

**Corruption Crime Statistics and Police Numbers Reporting
in Bosnia and Herzegovina**

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Disclaimer

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Executive Summary

This short research study examines the information available in police institutions regarding the police corruption and statistics reporting on it. Moreover, it identifies shortcomings in the system and needs analyses. The aim of the study is to identify key issues in reporting police corruption cases and statistics related to the cases of police integrity, with a specific emphasis on the methods and ways of analysing the existing (reported) police corruption cases, as well as the efficiency of implemented prevention strategies. There was neither sufficient time, nor resources available for more detailed research, which should have led to detailed recommendations for police agencies. However, this study can be used as a starting point for a more comprehensive research that should result in a quality proposal to amend and overcome the identified shortcomings and obstacles in this field. Additionally, it could assist law enforcement agencies (LEAs) in BiH to consider and eventually design a database on police corruption if proof needed.

Introduction

The wide extent of corruption in all spheres of the police sector in BiH is still one of the major obstacles for development and democratization of the country and plays a major role in hampering its steady progress towards the EU and NATO integration. Although BiH authorities have made serious efforts in fighting corruption by adopting a set of anti-corruption laws, strategies and ratifying a number of international acts, a lot of work related to the process of harmonization and improvement of national legislation and practice supposed to be in line with the international anti-corruption standards remains to be done. Special issue relates to police corruption. It is interesting to mention a research conducted by the Global Corruption Barometer-GCB (2013), which states that there are 62% of respondents in Bosnia and Herzegovina who felt that police were corrupt/extremely corrupt¹. At the score scale 1–5 (where 1 means not at all corrupt and 5 means extremely corrupt), BiH citizens assessed police institutions with the score 3,8². However, since this is one of the perception-based surveys, the CSS team calls for an improved collection of legal statistics on the police corruption that would be kept by the police forces.

Unfortunately, police bodies in BiH do not keep statistics on the police corruption. There is no data available on the police corruption either at the prosecutor's office or at the court and there is no database on this type of corruption³. Data on the police corruption can be obtained manually through the available registers that keep track of complaints, internal investigations, disciplinary proceedings, as well as the crime registers.

¹ http://www.transparency.org/gcb2013/country/?country=bosnia_and_herzegovina

² GCB (2013), Table 2, pg 36 (<http://www.transparency.org/gcb2013/report>)

³ Read more about information sources on police corruption in „Overtly about Police and Corruption“, Maljevic et al, Sarajevo, 2006.

Methodological framework

The project was conducted in three stages:

- The analysis of legislation on police and police related strategies and action plans for fighting corruption within the police;
- Screening of the available official statistics on corruption;
- Field visits to several LEAs in all three government levels in BiH (state, entity and canton). During this stage, the team interviewed police officials that were nominated for those meetings by the managers of their agencies. Each agency nominated 2-5 officials who attended these meetings. Most of them were mid- to high-ranking officials dealing with: statistical analyses, corruption investigations and internal investigations. The team visited following LEAs and interviewed their representatives:
 - o BiH Border Police (BP)
 - o BiH Directorate for Coordination of Police Bodies (DCP)
 - o Ministry of Interior of the Federation Bosnia and Herzegovina (FMoI) and the Federal Police Administration (FPA)
 - o Canton Sarajevo Ministry of Interior (MoI)

Interviews were conducted in a semi-structured way. The research team prepared a set of questions for the discussion with the LEAs representatives (questions listed in Annex 1) covering the most important topics such as the need for the statistics on the police corruption, ways of gathering statistics, different approaches in the methodology, etc.

Letters with the set of questions for the discussion were sent to:

- o State Investigation and Protection Agency (SIPA), and
- o Ministry of Interior of Republika Srpska

Their answers have been provided to us in telephone conversations, informal meetings as well as in the course of previous similar projects.

Information on the practice of Police of Brcko District BiH was gathered in informal conversation and the data from recently completed projects has been made available.

