Internal Controls to Curb Corruption in the Police Department: Challenges and Way Forward

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Abstract

In the developing countries like Pakistan the expectations from the systems are democratic but the basic structures are colonial. Historically speaking, the police act of 1861 did not provide much scope to police accountability that is later altered and amended in Article (8) of The Police Order 2002 (PO) that has put in place system of police accountability based on public participation and community input. Article 155 of PO 2002 explains the penalty for certain types of misconduct.

According to the Transparency International Corruption Perception Index 2020 Pakistan is at 124th number out of 180 countries. Keeping in view these statistics the importance to study the reasons of corruption in police become imperative. In Pakistan where religious intolerance, sectarian, ethnic, and gender-based violence is on the rise and on the other hand there is stagnant economic growth coupled with high rates of inflation, unemployment, poverty, and income inequality, under such situations if the law enforcement department of the country itself face the challenges like corruption and lack of integrity, then there is a need of researches and policy makers to provide direction and dimension to the stakeholders.

This research aims to identify the gaps in internal controls in police department due to which image of image is being affected. It will also analyze the existing accountability mechanism in Punjab Police and the results achieved so far. It will also compare it with the internal controls of countries having best practices of the world and will also suggest policy recommendations to improve internal controls and increasing efficiency of accountability mechanism of Punjab Police.

Introduction:

"Corruption is a disease; Transparency is an essential part of its Treatment" (Kofi Annan). A number of studies over the period of time has indicated that corruption within law enforcement is a serious task to combat. In public organizations, Police department is that public entity, which is commonly exposed to chances of corruption. As Police officers have vested legal powers, it is ordinarily presumed that many a times the authority can easily be misused for personal advantage especially in terms of unlawful financial gain. Corruption is a disturbing phenomenon regardless of institution, but the notion of corruption intensifies when it comes to police department because the prime duty of this institution is to enforce law and assurance of fair prosecution of the culprits (under any offense). So, the agency that has been designated with such a responsibility, if itself violate the very core of it, then it becomes a point of grave concern for the people in general as they lose trust and confidence to put their matters under their control. For pursuing

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concrete reforms, corruption in law enforcement departments needs to be reduced as it is a necessity.

Statement of Problem

According to report of Transparency International regarding corruption perception indexes (CPI), an annual index that ranks countries based on perceptions of public sector corruption, Pakistan ranked 124 amongst 180 countries. Last year, Pakistan ranked 120 in that list, so Pakistan rank has dropped by four more points after one year meaning by corruption has increased. According to a survey , Police in Pakistan is the world's 13th most corrupt police. Despite placing so many internal checks in Police Department, the level of corruption in Police is still on the rise. In view of the above, in this IRP an endeavor will be made to analyze

1. Why internal controls in police department failed to check corruption by police?

2. What are the main challenges faced by Police Department in curbing the corruption in police?

3. How to improve Internal Controls so as to eradicate corruption in police department?

Scope and Significance of the Study

The study will be limited to departmental handling of corruption cases by using the data of reported corruption cases in Punjab Police against different ranks of police officers and the number of officers being punished during last five years.

This study will analyze current corruption coping mechanism within the Punjab police department which is affecting police fairness and integrity. This study will further shed light on the best practices that are used in different countries to curb corruption in police force. Lastly it will provide adequate policy recommendations keeping in view the culture and specific conditions in Pakistan related to police department in order to reach goal of curbing police corruption. The issue of police corruption in Pakistan is multifaceted, and it is combination of several permutations and characteristics. It is, therefore, important to realize the true nature of police corruption and its causes in Pakistan. The study will use PEST analysis to explore socioeconomic and institutional reasons.

Review of Literature

Despite the enormity of the situations prevailing due to corruption rooted deep in our society, there is a drought of research in this area. Especially studies with reference to corruption in police force are too few. So here we will discuss the few studies conducted in Pakistan along with some international researches to get a better picture to identify reasons and repercussions of various polices and

suggestions regarding corruption control in police forces.

Police corruption is not only a criminal but social phenomenon. The word "police corruption" has been used to explain numerous actions i.e., violence; bribery and brutality; destruction and fabrication of evidence; favoritism and racism. It was also pointed out that police corruption can be connected to religion, gender, education, social status, ethnical separation and urbanization. Becker in his seminal work identified that any criminal act including white collar crimes i.e., corruption is done after the evaluation of risks and benefits of the act. If returns (that is income in case of corruption) is higher than the legal income the person will execute the act of corruption. Similarly, the individual weighs his cost in terms of punishment if the probability of being caught or convicted is low, the act of corruption will take place. These are the very reasons of increased corruption looking from an individual's perspective and evidences are available that officers in lower ranks are more involved in financial embezzlements . In the corruption analysis it has been identified that low salaries of police officers is an important indicator to contribute to high corruption rate among police. The governments in developing countries are not willing to allocate more resources to internal security forces in terms of wages and facilities .

