

Combating Administrative Corruption: A Comparative Study of Frameworks in New Zealand and Singapore"

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Abstract

The purpose of this study is to provide a comparative analysis of New Zealand's and Singapore's frameworks for combating administrative corruption. The administrative corruption combating frameworks of these two countries have similarities in some points, such as zero tolerance against administrative corruption, existing effective laws, strong law enforcement, and independent judiciaries. Although New Zealand has been experiencing a corruption-free society since it was colonised by hunters and whalers (which started in the 1700s) from America, Australia, and Europe (mostly from Great Britain), Singapore began to combat corruption after being separated from Malaysia in 1965. Moreover, New Zealand places more emphasis on international anti-corruption laws, while Singapore relies intensively on domestic anti-administrative corruption laws. In addition, New Zealand has the Serious Fraud Office (SFO), and Singapore has established the Corrupt Practises Investigation Bureau (CPIB) to investigate cases related to corruption.

Intisari

Tujuan dari penelitian ini adalah untuk memberikan analisis perbandingan kerangka kerja Selandia Baru dan Singapura dalam memerangi korupsi administratif. Kerangka kerja pemberantasan korupsi administratif di kedua negara ini memiliki kesamaan dalam beberapa hal, seperti tidak ada toleransi terhadap korupsi administratif, undang-undang yang efektif, penegakan hukum yang kuat, dan sistem peradilan yang independen. Meskipun Selandia Baru telah mengalami masyarakat bebas korupsi sejak dijajah oleh para pemburu dan pemburu paus (yang dimulai pada tahun 1700-an) dari Amerika, Australia, dan Eropa (kebanyakan dari Inggris), Singapura mulai memberantas korupsi setelah terpisah dari Malaysia. pada tahun 1965. Selain itu, Selandia Baru lebih menekankan undang-undang antikorupsi internasional, sementara Singapura sangat bergantung pada undang-undang anti-korupsi administratif dalam negeri. Selain itu, Selandia Baru memiliki Serious Fraud Office (SFO), dan Singapura telah membentuk Biro Investigasi Praktik Korupsi (CPIB)

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untuk menyelidiki kasus-kasus terkait korupsi.

Keywords: *Administrative Corruption, New Zealand, Singapore, Comparative analysis, Anti-Corruption frameworks*

Kata Kunci: *Korupsi Administratif, Selandia Baru, Singapura, Analisis komparatif, Kerangka Anti-Korupsi*

A. Introduction

Administrative corruption is widespread globally; according to the World Economic Forum, it costs developing countries more than \$1 trillion every year.² Corruption is the abuse of entrusted power for personal gain for family relations and interests.³ When the word corruption is used, the first image that directly springs to mind is an economic phenomenon, though it is not limited only to business and economics; power is included in political and social content as well. It is because the abuse of entrusted power is the main characteristic of corruption. Corruption types vary, including bribery, embezzlement, influence-peddling, graft, and extortion. Corruption may occur everywhere. However, corruption differs in its form, scope, and how each society and culture combats it. Based on its clandestine nature, it is often difficult to quantify. In those countries where officials have excessive influence over policymaking and economic management decisions, the chance for administrative corruption is widespread. Thus, corruption is the abuse of power by public servants and officials where there is not enough dominance of the law, which weakens transparency.

Administrative corruption has existed for a long time in human societies. Some countries managed to eradicate it in their societies. New Zealand has consistently maintained its top or near-top ranking on the corruption perceptions index (CPI) over the past two decades, which understandably informs its commentary on corruption in the country. In the late 19th century, social and political egalitarianism in New Zealand began under the liberal governments of John Ballance and Richard Seddon. The majority of New Zealanders are of European, mostly British descent; they are called Pakekas,⁴ a Maori term for white people. Many of them are from Presbyterian Scotland, who brought with them a strong Calvinist ethos, including values of thrift, hard work, and social unity, which were central to New Zealand's development with an export economy based on the primary industry that served Great Britain's consumers. Furthermore, New Zealand, as an island, was largely isolated from corruption influences internationally. Social responsibility was highly valued in such a small society, with most people being conscious of engaging in any form of behaviour that, if exposed to public scrutiny, would result in a loss of individual or family reputation. Since the raucous, violent, and drunken beginning in the early 19th century, when sealers and whalers engaged with Maori communities in the north of the country, no organised crime has built up in the country. Even low-level tipping was rarely seen as socially acceptable in New Zealand, and the police were among the most