Statistics on corruption in general and specific situation in BiH

Corruption is a pervasive global phenomenon. Many scientific studies suggest that it is often closely associated with the organized crime, illegal financial transactions, smuggling of drugs, humans, weapons etc. Overall, corruption has a negative effect on the economic and social development of every country; it hampers the functions of the internal market by generating low levels of investment, economic productivity and very low economic growth. UNODC (2011)⁴ reports that all criminal proceeds have amounted to \$2.1 trillion, or some 3,6 % of the global GDP. The money associated with the corruption (received by public officials from developing and transitional countries) is estimated at \$20 billion to \$40 billion per year (World Bank, 2009).⁵ It has been reported that four out of five citizens of the EU consider corruption to be one of the major problems. It is estimated that the corruption costs the EU economy approx. €120 billion per year.

One of the main challenges in reporting the accurate and reliable data on the corruption level is a lack of consistent statistical methods at the international and the EU level. Police numbers reporting is one of the most critical areas in dire need of reassessment and harmonization. Less commonly, police actively engages in reporting the number of corruption-related crimes that have been committed. Simultaneously, lack of consistent, agreed upon definition has to be considered as a problem. For instance, some analysts dealing with the police corruption, such as Maurice Punch, want to include unwarranted violence and prejudice (homophobia, sexism, racism, etc.), whereas others prefer to use a narrower definition that focuses on improper personal or group gain (e.g. bribery, embezzlement, cronyism)⁶. Therefore, a standardized method used for collecting police corruption statistics would need a more consistent and uniform definition.

One of the most influential police related projects in Bosnia and Herzegovina “EU Support to Law Enforcement in BiH”, in its comment on the UNODC report on improving the quality and availability of crime statistics at the national and international levels, explains: “Translated to the reality of Bosnia and Herzegovina, manner of recording data on crime and keeping police statistics differ across the country. The same refers to the standardization of gathering statistical data and reporting on criminal activities. As the document templates differ across the country so does the quality of information particularly in relation to the organized crime, money laundering, terrorism and corruption”⁷. This is caused by the complex state structure in BiH, which to a large extent influences the police structure and jurisdiction. Police structure is very complicated, there are various police agencies and each of them acts as an independent entity⁸. There is no harmonized methodology on data entry, collection and aggregation.

⁴ http://www.unodc.org/documents/data-and-analysis/Studies/Illicit_financial_flows_2011_web.pdf

⁵ http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2009/08/27/000334955_20090827040954/Rendered/PDF/501750WBAR02009.pdf

⁶ Leslie Holmes, „Australian Police Corruption in Comparative Perspective“, University of Melbourne, pg. 4 http://apsa2010.com.au/full-papers/pdf/APSA2010_0256.pdf

⁷ <http://www.lawenforcement-bih.eu/index.php?lang=en>

⁸ Read more about complex police structure and its jurisdictions in BiH in “Overview of Policing in Bosnia and Herzegovina”, Chapter II “Organization, Numbers and Competences” and Chapter IV “Structural Analysis of

Therefore, the level of objectivity of statistical data recorded in two BiH entities, in agencies on a state level and in Brčko District (BD) is somewhat different because of different legal regulations for counting offenses and data. The methods used for verification of recorded data vary from one police body to another and very often the rules are neither entirely clear nor set. Reporting or submitting information on corruption in BiH to the Ministry of Security of BiH is done in different ways, and the information gathered cannot be easily compared or matched.

Statistics on police involvement in corruption in BiH

The term ‘police corruption’ is used to describe different activities, such as bribery, trading favours, a range of unprofessional behaviour and favouritisms or nepotism. Generally, police officers can be held responsible for engaging in corruption when, in exercising or failing to exercise their authority, they act with the intention of gaining illegal private or other benefits.

