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RESEARCH PROJECT: CRIME AND CULTURE

Crime as a Cultural Problem. The Relevance of Perceptions of Corruption to Crime Prevention. A Comparative Cultural Study in the EU-Accession States Bulgaria and Romania, the EU-Candidate States Turkey and Croatia and the EU-States Germany, Greece and United Kingdom

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Perceptions of Corruption in Bulgaria, Romania, Turkey, Croatia, Greece, Germany and the United Kingdom

A Content Analysis of Interviews from Target Group Media



BULGARIA

Target Group Media

Definitions

Journalists define corruption in a rather inflated way as an improper and illegal (concepts used interchangeably) advancement as a result of the abuse of the power resources. This only concerns matters, which involve exercising public power. Similar relations in private life are not included in this definition. In terms of possible negative effects on society there should not be a difference between the so called “grand” and “petty” corruption. Petty corruption undermines the rules and the social discipline, which eventually leads to negative consequences for society as a whole. Grand corruption has not only a monetary effect for the state, but also a broader social effect, since in most cases the public services provided as a result of unfair procurement procedures are of poor quality. The legislation focuses to a greater degree on the phenomena related to petty corruption, such as bribes, where the crime can be easily proved with the help of forensic instruments. Legislative provisions, however, are much less powerful when it comes to the grand corruption. In many such cases, the legal procedures are strictly followed and observed but at the end many of the deals concluded by the public authorities are immoral. Both the politicians and the business believe that the system of distribution of public resources should function in a way that is not based on pure market principles but requires special relations and arrangements between both sides.

Causes and Origin

Media representatives perceive the presence of the state in the economy as the major reason for the existence of corruption. Registration and licensing regimes are numerous and many key companies are in the hands of the state. One specific feature of the Bulgarian case is the great role of the state in the process of redistribution of the huge public resources inherited from the communist past. It is perceived that this process inevitably brings up corruption in any country and that Bulgaria is no exception to the rule. The transition process, with all its components, is recognised to play a role for the development of corruption. Yet transition itself may not be regarded as a cultural phenomenon; it is very likely that similar situations in different societies produce very similar problems and outcomes.

Size and Scope

The journalists think that measuring corruption is an enterprise bound to fail. What can be measured are the perceptions of the people about corruption. At the same time they believe that the phenomenon is omnipresent in the whole society. This judgement is made on the basis of personal experience and knowledge shared with colleagues, friends and relatives. Due to the specific interconnections within society, corruption has spread everywhere from the field of politics to the field of art. The financial and economic spheres are most susceptible to corruption since the monetary flows are in bigger size there. This sphere includes also all public bodies having discretion in dealing with financial resources. The most dangerous corruption, however, is that present in the judicial system because it is itself the major structure meant to investigate and punish acts of corruption.



Anti-corruption Measures

According to media representatives anti-corruption measures cannot succeed in their current form for one main reason: the major actor that is expected to fight corruption, the political class, is deeply corrupt itself. It is hardly a secret that being a politician is indeed a business enterprise. This is the way in which politics functions and the political system recruits politicians. There is a superficial consensus that corruption should be counteracted, which has been pushed by the EU accession process and post-accession monitoring. However, reforms, to the extent they exist in practice, concern only general normative measures that are implemented so as to allow to preserve the status quo almost untouched. These superficial policies have produced no satisfactory results so far and the authorities desperately need to show the EU that people involved in corruption are indeed being punished in Bulgaria. The efforts of the Public Prosecutor's Office to do something in this respect resulted in several so called “demonstrative” corruption court cases involving high ranking officials and representatives of organised crime. However, for now there is no indication they might end successfully. Another evidence demonstrating the lack of political will to counteract corruption is the fact that some simple and very well functioning anti-corruption practices were suspended. The example that was given in this respect is the suspended practice of police officers under cover testing their colleagues, traffic policemen, whether they would accept the bribes that they are offered in return for not fulfilling their obligations.

One possible anti-corruption strategy, according to journalists, would be a dramatic reduction of the state presence in the economy. This, of course, cannot lead to a complete eradication of corruption, but the opportunities for its occurrence would be significantly limited.

Another idea for optimising the anti-corruption activities at the level of the state is a reorganization of the system of powers in Bulgaria and in particular transferring the Prosecutor's Office from the judicial to executive branch of power.

The roles of the different institutions in counteracting corruption as seen by media representatives are the following:

The media are the only arena left where a corruption scandal can be revealed and made available to the public. Unfortunately, the quality of journalism in Bulgaria is very low and corruption investigation is not always done in the best possible way. Another problem is that continuous corruption rhetoric has made the people tolerant to corruption. They are convinced that the country is lost in corruption and the media maintains these perceptions stimulating passive instead of proactive citizens' behaviour. The lack of clear institutional response to corruption scandals in combination with the situation in the media described above leads to a social normalisation of the phenomenon of corruption.

Political parties use the corruption/anti-corruption discourse only in its capacity to mobilize the public when trying to deal with their political rivals. When in power, politicians make use of information and investigative powers they control to accuse their predecessors of corruption. If however, these parties remain in the government as coalition partners then all information about possible corruption activities is concealed in the name of the political stability of the coalition.



The role of NGOs in preventing and counteracting corruption is ambiguous. It has many positive effects: it creates expert knowledge about the problem and promotes some anti-corruption measures in the legislation. On the other hand, it has some negative effects as well: its excessive focus on raising public awareness about corruption is one of the major reasons for normalisation of the topic and social tolerance toward the problem. In the time when there were such awareness campaigns the public perceptions about corruption (measured by the same NGOs that organised these campaigns) went very high. After the funding for similar sort of activities decreased the public perceptions did, too. In order to get governmental support for their activities and general programmes, NGOs have worked in close cooperation with government representatives, including persons allegedly involved in corruption. In this way, the NGOs took part in building an image of anti-corruption fighters for some corrupt politicians.



ROMANIA

In the Romanian report analysis was based in a comparison between perceptions of corruption regarding different fields of the problem without distinguishing in different target groups. For more information please see the Romanian report in “Scientific Report Romania 2007” in this web site.



TURKEY

The Analysis of the Target Group Media

Corruption is defined as acts contrary to legislations, regulations, traditions and cultural norms; in order to gain personal tangible or intangible advantage. However, it is hard to include cheating of a child and illegal financing of a political party or insider trading within the same definition. At this point, the definition has to be expanded. It should include ways of capital accumulation or party financing by taking advantage of legal loopholes, where jurisdiction has difficulty to define them as acts of corruption. It is open to discussion to qualify a modern enterprise that makes people work like slaves, as pure and clean just because it is adapting supposedly some ethical codes; such as paying taxes and agreeing international laws. Favoritism and nepotism should also be included in the definition of corruption.

It is disturbing to provide a general definition where every type of corrupt act, no matter grand or petty is placed in the same basket and develop a prevention strategy based on the petty ones since they are more visible.

