GIACC-SA Infrastructure Project Anti–Corruption Practitioner (IPACP)

Definition: An Infrastructure Project Anti-Corruption Practitioner is a person who according to the GIACC-SA (NPC), possess the requisite competence (including qualifications), skills and experience in international and local anti-corruption law and frameworks, corporate and project anti-corruption advisory, corporate and project anti-corruption implementation, corporate and project anti-corruption monitoring, investigation and the reporting of corrupt activities within infrastructure organisations and project delivery in the built environment.

Description: An Infrastructure Project Anti-Corruption Practitioner is both an organisation and project specialist within the built environment, including the advisory, implementation and management of related anti-corruption services following the defined SACPCMP six stages of a construction project.

Infrastructure Project Anti-Corruption Practitioner Scope of Work

Definition: Stages of anti-corruption services and deliverables to be performed during an infrastructure project:

Scope of an IPACP's Services and Deliverables

Stage 1: Infrastructure Project Initiation and Briefing

Definition: Agreeing client requirements and preferences, assessing user needs and options, appointment of necessary consultants in establishing project brief, objectives, priorities, constraints, assumptions and strategies in consultation with the client.

Objective: To proactively embed anti-corruption safeguards and good governance practices during the foundational phase of an infrastructure project by supporting the client and their team in establishing transparent, ethical, and compliant project frameworks.

Services:

1. Infrastructure Anti-Corruption Risk Assessment and Advisory

- To conduct a preliminary corruption risk assessment aligned with the project's nature, scale, location, and stakeholders.
- To identify and document red flags and potential corruption-prone processes at the early stage of project definition.
- To provide strategic advice to the client on incorporating integrity, accountability, and transparency into project planning and decision-making frameworks.

2. Support in Establishing Ethical Infrastructure Project Governance

- To advise the client on appropriate governance structures that ensure ethical oversight and conflict-of-interest mitigation.
- To recommend policies or procedures that promote transparency, including whistleblower protections, ethics declarations, and documentation protocols.
- To participate in or support the formation of an Ethics & Compliance Committee.

3. Infrastructure Consultant Selection Oversight

- To provide guidance or monitoring during the procurement and appointment of consultants to ensure fair, transparent, and corruption-resistant selection processes.
- To review and recommend ethical clauses for consultant contracts.
- To assist in verifying consultant independence and disclosure of conflicts of interest.

4. Input into Infrastructure Project Brief and Strategy Development

- To ensure that anti-corruption considerations are embedded in the project brief, particularly around decision-making authority, documentation standards, and communication protocols.
- To recommend anti-corruption and compliance elements in project objectives, priorities, constraints, and assumptions.
- To help define clear roles and responsibilities to minimise overlap or ambiguity that could enable corrupt practices.

5. Infrastructure Stakeholder Engagement and Capacity Building

- To support the client in conducting ethical stakeholder engagement, ensuring inclusive and transparent consultation processes.
- To deliver orientation or training sessions for client representatives and early-stage project consultants on corruption risks, reporting mechanisms, and expected standards of conduct.

6. Infrastructure Documentation and Reporting

- To prepare a Stage 1 Anti-Corruption Compliance Report, summarising risks identified, actions taken, and recommendations for future stages.
- To maintain a secure and auditable record of key decisions, advice provided, and engagement outcomes.

Deliverables:

1. A preliminary Infrastructure Corruption Risk Assessment Report.

2. Ethical Governance Structure Recommendations.

3. An Infrastructure Consultant Procurement Oversight Memo.
4. Infrastructure Anti-Corruption Clauses for Consultant Contracts.
5. An Infrastructure Project Brief Review and Compliance Advisory Note.
6. An Infrastructure Stakeholder Engagement Ethics Protocol.
7. Infrastructure Capacity Building Materials.
8. Stage 1 An Infrastructure Anti-Corruption Compliance Report.

Stage 2: Finalisation of Infrastructure Project Concept and Feasibility

Definition: Finalisation of the project concept and feasibility

Objective: To ensure the finalisation of the project concept and feasibility phase is conducted with transparency, integrity, and robust safeguards against corruption risks, particularly during the refinement of technical, financial, and operational frameworks.

Services:

1. Integrity Review of Infrastructure Project Concept and Options
    - Evaluate the transparency and objectivity of the process used to finalise the project concept.
    - Assess whether alternative options were considered fairly and without undue influence.
    - Ensure that the selection of the preferred concept reflects the public interest and is free from conflicts of interest or manipulation.
2. Review of Infrastructure Feasibility Studies
    - Conduct an integrity-focused review of all feasibility reports to identify:
        - Data manipulation risks
        - Biased or incomplete assessments
        - Inflated cost or revenue projections
        - Improper assumptions favouring specific vendors or consultants
    - Evaluate transparency in data sourcing and assumptions made.
    - Recommend improvements in documentation and auditability of key decisions.
3. Anti-Corruption Input into Infrastructure Risk Management Framework
    - Review the project’s emerging risk register to:
        - Ensure corruption-related risks are properly captured and rated.

