentation and physical observation. The following operations were observed and documents reviewed:

- The Office of Comptrollership monitors the submission of accounting and budget reports as listed in the bulletin board located inside the Budget Section, like

    a. Statement of Allotment, Obligation and Allowances
    b. Fund Utilization of MOEE
    c. Report on the Distribution of MOOE
    d. Internal Audit Reports
    e. Program of Expenditures
    f. Budget Estimates/Proposal
    g. Program Review and Analysis of MOOE
    h. Quarterly Report of Utilization of RCF Funds (Reserve Contingency Funds)
    i. Report of Operations

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      j.   Analysis of Obligations
      k.   Statement of Disbursing I Officers Balance
      l.   Trial Balance
      m. Statement of Charges go A/P
      n.   Bank Reconciliation Statements
      o.   Statement of Allotment and Expenditures

- The Accounting Section provided also a copy of the Schedule of Unliquidated Cash Advances outstanding in the account of disbursing officers and employees, as of December 31, 2005. The earliest cash advance is August 23, 2005 and the latest is December 21, 2005, all current transactions.

- The Office has a compilation of DBM Circulars (National Budget Circulars, Circular Letters, and Budget Circulars), Fiscal Directives and NAPOLCOM Resolution/Circular.

- PNP-R11 is compliant with the New Government Accounting System. Journal Entry Voucher (JEV) RA 02-01-01 dated January 2, 2002 showed the conversion of old accounts to conform to the NGAS chart of accounts. The JEV is signed by the Chief Accountant.

- The regional office has in its file Fiscal Policy Directive 01-2002, showing the flow of payroll and disbursement vouchers. Attached to this document is the authorized signatories for personal services, MOOE classified funds, transaction requiring bidding (Logistics), other transactions. But the attachment did not bear the signature of the issuing official. The IDR assessor was also provided with functional chart of the PNP Internal Audit Office, Office of the Chief, RCD and the functional chart of the Office of the Regional Supply Accountable Officer.

These flow charts and functional chart showed graphic information of the control systems in place and the responsibilities and accountabilities of the process owners.

The PNP takes action on the COA audit findings. A memorandum dated July 12, 2005 was issued by the Chief, Management Division of the Directorate for Comptrollership, PNP-NHQ, directing the Regional Director of PNP-PRO 11 to submit a report on his actions on the COA findings. Through a memorandum dated August 3, 2005, the Regional Director reported his actions on the audit findings, in compliance to the directive of the Directorate.

From the documents gathered, the assessors believe that 3 is the possible rating for this dimension in PNP-R11 because it has not yet computerized its system of operations.

Based on the survey results, the respondents gave a moderately positive rating to the statements that " The management scrutinizes our agency spending." (1.95) and " Financial statements and audit reports of our agency are accessible." (2.13).

Assessors' Rating. The Team of Assessors gave this dimension an over all rating of two (2) following the self-rating of PNP – NHQ since financial management in the regions takes direction and advice from the Headquarters Comptrollership.

8. WHISTLE BLOWING, INTERNAL REPORTING AND INVESTIGATION

Whistle blowing should be encouraged in every agency, as it is one of the fastest ways of detecting corruption. However, it is most difficult for staff/officials to do. Many times reporting has led to harassment of the whistleblower, or worse, complete reversal of the case where the whistleblower is victimized. Incentives and protection are therefore necessary to encourage employees to report corrupt behavior or practices.

This dimension aims to determine the existence, within the agency, of a mechanism for Whistle Blowing, Internal Reporting and Investigation of graft and corrupt practices and to foster a conducive environment for such mechanism.

The table below shows the criteria used by the participants of the Focused Group Discussion (FGD) in coming up with their self-rating of the agency.