² Sean Fleming, "Corruption costs developing countries \$1.26 trillion every year-yet half of EMEA think it's acceptable" (paper presented at the World Economic Forum, 2019).

³ Ibrahim, Shihata, 20.

⁴ Richard Walter, Chris Jacomb, and Sreymony Bowron-Muth, "Colonisation, mobility and exchange in New Zealand prehistory," *Antiquity* 84, no. 324 (2010).

corruption-free constabularies in the world.⁵ According to Transparency International's recent corruption perceptions index, New Zealand ranked first, equal to Denmark, out of 176 countries and nations.⁶

Comparably, Singapore has consistently been ranked as the least corrupt nation among Asian countries in the last two decades. It was ranked 7th among 176 nations on the recent Transparency International Corruption Perceptions Index (CPI).⁷ This ranking gives credence to the widespread perception that this country is also one of the most corruption-free economies in the world. Nonetheless, Singapore had a high corruption index prior to self-government in 1959; at the time of separating from Malaysia, corruption was rampant in Singapore because of numerous factors, such as inadequate laws, insufficient professional manpower in the anticorruption agency, a big disparity in pay between the public and private sectors, a lack of commitment among law enforcement officials, etc. The entire socio-economic climate made it suited for corruption to take root, and it needed political will to exterminate the scourge of administrative corruption in the country. Since Lee Kuan Yew, the first prime minister of Singapore, and his team formed the government, there has been a sustained effort to develop a society and culture that avoid any types of corruption, especially administrative corruption. The society of Singapore expects the government to not condone social lubricants. This atmosphere of anti-administrative corruption demands robust prosecution and deterrent sentences for corrupt public servants. Recent prosecution examples include the sentencing of Peter Lim, former Chief of the Civil Defence Force of Singapore, who accepted bribes from a constrictor in return for advancing the business interests of that company. He was sentenced to six months imprisonment in June 2013, and more recently, a former customs officer was charged with corruptly accepting S\$3,350 in bribes in exchange for processing fraudulent goods and services and was sentenced in February 2015 to five years imprisonment. The four pillars of Singapore's administrative corruption framework stem from the strong foundation of the political will to wipe out corruption wherever it may occur, effective laws, an independent judiciary, strong enforcement, and respective public services.⁸

Hence, this study aims to highlight how Singapore and New Zealand have reduced their administrative corruption rates and compare their approaches in light of the United Nations Code of Conduct. and recommend their frameworks for combating

⁵ Robert Gregory and Daniel Zirker, "Historical corruption in a 'non-corrupt' society: Aotearoa New Zealand," *Public Administration and Policy* 25, no. 2 (2022), <https://doi.org/10.1108/PAP-01-2022-0008>, <https://doi.org/10.1108/PAP-01-2022-0008>.

⁶ Robert Gregory, "Governmental corruption and social change in New Zealand: using scenarios, 1950–2020," *Asian Journal of Political Science* 14, no. 2 (2006).

⁷ Emigdio Alfaro, "Understanding the Corruption Perceptions Index," in *Modern Indices for International Economic Diplomacy* (Springer, 2022).

⁸ Nicholas Lim Kah Hwee, "SINGAPORE'S EXPERIENCE IN THE FIGHT AGAINST CORRUPTION," (2019).

administrative corruption to those nations that are still struggling with high corruption rates. Providing administrative corruption combating approaches is significantly contributing to bringing transparency and experiencing a free-corruption environment, and this study uses the library-based method to provide a clear and efficient framework for combating corruption.