The situation if Pakistan is no different. Khan et al., (2021), identified that poor pay scale, resource shortage, politicization of police, various social factors and lack of social and economic policies are the main reasons of police corruption in Pakistan . Similarly other researchers , discussed the problems and hurdles that Pakistan is facing to bring reform in the police force. They argued that though illegitimate political interference has been the most important problem in widespread corruption but even places and times when favoritism and politicization is not present, the common man in Pakistan cannot seek assistance of police even for his genuine issues unless he somehow pays bribe to police. They suggested that one way to combat these problems is related to allocation of resources, improving the compensation, revamping the service structure, improving working environments, decreasing the workload of police and results can be achieved if reforming police is a priority of political elite in Pakistan. Secondly, a strong accountability mechanism needs to put in place. Though the amendments have been made in the police order 2002 but virtually accountability of police force is non-existent in Pakistan.

Malik & Qureshi (2021) , correlated police corruption with various economic, cultural and political factors. They identified two economic reasons a) low wages b) low operational cost. Whereas cultural reasons are referred to the "moral economy" where practices and perception of any bad need like corruption become normal. Jackson et al., (2014) , conducted survey regarding public perception and

is considered as an important research contribution as they tried to check corruption and police legitimacy in Pakistan by conducting a survey in Lahore city. They connected the experiences of people empirically which was related to police corruption, and their views of the impartiality and efficiency of the police, and their opinions about the neutrality of the police. The study suggested that in a context in which marginal efficiency and reliability of police is still not in place, police neutrality may not only be judged that whether officers are honest and neutral, but also on their professional competence to contain crime and check corruption .

Based on the review of the literature the main causes of the police corruption can be summarized in the following diagram.

Figure 1:
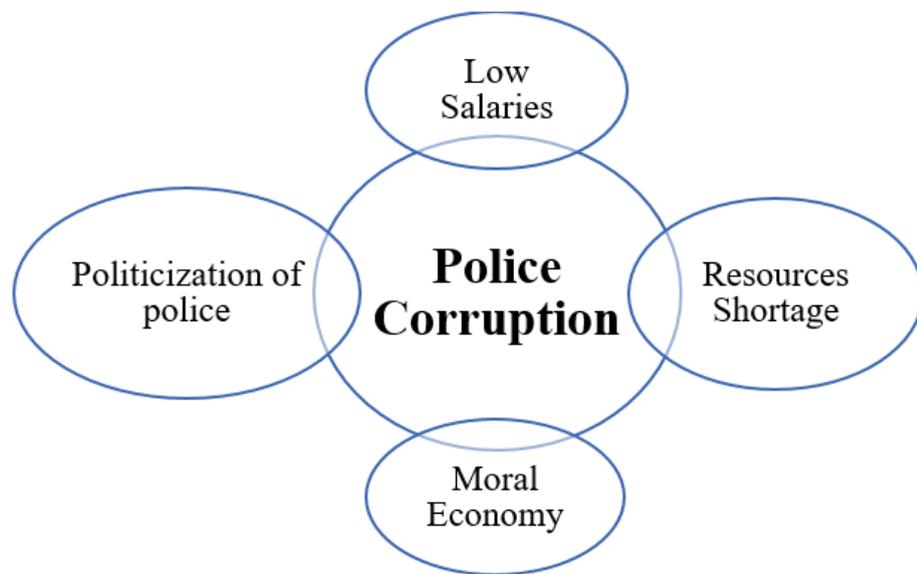
Research Methodology

To analyze the degree of corruption, people's perception, measures and punishments awarded in the recent past, and to determine the factors of corruption in police, both descriptive and empirical methods are being used, so that adequate policies can be formulated in line with the findings of the study.

Firstly, by utilizing the data from Accountability Branch at Central Police Office (CPO) Lahore, a graphical representation is provided to see the number of cases being filed from the department on different police personnel on account of corruption charges. Furthermore, graphical representation has been made for punishments (minor and major) awarded to various ranks. The data is taken from

Punjab province.

Secondly, A survey has been conducted using Jackson et al., (2014) scale (This scale has been explained in the later portion of this report in form of table 1-4) and 120 people has been surveyed randomly to measure people's perceptions of the procedural fairness and effectiveness of the police officers' via respectfulness, impartiality, problem solving, money seeking behavior etc.