Likewise, it is questionable to qualify multinational corporations which do not evade taxes and fight for environmental issues in their own states and yet, exploit child labor in developing or less developed countries, as clean. The acts of international companies which virtually trap people in a never ending cycle of debt and exploitation and which force them to work on long-term contract basis with low wages should also considered as a form corruption.

Process of globalization commanded by the large multinational corporations and by the governments at the expense of poor countries is not considered as corruption in any part of the world. Moreover international institutions like IMF, World Bank even the EU at the service of those corporations interests are claiming that “poor countries are starving because they are corrupt”.

In early 1990s the term ‘clean society’ was operationalised by some media organs for the first time. They were making daily news of corruption related to every institution, from army to opposition and the government in charge. Their target was not to create a clean society but to be able to give such news by introducing the term itself. However, recently one can not read such news in the press.

Now, the term lost its meaning. TUSIAD (Association of Turkish Industrialists and Businessmen) for example, has quite strict ethical codes. The same codes exist in the publishing commission of Dogan Group. They allege easily that they are clean because they have such codes. The existence of these codes of ethics look as if there is significant improvement in this sphere compared to practices of the past. However, the situation is worse at present. Because, they declare something that does not exist in reality. One should ask the question whether the relation between the news about “Turkey will become Malaysia” and “the wish of Dogan Group to purchase the land of Hilton” have nothing in common. These two things are absolutely connected. But, the Dogan Group has certain ethical principles of publishing. The daughter of the owner of Dogan Group is the president of TUSIAD. When all these evaluated, what is going on is as follows: In the past, it was the events, people and institutions that were dirty. It was necessary to put forward concepts such as ‘clean society’. But now these concepts also became dirty. Therefore, they need to be redefined.



Corruption takes place mostly in the trivet of politics-bureaucracy-business world as demonstrated in the case of Turkbank. Despite the fact that the logic of market economy imprisons corruption within the boundaries of public sector, one can not deny that the role of economic agents is of primary importance. Corruption is extremely destructive if it is committed in Jurisdiction, because it erodes the legitimacy of the State. As for corruption in the police department, it becomes dangerous if it collaborates with mafia and other criminal organizations contrary to its mission. NGOs are usually in the bottom of the list.

As for the media, it is obvious that it is not struggling with corruption the way it should. Corruption could be unveiled by journalism rather than jurisdiction and legislation. Contrary to their claims, media members however are far from developing an ethical position on unveiling corruption. They can act only as much as the capital group behind them allows. If one does not have ethical codes, it can only unveil some corrupt acts or none. This is because the capital groups in the media sector are also involved in corruption: all the economy reporters know that there is ‘insider trading’ in every media group, both at the individual and institutional level. In this case, how can a media member declare himself as man of principles? How can he confirm that he is making this news in the name of principle, clean media, clean society or clean stock market? What is done is done to ‘hit’ some people by a piece of news.

However, the story is hypocritical in Turkey: The private sector, the capitalists and the journalists as their spokesmen always show the public field as the only corrupt area. It could be in a way correct. There are many perversions going on in the public sphere, but corruption has always two sides. A policeman does not bribe a judge. A judge does not protect an army officer to gain a bidding. Public field does not consist of government or state officials solely.

Within this framework, granting advantages, protection, favoritism, provision of interests should be evaluated differently from each other depending on their scale. Despite characteristically the same, the corrupt acts of a policeman whose living conditions are poor and of someone who just wishes to satisfy his greed should not be considered equally corrupt. The system in Turkey, however punishes only “the smaller/weaker” but not “the powerful”.

The other reasons of corruption can be stated as such:

- Inefficiency of jurisprudence (Overburdened prosecution personnel, long processing times, lack of expertise, time bar)
- Lack of punishment
- Legal loopholes
- Frequent amnesties
- Poor quality of education
- Poor performance of inspection mechanisms (although many middle level bureaucrats are seriously fighting against corruption but they can not find the political authority to finalize their efforts)

The fact that there is less corruption in developed countries is not because people in these countries are more honest, but because of high and severe penalties. Corruption, chiefly the bribery is inured because; appropriate penalty is not given at appropriate times. Ordinary people do not believe in judicial system in Turkey since “justice delayed is justice denied”. In



this context, it would be wrong to draw a parallel between the uneven income distribution and bribery. It is just a way of legitimization. The inverse is correct however: the higher corruption is, the wider the gap in distribution of income becomes. The fact that many people do not have opportunities to improve their living conditions in their normal course of life turn them into individuals who run after small gains, favors, etc. They believe that it is the only way to survive. This condition worsens due to the inequality of opportunity. On the other hand, ordinary people are not that innocent at all. They watch “Kurtlar Vadisi” (a TV serial showing intriguing relations in the state) and criticize severely those who manifested against Hrant Dink’s murderers.

On the relation of financing of politics with corruption, one has to differentiate between the “maintenance of functioning of the political party” and “maintenance of the businesses of the leading figures in the party”. Within this framework, the question ‘Why do some people become leading politicians and others do not?’ is worth revising. The political system takes in the figures that could provide the system financial support. In return, the system nurtures them by means of certain decisions, hints, insider trading, etc. It is not possible to see an ordinary worker as a member of the parliament. Because, he would not be valuable for the party in terms of creating any sort of impact. It is very hard to break this vicious circle.

The dimensions of corruption in local politics are more striking, despite smaller in scale compared to those committed in the center. In local politics, informal clusters and networks of kinship, townsmanship, friendship, enmity and such relations are more common.

On the financing of politics, the practices in the USA are considered applicable for Turkey. If “watch organizations” similar to the ones in USA could be established in Turkey, it might provide positive results in relation to monitoring certain processes.

Another important issue with regards to sphere of politics is the extent of the immunities the MPs are offered. They must certainly be limited to the freedom of speech. Yet, it is not realistic to expect that the immunities will be lifted in the near future while some many people are struggling for being an MP to enjoy the legal protections they provide.

In Turkey corruption increased after 1980, with the transition to the liberal economic model. The state however behaved in contrast with liberal economic paradigm and carried on with its interventionist stance in a reformed manner: it created a new set of entrepreneurs by means of distributing them public resources (export incentives, tax rebates, heavy domestic borrowing, etc.) and took no notice of their misuse deliberately. As a result, Turkey had to face successive economic crises with extremely high social costs. Now, the big bosses who got rich through corruption during 1980s and early 1990s are demanding transparency and regulations. Beneath this demand, however there lies the fear of new rivals, mainly coming from Anatolia, challenging their position by using the same path that the formers followed. Mercimek case could be evaluated in this context.