Rating	Levels of Achievement
1	- The agency has a written policy or guideline to encourage its employees to report corrupt or unethical behavior within the agency and government in general. - The policy or guideline specifies what constitutes corrupt and unethical behaviors, the procedures and responsibilities for reporting. - Roles and responsibilities of staff involved in investigation are clearly defined.
2	- The agency disseminates the policy on internal reporting and investigation to all employees. - Employees are trained on how to report corruption. - Relevant personnel receive training in the handling of complaints and reports of corruption.
3	- The agency initiates investigations of reported corruption and tracks complaints/cases until final action is taken. - The agency keeps full and complete record of all reports. - The agency protects employees who report corrupt behavior/suspicions of corruption. - The agency protects the rights of suspected individuals when investigating reports of corruption.
4	- The agency regularly monitors progress and outcomes of every investigation. - The agency imposes appropriate sanctions to erring employees and officials (includes those who submit malicious reports). - The agency reviews and analyzes reports and statistics on incidence of corruption to identify patterns, which could indicate weaknesses of the system.
5	- The agency regularly assesses the effectiveness of the internal reporting and investigation system in enhancing integrity and preventing corruption. - Results of the review are used to strengthen management systems and enhance internal reporting and investigation processes.

Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors.

Table 8: IDA Rating on Whistleblowing, Internal Reporting and Investigation

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Whistleblowing, Internal Reporting & Investigation	0	4	1	1	0
Level of Deployment		90-100%	90-100%	30-40%	

Whistleblowing, Internal Reporting and Investigation in PNP

PNP National Headquarters, Camp Crame. The participants in the Integrity Development Assessment focus group discussion rated the PNP Headquarters zero for this dimension. Accordingly, the PNP does not have clear guidelines or policy on internal reporting and investigation of corrupt or unethical behavior, in particular, on motu propio investigations. The participants believe, however, that PNP members are incidentally trained on how to report corruption when they receive training on the PNP Code of Conduct. They also claimed that the term "whistleblower" is a negative and unpopular term in the PNP and may be taken to be synonymous to "destablilizer" or "technical criminal".

Region III, Camp Olivas. The participants in the IDA in PNP Region III rated the regional office 4 for this dimension. They claimed that there are existing means within the region to report corruption. To facilitate reporting, there are standard forms used.

Like other regions, there are existing regional and provincial offices of the Internal Affairs Service, which receives and investigates complaints against PNP members.

Region VII, Camp Osmeña. The participants in the IDA in PNP Region VII rated the regional office 1 for this dimension. There is an established Regional Internal Affairs Service in the region, which receives complaints against members of the PNP. Moreover, there is a provincial Internal Affairs Service in every provincial office in the region. Aside from this, there is also a mechanism for airing grievances before the Grievance Committee. The Regional Director also gives his men the opportunity to discuss with him their problems in their regular dialogues.

Policies on reporting corruption are disseminated once a week through the Police Information and Continuing Education (PICE). The PNP leadership also takes advantage of flag ceremonies and command conferences in disseminating the policy.

The regional office protects employees who report corrupt behavior from harassment by imposing preventive suspension upon the respondent and by withdrawing his ID, firearm, and badge. It also protects the rights of suspected individuals when investigating reports of corruption by giving them due process, transferring them to a safer environment, and giving them the opportunity to explain their side especially to the media. Appropriate sanctions are also imposed to erring police officers.

Region XI, Camp Catitipan. The participants in the IDA in PNP Region XI rated the regional office 1 for this dimension. Like other regions, there are existing regional and provincial offices of the Internal Affairs

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Service, which receives and investigates complaints against PNP members. The participants claimed that there is a written policy or guideline on internal reporting and investigation contained in the PNP Code of Conduct. Such policy, accordingly, specifies what constitutes corrupt and unethical behavior, the procedures, and responsibilities for reporting.

The survey results on Whistleblowing showed that respondents gave a moderately positive rating (1.91) to the statement, "Employees are encouraged to report corrupt and unethical behavior." And to the statement, " Employees who report corrupt behavior are protected." (2.16). The respondents also gave these suggestions: (1) protection for whistleblowers; (2) fearless system of reporting, incentives to those who report; (3) proper dissemination of reporting procedures and guidelines, evidence to back up report; (4) clear reporting channels; and (5) investigation is done by an independent body, no "palakasan", transparency.