Lastly, PESTLE (Political, Economic, Sociological, Technological, Legal and Environmental) analysis has been done based on the studies /literature to determine the socio-economic, political, environmental factors that aid to corruption so that a boarder ideology can be proposed.

Organization of the paper:

The research paper has been divided into four sections. First section will deal with the existing situation of police corruption in Pakistan and will also analyze the current mechanism to control the police corruption in Punjab. The second section consists of the research part in which descriptive and empirical data has been used to find out the causes and issues of corruption in police department and to find out loopholes in the system. Section three will deal with the international best practices to control police corruption. It will be followed by conclusion by deducing from the study. The research will provide recommendations that can be implemented to curb the corruption.

Situation Analysis

Current situation in Pakistan and image of Police

The tendency of corruption among police forces is a global phenomenon. No country can claim that their system is free from corruption as the intensity may differ in different countries due to reason that some countries have strong check and balance to keep the system as sanitized as possible. Deteriorating law and order conditions in Pakistan have severe consequences not only on current situations, and economic growth, in fact it is leaving a long-lasting impact on the future generations and decisions as currently we are facing the issues that have not been addressed properly in the past.

According to the Transparency International Corruption Perception Index 2020 Pakistan is at 124th number out of 180 countries. On the other hand, the report of World Governance Index (WGI) has suggested otherwise, where in the absence of corruption index Pakistan is at 162nd number out of 179 countries in global ranking and 6th number out of 6 countries at Regional Level . For corruption in police, Pakistan's Score is 0.347 (lowest, indicating high rates of corruption) . Keeping in view these statistics the importance to study the reasons of corruption in police

become imperative. In Pakistan where religious extremism, gender-based violence, ethnic issues and sectarian clashes are on the rise and on the other hand there is stagnant economic growth coupled with high rates of inflation, unemployment, poverty, and income inequality, under such situations if the law enforcement department of the country itself face the challenges like corruption and lack of integrity, then there is a need of researches and policy makers to provide direction and dimension to the stakeholders

Corruption Control Practices in Pakistan

To maintain discipline and to keep in place the mechanism of accountability in the Police Department, the complaint of violation of any rules, corruption, faulty investigation, misuse of official power, criminal case, negligence, delay in FIR etc.by any police officer is taken up by Regional Police Officer (RPO), City Police Officer /District Police Officer (CPO / DPO) and disciplinary action is started against the delinquent officer.

Disciplinary action against police officers (Constable to Inspector rank) normally termed as Junior Police Officers is taken under "Punjab Police Efficiency and Discipline Rules, 1975" by respective offices of RPOs / DPOs. However, action against ministerial staff and other Police Officers of Punjab from the rank of DSP and above (Senior Police Officers) is taken under "the Punjab Civil Servants (E&D) Rules, 1999". Once the departmental inquiry is finalized by Enquiry Officer against the delinquent officer, the authority competent will award departmental punishment according to his fault or onus. The punishments are divided into two categories i) Major punishment i.e., dismissal, removal from service, forced retirement, reduction in pay scale and rank, recovery from pay / pension ii) Minor punishment i.e., withholding of increment and promotion, fine, censure, forfeiture of approved service. If after the inquiry, it is found that the allegations or charges are not substantiated then departmental enquiry / departmental proceedings can be filed accordingly.

In the countries like Pakistan the expectations from the systems are democratic but the basic structures are colonial. Historically speaking, the police act of 1861 did not provide much scope to police accountability that is later altered and amended in Article (8) of The Police Order 2002 (PO) that has put in place system of police accountability based on public participation and community input. Article 155 of PO 2002 explains the penalty for certain types of misconduct. In UN General Assembly Resolution 34/169, the Code of conduct for law enforcement officials refers to accountability. Articles 7 and 8 require police to combat corruption

Analysis of Internal Control against Corruption in Punjab Police

Descriptive Analysis of Cases Under Section 155-C Police Order 2002:

The following is the descriptive analysis of the data of offense of corruption committed by police officers. Figure 2 indicate the number of cases filed against police officials by the department under section 155 C of police order 2002. These are the total number of cases ranging from the rank of Constable to DSP from 2017 to 2021. Current year's data is up till October 2021. The statistics indicated an increasing trend in the number of cases filed against police officers by the department on account of corruption.