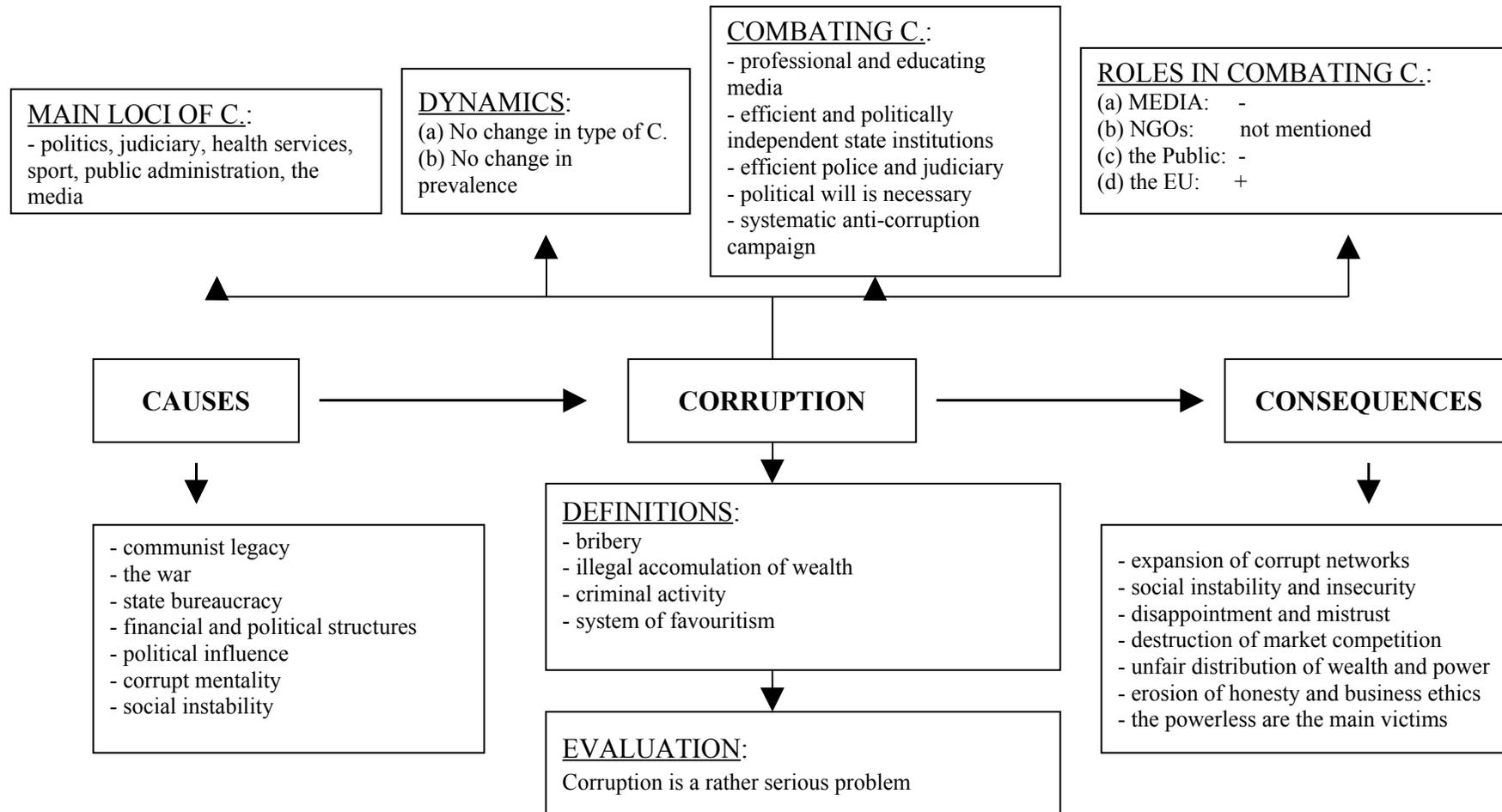
Conclusion (on prevention)

The biggest contribution on corruption prevention is expected to come from the EU integration process. Even if this process would not solve the problems arising from the natural functioning of liberal economic system, it could rasp some of the exaggerated,



obvious mal-practices. EU actors would not prevent the conversion of an archeological site into a construction land for a skyscraper. Conversely, they might give support to such a decision for the aim of purchasing the land themselves. The bureaucrat in Brussels would not explicitly approve it, but its businessman would certainly do. Yet, still EU process would be necessary for Turkey to reach a certain standard. Unfortunately, without an external pressure, it would be unrealistic to expect Turkey to set itself in order. In case the EU process interrupts, it is very likely that Turkey will become an isolated country, closed on itself.

CROATIA TARGET GROUP MEDIA



GERMANY

Target Group Media

Outline

The analysis of the interview conducted with a journalist specialising in corruption cases focuses on the way journalistic research is able to shed light on the social roots of corrupt conduct. Tracing the latter back to forms of spontaneous social co-operation helps account for the fact that corruption is a much wider notion than the offences designated in penal law. Journalistic work is best suited to illustrate the difference between the narrow judicial prosecution of (corruption) offences and the broader, moral-political criticism of illegitimate action. It can also pinpoint certain prosecution deficits, and especially the difficulties encountered by journalists in gaining access to information. Last but not least journalist work can be situated between the judicial reconstruction of criminal action and the efforts by lawyers to present a law-conforming course of events.

Analysis

I. Journalism and corruption

Journalism's approach to corruption can be considered multi-layered, because investigating into corruption cases – a laborious task also involving research on and reconstruction of the social milieus and cultures, in which corrupt conduct thrives –, means taking into account different patterns and rationalities of action: social, cultural, economical, police/judicial. However, one fact that obtains across the various aspects and types of action that make up the profile of a case of corruption including prosecution aspects consists of drawing a line between what counts as such according to penal law and a broader notion: in other words the difference between *judicially sanctionable and moral-politically criticisable* action [P1: 120-121]. This divergence can be sometimes a complementary, sometimes a disjunctive relationship, the latter being the case when certain actions may by all means be castigated as corrupt, although this has nothing to do with penal legislation. This of course leaves the possibility aside that penal law can play a role in this case, albeit in the sense that the person (e.g. the journalist) raising the claim of corrupt conduct can be accused of slander. One main reason for the divergence lies in the fact that the notion of corruption is not a technical term in penal law. Furthermore, due to certain shortcomings in penal law the most important of which being the prescription of five years, corruption cases cannot be appropriately examined. As a result, one can only criticise the illegitimacy of the whole affair [P1: 114-119].

Now in one sense 'corruption' as a notion will never be incorporated into the penal law terminology, because it is a too general or too *elusive* term to be able to provide a well demarcated field of law application. The other way round, the existing codified offences of active and passive bribery, giving/taking advantages, fraud etc. clear-cut defined as they are, cannot live up to the notion, because corruption involves much more than what they designate. Journalists working in the field know all too well that an "essentialist" reading of the term is sure to reduce the phenomenon to a 'hard core' issue of facts susceptible to penal sanction, but tends to ignore or minimise the transitive moments or fluctuating conditions from corrupt conduct results in full-blown form (in a judicial sense). Therefore the question that preoccupies journalist work is where to set a demarcation line between merely



‘antecedent’ on the one hand and sufficient (from a legal point of view) conditions of corrupt conduct on the other [P1: 105-108].