B. Administrative Corruption in New Zealand

New Zealand is corruption-free due to its long-term geographical isolation, its close legal and cultural affinity with Britain, its egalitarian socio-economic and cultural traditions, and its unique regulatory civil service, which largely explain its success in preventing corruption. However, international influences, including the absence of a single anti-corruption agency and changing values, may affect New Zealand's record of success like any other political unit in the world. And New Zealand uses approaches to combating administrative corruption to fill this gap.⁹

New Zealand has approved several essential international anti-administrative corruption convention treaties, such as the United Nations Convention Against Corruption 2003 (UNCAC), the Organisation for Economic Co-operation and Development's "Bribery of Foreign Public Officials in International Business Transactions (OECD Anti-Bribery Convention), and the Asia Pacific Economic Cooperation's (APEC) Santiago Commitment to Fight Corruption and Ensure Transparency".¹⁰ New Zealand is a signatory to each of the above-mentioned anti-corruption laws. New Zealand has strengthened its domestic anti-administrative corruption frameworks by enacting the "Organised Crime and Anti-Corruption Legislation Bill (the Organised Crime Bill)."¹¹

Moreover, in order to maintain a corruption-free country, New Zealand has strengthened anti-corruption laws, and anti-corruption agency SFO¹². SFO is committed to proactively detecting, investigating, and prosecuting both public and private sector corruption. Alongside UNCAC, the OECD Anti-Bribery Convention, and the APEC Santiago Commitment, New Zealand enforces any other foreign anti-corruption acts, particularly for those New Zealanders who operate abroad and need to be aware of the overlapping acts that may apply to their business. In addition, New Zealanders, individuals, and international corporations operating in New Zealand or

⁹ Daniel Zirker, "Success in combating corruption in New Zealand," *Asian Education and Development Studies* 6, no. 3 (2017), <https://doi.org/10.1108/AEDS-03-2017-0024>, <https://doi.org/10.1108/AEDS-03-2017-0024>.

¹⁰ Martin T Biegelman and Daniel R Biegelman, *Foreign Corrupt Practices Act compliance guidebook: protecting your organization from bribery and corruption* (John Wiley & Sons, 2010).

¹¹ A Adams, 4.

¹² Sally Ramage, *Fraud and the Serious Fraud Office: Fraud Law: Book Two* (iUniverse, 2005).

related to New Zealand should familiarise themselves with the United Kingdom Bribery Act 2010 ("U.K. Bribery Act). As the United Kingdom and New Zealand are bound together culturally and legally, New Zealand is also a constitutional monarchy with The King as Sovereign¹³. Furthermore, these laws and acts are effective because of New Zealand's long-free society and zero tolerance for corruption. Due to the enactment and practise of several types of anti-administrative corruption laws, the strengthening of the SFO, and zero tolerance for corruption, New Zealand earned a reputation as one of the least corrupt political units in the world. Following the enactment of effective anti-corruption laws, New Zealand applies and enforces the laws, and all New Zealanders have duties that directly contribute to making and enforcing New Zealand law. Also, permanent residents over the age of eighteen have the same duties as citizens, whereas in most Asian countries, even citizens do not have direct contributions to law enforcement but are made through related channels.¹⁴

Moreover, one of the crucial factors in combating corruption in New Zealand is the existence of the SFO. It is a highly specialised government department whose mission it is to disrupt and prevent serious fraud through investigation and prosecution. The New Zealand SFO was established in 1989 in response to corruption arising out of the 1980s financial crisis, specifically the share market crash of 1987. In the short period of about one year, the total amount of money involved in corporate fraud in New Zealand increased dramatically from NZ\$10–15 million before 1988 to NZ\$50–70 million in 1989, which is a NZ\$55–60 million increase in only one year. Consequently, the New Zealand Department of Justice proposed establishing a specialist institution and legal mechanism for the investigation of serious fraud. Hence, the SFO has been one of the essential factors in combating administrative corruption in New Zealand since 1989. The next factor that contributed to preventing administrative corruption in New Zealand was society's zero tolerance for corruption. Not only the government but also society avoids administrative corruption in this country. New Zealand has been experiencing a free-corruption atmosphere since a long time ago.