The Figure 3 shows the number of police officials being awarded minor and major punishments from the year 2015 to 2020. The statistics indicate that the highest number of punishments under corruption are awarded to the lowest rank officers. These results can have various implications. a) it is usually assumed that most financial corruption is common in junior police officers, that is salary restructuring is advised b) it is comparatively considered easy to convict a junior police officer than to blame a senior official c) though the accused are impeached but there are chances that they file appeal against their punishments. Moreover mostly, the punishments are minor.

The figure 3, the Pareto chart shows the figures of one year in form of bars and cumulative trend in the form of the trend line. Though punishments are increasing but they are at the lowest level, there is a need to develop policies and procedures for the senior officers as well.
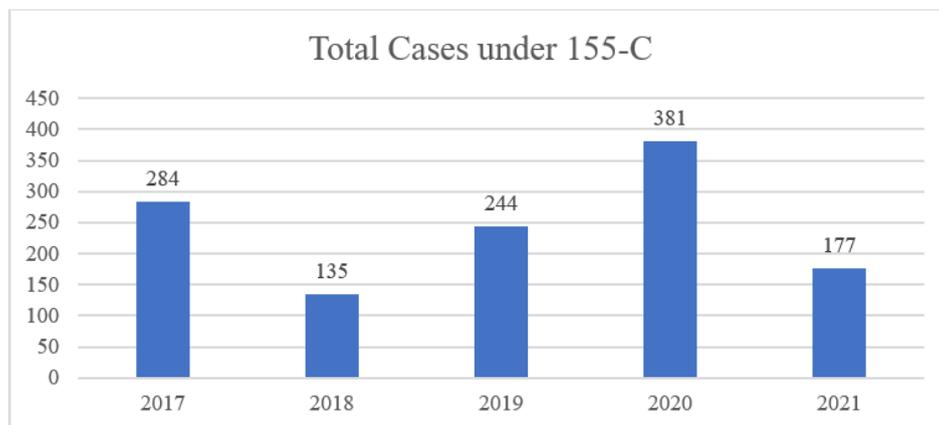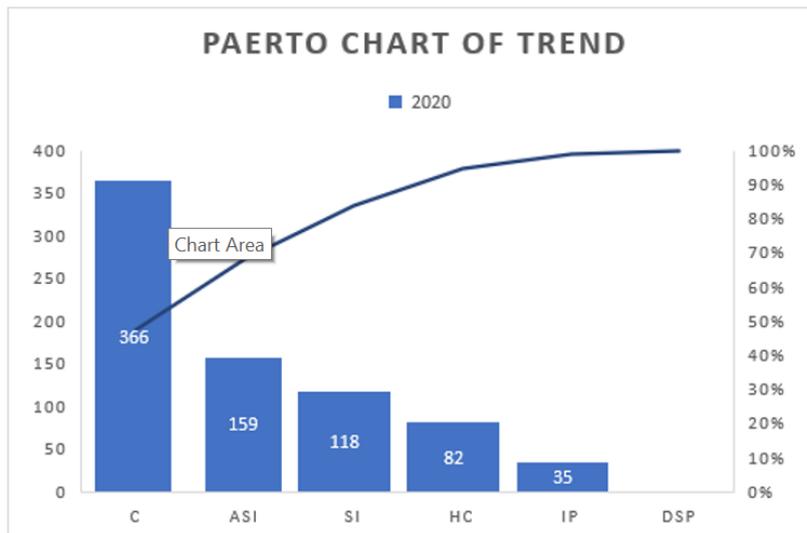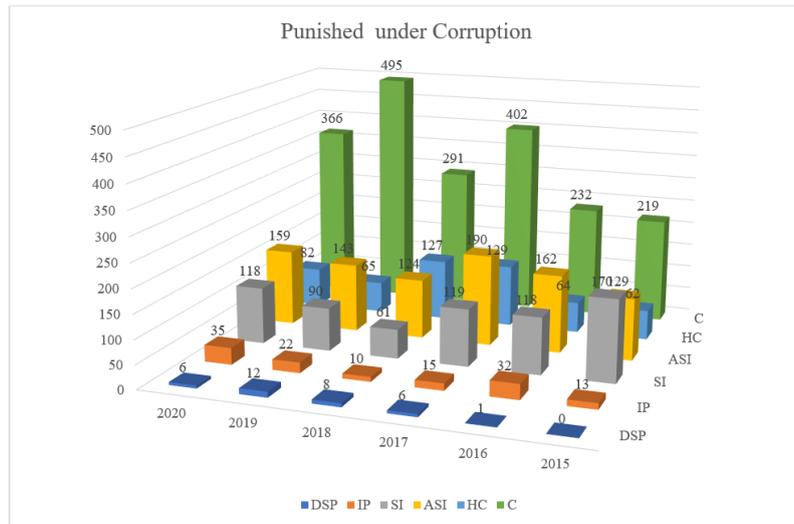
Figure 2;