No matter how this issue is coped with and the demarcation line drawn there is one thing journalist investigation is firmly convinced of: there are some tracks of corruption that *protrude too deeply into the sphere of everyday communicative and co-operative action* for the prosecution authorities to tackle [P1: 200-204]. Even if not everybody subscribed to the belief that corruption should be regarded as a deeply entrenched human phenomenon unavoidably cropping up some time or another in life, the fact that it is rooted in everyday co-operation or exchange activities is indisputably obvious. It is also not easy to deny the observation that as far as concerns the subjective dispositions to corrupt conduct the socialisation of the individual can play a definitive role in terms of virtues and moral standards transmitted to him [P2: 1631-1634; 1650-1653].

Seeing corrupt conduct rooted in ordinary action can mean a ‘bottom-up’ approach that starts from everyday co-operation and works all the way up to manifest criminal conduct. Such an approach could take the form of a three-layered scheme or pyramid [P1: 64-65] that does not purport to supply necessary, causal conditions of corrupt conduct, but only such conduct without which it can hardly be conceived:

- At the lowest level or the broad basis of the pyramid we find all those forms of situative co-operation, the most common of which being mutual help in the neighbourhood or local communities. This need not occur for any particular purpose. It suffices that a certain atmosphere of solidarity among the people exists. Nor for that matter should the fact that the person who has helped receiving an invitation, let us say for a drink, be considered as a token of gratitude akin to ... bribery for further private ‘services’.
- The story normally ends there, although sometimes it occurs that on the basis of mutual acquaintance or even friendship to be of help acquires a new quality. This is the case when
 - a) The need for assistance becomes regular or assumes dimensions that go far beyond just wanting to be helped out and
 - b) The person in need of help is aware that signs of gratitude must be raised to a ‘new level’. This new art of dependency, but also the knowledge that things are going to “taken care of” through the use of certain tokens of gratitude turn the initial ad hoc assistance into *habitualised co-operation* or *network* [P1:102].
- The network puts the situative co-operation of the first two levels on a stable basis. It must also be regarded as a necessary (not sufficient!) precondition for the emergence of corruption. The latter differentiation must be made because the network represents a basic form of social interdependence or reciprocity and for this reason is not immediately conducive of corrupt conduct. The crux of the difficulty of tracing corruption back to determinate causes lies right here: Such a form of reciprocity can or often leads to, but is not necessarily the cause of corrupt conduct. Therefore the difference between judicially sanctionable and morally and politically criticisable action will ineradicably remain.

This in turn means that transforming the latter into the former will always be a difficult process especially for judicial prosecution. For one thing, when attempting to reconstruct the case the judge may well discern the moments of wrong-doing clearly, but this does not automatically imply that he is able to make this wrong-doing fit into the penal scheme [P1: 302-306]. This accounts also for the fact, that although sometimes there is broad public discontent about what is perceived as obvious corruption, justice is extremely slow in coming



up with an effective prosecution [P1: 327-332]. In addition, the prosecutor is confronted with yet another difficulty: While he must take pains to judicially sustain the claim of illegal action, there are very competent lawyers that are often surprisingly successful in proving the contrary, because they reconstruct the case not only in such a way that there seems to be no ... case at all, but they also stave off any claims of their clients' involvement in any criminal action [P1: 299-308]. The latter naturally has grave consequences for journalistic investigations, because journalists are thus deterred from uttering anything that could raise the impression that corrupt conduct has evidentially taken place [P1: 313-314].

Thus the elusiveness of corrupt creates a field of indeterminacy, in which the efforts of the prosecuting authorities *to construct the illegality of action* collides with the strategies of the defence *to present an account of the matter at all in conformity with existing legal regulations* [P1: 265-269]. For example, as regards bribery it proves possible every now and again for the defence to downplay the event, presenting it as a kind of personal assistance. Worse still, the defence can even exert influence on the prosecution authorities (judges and general attorneys) not to give the journalists any information concerning the case, lest the rights of their clients be violated [P1: 376-381]. Against this background all the journalists investigating corruption cases can hope for there to still be general attorneys who do not let themselves be intimidated by lawyers [P1: 407-409], thus supporting the right of the press to have access to relevant information [P1: 376-381; 421-426].

But it is not only the aggressive stance of expert lawyers in the field of corruption that works against prosecution thus obstructing the efforts to achieve transparency. There are home-grown deficits in the judicial prosecution itself as well that prove to be an obstacle to effectively sanctioning corruption .

- The prosecuting instances being overloaded the time to unfold/reconstruct such complex cases as those of corruption is lacking [P1: 145-146; 569-573].
- Additionally, sometimes whole departments dealing with corruption prosecution are closed down [455-459] the result being that other instances bestowed with such duties raise an accusation, but are not able to bring the case to court quickly. This is of course a splendid opportunity for the lawyers to mount a counter offensive claiming that their clients are unlawfully being accused and human rights violated [P1: 464-470].
- The court indictments fall sometimes short of what is widely perceived as justified punishment [P1: 1160-1164]. To be sure some are convicted to prison, but more often than not and contrary to the expectations the sanctions are mild. Furthermore, since the verdicts are often issued many years after the criminal offence, they fail to have the hoped effect of deterrence [P1: 480-482].
- As a result of the first two points the court procedures take much too much time, sometimes with the outcome that the case is closed according to certain paragraphs of the penal code [P1: 1351-1355]. This is of crucial importance since corruption is among those criminal offences that must be quickly handled, if there is to be any effective sanctioning at all [P1: 471-484].

II. On fighting corruption

Due to the investigative capacity to trace corrupt conduct down to its social aspects, or conversely to follow the course of co-operative action from the 'bottom' up till it manifests criminal dimensions, journalistic work is essential in fighting corruption. However, access to



required information is not always easy, especially since expert lawyers deploy legal means to block off further investigations concerning their clients, but also to deter the prosecution authorities from co-operating with the press by supplying it with information. Therefore one thing that journalists working in the field of investigating corruption cases hope for is that

- General attorneys will not let themselves be intimidated and will hold the communication channels to the press upright.

Although not directly connected to the work of journalist research there are also some prosecution shortcomings that *need be removed*, to make sanctioning corrupt conduct more effective. They include:

- a) The long time it takes to bring a case to court,
- b) Convictions not being hard enough,
- c) Overburdened prosecution personal, and
- d) Prescription times not being conform with the fact that corruption cases demand long processing times.