According to Charles H. Lipson, there is a direct connection between the country's egalitarianism and the absence of corruption in the bureaucratic routine of New Zealand's government. In fact, the honesty and integrity of society workers, either in the public or private sectors, can keep a country at the top of the CPI; otherwise, even stricter laws and more time in prison would not stop the spreading of corruption as regarded in other nations. Lipson noted the generally high standard of personal integrity prevailing among New Zealand's civil servants and observed in its civil service a commendable absence of graft and a strict code of honesty.¹⁵

¹³ Daniel Zirker, "Success in combating corruption in New Zealand," *Asian Education and Development Studies* (2017).

¹⁴ Steve Matthewman, "'Look no further than the exterior': Corruption in New Zealand," *International Journal for Crime, Justice and Social Democracy* 6, no. 4 (2017).

¹⁵ Gregory and Zirker, "Historical corruption in a 'non-corrupt' society: Aotearoa New Zealand."

He related this to job security, strict accounting and audit requirements, and an inner check reflecting public servants. Most of the characters mentioned in the New Zealand government's public servants seem to be absent in most Asian countries public servants. According to Charles H. Lipson, there is a direct connection between the country's egalitarianism and the absence of corruption in the bureaucratic routine of New Zealand's government. He noted the generally high standard of personal integrity prevailing among New Zealand's civil servants and observed in its civil service a commendable absence of graft and a strict code of honesty. It has a strong culture of integrity, and our institutions remain largely free from systemic corruption. Lipson related this to job security, strict accounting and audit requirements, and an inner check for public servants. Most of the characteristics mentioned for the New Zealand government's public servants seem to be absent in most Asian bureaucracies. Therefore, the below figure illustrates the four pillars of combating administrative corruption in New Zealand, and the output is a "free corruption nation or country."

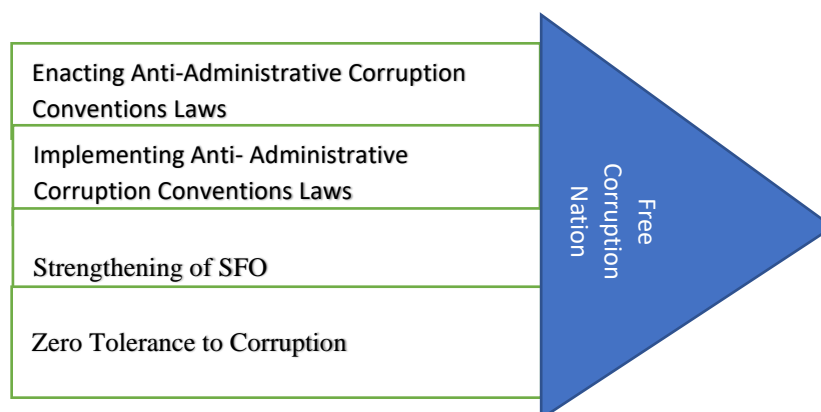


Figure1 illustrates combating administrative corruption framework in New Zealand.

C. Administrative Corruption in Singapore

Since Singapore separated from the Federation of Malaya and obtained self-government in 1959, combating corruption has been at the top of the government's agenda. Since the British took over the region, corruption has been prevalent; administrative corruption was not a seizable offence; the prevention of corruption office was short-staffed; and the power of the anti-corruption bureau was insufficient. Moreover, the public officers were poorly paid, and the population was less educated, but they did have enough awareness of their rights to often get things done through bribery.¹⁶ It was crucial to control corruption for Singapore's national survival as a

¹⁶ Nancy McHenry Fletcher, "The separation of Singapore from Malaysia," (1969).

small city-state. And it was vital in order to create a conducive climate and a level playing field to promote economic growth. At that time, it was a competitive advantage to lure foreign businesses to invest in Singapore. Combating corruption has become the main strategic goal of the Singaporean government. Fluently conducting government affairs had to be substantiated on a national basis; there were obvious rules to follow. It provides the confidence and predictability for the citizens to rely on the government to discharge its duties without bias. There had to be no atmosphere to tolerate those who hoped for windfalls from powerful friends or from lubricating contacts in high positions.