Total Cases under 155-C

Figure 3:

Empirical Analysis:

The study has conducted a small survey to record the general perception of police fairness and effectiveness. 120 respondents have been randomly selected. Table 1 indicates the social and demographic characteristics of the respondents. Out of 120 respondents 97 were male and 23 were female. The proportion of male was more as they are likely to have more interaction with police as compared to female. Even if a female has to face some incident, male counterparts are more likely to launch complaint and visit the police station.

Table 2 shows that among the 120 respondents 70% had direct interaction with

police on account of some case, 22.5% had indirect contact (i.e., a relative / sibling / neighbor / colleague came in contact with police due to some criminal activity took place with them). Whereas 6.67% claimed they never had any direct or direct interaction with police.

Table 3 shows the results of experience of these respondents with police officials. The results are not very satisfactory because this experience is measured on the basis of corruption and financial benefits that police officials tried to attain from them or the person they were in contact with. Only 19% of the respondents have not paid a bribe but rest of the 80% at some point of time in their interaction with police have paid a bribe. Similarly, when they were asked if they know people in their surroundings who have done or experienced the same, the results became even shocking as only 9% came with the answer of never and rest 91% mentioned that the people in their circle have paid a bribe or they have heard so.

The index of table 4 was designed to evaluate the police fairness and effectiveness keeping in view with financial embezzlements. The majority of the respondents are of the view that police officers that are present to deal the general public are not trained to handle and solve criminal case, they usually are unable to provide helpful assistance and respondents often felt that they are not being treated with respect. 85% of the respondent believe that police seek money even from the criminal and offenders to change the charge sheet or investigation report. The 80% of the respondents experienced (themselves or the people in their surrounding) that police also seek financial "assistance" from the victim's family to file FIR or sometimes "kharcha pani" for keeping the investigation going. This has badly distorted the image and perception of police and there is another popular notion that police station is not the place for a civilized person to visit and dealing with police cannot be done by a Nobel person. Figure 4 & 5 shows the results of the same finding in the form of a graph. Figure 4 shows the peaks of respondent's response that raise a big question mark on police force's ability to have fair dealings with a common man. Figure 5 is the funnel chart represents stages in a process showing progressively decreasing proportions.

Table 1: Social and Demographic details of respondents

Characteristics in percentage (n = 120)			
Gender		**Education**	
Male	97 (80.83%)	up to matric	30 (25%)
Female	23 (9.16%)	Graduation	70 (58.33%)
Age		MPhil and above	20 (16.66%)
18-25	43 (35.83%)		
26-35	42 (35%)		

36 and above	35 (29.166%)		

Table 2: Police Contact of the Respondents

Contact	Response
Direct	85 (70.83%)
Indirect	27 (22.5%)
No	8 (6.67%)

Table 3: Interaction with police and their Corruption

	Not at all	Very less	At times	Many times,
Did u ever give money to police officer or assured him that you will return favor if he let you go for your illegal act (e.g., over speeding, fight, burglary/ theft)?	19 (15.83%)	80 (66.67%)	15 (12.5%)	6 (5%)
Have you ever seen anyone paying money to a police officer or assuring the officer that he will return him a favor if officer forgo their illegal act (e.g., over speeding, fight, burglary/theft)?	9 (7.5%)	30 (25%)	68 (56.67%)	13 (10.83%)

Table 4: Perceptions of Police Effectiveness and Fairness

|	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
The police officials are well qualified to chase lawbreakers	2 (1.67%)	10 (8.33%)	15 (12.5%)	75 (62.5%)	18 (15%0
The police react quickly to calls about crimes (e.g., theft, fight)	8 (6.67%)	10 (8.33%)	14 (11.67%)	78 (65%)	10 (8.33%)
The police are always able to provide the assistance the public need from them	3 (2.5%)	12 (10%)	6 (5%)	60 (50%)	39 (32.5%)
The police are doing well in controlling violent	0 (0%)	2 91.67%	10 (8.33%)	91 (75.83%)	17 (14.17%)
The police treat everyone with respect and dignity	2 (1.67%)	10 (8.33%)	34 (28.33%)	66 (55%)	8 (6.67%)