GREECE

TG IV MEDIA

General Comments

The Media representatives, who participated in our research, are columnists in Athenian newspapers of high circulation, while one of them is member of the administrative council of the Editors' Association of Athens's Daily Newspapers (ESHEA). They had either covered the case studies in the first phase of the programme, or have occasionally written articles about corruption in Greece. They are not 'stars' of the local journalism, a reason for which we asked them to participate in our research, and they are working in the media for a long time (at least 20 years). We didn't contact any TV or radio journalist, because of our experience from the first period; we considered having hardly any chance for an interview. In addition, we adhered in some degree to the Press, which was our main source in the first period.

Evaluations Units

P6 TG MME_DOL

P7 TG MME_ELEF

P8 TG MME_ENET/ESHEA

Interviews' Analysis

All three journalists analysed corruption, its origin and causes, as well as its forms from a quasi historical-sociological approach.

The phenomenon is defined as 'social, political, and cultural'¹, with ranging seriousness (petty – grand corruption)², associated mainly with the 'habitus' of a society³. The phenomenon is defined as 'an exchange which is not necessarily monetary and not always illegal' (in terms of law)⁴, although money are very often at the core of the exchange. It is inherent in the capitalist system of western democracies⁵ (*the political-economic system cannot live without corruption*⁶). Therefore considering corruption a 'social disease is a trivial ('dog-cheap') justification' used by the mass media and politicians⁷.

Culture is regarded as the significant variable for explaining not only the nature but also the forms of corruption in Greece. Some of the interviewees distinguish between corruption in the East and corruption in the West⁸, where 'the eastern you move, the bigger is the problem'.

¹ P7 TG MME_ELEF: CODES 1, 3, 44, 9, 12.

² P7 TG MME_ELEF: CODE 2.

³ P7 TG MME_ELEF: CODE 6.

⁴ P6 TG MME_DOL: CODE 49; P7 TG MME_ELEF: CODES 50, 122.

⁵ P6 TG MME_DOL: CODE 56.

⁶ P7 TG MME_ELEF: CODE 11.

⁷ P7 TG MME_ELEF: CODE 85.

⁸ P7 TG MME_ELEF: CODE 44, 48.



Corruption acquires peculiar characteristics in the discourse of our interviewees growing or decreasing depending on cultural developments. Starting from a sketchy – in our view – distinction between an indefinable East and an equally nebulous West⁹.

Greece is characterized as a country of ‘semi-Eastern – semi-Western type’¹⁰, which goes us back to the ideological dilemma of the Greek intelligentsia during the middle of the 19th century, whether Greece belongs to the East or to the West, as Markos Renieris wrote in his famous article “What it is Greece: East or West?”, which initially was published anonymously in 1842. In this the author criticized Adamantios Korais, one of the most well known representatives of the Greek Enlightenment, for his adherence to Western civilization and the characteristics of Greek culture.

Although there is no doubt about corruption in Western societies, what differentiates it from its ‘Eastern version’ is the existence of ‘rules of the game’¹¹. In addition, although an ‘export of corruption’ takes place from the West (mainly multinational corporations) to third (underdeveloped, developing) countries the ‘rules of the game’ within western societies remain stable¹².

Apart from heavy bureaucratic structures¹³ and overregulation producing corruption¹⁴, the journalists search the origins of the phenomenon in Greece, in the institution of the New Greek state after the liberation from the Ottoman Turks in the 19th century, its structures and the establishment of the political system.

Their analysis refers to the structure of social power and its division among the dominant social groups (social elites). A significant factor for the extent of corruption is considered to be the ‘distorted development of the social and financial structures’¹⁵, which took place in the post-war era (after 2nd World War). According to the interviewees, during the 80’s the problem in Greece is expanded and took modern forms¹⁶, while during the 90’s corrupt practices were established, improved and refined.

The transformation of the Greek economy (following the ‘modernization dogma’), the influx of EU funds, and the consequent boost of the private economy in relation to that of the state decline and its structural shortcomings – especially the control mechanisms¹⁷–, expanded corruption followed by its side effects in collective behaviours (state and society).

In the whole problematic ‘the political-economical system’ is dominant; this not only produces corruption (mainly grand corruption) but also reproduces it. The protagonists of this

⁹ This distinction suggest the also rather obscure and methodologically dicey distinction that Samuel Huntington attempts in his well-known book *The Clash of Civilizations and the Remaking of the World Order*, New York: Simon & Schuster, 1996.

¹⁰ P7 TG MME_ELEF: CODE 117.

¹¹ P7 TG MME_ELEF: CODES 46, 50, 56.

¹² P8 TG MME_ENET/ESHE: CODE 22.

¹³ P7 TG MME_ELEF: CODES 96, 97, 102.

¹⁴ P7 TG MME_ELEF: CODE 105.

¹⁵ P7 TG MME_ELEF: CODES 10, 29, 73; P6 TG MME_DOL: CODE 69.

¹⁶ P6 TG MME_DOL: CODE 64.

¹⁷ P6 TG MME_DOL: CODE 65; P8 TG MME_ENET/ESHEA: CODE 53.



system are the powerful economic and political groups, the organized pressure groups¹⁸, and the economic and political oligarchy¹⁹. The interviewees adopt the dominant view of the 70's and early 80's about the ways these groups have been established, referring to an '*intermediary capital with Greek peculiarities*'²⁰ and sometimes of a '*state-sponsored capital*'²¹ that has privileged relations with political power.

Summing up, the interplay of political and economical interests is related to the original accumulation of the Greek capital in the 19th and 20th century (see also TG Politics). A similar historical-socioeconomic approach is attempted for the development the modern political system in Greece and the way it eventually reproduces corruption. For the media representatives, 'political corruption' is strongly related with the operation of political parties, as well as their establishment²² and financing. The outcome is dependence on and reproduction of the dominant socio-economic groups in a context of generalized corruption, because the economic system has never operated in terms of international capital and true competition²³. The interviewee emphasizes that even in the 90's, when the Greek capital moved beyond the national borders, this took place in the Balkans where are characterized by an extensive interplay of political and economic power²⁴. This is a rather rough approach, because the geographic area is the natural place for Greek investments and bypasses the discussed 'export of corruption' which takes place from big multinational corporations of the West to the developing and underdeveloped²⁵, starting from the neighbouring countries. In parallel, the powerful groups ('economic elite') involved in corrupt practices and such exchanges are those who reproduce it for their own interests²⁶, and are the main parties' financiers²⁷.

After all, the model of corruption in Greece, according to our interviewees has a triangle form. The political and economic power is at the base, and the mass media at the top (see also below). The system (sometimes the use of the term is extremely vague) is regarded operating independent (without social control), reproducing itself together with collective attitudes and social behaviours. In short, the 'system' is strong, distorting conscience and disabling mechanisms in order to support its own interests²⁸.

¹⁸P7 TG MME_ELEF: CODE 18.

¹⁹P7 TG MME_ELEF: CODES 20, 24; P6 TG MME_DOL: CODE 73.

²⁰P7 TG MME_ELEF: CODE 27.

²¹P7 TG MME_ELEF: CODES 20, 21, 22, 26, 61.

²²P6 TG MME_DOL: CODE 1.