Assessors' Rating. Following the rating of the IDA participants in the PNP Headquarters in Camp Crame, the team of assessors rated the PNP 0 for this dimension. The team noted the lack of a written policy or guideline on internal reporting and investigation of corruption and unethical behavior although admittedly, there is an established internal machinery that investigates complaints filed against police officers.

The Internal Affairs Service (IAS), created pursuant to R.A. 8551 (PNP Reform and Reorganization Act), investigates complaints, gathers evidence in support of an open investigation, conducts summary hearings on PNP members facing administrative charges, files appropriate criminal cases before the courts, and assists in the prosecution of the case. Not being a disciplinary authority, its recommendations are submitted to the proper disciplinary authority for disposition or adjudication. The IAS is headed by the Inspector General and assisted by a Deputy Inspector General.

The Directorate for Investigation and Detective Management (DIDM), on the other hand, conducts pre-charge investigation on complaints brought against PNP members directly with the different disciplinary authorities who may then impose administrative punishment after due notice and summary hearing. Both IAS and DIDM have offices in the regional, provincial and district or city police offices.

The PNP does not have definitive rules exclusively for internal reporting although various memoranda and issuances equally apply to complaints filed against a police officer by the general public and by another police officer. NAPOLCOM Memorandum Circular No. 2002-13 prescribes the rules of procedure in the investigation and disposition of administrative complaints against PNP personnel before the IAS, including the administrative offenses and appropriate penalties. The IAS also published a PNP Manual on Summary Proceedings pursuant to R.A. 6975 and NAPOLCOM Memorandum Circular No. 96-010. Annex B to NAPOLCOM Memorandum Circular No. 2003-01, meanwhile, delineates the functions of the Inspector General, his Deputy, and the personnel involved in the investigation.

The Philippines does not have a whistleblower law that protects the rights of whistleblowers and gives incentives to them. Nevertheless, there is a Witness Protection Program under the auspices of the Department of Justice pursuant to R.A. 6981. It is doubtful, however, if potential whistleblowers from the PNP may take advantage of the program. Under the law, members of the law enforcement are particularly excluded from the coverage of the protection. The PNP neither has any written guidelines or policy protecting whistleblowers from retaliatory acts.

In order for the PNP to achieve a higher rating, it is recommended that a written guideline or policy be issued by the PNP leadership that specifies the subjects of a whistleblower report; protects the rights of whistleblowers, their relatives, and other persons giving them support from retaliatory acts; gives incentives and rewards to whistleblowers; outlines the procedure for reporting and investigation of the reports; protects the rights of suspected individuals from malicious reports; and clearly defines the roles and responsibilities of personnel involved in the investigation.

9. CORRUPTION RISK MANAGEMENT

Corruption Risk Assessment is a systematic process of identifying, analyzing, evaluating, sourcing and prioritizing corruption risks, analyzing the existence of corresponding controls, its sufficiency and operation as well as looking into concrete steps on how should residual risks be managed. Risk is defined as the probability of an event occurring that could have an adverse effect on the achievement of objectives. Risk is measured in terms of consequences and likelihood. Risk assessment is an important management tool in detecting and preventing corruption.

The following is a tabular presentation of the levels of achievement under this particular dimension.

Rating	Levels of Achievement
1	• The agency recognizes the role of internal audit in the prevention and detection of fraud and corruption. • The agency has identified its high-risk areas and functions.
2	• The agency proactively undertakes assessment of corruption risk areas. • Relevant personnel are trained on corruption risk assessment and corruption prevention planning. • Results or risk assessment are reported to management.
3	• The agency develops and implements a corruption risk management/corruption prevention plan to address identified risks. • Time and resources are allocated and managers are given clear tasks of implementing and monitoring the corruption risk management plan. • Employees are encouraged and rewarded for identifying responses to corruption risks.
4	• The agency's corruption prevention plan is supported/integrated in the corporate plan and other management plans. • Corruption prevention focus in incorporated in management functions, policies, systems and procedures of the agency.
5	• The agency's approach to corruption risk management is regularly reviewed for effectiveness in detecting and preventing corruption. • Results of evaluation are used to enhance integrity measures and corruption prevention strategies.