In order to succeed, Singapore had to operate on a meritocratic principle, where the public could see that rewards were tied to the efforts that they carried out and not through corrupt means. There was much reform required; the law was strengthened, rigorous enforcement took place, and the government administration was improved.¹⁷ All these efforts provided the impetus for Singapore's transformation from a corrupted city state to its present state, where its citizens enjoy a good reputation internationally. The culture and resolve to vigorously prevent corruption were echoed by the government in early 1960, when the parliament declared that "take all possible steps to see that legislative and administrative approaches are taken to reduce the opportunities of corruption to make its detection easier and to deter and punish grievously those who are susceptible to corruption and who engage in it shamelessly. Strong anti-corruption prevention was heard continuously, including in a 1979 statement by Prime Minister Lee Kuan Yew, which illustrated the need for a corruption-free Singapore: "... Singapore can survive only if the ministers and senior officers are incorruptible and efficient... I will not let standards drop...I expect all Ministers, all MPs, and all public officers to set good examples for others to follow".¹⁸ This has been the same position until now. The will of the government, independent adjudication, strong enforcement, and effective laws are pillars of the anti-corruption framework in Singapore that are present to stamp out corruption.

One of the pillars that has contributed to gaining a corruption-free reputation in Singapore is effective legislation. Singapore relies on two key legislations to fight corruption: the Corruption, Drug Trafficking, and Other Serious Crimes Act 1992 (CDSCA) and the Preventing Corruption Act 1960 (PCA).¹⁹ The CDSCA is used to confiscate illegally obtained gains from corrupt offenders. The PCA has a wide scope and is applied to people who give and receive bribes in both the private and public sectors. Singapore experiences a corruption-free atmosphere because of its strict and

¹⁷ Natalie Oswin and Brenda SA Yeoh, "Introduction: mobile city Singapore," *Mobilities* 5, no. 2 (2010).

¹⁸ Koh Teck Hin, "Corruption control in Singapore," *Tokyo: United Nations Asia and Far East Institute for the Prevention of Crimes and the Treatment of Offenders* (2013).

¹⁹ Jon S. T. Quah, "Lee Kuan Yew's role in minimising corruption in Singapore," *Public Administration and Policy* 25, no. 2 (2022), <https://doi.org/10.1108/PAP-04-2022-0037>, <https://doi.org/10.1108/PAP-04-2022-0037>.

effective laws, zero tolerance against corruption in society's way of life, and intensive law enforcement. Although every country may have sufficient laws, whether with a low or high CPI.

Stabilising and maintaining an independent judicial system is another factor that helped Singapore become a corruption-free nation. An independent judiciary provides insulation from political interference in Singapore. The chief justice is selected by the president on advice from the prime minister, and the council of presidential advisers, district judges, and magistrates are appointed by the president with advice from the chief justice. Also, in Singapore's constitution, various provisions guarantee the independence of the Supreme Court judiciary. The judiciary recognises the seriousness of corruption and adopts a stance of deterrence by meting out strict fines and imprisonment towards corrupt offenders to meet its objectives and promote transparency in order to strengthen the rule of law.²⁰ The way that the chief of justice is appointed in Singapore illustrates control of power, with the president and presidential advisers implementing their duties without bias, and the president's administration also examining the prime minister's advice.

Enforcement is another factor in Singapore that contributes to combating corruption. In Singapore, the CPIB is the only responsible agency for fighting corruption. This agency operates under the prime minister's administration and reports directly to the prime minister, which enables CPIB to operate independently. According to findings, through more than 65 years of corruption, combating a dissuasive stance has always been practised, guaranteeing that there are no covered corrupt practises and that corruption is fought without fear or favour by the responsible agency.²¹ The CPIB operates swiftly and vigorously to enforce the tough anti-corruption acts impartially for both public and private sector corruption. The investigation process is done through the coordination of various government agencies and private organisations with the CPIB to gather evidence and obtain information.

