

Poland

2015 Country Summary

Recommendations

Poland's GI ranking in Band B places it in the low risk category for corruption in the defence and security sector. The highest risk area is Operations, which fell in Band D (very high risk of corruption). The Polish government has embarked upon a large modernisation programme for the armed forces and has announced its intent to increase defence spending to the NATO-recommended 2% of GDP in 2015. In parallel, it has been working on diagnosing and addressing corruption risks within the defence sector and putting in institutional and legal solutions mitigating risks. The MOD's internal Anti-Corruption Bureau has been engaged in risk monitoring, establishing of corruption reporting lines, and monitoring confidential procurement procedures, and its activities are examples of good practice. The government should build on progress made and address outstanding issues such as whistleblower protection and inclusion of corruption issues in military doctrine.

Preventing corruption: approach and implementation

The MOD's Anti-Corruption Bureau, a small internal unit, is responsible for designing corruption-proof procedures and overseeing confidential procurement processes. This is an example of good practice, as is the stipulated involvement of external audit institutions and the government-wide Public Procurement Office in determining the kind of procurement procedure that should apply to a particular acquisition. The MOD and the audit institutions can build on this by ensuring that audits are carried out regularly and their results are public (at least in abbreviated form where confidential information needs to be protected) and ensuring that national security exemptions from regular procedures are well justified. The MOD has made great progress in making its procurement procedures more robust, but much remains to be done when it comes to requirements placed on suppliers. The MOD should consider introducing regulations promoting the adoption of anti-corruption and compliance programmes among contractors and subcontractors.

The Anti-Corruption Bureau has established reporting mechanisms for whistleblowers. However, there are no comprehensive whistleblower protection mechanisms and the procedures for handling complaints are not clear. The MOD and the Armed Forces should build on available solutions to put in place a clear, comprehensive system dealing with whistleblower signals and protecting whistleblowers afterwards.

Corruption and military operations

While there is evidence that individual Polish military officers are aware of the risks corruption poses during military operations and have responded to the issue when they encountered it, there is no recognition of it in military doctrine or training and this

operational issues remain the greatest corruption risk in the Polish system. There are also no specific guidelines on operational contracting and corruption monitors are not deployed in theatre. The exposure to large-scale stabilisation missions in Afghanistan and Iraq has yielded experience which could be turned into comprehensive doctrines and training programmes for the armed forces, contributing to NATO training through the NATO Joint Force Training Centre in Bydgoszcz.

Scorecard

Political	Defence & Security Policy	Legislative Scrutiny	3
		Defence Committee	3
		Defence Policy Debated	4
		CSO Engagement	3
		International AC Instruments	3
		Public Debate	4
		AC Policy	3
		AC Institutions	3
		Public Trust	3
		Risk Assessments	3
	Defence budgets	Acquisition Planning	3
		Budget Transparency & Detail	4
		Budget Scrutiny	4
		Budget Publicly Available	3
		Defence Income	4
		Internal Audit	3
		External Audit	4
		Other Political Areas	Natural Resources
	Organised Crime Links		2
	Organised Crime Policing		3
Intelligence Services Oversight	3		
Intelligence Services Recruitment	2		
Export Controls	2		
Finance	Asset Disposals	Asset Disposal Controls	3
		Asset Disposal Scrutiny	4
	Secret Budgets	Percentage Secret Spending	2
		Legislative Access to Information	4
		Secret Program Auditing	1
		Off-budget Spending in Law	4
		Off-budget Spending in Practice	
		Information Classification	2
	Links to Business	Mil. Owned Businesses Exist	3
		Mil. Owned Business Scrutiny	3
Unauthorised Private Enterprise		2	
Personnel	Leadership	Public Commitment	3
		Measures for Corrupt Personnel	3
		Whistleblowing	1
		Special Attention to Sensitive Personnel	3

	Payroll and Recruitment	Numbers of Personnel Known	3
		Pay Rates Openly Published	4
		Well-established Payment System	4
		Objective Appointments	3
		Objective Promotions	3
	Conscription	Bribery to Avoid Compulsory Conscription	
		Bribery for Preferred Postings	
	Salary Chain	Ghost Soldiers	4
		Chains of Command and Payment	4
	Values, Standards, Other	Code of Conduct Coverage	3
		Code of Conduct Breaches Addressed	3
		AC Training	2
		Prosecution Outcomes Transparent	2
		Facilitation Payments	3
Operations	Controls in the Field	Military Doctrine	2
		Operational Training	1
		AC Monitoring	1
		Controls on Contracting	1
		Private Military Contractors	2
Procurement	Government Policy	Legislation	3
		Transparent Procurement Cycle	4
		Oversight Mechanisms	3
		Purchases Disclosed	3
		Standards Expected of Companies	1
	Capability Gap	Strategy Drives Requirements	3
		Requirements Quantified	3
	Tendering	Open Competition v. Single-Sourcing	2
		Tender Board Controls	3
		Anti-Collusion Controls	3
	Contract Delivery / Support	Procurement Staff Training	3
		Complaint Mechanisms for Firms	3
		Sanctions for Corruption	3
	Offsets	Due Diligence	2
		Transparency	2
		Competition Regulation	2
	Other	Controls of Agents	3
		Transparency of Financing Packages	2
		Subsidiaries / Sub-Contractors	1
Political Influence		3	