



# The Hamburg Strategy of Corruption Prevention

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- **Membership in the EPAC organization  
(European Partners Against Corruption)**
- **The Department of Internal Investigations (DII) is one of three  
German contact points in the contact point network of the EU  
(European Anti-Corruption Network)**
- **Exchange of observation visits with investigators  
from neighboring countries (Austria, Belgium)  
Exchanges planned with Czech Republic, UK, Denmark, Switzerland**
- **Exchange of information with other cities  
(New York, Sydney, London, Hong Kong etc.)**



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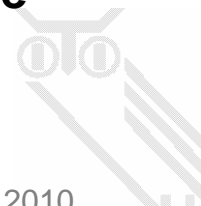
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## **Guideline 3 of the Council of Ministers of the Council of Europe:**

**It must be ensured that those whose responsibility it is, within the framework of anticorruption efforts, to participate in prevention and investigation, to prosecute cases of corruption and to administer justice**

- enjoy independence and autonomy in the exercise of their responsibilities,**
- that they are free of undue influence, and that they have effective means of obtaining evidence.**

**Furthermore, it must also be ensured that the individuals who help the authorities to combat corruption are protected and that the investigations are confidential.**



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## **Guideline 7 of the Council of Ministers of the Council of Europe:**

**The specialization of the responsible individuals or units operating in anticorruption programs should be promoted.**

**These individuals and units should be equipped with the resources they require and appropriately trained to carry out their responsibilities.**