Public administration is another feature of the corruption-fighting framework in Singapore. The public affairs and private services are guided by a code of conduct in Singapore that determines the high standards of behaviour expected of public officers based on principles of incorruptibility, integrity, and transparency.²² Exercising meritocracy in the public service, along with regular reviews of administrative regulations and processes to improve efficiency, also reduces the intention and opportunities for corruption. Moreover, based on the Singaporean code of conduct,

²⁰ Paul J Teo, "Adjudication: Singapore perspective," *Journal of Professional Issues in Engineering Education and Practice* 134, no. 2 (2008).

²¹ Jon ST Quah, "Singapore's Corrupt Practices Investigation Bureau: four suggestions for enhancing its effectiveness," *Asian Education and Development Studies* (2015).

²² David B Resnik and Adil E Shamoo, "The Singapore statement on research integrity," *Accountability in research* 18, no. 2 (2011).

public servants should always act with integrity and full responsibility, improve their competence, and act with professionalism. When the People's Action Party (PAP) was elected into government in 1959, it was determined to set out to build an incorruptible and meritocratic government and take crucial and comprehensive action to stamp out corruption at all levels of Singapore's society. As a result of the government's unwavering political commitment and leadership, a culture of zero tolerance against corruption has rooted itself in the Singaporean way of life.

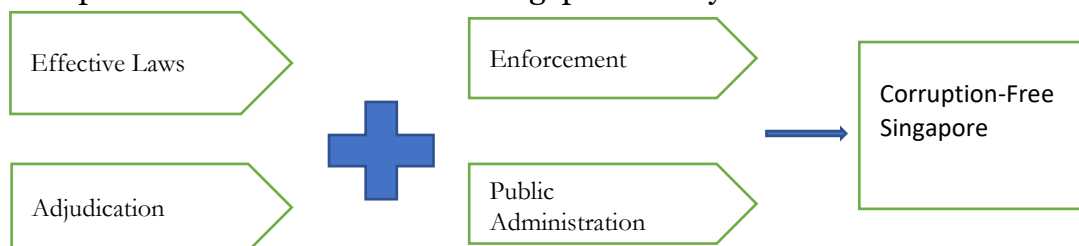


Figure 2 denotes Corruption Combating Framework in Singapore

D. Discussion

Both New Zealand and Singapore have been rated the least corrupt nations in recent years. In the 2022 CPI, New Zealand earned the second highest score of 87 out of 100 possible among 180 countries, and Singapore ranked as the 5th least corrupt nation and earned 83 out of 100 possible in the same year as New Zealand.²³

New Zealand approved several essential international anti-administrative corruption conventions and treaties, including the UNCAC, OECD, APEC, and Santiago Commitment to Fight Corruption and Ensure Transparency. Also, this country is a signatory to each of the mentioned treaties. Moreover, New Zealand adopted the United Kingdom's bribery law as they have strong ties in their politics and economies, making this law applicable abroad to individuals and corporations who are connected to New Zealand corporations.²⁴ Alongside the international laws on combating corruption and UK bribery law, New Zealand has strengthened its domestic anti-administrative corruption frameworks by enacting the "Organised Crime and Anti-Corruption Legislation Bill (the Organised Crime Bill)". Furthermore, the success story of New Zealand in preventing administrative corruption is the result of a practical framework with its main key points: enacting and implementing anti-administrative corruption conventions, including the United Nations Convention Against Corruption, October 31, 2003, and the United Nations Code of Conduct; establishing and strengthening of SFO and developing a culture of zero tolerance against corruption.

²³ Kaunain Rahman, "Transparency International Anti-Corruption Helpdesk Answer," (2022).

²⁴ Zirker, "Success in combating corruption in New Zealand."