Assessment

Found below are the scores of the 4 sites in this dimension including the assessment made by the assessors.

Table 9: IDA Rating on Corruption Risk Management

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Corruption Risk Management	0	1	2	2	0
Level of Deployment		50-60%	90-100%	30-40%	

PNP National Headquarters, Camp Crame. The consensus rating arrived at by the participants is zero (0). They explained that 1.1 has been satisfied but in 1.2, they only identified risks and these were not classified according to high or low risks. Based on these identified risk areas the PNP has prepared an Anti-Corruption Plan.

Region III, Camp Olivas. The participants agreed to a rating of one (1) with a deployment of 50-60%. They consider Corruption Risk Management to be a part of Total Quality Management (TQM), which they practice.

The participants are aware of the PNP Anti-Corruption Plan and the PNP Transformation Program.

Region VII, Camp Osmeña. The participants gave a consensus rating of two (2) with a deployment of 90-100%. They conceded that the region has no Corruption Risk Management Plan but they consider the PNP Anti-Corruption Plan to be one.

The participants are conversant with the PNP Anti-Corruption Plan and the PNP Transformation Program.

Region XI, Camp Catitipan. The participants arrived at a consensus rating of two (2) with 30-40% deployment.

The survey results showed quite low ratings for these two statements: (1) "It is difficult to corrupt our current system of operations." (2.17) And " Our agency is successful in fighting corruption." (2.23).

Assessors' Rating. The Assessors agree with the general rating of zero (0) given by the NHQ because it has not identified the agency's high-risk operations and functions. The PNP focus in this dimension is mainly on financial risk. It should be noted however that the PNP has an Anti-Corruption Plan and a PNP Integrated Transformation Program presently being undertaken.

10. INTERFACE WITH THE EXTERNAL ENVIRONMENT

Corruption incidences within an agency normally involve an external party. Agencies should effectively manage their external environment to contain corruption. Management of external environment included promoting the agency-established process of doing business, clarifying condition of engagements, and responding to the needs of the clients.

The manner by which an agency interacts with its external environment––the general public, officials and employees of government, private sector and other stakeholders––is important in preventing and eliminating corruption. Managing the external environment involves providing them information on the basic processes and procedures of the office, setting up mechanisms to receive feedback, handle complaints and respond to client needs, ensuring transparency of transactions and procedures, clarifying conditions of engagements as well as areas where transactions should occur. Effective management of the external environment would result not only in raising the accountability of personnel involved in transacting business with the public but also in enhancing the public's perception on the integrity and responsiveness of the agency.

In line with the objective of this dimension is to establish effective parameters for external relations and foster good client relations, the following levels of achievement were adopted.

Rating	Levels of Achievement
1	• The agency has established an information system to inform the public of its services, policies, rules and procedures. • The agency has a policy on disclosure of information to the public.
2	• The agency proactively disseminates information on its services, policies, systems and procedures to the transacting public. Procedures for frontline transactions (that includes standards processing time, fees, persons responsible, specification of the transacting area, etc) are posted in public areas. • The agency employs systems to avoid long queues and prevent "facilitators" of transactions. • Employees are given training on how to interact with clients/stakeholders in appropriate and ethical manner.
3	• The agency has mechanism to check that the published rules, procedures and standards are being met (e.g. client complaints/feedback mechanisms) • Relevant personnel are given training on how to handle and resolve complaints. • Managers monitor compliance with service standards.
4	• The agency has full and complete record of complaints and feedback from clients, and how these were resolved. • Complaints and feedback from clients are analyzed to identify possible incidence of corruption. • Records of releases of information are examined.
5	• The agency regularly reviews its system of managing interface with external environment for effectiveness in preventing corruption. • Results of evaluation are used to strengthen policies/systems on disclosure of information/dealing with external parties.