The current official statistics on corruption can only illustrate the “tip of the iceberg”. This is a consequence of the several reasons: the level of corruption present in the society is usually underreported due to the “code of silence, meaning that both sides - the party that receives and the one that gives the bribe - have their own interests in the specific case; it is difficult to prove and investigate this type of crime because of the vast timespan between the conduct of the crime and the start of the investigation; corrupt societies have no interest to investigate corruption. Given the complex police structure and decentralization within the existing BiH police system and the lack of subordination in managing the police work in the Federation of BiH, the official police statistics are being kept in a non-harmonized manner. On the other hand, as a consequence of the centralization of the police structure in Republika Srpska and limited organizational scheme of the Brčko District Police, statistical data produced there reflect a more reliable situation when it comes to recording the corruption-related criminal activities in general.

The lack of real and objective statistical data on police corruption in Bosnia and Herzegovina as well as the lack of legislation regulating this obligation leads towards the misinterpretation and wrong assessment of the police behaviour. In addition to this, the lack of clear international standards regulating this area makes the issue more dubious.

The problem of the lack of reliable police statistics on police involvement in corruption is caused by three main factors. The first one is the complex police structure, with various police agencies⁹, which lead to various police jurisdictions/competencies and authorities at all three levels of the government. Overlapping and incoherent jurisdiction and competencies of police

Jurisdiction in Legislation and Practice” at

http://www.css.ba/images/docs2/pregled%20stanja%20policije%20u%20bih_english%20final.pdf

⁹ The system consists of two entity Ministries of Interior (Federation of BiH and Republika Srpska), Brčko District Police and ten Cantonal Ministries of Interior and three agencies at the state level. LEAs work under incoherent and non-harmonized set of regulations and intertwined (often overlapping) competencies.

agencies have been reflected in their internal procedures regulating the way of recording and processing data on the involvement of the police officers in the corruption. Second, there are no clear rules regulating methodology for keeping police statistics on police corruption in general¹⁰ since there is no central police body, which would be in charge of setting the statistical standards for all police agencies. Third, the general practice and methodology on police statistics is not harmonized countrywide and differs significantly in each police institution. If we add the fact that there are no clear regulations adopted at the EU and international level regulating the area of statistics on the police involvement in corruption, we come to the conclusion that it is not odd that Bosnian police keeps no statistics on the involvement of its officers in corruption. All facts mentioned above play an important role in enabling police agencies to collect information on cases related to police corruption, create database, sheets and forms on their own.

The manner of reporting the police corruption to external subjects is not standardized among different police agencies, and some of them lack the basic methodology and approach to deal with this matter. Most commonly, the statistics on the number of corruption-related crimes within the police is misleading, often lacks accuracy and is sometimes misinterpreted. The statistics on police involvement in corruption in BiH is not reliable and the stats are not available in one place. Additionally, the existing stats records kept and processed by the prosecutor's offices and courts statistics use different sets of rules and standards, which do not entirely match the ones, used by the police agencies.

Sources of information used in the research on corruption in the social sciences and especially criminology are usually surveys (both victimization and self-reports), which assume interviewing and distribution of questionnaires among selected groups of respondents. The statistical data on corruption cases within the police, kept and processed by the police agencies using the standardized and proved methodology, should be carefully considered. The data collected are based on perceptions, partial recollections, opinions and beliefs, which cannot entirely reflect the true reality nor can be these considered as the objective indicators. Therefore, there is a task in front of us to attempt to improve and refine the measurements.

¹⁰ As well as on serious and organized crime.

Legal Framework

The complex constitutional structure of Bosnia and Herzegovina has been reflected in the even more complex organizational police system. In order to undertake the complete analysis of the police corruption in BiH, it is necessary to carefully consider its content and organization at the three existing levels.

At the beginning of 2002, the Parliamentary Assembly of Bosnia and Herzegovina ratified the Criminal Law Convention on Corruption (ETS no. 173), and the Civil Law Convention on Corruption. In addition, the BiH Parliament has ratified The European Convention on Mutual Assistance in Criminal Matters (in 2005), The UN Convention against Transnational Organized Crime (in 2002), and the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime (in 2004).