Singapore also enjoys an earned reputation for a high level of transparency and a free of corruption environment. Based on the previous discussion, Singapore earned a reputation as a free nation due to its practical framework for combating administrative corruption with its four key pillars: adjudication, enforcement, public administration, and political will and leadership.²⁵ In addition, Swift operates against corruption, and there is no covered corrupt practise. Singapore also investigates the public and private sectors for corruption.

To compare these two countries for combating administrative corruption, Singapore, unlike New Zealand, relies more on its demonstrative anti-corruption laws. Singapore adopted Will Political Practise, which was established in Singapore by its prime minister, Lee Kuan Yew, after electing PAP into government in 1959.²⁶ This party declared to build an incorruptible and meritocratic government and took comprehensive and decisive action to eradicate corruption from all departments of Singapore's government. As a consequence of the government's steady political commitment and leadership, a culture of zero tolerance against corruption was rooted in the Singaporean way of life. The next differences between these two countries are their frameworks' elements: New Zealand enacted anti-administrative conventions and laws and focuses on them the same as domestic anti-administrative corruption laws, while Singapore relies significantly on the Corruption, Drug Trafficking, and Other Serious Crimes Act (CDSCA) and Preventing Corruption Act (PCA); however, New Zealand also has an Organised Crime Bill law. Not only that, New Zealand has established the Serious Fraud Office to fight corruption, and CPIB is the only responsible agency for fighting corruption in this country. There are similarities in the way of combating administrative corruption in Singapore and New Zealand, such as the culture of zero tolerance to corruption and swift operating against corruption, and finally, these two countries earned the reputation of being the least corrupt nations.

E. Conclusion and Recommendation

Both New Zealand and Singapore adopted political will that allows officials and senior officers to carry out their duties in the absence of their private interests and political interference. New Zealand has been experiencing zero tolerance against corruption since Europeans (Pekahas) migrated from Scotland. The only issue was land claims from Mori, who claimed that the British took their lands based on the Treaty of Waitangi, giving Britain control over New Zealand. The English and Maori translations of the treaty differed; the English version gave Great Britain complete control, while the Maori version gave Britain "government." Disagreement over who owned the land

²⁵ Gianna Gayle Herrera Amul and Tikki Pang, "Progress in tobacco control in Singapore: lessons and challenges in the implementation of the framework convention on tobacco control," *Asia & The Pacific Policy Studies* 5, no. 1 (2018).

²⁶ Hin, "Corruption control in Singapore."

helped cause the Law Wars, which lasted from 1845 to 1847 and from 1860 to 1872.²⁷ Britain began governing based on the Waitangi betrayal; in spite of this, there is no organised crime in New Zealand.

Combating administrative corruption requires a specific framework in every society based on its culture, level of education, level of current transparency and responsibility, and the rule of law. This study discussed the two least corrupt nations, New Zealand and Singapore. Initially, New Zealand's framework for combating administrative corruption was a combination of approving the United Nations Code of Conduct and the United Nations Convention Against Corruption 2003, the OECD, and the APEC Santiago Commitment to Fight Corruption and Ensure Transparency.²⁸ Singapore's framework for combating administrative corruption is a combination of effective laws, such as the Preventing Corruption Act 1960 and the Corruption, Drug Trafficking, and Other Serious Crimes Act 1992, strengthening law enforcement, adjudication, public administration, and political will, which drive Singapore in a free corruption direction. In addition, this study provides a clear explanation of the frameworks, which are: creating political will between the government prime ministers, ministers, and high-ranking officials; making and developing a culture of zero tolerance against corruption at any cost; establishing an independent judicial system; and effective law enforcement, which is recommended to those nations that still struggle with high administrative corruption. In conjunction with the scope of this study, studying why administrative corruption is widespread is highly recommended for further research.

²⁷ Claudia Orange, *The treaty of Waitangi* (Bridget Williams Books, 2015).

²⁸ Richard Woodward, "The organisation for economic cooperation and development: Global monitor," *New political economy* 9, no. 1 (2004).

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