Assessment

Table 10: IDA Rating on Interface with External Environment

Dimension	Camp Crame (NHQ)	Camp Olivas (Region III)	Camp Osmeña (Region VII)	Camp Catitipan (Region XI)	Assessors' Rating
Interface with External Environment	4	4	3	3	3
Level of Deployment	50-60%	90-100%	90-100%	50-60%	

PNP National Headquarters, Camp Crame. The IDA participants in the national headquarters gave the PNP a high score of 4 and deployment level of 50-60% for this dimension. The PNP, accordingly, has an established information system to inform the public of its services, policies, rules and procedures. It has the Text 2920 program where subscribers of major cellular phone networks can send in their complaints and feedback through SMS. There is also a PNP hotline 117 and an interactive website for the same purpose. The website also provides other information about the PNP to those who log on it. Moreover, there is a service desk in each precinct where the public may personally report their complaints.

The participants identified as strength of the agency attempts to measure response time to calls for police assistance. They lamented, however, that the scorecard for this dimension does not take into consideration the influence of politicians in PNP operations, which is a weakness of the organization.

Region III, Camp Olivas. The participants in the IDA exercises from Camp Olivas also scored the regional office 4 for this dimension with a deployment level of 90-100%. Although they claimed that the regional office regularly reviews its system of managing interface with the external environment, the review, admittedly, is not for the purpose of evaluating its effectiveness in preventing corruption. The results of the review, they asserted, are used to strengthen policies or systems on dealing with external parties.

Region VII, Camp Osmeña. The PNP regional office based in Cebu City got a consensus rating of 3 for this dimension. The following were identified as strength of the organization relative to this dimension: (1) All provincial and city directors and chiefs of police of municipalities and precincts are required to disseminate their cellular phone numbers to the general public and maintain their phones open to receive complaints; (2) There are radio programs hosted by or featuring police officers to inform the public of services of the PNP; (3) Regular dialogues with the public termed "Ugnayan" are being conducted on the regional and provincial level; and (4) Customer feedback mechanism with a limited deployment (50%) and a record of all complaints coming from the public.

The participants in the IDA are of the same opinion that corruption in the PNP is more external than internal. However, they observed that the criteria or bases for rating the PNP focus only on internal processes in the organization. Little or no attention is given to the role of politicians in the PNP set up. They recommended passing legislation to remove the influence of politicians in the appointment of PNP directors and chiefs.

Region XI, Camp Catitipan. The PNP regional office based in Davao City also got a consensus rating of 3 for this dimension.

According to the survey results, the overall operations in their agency are clear and easily understood (given a rating of 1.88 - moderately positive) while the statement saying that the complaints and feedback of their clients are acted upon gained a rating of 1.78, which is a highly positive rating. Asked what common complaints are lodged by their agency's clients, the respondents gave the following: (1) slow or no response to complaints, delayed results; (2) corruption, palakasan; (3) abuse of authority, grave misconduct,

dereliction of duty; (4) lack of manpower, facilities, equipment, etc.; (5) incompetent, discourteous employees; and (6) lapses in the system of processing. To improve the services of the agency, the respondents proffered these suggestions:

- Continuous improvement of the system/logistics; modernization
- Employees should perform their jobs with industry, diligence and honor, immediate action
- Public information dissemination, open lines with people, visibility, transparency of operations
- Seminars and training, spiritual renewal
- Hiring of highly competent and dedicated professionals particularly for frontline duties
- Increase salary, benefits , rewards and incentives for good performance

Assessors' Rating. The team of assessors for the PNP is of the belief that the organization deserves a rating of 3 for this dimension. The team noted various attempts of the PNP to proactively disseminate information on its services, policies, systems and procedures to the transacting public through the use of print, radio, and electronic technology.