The Government of Bosnia and Herzegovina also adopted the Anti-Corruption Strategy 2009-2014 and the Law on the Agency for the Prevention of Corruption and Coordination of the Fight against Corruption (in 2009). In 2009, the Law on Mutual Legal Assistance in Criminal Matters, which stipulates the general and special institutes of international legal assistance, was passed. The BiH government also participates in the implementation of the Council of Europe monitoring mechanism by the Group of States against Corruption (GRECO). However, the BiH Government has not yet adopted the Additional Protocol to the Criminal Law Convention on Corruption of the Council of Europe. Based on these documents, many LEAs in BiH have adopted their individual anti-corruption plans, which contain internal regulations, measures and indicators for fight against the corruption in police. However, these plans do not require or consider keeping statistics on the police corruption.

Criminal Codes (CC), Criminal Procedure Codes (CPC) and Laws on Police Officers (at all three levels of the police organization) regulate the police acts and its obligation to investigate corruption as a criminal offence. The obligation to initiate internal investigation and disciplinary proceedings in the case of awareness of police corruption or in the case of available facts pointing towards the committed breach of duty is regulated by various by-laws and internal instructions in the different police organizations (i.e. Instruction on the work of the Internal Control Unit, Regulations on disciplinary responsibility in all particular LEAs).

Data entry/recording- Internal and independent investigations/procedures within the police institutions

Detection, suppression and successful fight against corruption in the police agencies heavily depend on a wide range of factors. Successful detection and prosecution of corruption primarily depends on the amount of information and evidences that authorities obtain and the cooperation of the suspects and afflicted persons with the investigation authorities. The most common sources of information are the witnesses' reports, self-reports by the participants in the corrupt practices, anonymity and pseudo-reports, reports of afflicted persons, state reports, economic subjects reports etc. All named processes require a strategic and carefully organized monitoring of all phenomena within the system.

Within their organizational structure, all LEAs have units investigating the breaches of duty. These are named units for internal control or the units for professional standards. These units are responsible for the detection and investigation of police misconduct. The investigation proceedings can be started by the citizens' complaints, request by the police employee(s), request by the manager or a direct supervisor or the request by the Independent office for citizens' complaints against police.

Generally, LEAs do not keep register on the police corruption. There is no database in which such details are to be entered. However, in accordance with the existing legal framework, all LEAs in BiH keep general registers on:

- Citizens' and all others complaints against police related to police misconduct;
- Internal proceedings/investigations;
- Disciplinary proceedings;
- Pronounced disciplinary sanctions;
- Crime offences (reports sent to the prosecutors' offices)

These evidences are kept in accordance with the existing legal framework at all levels of the police organization. Registers particularly related to the police corruption are not kept, since there are no binding regulations obliging police to keep such statistics. Therefore, using the advantage of the available evidences and the details described in the particular cases, police forces can only manually count:

- The number of complaints related to the police corruption;
- The number of internal investigations for allegations related to the police corruption and their results
- Disciplinary proceedings related to the corruption, i.e. corruption as a breach of duty and their results.

If the third party requires information on the number of cases related to the police corruption registered within a particular police agency force, or any other information linked to such statistics, every police body should go through the abovementioned registers manually and count such cases or other information requested. This procedure makes work of statistical officers more complicated and keeps them occupied, thus preventing them from doing their daily work.

Apart from the internal investigations carried out by the police forces, there are external offices for citizens' complaints against the police officials established at each particular level of the police organization. However, these offices are not responsible for an independent investigation, but they forward complaints to the relevant police institution in which the respective police officer is employed. Like the LEAs, these offices do not keep stats register on police corruption in general because they receive only citizens' complaints against police and do not deal with the criminal investigation or with the internal procedures. However, they produce

reports on timely basis, which contain the number on citizens' complaints against police officers related to the corruption including the result of their proceedings¹¹.