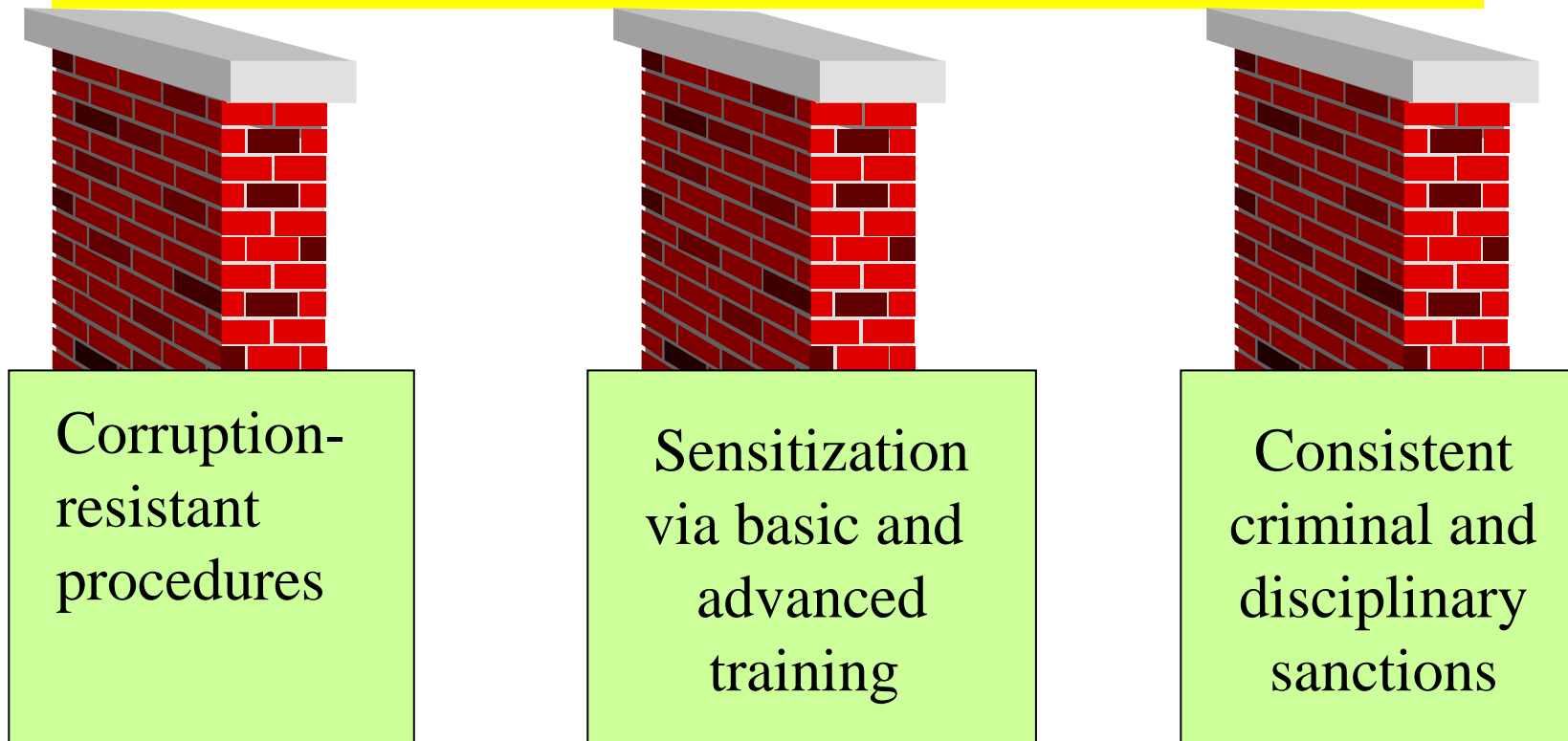


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## The “Three Pillars” Approach to Combating Corruption



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## The Hamburg Anticorruption Concept

- **Identification of work areas at risk of corruption (risk analysis)**
- **Regular monitoring by supervisors and experts**
- **The “four eyes” principle and transparency**
- **Fundamental separation of planning, calls for bids, and billing**
- **Compliance with the basic principles of public calls for bids**



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- **Limits on the length of time individuals may stay in a staff position (rotation), especially in sensitive areas**
- **Appointment of an anticorruption officer or establishment of anticorruption centers in all municipal offices**
- **Obligation of staff members to report all cases of suspected corruption (reporting duties)**
- **Strengthening of the internal review process**
- **Special care in the selection of personnel in areas at risk of corruption**



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- **Restrictive regulation of the right to engage in secondary work**
- **Intensive basic and advanced training**
- **Introduction of a culture of future-oriented correction of errors**
- **Sensitization and instruction of employees**
- **Exclusion of certain companies from competition; anticorruption clauses**
- **Regulations regarding the acceptance of rewards and gifts**



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- **Duty of contract partners to comply with the Law on Obligations**
- **Passing a law concerning freedom of information**
- **Setting up a department focusing on anticorruption activities**
- **Setting up a free-of-charge citizen hotline**
- **Setting up a confidential reporting center**