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Police seek money from victim / complainant (FIR, Petrol, Food, other expenses)	20 (16.67%)	82 (68.33%)	8 (6.67%)	9 (7.5%)	1 (0.833%)
Police seek money from offender	30 (25%)	77 (64.17%)	8 (6.67%)	5 (4.17%)	0 (0%)
The police always try to look for the option which is best to resolve people's issues	1 (0.83%)	15 (12.5%)	5 (4.17%)	74 (61.67%)	25 (20.83%)
The Police is tustworthy	1 (0.83%)	15 (12.5%)	12 (10%)	82 (68.33%)	10 (8.33%)

Figure 5:
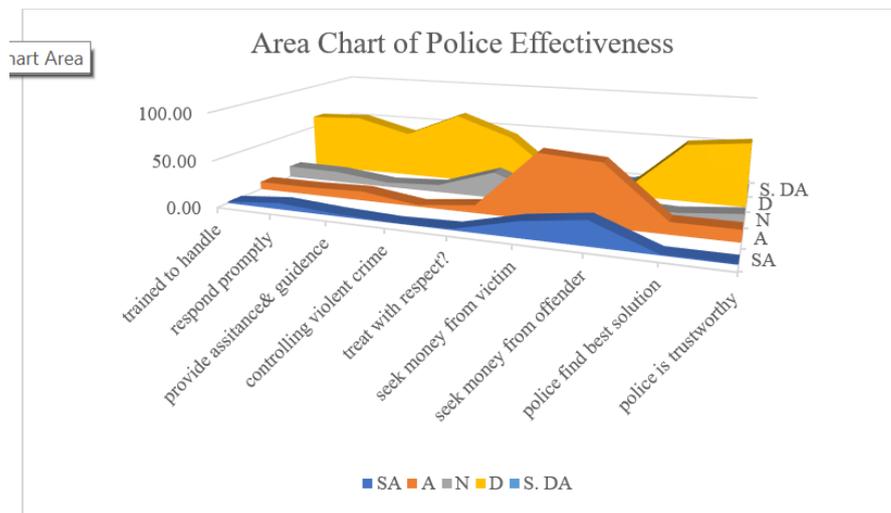
SA: Strongly Agree

A: Agree

N: Neutral

D: Disagree

S. DA: Strongly Disagree

Figure 6:
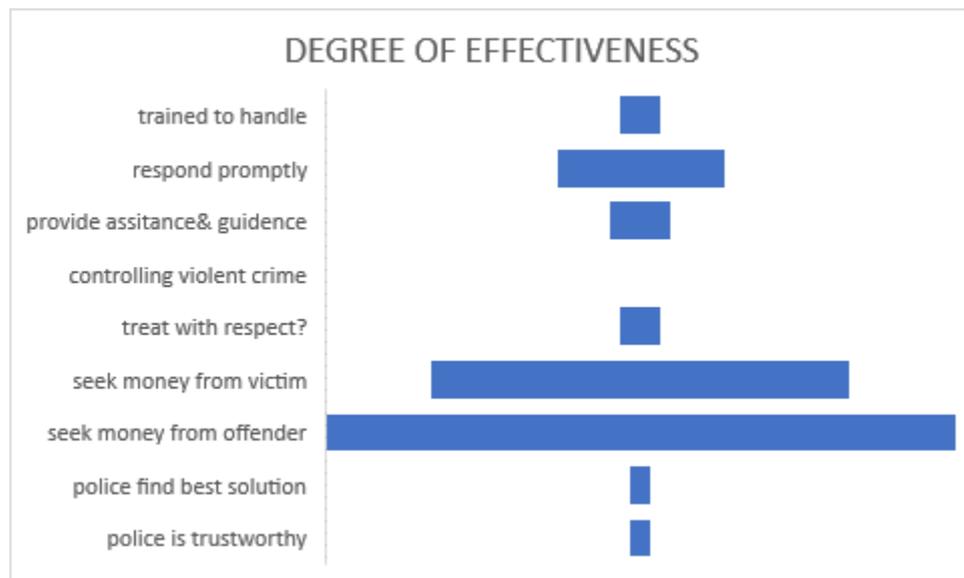
PESTLE Analysis

With the extensive review of literature, PESTLE analysis for corruption is Police can be formulated. It aims to identify political, economic, social, technological, legal and environmental aspects that can add to corruption or can help to control it. In the following table we will see some of the factors under each category also with their relationship with corruption and degree of significance. All these factors are of immense importance and careful handling of these factors can curb the degree on corruption in law enforcement agencies.