²³ The interviewee emphasizes that even in the 90's, when the Greek capital moved beyond the national borders, this took place in the Balkans where, according to him, are characterized by an extensive interplay of political and economic power (P7 TG MME_ELEF: CODE 62). This is a rather rough approach, because the geographic area is the natural place for Greece for investments and bypasses the discussed "export of corruption" which takes place from big multinational corporations of the West to the underdeveloped and developing P8 TG MME_ENET/ESHEA: CODE 22.

²⁴P7 TG MME_ELEF: CODE 62.

²⁵ P8 TG MME_ENET/ESHEA: CODE 22.

²⁶ P8 TG MME_ENET/ESHEA: CODES 45, 46, 47.

²⁷ P8 TG MME_ENET/ESHEA: CODES 49, 50.

²⁸ P7 TG MME_ELEF: CODE 72; P8 TG MME_ENET/ESHEA: CODE 221.



All the interviewees agree that corruption in contemporary Greece is extended²⁹, covering the public life³⁰, ‘representing a serious social problem’³¹ and can eventually be followed by ‘uncontrollable situations’³². Nonetheless, corruption is counted to be a general problem of all countries, inherent in our times³³. Furthermore, they distinguish between petty and grand corruption³⁴, and refer to its intensity and development corresponding to the development of the political and economic system³⁵.

Corruption is presented as a dominant social attitude³⁶ and acceptable behaviour in the exchange of the citizen with the state³⁷, irrespective of its eventual justification in the current system of power that produces injustices, inequalities and discrimination against the lower and middle class.

According to the interviewees, contemporary Greek society has incorporated corrupt practices as accepted social behaviour, because as society is based on reciprocity, mutual services (peculiar form of solidarity?)³⁸. At the same time, they accept the frequent and exaggerated references to the topic, together with its superficial official approach do nothing more than to befog and reproduce the phenomenon³⁹. For the media representatives, the extent of corruption in Greece is inversely proportional to the social reaction it provokes. Compared with the past, greater tolerance and lower social resistance is observed⁴⁰, while the politicians’ declarations about their commitment and effort to decrease corruption are considered meaningless and for show off⁴¹.

As mentioned above, all interviewees agree for the tolerance’s increase about corruption. Two interpretations are promoted. The first sees the ‘dominant (political and economical) system’ neutralising citizens’ reactions⁴². Mass media have a significant role in this process⁴³ and in their exchange with the ‘dominant political power’ (see political parties) takes care of its self-maintenance⁴⁴.

²⁹ P7 TG MME_ELEF: CODES 2, 74; P8 TG MME_ENET/ESHEA: CODE 23; P6 TG MME_DOL: CODE 112.

³⁰ P7 TG MME_ELEF: CODES 54, 55; P8 TG MME_ENET/ESHEA: CODES 24-26; P6 TG MME_DOL: CODE 224.

³¹ P8 TG MME_ENET/ESHEA: CODE 16.

³² P7 TG MME_ELEF: CODE 111.

³³ P6 TG MME_DOL: CODE 59.

³⁴ P8 TG MME_ENET/ESHEA: CODES 24, 25.

³⁵ P8 TG MME_ENET/ESHEA: CODE 16.

³⁶ P7 TG MME_ELEF: CODE 191.

³⁷ P6 TG MME_DOL: CODES 121, 218, 236.

³⁸ P8 TG MME_ENET/ESHEA: CODES 27, 28.

³⁹ P8 TG MME_ENET/ESHEA: CODE 37.

⁴⁰ P7 TG MME_ELEF: CODES 29, 30; P8 TG MME_ENET/ESHEA: CODE 17.

⁴¹ P6 TG MME_DOL: CODES 57, 58, 244.

⁴² P7 TG MME_ELEF: CODE 31.

⁴³ P7 TG MME_ELEF: CODES 33, 34.

⁴⁴ P7 TG MME_ELEF: CODE 37.



The second view, without ignoring the role of the mass media, ascribes greater importance to a socialisation of the citizens which produced not only tolerance but also acceptance (especially those of the lower and middle social strata) to these practices⁴⁵.

All the interviewers accept that corrupt practices (mainly petty corruption) may operate for the ‘redistribution of wealth’⁴⁶, thus is characterized as ‘functional’⁴⁷. At the same time they underline the inherent inequality between state–citizens relations because of this exchange. This cooperation puts automatically the limits of the relationship, because not all citizens can use such means or methods (relations). Therefore, it is an unwholesome equality⁴⁸ leading to an impasse⁴⁹.

‘Redistribution’ is not real redistribution of resources in favour of the social disadvantage and poor population, but as a way through which petit bourgeoisie exploit a ‘grey zone’ of the public sector (not defined by the interviewees and rather extended) with corrupt exchanges and mutual services (bribery, clientelism). To the question how many chances have the ordinary people not to use illegal practices, given the social inequality and the discrimination, the answer is that no illegal practices can be accepted⁵⁰. Therefore, the individual is regarded as ‘pure political being’ who acts only according the common interest and not the personal or group benefit. The other new justifies such practices, though it rejects them. Furthermore, concerning the limits of tolerance and social erosion, the first approach sees corruption extended in all social strata⁵¹, while the second refers to social fatigue citizens’ dissatisfaction and signs of increasing reaction. They consider that there is a rising social dissatisfaction⁵², but not yet organised: this behaviour is expressed in a rather destructive than constructive way⁵³. In any case, Greek society demands changes, rules and improvements⁵⁴.

In spite of the criticism to EU policies and other international organizations for this issue (OECD, World Bank, Transparency International), the whole effort is appreciated in general and considered to be positive for Greece in particular. And this because it supports a thorough analysis and discussion, as well as because it promotes the education and the information of the society⁵⁵. It is accepted⁵⁶ that a closer cooperation of Greece with EU in corruption control will contribute to its reduction, mainly because of the financial costs required for the European convergence. Moreover, Greece’s integration in the structures of EU will support⁵⁷ the re-organization of the political parties⁵⁸.

⁴⁵ P7 TG MME_ELEF: CODES 40, 41; P6 TG MME_DOL: CODE 228.

⁴⁶ P7 TG MME_ELEF: CODE 65.

⁴⁷ P6 TG MME_DOL: CODES 119, 120.

⁴⁸ P7 TG MME_ELEF: CODES 65, 66; P6 TG MME_DOL: CODE 158.

⁴⁹ P8 TG MME_ENET/ESHEA: CODES 19-21.

⁵⁰ P8 TG MME_ENET/ESHEA: CODE 21.

⁵¹ P7 TG MME_ELEF: CODES 40, 41; P8 TG MME_ENET/ESHEA: CODE 33 ; P6 TG MME_DOL: CODE 228.

⁵² P7 TG MME_ELEF: CODE 67.

⁵³ P7 TG MME_ELEF: CODES 68, 69.