## Main responsibilities of the DII

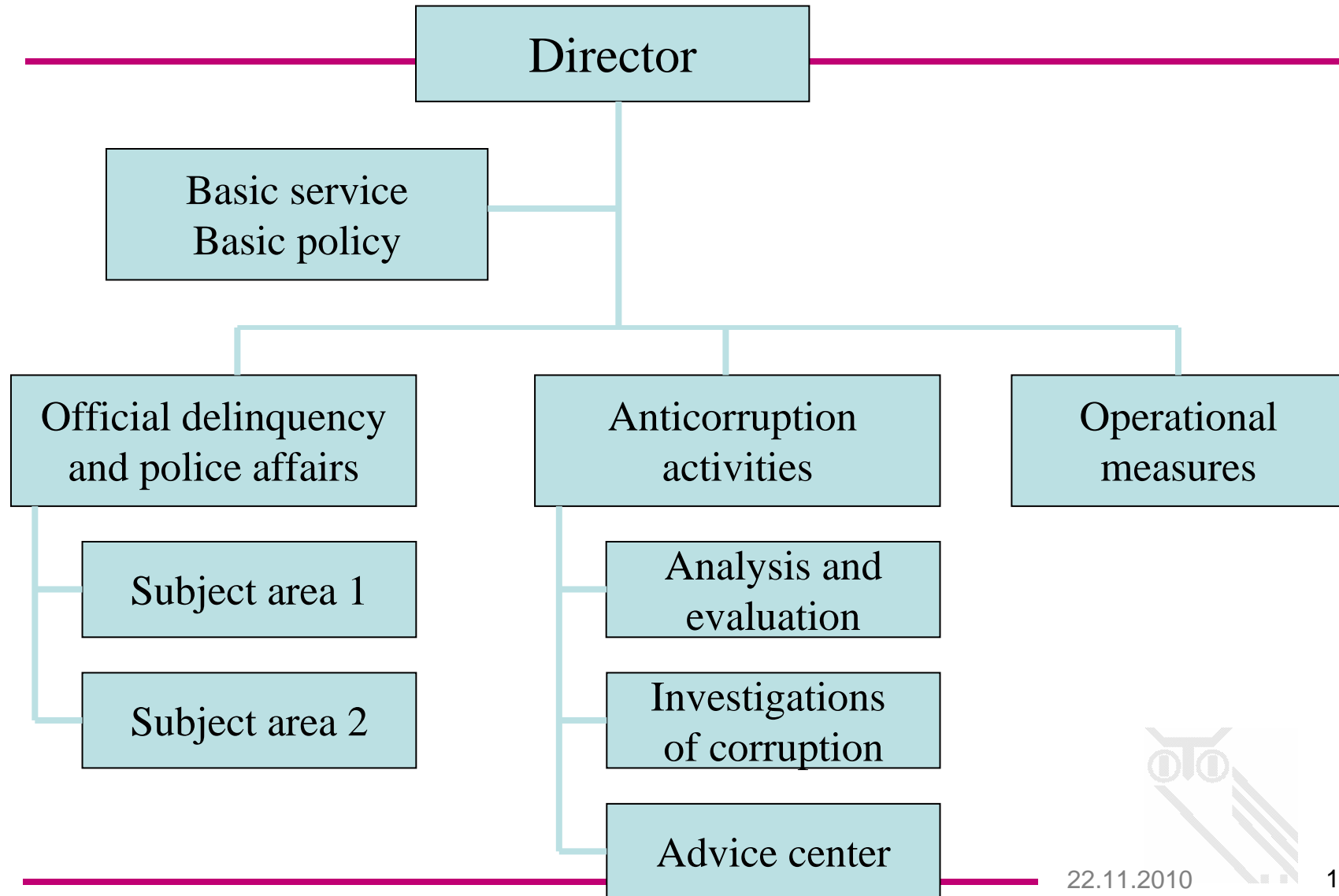
**Official delinquency  
and criminal acts  
of police officers**

**Corruption in  
public administration  
and business**

**Analysis and  
evaluation of  
information**

**Prevention**

# Organization of the DII



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## The Anticorruption Conference (ACC)

**The Anticorruption Conference is responsible for matters such as:**

- **Maintaining a continually updated overview of the situation with regard to corruption.**
- **Submitting suggestions for basic and advanced training programs to be carried out within the municipal office.**
- **Updating the regulatory system for rewards and gifts.**
- **Devising programs for the rotation of personnel.**



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- **Devising models and measures for preventing corruption.**
- **Monitoring the current applicability of the regulations regarding secondary work.**
- **Establishing measures for excluding parties from competition.**
- **Creating a set of general administrative regulations concerning employees' obligation to communicate and report cases of suspected corruption.**
- **Monitoring the implementation of these measures.**



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- **Free repair and maintenance of private cars by shady auto dealers.**
- **Close cooperation with detective agencies and security guard companies.**
- **Part-time work as a service employee in a shady pub or restaurant in one's free time.**
- **Working as a doorkeeper in a popular nightspot.**
- **Working as a salesperson in a sex shop.**
- **Common-law marriage with a prostitute.**
- **Regular contacts with criminals in one's free time.**