Similar and different practices and needs in various police organizations

All LEAs have designed and adopted their internal action plans against the corruption among their own staff, as a result of the general BiH Anti-corruption strategy 2009-2014. The action plans postulate, more or less, clear indicators for their implementation. However, none of these plans prescribes an obligation for keeping statistics on the police corruption. Nonetheless, all interviewed representatives of the LEAs believe that the statistics should be kept and that the records should be available at any time to the third part with the aim of enhancing a more realistic perspective/outlook on their staff's involvement in corruption. This would clearly result in the increase of the level of transparency, accountability and legitimacy of the police work in fighting the corruption within other institutions.

Generally, all interviewed officials stated that statistics on the corruption within the police should be kept (at any stage of the case/proceeding), but they are missing a clear methodology, roles and legal provisions that would require and entitle them to do so.

However, there is a significant gap in the legal framework that would allow them to undertake this step, as a consequence of the lack of clear guidelines and methodology. On the other hand, representatives of some police bodies like SIPA (State Investigation and Protection Agency) and Direction for Police Coordination claim they have not observed many police corruption cases of their staff or received a great number of citizens' complaints related to the corruption. SIPA has very limited registers related to the police corruption as its employees do not have a direct contact with the citizens and the number of complaints it receives is rather trivial. In other words, the subject is limited to a small number of corrupt officers who are not considered as the representatives of the wider agency standards. Accordingly, maintaining the statistics on the police corruption seems to be obsolete in these agencies and would not make much sense.

On the other hand, representatives of the Border Police describe the issue as an important one within their organization as the border crossings are the most vulnerable points and the police officers are very much involved in the corruption. Allegedly, the problem is that a bribe taken by the police officer at a border crossing is very difficult to be evidenced and proved by the investigation unit (it is well known that many officers take smaller bribes several times a day, which creates a continued offence, but the prosecutors are not interested in investigating such cases). Border Police has more detailed evidences on the corruption in general as well as

¹¹ Read more about the ways of lodging complaints and grievances about the work of police authorities and complaints and reports on grounded suspicion of corruption in the police in "National Integrity System Assessment", Bosnia and Herzegovina 2013, Transparency International, Chapter 6.6. Law Enforcement Agencies. Pg 119, at the link <http://ti-bih.org/wp-content/uploads/2012/12/National-Integrity-System-Assessment-BiH-2013-en.pdf>

evidences related to the internal investigations, disciplinary proceedings and all measures undertaken against the police officers.

This differences observed in the responses obtained suggest that the complex police structure, overlapping competencies and jurisdiction of different police agencies and different nature of their jobs affect their perception on the means and modes of fighting the corruption within their own lines. Namely, some agencies are responsible for criminal investigations, traffic control etc., while others are in charge of coordinating the police activities and often do not interfere in the criminal investigations related to the corruption or they do not engage in contacts with the ordinary citizens, which decreases the chances of corruption ever taking place. Thereby, those police agencies which are more “exposed” to the corruption tend to have a more positive attitude towards keeping and maintaining the corruption stats, as a useful mechanism for combating this criminal activity, while the police agencies less exposed to corrupt practices regard stats as an obsolete measure, and one that would be an additional burden to their duties.

According to the available statistics on criminal charges submitted to the prosecutor office kept by Federal Mol, the number of police officers and civil servants employed in the Federal and Cantonal Mols is always available, while other details are not registered. This data is registered in forms “KD” within the “Statistical review on crime offences and reported perpetrators” which FMol and Cantonal Mols are obliged to keep in accordance with the “Instruction on mutual reporting on occurrences in the area of public security between Mol FBiH and cantonal Mols on issues relevant to safety in FBiH”. Other police agencies do not have a particular column in their statistical reviews on the police officers. Instead, they state that this detail can be found within their reports by using manual way of counting. However, once the criminal cases are brought under the prosecutor’s jurisdiction and the possible further investigation or court proceedings, the statistics on police corruption are no longer available. Prosecutor’s office and courts periodically publish information related to their work, including the number of orders for investigation, indictments, first instance and the final verdicts, but no statistical data on police officers as defendants or convicts. Such data can be counted and collected for particular purposes but there is no standardized methodology on keeping the statistics.