⁵⁴ P7 TG MME_ELEF: CODES 76-78.

⁵⁵ P8 TG MME_ENET/ESHEA: CODES 13, 14.

⁵⁶ P6 TG MME_DOL: CODE 245.

⁵⁷ P6 TG MME_DOL: CODE 76.



The problem however in the relations between EU and Greece starts, according to the media representatives, either from the structural weaknesses or unwillingness of the Greek political and economic system to adjust to regulatory reforms⁵⁹. The interviewees note that the Greek governments simply accepted the anticorruption legislation of EU, without participating in their formulation, since they haven't worked them out, and started integrating them in the national legislation with delays and following only roughly the anti-corruption policies⁶⁰. This results in adopting approaches and policies from abroad, which certainly couldn't take into account the forms and extent of the problem to each country, since the country itself hadn't expressed its own view.

All the interviewees strongly criticize the use of corruption by the media, especially the electronic ones. According to them, media, being private enterprises, are the main players in corrupt exchanges serving their own financial interests⁶¹. Media are characterized by their close relationships with the prevailing political and economic interest groups⁶². The interviewees recognize the absence of independent media and the weakness of the Press for independent journalism. Consequently, media don't correspond to their basic mission for objective information and social control, but work as intermediaries of political and economic interests⁶³. At the same time, the rapid increase of their influence to society, mainly of television, resulted in an absurdity: Media have replaced the institutional control with a television one⁶⁴. Therefore, the discussion in relation to corruption increases either superficial, or nihilistic and destructive⁶⁵. Media don't promote productive discussion but their agenda is defined according to their own interests and not, by the real problems and social needs⁶⁶.

The view of our target group about corruption in politics is also critical. Politicians are captured⁶⁷ between the prevalent image which is promoted by the media and the alleged demands of their electoral clientele. The result is lack of political courage to enforce measures of transparency and anticorruption with the repeated justification of the 'political cost'⁶⁸. Media representatives attribute the reasons of reluctance, to the formation of the party political system in the new Greek state and its submission to foreign powers. Summing up, apart from the accepted media role to the modern party system⁶⁹, the basic factors that (re)produce corruption in politics are the shortcomings of their democratic organisation⁷⁰, its

⁵⁸ P6 TG MME_DOL: CODE 80.

⁵⁹ P8 TG MME_ENET/ESHEA: CODE 71.

⁶⁰ P8 TG MME_ENET/ESHEA: CODES 72-74.

⁶¹ P8 TG MME_ENET/ESHEA: CODES 34, 35; P6 TG MME_DOL: CODE 34.

⁶² P7 TG MME_ELEF: CODES 82-84; P8 TG MME_ENET/ESHEA: CODE 36; P6 TG MME_DOL: CODES 184, 187, 193, 203, 204.

⁶³ P6 TG MME_DOL: CODES 35, 38.

⁶⁴ P6 TG MME_DOL: CODE 207.

⁶⁵ P7 TG MME_ELEF: CODE 81; P6 TG MME_DOL: CODE 183; P6 TG MME_DOL: CODE 181.

⁶⁶ P8 TG MME_ENET/ESHEA: CODE 32.

⁶⁷ P8 TG MME_ENET/ESHEA: CODE 44.

⁶⁸ P8 TG MME_ENET/ESHEA: CODES 29, 30.

⁶⁹ P6 TG MME_DOL: CODES 31-33.

⁷⁰ P6 TG MME_DOL: CODES 28, 29.



person oriented character⁷¹, its reliance on economic interests⁷² and inefficient control mechanism⁷³ for party and electoral expenses. In fact, the existing control mechanisms (e.g. the electoral committee) are completely inefficient and powerless.

Corruption in public administration and corruption in politics⁷⁴ are two different things although they are strongly related to each other⁷⁵: it is visible and petty, though inherent in the structures of PA⁷⁶.

The reasons for this situation are attributed to the so-called ‘distorted economic development’ of the country⁷⁷, to the existence of heavy bureaucracy⁷⁸, to the outdated administrative structures and the intervention of party-politics to serve their clientele⁷⁹.

Our interviewees emphasize on administrative reform⁸⁰, computerization and overall modernization of Public Administration, as well as its control mechanisms⁸¹. Moreover, they accentuate the need for investments to the human and material capital of Public Administration⁸² and better regulation⁸³.

They refer to structural changes without specifying them⁸⁴, which have to be fulfilled gradually, in order the generalized collapse of the existing power system to be avoided⁸⁵. All in all, reducing corruption in Greece demands commitment⁸⁶ of the citizens, education and awareness, together with an effective social control⁸⁷. And this because, as one interviewee said: ‘Democracy is a very difficult system that requires continuous alertness and control by the citizens’⁸⁸.

⁷¹ P6 TG MME_DOL: CODE 31.

⁷² P6 TG MME_DOL: CODES 4, 6.

⁷³ P6 TG MME_DOL: CODES 12, 14, 16; P6 TG MME_DOL: CODE 26; P6 TG MME_DOL: CODES 17, 23, 24, 27.

⁷⁴ P6 TG MME_DOL: CODE 2.

⁷⁵ P6 TG MME_DOL: CODES 124-128.

⁷⁶ P6 TG MME_DOL: CODES 115, 116, 235.

⁷⁷ P6 TG MME_DOL: CODE 123.

⁷⁸ P6 TG MME_DOL: CODES 130, 137.

⁷⁹ P6 TG MME_DOL: CODES 117, 123.

⁸⁰ P7 TG MME_ELEF: CODES 70, 103, 104; P6 TG MME_DOL: CODES 140, 141.

⁸¹ P8 TG MME_ENET/ESHEA: CODES 65, 68, 69.

⁸² P8 TG MME_ENET/ESHEA: CODES 40, 41, 43.

⁸³ P6 TG MME_DOL: CODE 104.

⁸⁴ P7 TG MME_ELEF: CODE 71; P8 TG MME_ENET/ESHEA: CODE 11; P6 TG MME_DOL: CODES 96, 103, 162.

⁸⁵ P7 TG MME_ELEF: CODE 110; P6 TG MME_DOL: CODE 113.

⁸⁶ P8 TG MME_ENET/ESHEA: CODE 40.

⁸⁷ P8 TG MME_ENET/ESHEA: CODES 7, 8, 11; P6 TG MME_DOL: CODE 169.

⁸⁸ P8 TG MME_ENET/ESHEA: CODES 9, 59.



UNITED KINGDOM

Target Group Media

Interviewee 1: A correspondent for broadsheet newspaper 'A'

The interviewee highlighted a long-standing concern in their work to avoid double standards when discussing corruption abroad and within the UK. Thus, the cash-for-honours scandal was, for the interviewee, an investigation of corruption.