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- **Working as a salesperson in a sex shop.**
- **Common-law marriage with a prostitute.**
- **Regular contacts with criminals in one's free time.**
- **Close contacts with (police) reporters that cannot be explained in either professional or private terms.**



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- **Receipt of “Christmas gifts” that might be sent directly to the employee’s private address, are worth more than the permitted value, and are presented in disregard of the relevant regulations.**
- **“Business dinners” to which the employee is invited by company representatives outside of working hours, and which are particularly noticeable after the placement of purchasing orders or in connection with especially big purchasing orders.**
- **“Conferences” with company representatives outside of the usual framework (e.g. during a sailing trip).**
- **Engaging in secondary work that uses skills acquired as part of the employee’s job (e.g. as an assessor or an authorized expert).**



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- **Company owned by the employee's wife: alleged business relationships with companies from which the municipal office buys materials. Bills sent by this company enable the transfer of bribes. Alternatively, genuine business relationships in which the husband (an employee of the municipal office) actually provides services, e.g. provides expert assessments.**
- **Close cooperation with a single company in the development and testing of machinery or items of equipment.**
- **Purchasing objects for private use in the name of the municipal office, even though the bill is paid privately by the employee.**



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- **Sale to detective agencies of personal data from information systems that are accessible to the police.**
- **Handing over such data to private individuals – especially to individuals from the criminal underworld.**
- **Requests by police detectives, outside of their normal professional activities, to other police authorities (including foreign police authorities) for information about individuals associated with organized crime.**
- **Divulging planned investigations, or the results of investigations, to media representatives, while knowing that this may jeopardize the success of the police operation.**



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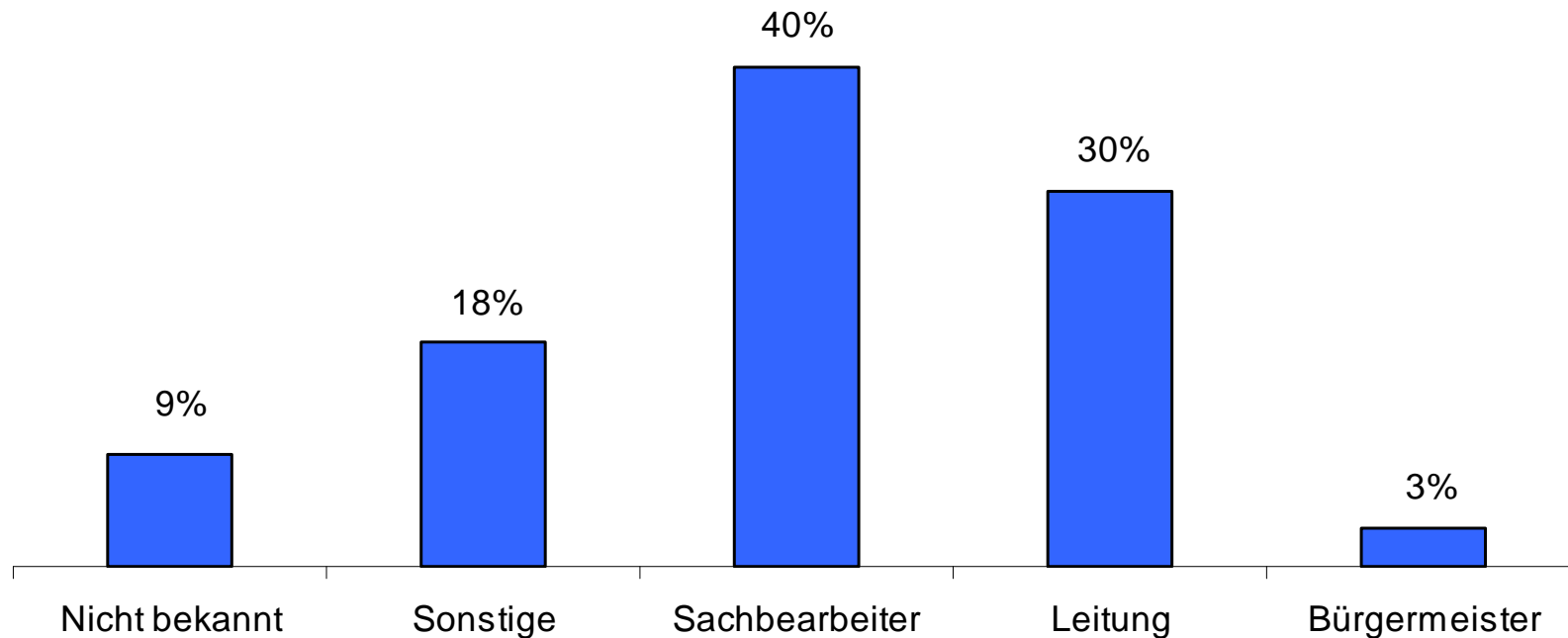
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- **Communicating accidentally acquired information about planned measures to be taken against criminals with whom the employee has a close private relationship.**
- **Diverting various items acquired by the municipal office, especially cash.**
- **Requesting “donations for a good cause” in exchange for waiving a burdensome official procedure.**
- **Providing the addresses of deceased individuals to funeral directors for pay.**