Category	Political	Economic	Social	Technological	Legal	Environment / Ecological
Possible Factors	* Political instability * "good posting / bad posting" as reward and punishment * Hiring and deputation of	* Low wages * Lack of police operational resources * Bribe considered as reduced cost than entering into procedural delay * Rising inflation rate	*Acceptance of bribery culture * Under the social fabric of society, the moral economy has taken a dark shade where	* Lack of systematic investigation approach * Provision to right to information * Cut red tape through automation of bureaucratic processes via digitalization	*Effective law enforcement to punish corrupt officer and end the impunity * Improving financial management and	* Resource management * Workforce health and working hours * Healthy working environment and provision of basic facilities to policemen and their families

Category	Political	Economic	Social	Technological	Legal	Environment / Ecological
	officers who can oblige all requests	increasing cost of living	corruption has been normalized and considered easy way even for a legal job get done in time		strengthening the role of auditing agencies	
Type of Impact	Negative	Negative	Negative	Positive	Positive	Positive
Rate of Impact	Significantly High	Significantly High	Moderate	Moderate	Significant	Significant
Importance	Important	Critical	Important	Important	Critical	Important

The above three analyses (Descriptive/Empirical/PESTLE) have highlighted the causes of corruption in police department. The general perception and experience of the public has also been measured. And lastly the departmental efforts to curb corruption has been examined. Now to suggest policy options for this issue, first we will see the best practices of different law enforcement agencies which they are following their countries to control corruption. Then keeping in view these practices and results of analysis, we will propose adequate recommendations.

International Best Practices

Best Practices

Here are few examples from around the world regarding handling police misconduct (corruption, and other complaints) and citizen oversight.

United Kingdom (UK):

United Kingdom's Police Complaints and Misconduct Regulations 2004' and 'The Police Conduct regulations 2004' is the law to deal with the complaints against police officers regarding any misconduct including corruption. It has two systems for complaint handling a) Independent Police Complaints Commission (IPCC) and b) Citizen Community Boards

IPCC act as an independent body report to parliament and its decisions cannot be

overruled by any administrative body. The regulations and procedures of the body and the execution of its instructions and objectives are well defined in the law. IPCC work as an autonomous body that can conduct independent investigation on its own or by the help of the police personnel and can take decision that any police authority is bound to follow. For Citizen Community Boards, the citizens' contribution in police affairs is managed through local councilors inputs on the police supervisory boards. The local police get a certain budget by local government for the said purpose.

Canada:

The laws regarding police demeanor is explained in the "Canadian Police Services Act". Similar to UK system, Canada also has two mechanisms for handling complaint regarding police force. a) A civilian commission head the board to conduct an independent investigation. The respective commission is so powerful that it can dismantle the entire police unit if the performance is found unsatisfactory. The commission has to complete its report and findings with a time period of sixty days. b) The whole police force is oversighted by citizens in the form of Civilian Commission and Municipal Police Services Boards in metropolitan area and municipalities respectively. Police policies and priorities are being formulated there in discussion with all stake holders including police officers.

Japan:

The dual system of the national rural police and the municipal police was abolished in 1954 Law and all police forces were integrated into the prefectural police system. A National Safety commission is established, that controls the National Police Agency of Japan. "To control" in this perspective means setting the core policy issues and then letting the National Police Agency supervising the police matters accordingly

Northern Ireland

Norther Ireland has a Policing Board and it is considered as a pioneer to use performance metrics and through that it monitors the police organization's abilities, actions and overall quality of services. It was founded in 2001, basically it is autonomous public body and its main task is to make sure that police service in Northern Ireland comes up to expectations of the community and it works as an impartial, effective and neutral police service.

South Africa:

A study was conducted in South Africa, and its focus was to conduct research that what are the causes which has reduced the bribery in the South African Police Service (SAPS). Data was collected in Limpopo province for the years 2011 to 2015, and this data showed that perception has changed in that province about

police and now community's trust on police has increased. As per Afro barometer , when the survey was conducted in Limpopo province in 2011, half of the surveyed people said "most or all police are corrupt", but that figure in 2015 dropped to almost half (28 percent). This study also revealed that this bribery reduction in Limpopo province was observed at that time when the national government launched an extra-ordinary drive against corruption in many provinces (Peiffer et al. 2018) .

Hong Kong:

Independent Commission Against Corruption (ICAC) was established by Hong Kong government in 1974, and it is rated as one of best model in world against anti-corruption. This step was taken by Hong Kong government when massive protests were done by public in 1966 and 1973, and the demand was to eradicate corruption, particularly in police department. Now, corruption in police in Hong Kong has gone to low level and several factors are involved in that. First, there are very effective internal and external controls in police now. Secondly, focus has been shifted to professionalism, and honesty and integrity has become the hallmark of police department of Hong Kong. Thirdly, the benefits and pay structure of police personal has been increased and that has motivated the police force and has discouraged the corruption in police. (Hope 2015).