The interviewee argued that Western governments and companies are deeply complicit in corruption around the world, and Britain was no cleaner than other countries and did not observe higher standards. Whilst one could say that in one sense British bureaucracy is cleaner and there is less open corruption here, if one considers Britain's role over the last century (relating to code family 4), because of its historic power and economic wealth,

“it has probably been implicated in far more corruption than Nigerian governments or companies or individuals ever have been. So you have to look at the thing at two levels”.

Corruption can be bad for business, both because it makes them vulnerable to blackmail themselves and because foreign investment will be undermined if politics is believed to unfairly intrude on regulation in the market place. Nevertheless, not all businesses are convinced of this logic, most are ambivalent when it comes to combating corruption, and even those that are may be cautious about speaking out against corruption because of their own past involvement in corrupt acts ('skeletons in the cupboard') (code family 3 – contrary).

Corruption has become a particularly critical problem for business in OECD states because companies in non-member states, such as China, India and Russia, have begun competing more assertively in foreign markets and, if an international standard against corruption is not enforced, there could be a 'race to the bottom' between western companies (who already have a poor reputation on this) and companies who are even more involved in corruption from other parts of the world.

The interviewee suggested that Britain has realised that combating corruption is good for the wealth of the nation, but suggested that Britain has always been prepared to export corruption, cynically allowing companies and individuals to act corruptly abroad in order to secure direct economic benefit to the UK. There has been an increasing commitment to anti-corruption norms over the past 15-20 years, which means that politicians would now be less willing to knowingly consent to corrupt arrangements, but what has appeared instead is a “ask no questions, hear no lies” approach; loopholes remain in British oversight and regulatory mechanisms. Furthermore, although the 'war on terrorism' has meant that there is greater scrutiny of international money flows, which means cases of corruption are more likely to come to light, because of the focus on the war on terror, cases may be less likely to be properly investigated (as in the case of the BAE scandal).

The interviewee argued that to tackle corruption successfully, one should not merely try to regulate companies more, but to change peoples' beliefs about the acceptability of such behaviour. The British media probably has helped to make corruption less acceptable, though



not all have been particularly interested in the subject. The interviewee argued that a simple distinction should not be assumed to hold between broadsheet and tabloid coverage of corruption, however, arguing that some tabloids had played an important role in uncovering cases of corruption, whilst some broadsheets were cynical and resigned. The OECD has played an important role on consciousness-raising with regard to anti-corruption efforts, but there is still a long way to go. NGOs have also played an impressive part in changing mindsets about corruption, by telling people what British companies and nationals are doing overseas (code family 2). The legal framework is still inadequate for effective anti-corruption efforts in the UK. Meanwhile, politicians from the two leading political parties have not been eager to tackle the issue.

Britain is seen as a model for good governance in some parts of the world (rightly or wrongly) and for that reason the recent BAE scandal has been very damaging, both in terms of undermining British anti-corruption efforts abroad and in encouraging a similar devaluation of anti-corruption efforts elsewhere. The OECD Convention can offer a more useful model of anti-corruption standards, and successfully prosecuted corruption cases internationally.

Interviewee 2: A correspondent for broadsheet newspaper 'B'

The interviewee explained that there was no specific 'house rule' of the newspaper on using the word corruption, other than caution to avoid libelling people and adhering to the legal definition, which the interviewee described as "quite tight". However, the interviewee later commented that because corruption does not appear to be a priority in the UK, there has been a lack of effort to tackle the problem of definition and update Britain's corruption laws.

The interviewee argued throughout the interview that corruption is not a systemic problem in the UK, and is "very limited" (code family 4). There are more cases of corruption than have been prosecuted, but it is a charge very difficult to prove. It was allowed that there is sometimes favouritism in the awarding of contracts, but these are exceptions to the rule; public administration is "done fairly cleanly and decently"(code family 4), especially at the national (as opposed to local) level of government. The interviewee posited that "classic corruption" in Britain involved local planning at the local council level with relatively little money involved.

The interviewee traced Britain's fortune with regard to its lack of systemic corruption to a long, cohesive tradition of public administration, and reforms of public life in the 19th century. Also, that standards raised over the past 10-12 years reduced the scope for political favours (code family 1).

The interviewee distinguished between dangerous and innocuous forms of corruption. The cash-for-honours scandal was viewed as "second rate" corruption, and denied very much significance because, it was argued, giving someone a title does not give them power; those who have allegedly bought titles were assessed as playing no active role in the House of Lords in actual fact.

The interviewee also proposed that donations to political parties might give the donor more access to a political party ("a hearing") but would not guarantee a contract or indeed make much practical difference in reality (code family 6).



The interviewee argued that the media, especially the tabloids, have fuelled public cynicism about politics. The interviewee stated that in 30 years of experience, very few politicians were ‘in it for themselves’, and that they approach ‘grey areas’ thinking of the public good (“in public policy terms”) (code family 4). In their newspaper, however, the interviewee made clear that there is an effort not to assume the worst, i.e. not to support suspicions of systemic failure, but to treat problems as serious deviations. Thus, just “because you get a thousand fraudulent votes in various places doesn’t mean the whole election is fraudulent”.

The interviewee emphasised that interactions between politicians and business may often be legitimate but may unfairly be interpreted as corrupt (e.g. the revolving door between Ministry of Defence staff and the defence industry). Equally bribery and corruption in general are not necessarily bad for business, it rather depends on the type of business being considered. Thus, in a market for consumer products, bribery would distort the market and so be bad. On the other hand, where the contract is with a State – e.g. the Pergau Dam – and is thus a limited rather than competitive market, the interviewee indicated that this would not be particularly bad.

The interviewee did not regard our second case study (Pergau Dam affair) as a serious incidence of corruption, but rather as a serious case of “conflict of objectives”; between supporting jobs in Britain and foreign policy alliances, and the objectives of overseas aid and “securing proper development”. In the interviewee’s mind, it was not corruption since “it wasn’t a case of anyone lining their pockets”; i.e. it was not corruption for private financial gain. However, the interviewee did attempt to distinguish between the relatively innocuous Pergau Dam affair and the “even murkier” recent BAE scandal.

Competing moral goods, such as employment and security, were difficult to balance with anti-corruption policies (code family 5). Nevertheless, the interviewee suggested that in the aftermath of the BAE scandal, British ministers will not be able to lecture foreigners on anti-corruption efforts.

When asked their view of NGOs who have campaigned against corruption, the interviewee initially responded that they were “perfectly entitled to do it, but [didn’t] think that there are absolute moral rights on one side or another”. However, immediately afterwards, in a discussion of whether corruption was less acceptable now than in the past, the interviewee responded that it was less acceptable today and this was in part thanks to NGO campaigns (now interpreted positively) (code family 2).

The interviewee agreed that British businesses may sometimes be forced to adapt to local customs with regard to paying bribes (and pointed out that one cannot expect them simply not to operate in certain countries). Additionally, it was implied that it is hard or undesirable to (over-) regulate the behaviour of companies abroad. They also underlined that company directors are much more sensitive now towards anti-bribery requirements than they were a few years ago.