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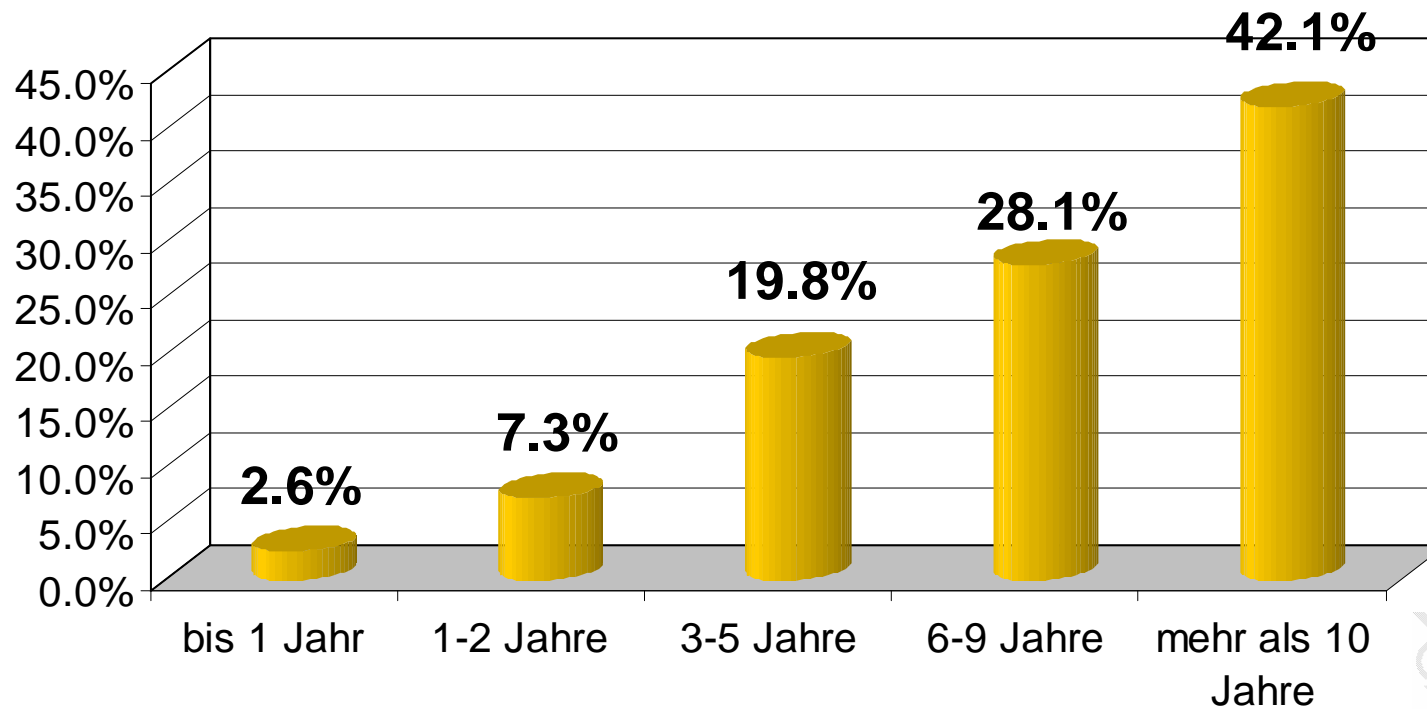
Function of the "takers"