Now we will derive conclusions and policy recommendation on the basis of study analysis and keeping in view the best practices being followed all around the world.

Conclusion & Recommendations

"Power doesn't corrupt people; People Corrupt power" William Gaddis

"Integrity, transparency and fight against corruption have to be the part of culture. They have to be thought as fundamental values" Angel Gurria (OECD Secretary General).

Conclusion

There is no single strategy or policy that can combat corruption. The agency, legislators, executives have to work together considering various dimensions to curb both individual and organizational factors that aid to corruption. Moreover, one must keep the expectations realistic that policy formulation and execution is a long road and patience, and transparency is the key to success for the said target to achieve. As to consider the golden principle for anti-corruption policies to be effective, fruitful, and wide-ranging, these strategies must be made an integral part in the broader framework of democratic institution building. The study attempted to make a thoughtful effort towards identification of reasons behind corruption in police and to suggest possible policy implication to curb it. Though the first steps are always the rough ones, but they needed to be taken to set direction of this long

road that will determine the path of future of Pakistan.

Recommendations

• The police reforms must be in line with the local environment and clearly grounded in the social, political, and economic realities which means the cause must be addressed rather than symptoms. The above analysis indicated that degree of corruption increases as we move down to low scales. So, the agency and government need to look at the economic conditions and the pay scale as the cause behind all this is merely the monetary gain.

• Similarly, one should keep in mind that corruption takes places due to incentives and opportunities. These incentives are not merely financial that are actually considered from the side of police force, but the incentives must be seen from the part of any individual coming in contact with police. So, any anti-corruption strategy must be based on logic and system. If strong systems are in place and every individual has the knowledge that their complaint registration and resolution mechanism is systematic and time bounded, then the chances can be minimized. There is a need to develop the cultural of systematic approach and fairness in the public in general.

• Corruption is deep rooted into our society and there is a general notion amongst the public that even for a right job to be get done, there must be a "shortcut" and this type of short cuts creates a room for corruption. Similarly, this ideology is making the corruption culture to be normalized in the society, which is not a good sign. The perception survey conducted in this study shed a light on this matter where whether a respondent has directly paid anything or not in the form of bribe but has a perception that it is a necessary component to get the job done. This perception can only break if more systematic approach is developed in our Thana culture while interaction with both complainant and offender. Though it will take time to break this perception, but it's better to be late than never.

• Civil society, media organization can play an important role is creating awareness among the public to curb corruption. For an instance, setting up community consultation forums. Again, the fruitfulness of such initiatives relies on the degree of involvement from the side of public and progressive and unbiased role of government.

• There is a need for restructuring of salaries and revision is required for the living conditions especially for the junior official as they have the maximum public dealing and interaction and most cases of corruption are

reported against them. But one must not overlook the increase in salaries might reduce petty corruption but does not eliminate huge corruption among senior civil servants and politicians.

- • Mechanism to curb corruption in the high rank officer and civil servants' can be improved by having a public defamation in case the officer plead guilty. In this scenario the incentives game will not do the job but major punishment like removal from service, ban on serving in any department for the rest of life, social degradation and limited future job opportunities can provide the required outcomes.

- In order to provide incentives or imposing punishments, there is a need of independent commission of inquiry. As discussed in the model of best practices around the world, it has been observed that there is a need of autonomous body independent of political and bureaucratic set up to work in this regard. Public representation can be one part of this commission, but studies have shown has public involvement does not create much of an impact on these commissions. Rather well-defined policies, procedures, rules and regulations, time frame of inquiry and implementation of conviction, execution of timely justice and independence of the commission are the key elements.

- Independent accountability mechanisms may be developed as provided in Police Order 2002. Police Complaint Authority made be made functional on priority. It is high time that Government should notify District Public Safety Commission as per spirit of Police Order 2002.

- A new strategy can be implemented in order to curb corruption and it involves three steps. First, we need to educate public, then preventive mechanism to be placed and then it should be strictly enforced. In Hong Kong, the same approach was adopted and even they publicly announced the details of corrupt police officers. This enhanced the credibility of ICAC in eyes of public.

- Large scale public education campaigns may be launched which can enhance the legitimacy and by promoting the information regarding anticorruption laws will encourage the public to report corruption.

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