A good example at the international level is the practice of the Austrian Anti-Corruption Agency (BAK). One of the main tasks of this agency is to investigate the corruption cases with the police involvement. All registered cases are covered by the BAK statistics already at the time of the police investigation (statistics on incoming cases / full-coverage survey). The statistical data is constantly being updated and adjusted on the basis of the results of the investigation. If the criminal investigation starts and ends within the survey period, the final data of the investigation is taken into account. It has to be noted that the BAK figures do not contain information on settled cases or legal convictions. Many of the persons covered by the statistics are only indicted with the crime but later not convicted due to the lack of evidence or because they are proven innocent¹². Additionally, it is interesting to mention the practice in Serbia, as a

¹² The information of work of the BAK related to police corruption statistics described in this paragraph was provided thanks to the assistance of the project “EU Support to Law Enforcement in BiH”, Project Component III – Fight against Corruption, Karlheitz Gortano, Leader of the Project Component

neighbouring country. The Belgrade Centre for Security Policy (BCBP) conducted a very good and interesting research on corruption in the security sector. “Based on the answers on BCBP questionnaires, it was recognized that there is no unique and integral data base on criminal responsibility of the police officers, due to the reason that the crime charges against such officers are submitted by regional police administrations as well as by the Department for Fight against Organized Crime (SBPOK) within the Crime Police Section. Apart from that, there is no unique and integral database on the number of submissions, complaints and appeals of the citizens and police officers on misuse of police authorities. This makes the risk analyses in the police sector more difficult“. It is also stated in the research that there is no any explanation how the police forces define the corruption in the police sector¹³. It is interesting to mention the case of Montenegro. The evidences on police officers and those working in the justice sector who are charged and processed for the corruption, are kept by the National Commission for the implementation of the Strategy for fight against corruption and organized crime. This could serve as a good example and BiH Agency could consider this possibility.

¹³ - See more at: http://korupcija.bezbednost.org/Korupcija/235/Unutrasnja-kontrola.shtml/nav_start=#sthash.EVC71Gty.dpuf

Conclusion

Collecting legal statistics on police corruption is important not only in itself, but because of the society's experiences with the police corruption, which, if negative, become detrimental to the police legitimacy. All interviewed representatives of the police bodies agreed that they should be the ones to keep statistics on the police corruption but there is neither clear nor harmonized methodology and guidelines nor legal framework requesting them to do so. Legal framework obliges police bodies to investigate corruption as a general crime and calls only for keeping registers on complaints, internal investigations and disciplinary proceedings, regardless of the type of misconduct and the breach of duty.

The difference in keeping registers and all statistics among the police bodies is a result of the complex police structure, as well as different responsibilities and competences of various police bodies in BiH. Various police agencies have different practices in recording" this type of police misconduct, which might be rooted in the differentiation of their powers and responsibilities (at many levels). Some of them are in direct contact with the citizens (cantonal MoI, Border Police) and their officers are more inclined to engage in corruption. On the contrary, other agencies have only coordinative role or deal with more serious and organized criminal cases (SIPA, FPA) – accordingly, these are rarely involved in corruption but can be implicated in the organized criminal cases.

Systemic approach in the fight against corruption is implemented on many different levels in BiH, with a focus on strengthening and enhancing the competence of institutions to fight it. However, the stagnation in terms of effective implementation of laws related to the prevention and punishment of corruption is obvious, and this fact was verified by numerous national and international research organizations.