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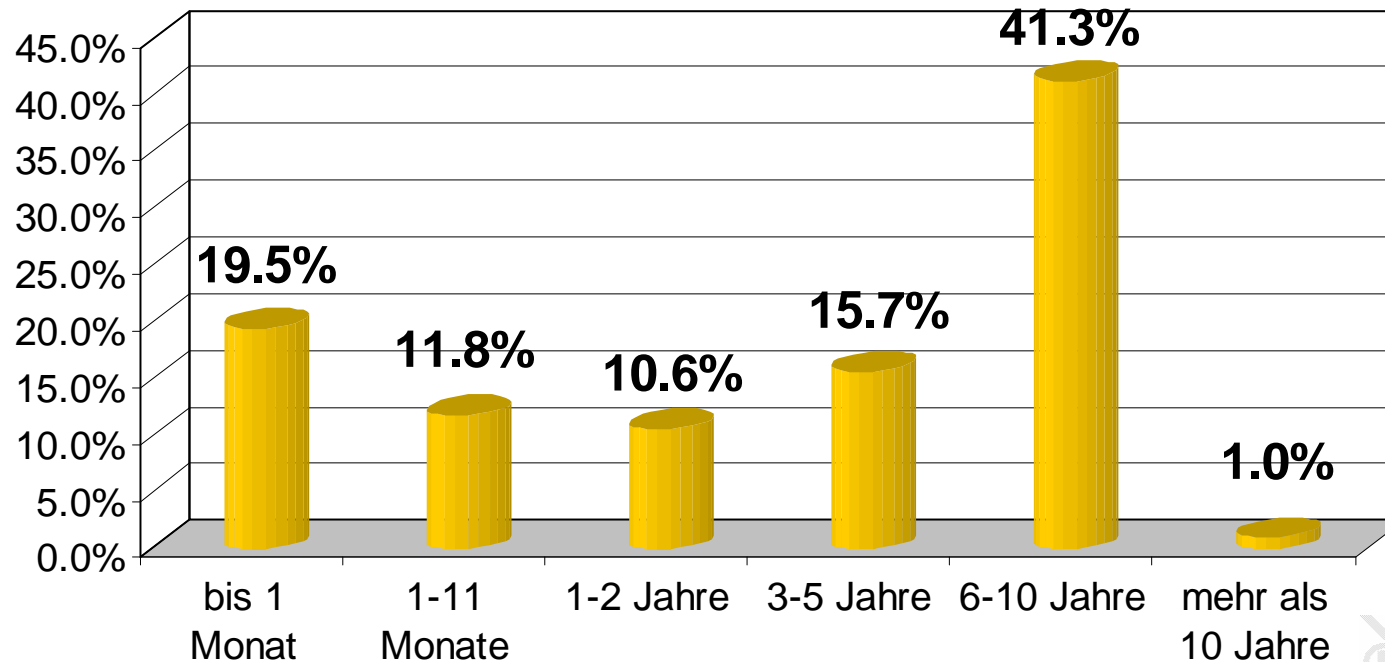
## Length of service in the position



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## Length of the corrupt connection



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# Thank you for your attention!