General recommendations

The statistical data collected from different sources (i.e. all available reports, crime statistics, victim surveys or citizen focus groups) can be valuable for identifying and understanding the trends, risks and opportunities to be addressed by the police. Therefore, we recommend the following:

1. All LEAs, in cooperation with the Ministry of Security, should consider introducing a standardized methodology and clear instructions related to the statistics on police corruption, followed by the relevant legal provisions that would oblige police to keep such evidence. This could result in the creation of a template for an electronic database on all information on police corruption, which would be accessible at the level of particular police agency and would enable the statistical staff to have access to the information at any time. This would, all together, increase transparency, accountability and legitimacy of the work police officers are doing in preventing and combating corruption outside of their own institutions.
2. Agency for the Prevention of Corruption and Coordination of the Fight against Corruption should consider introducing an annual victim-based survey on corruption within the police with citizens. This would help in obtaining the more reliable crime statistics. Current methods of recording corruption crimes, as explained above, done by the police and other authorities have significant shortcomings and limitations, and yet they are considered as the only valid source of information. An annual victimization survey with a random sample of the population, on their experiences with the corruption might better account for the volume of the crime and give more accurate estimation of the extent, forms, frequency, modes and severity of the corruption. This will help in measuring the dark numbers of crime (victimization prevalence) (Annual victim-based survey on corruption is suggested by the method of prof. Van Dijk)¹⁴.
3. LAEs are recommended to create a sheet for registering the police corruption cases, which would be used in their respective agencies. Here is a draft sheet proposed by the CSS team.¹⁵

¹⁴ Read more about The International Crime Victim Survey and and Complementary Measures of Corruption and Organized Crime on the following link: <http://arno.uvt.nl/show.cgi?fid=80082>

¹⁵ This is only a proposal by the CSS team that contains necessary variables which can help in producing more realistic data on police corruption. The form needs to be discussed amongst police agencies and agreed by all.

Ordinal no.	1.					
Register no. (case no.)						
Type of alleged criminal offence (mark with an X)¹⁶	Giving bribe		Opportunistic theft		Overt involvement (or collusion) with organized crime gangs'?	
	Receiving bribe		Shakedowns (extortion)		Other (specify)	
	Corruption of authority		Protection of illegal activities		
	Forging of Official Document		The fix		
	Kickbacks		Direct criminal activities			
	Internal payoffs		Padding and Flaking			
Time of Perpetrating the alleged criminal offence						
Mode of receiving the information						
Content of the complaint						
Suspect's official position						
Institution/ Department/ Unit						
Course of disciplinary proceedings						
All Legal measures taken						
Date of pronouncing decision(s) with final force and effect						
Additional comments and remarks						

¹⁶ This part can also simply contain crime offences as listed in the Criminal Codes if it is easier to use by LEAs

ANNEX 1

FRAMEWORK TOPICS FOR DISCUSSION WITH THE REPRESENTATIVES OF THE LEAs

- Do you think police corruption is an issue in your agency? Why?
- Do you know if any of the employees working in your agency are/were involved in corruption?
- If yes, do you know the specific number of the persons involved in corruption (note: you do not have to tell us the exact number, the question is rhetorical)? What paper sources/evidences do you use for this purpose? Do you keep any specific registers on police corruption?
- If you don't know the number, do you think it would be good to know it? If no, why not? If yes, what prevents you of keeping the register on police corruption?
- If you keep any kind of the register re police corruption, when do you acquire the details (when you get information, when you start the investigation, submit a criminal charge – is it after the court's judgment....)?
- What specific details on your employer do you fill in the register, if you find s/he is involved in corruption?
- To what extent the available police evidences (i.e. those on internal investigations, disciplinary proceedings etc.) can be useful in providing the realistic picture on police involvement in corruption?
- If you acquire such information during the investigation process, do you register details regarding the involvement in corruption of police officers from other police agencies?
- Has your agency adopted any internal measures for combating corruption? If yes, which measures?
- Do you use any international model and program for registering and keeping statistics on police corruption? If yes, which model?
- Are key managers and supervisors who are in charge of keeping statistics, properly qualified for this task? Do they have sufficient knowledge on statistics and criminal law?
- Do you think that keeping internal statistics on police corruption in BiH could contribute to the integrity of the officers? Why? Could this serve as an efficient preventive mechanism for combating corruption?

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