    - Recommend specific mitigation strategies, including segregation of duties, reporting mechanisms, and control processes.
- Advise on institutional roles for risk ownership and accountability.

4. Ethical Oversight in Value-for-Money and Financial Modelling
    - Review financial models for embedded bias or manipulation.
    - Verify assumptions for realism and integrity.
    - Provide input into the selection and justification of funding structures, especially if public-private partnerships, donor funds, or external investors are involved.
5. Infrastructure Consultant Performance Integrity Monitoring
    - Review consultant work outputs for transparency, completeness, and adherence to ethical standards.
    - Check for:
        - Conflicts of interest
        - Overreliance on unverified data
        - Signs of collusion between consultants and vendors/suppliers
    - Provide an integrity compliance evaluation of consultants' contributions to date.
6. Infrastructure Stakeholder Disclosure and Accountability Mechanisms
    - Assess whether stakeholder engagement processes during feasibility are transparent and inclusive.
    - Recommend mechanisms for documenting feedback, addressing concerns, and preventing undue external influence.
    - Assist in publishing or disclosing key feasibility outputs where required for public or regulatory transparency.
7. Update of Infrastructure Corruption Risk Register and Compliance Plan
    - Update the Stage 1 risk register to reflect feasibility-stage risks and mitigation responses.
    - Refine the Anti-Corruption Compliance Plan with Phase 2 priorities and revised control mechanisms.
    - Advise on continuity measures into Stage 3.
8. Infrastructure Reporting and Assurance
    - Prepare a Stage 2 Integrity Compliance Report for the client, summarising:
        - Findings

- Recommendations
- Compliance status of all feasibility inputs
- Areas of concern for the next project phase

Deliverables:

1. Infrastructure Feasibility Integrity Review Memo.
2. Infrastructure Project Concept Decision Integrity Note.
3. Updated Infrastructure Anti-Corruption Risk Register.
4. Infrastructure Compliance Assessment of Feasibility Consultants.
5. Advisory Note on Financial and Value-for-Money Assumptions.
6. Stakeholder Engagement Ethics Oversight Memo.
7. Updated Infrastructure Anti-Corruption Compliance Plan (Stage 2 Version).
8. Stage 2 Infrastructure Integrity Compliance Report.

Stage 3: Infrastructure Design Development

Definition: Manage, co-ordinate and integrate the detail design development process within the project scope, time, cost and quality parameters.

Objective: To ensure that the detailed design development process is executed with transparency, integrity, and effective corruption prevention controls, particularly where risks emerge from cost manipulation, conflicts of interest, and collusion during technical specification, material selection, and scope refinement.

Services:

1. Infrastructure Integrity Oversight of Design Development Coordination
    - Monitor the integrity of the design coordination process to detect risks of manipulation, bias, or opaque decision-making.
    - Provide advisory support to ensure that coordination between consultants, disciplines, and project stakeholders is documented, traceable, and compliant with ethical standards.
    - Review minutes and coordination protocols for transparency and accountability.
2. Review of Infrastructure Design Decisions and Material/Technology Selections
    - Conduct integrity reviews of major design decisions.
    - Assess risks of favouritism, sole-sourcing, and kickbacks associated with design specifications.

- Verify that value engineering, lifecycle cost analysis, and alternatives evaluation are conducted in a fair and documented manner.

3. Infrastructure Cost Integrity Monitoring
    - Assess alignment between design outputs and cost parameters to detect scope creep, cost padding, or manipulation.
    - Review the development of bills of quantities, cost plans, and quantity take-offs for irregularities or red flags.
    - Ensure transparency in consultant estimates and that cost changes are traceable and justified.
4. Prevention of Infrastructure Scope Manipulation and Design-Based Corruption
    - Monitor design modifications to ensure changes are not introduced to enable fraud.
    - Track scope changes against the approved baseline and verify change documentation for legitimacy and approvals.
    - Participate in design review panels or value management workshops from an integrity standpoint.
5. Conflict of Interest and Consultant Oversight
    - Conduct ongoing checks for undisclosed conflicts of interest among design team members or associated parties.
    - Review consultant performance and document adherence to anti-corruption clauses and reporting requirements.
    - Recommend corrective measures if evidence of collusion, underperformance, or ethical breaches is found.
6. Infrastructure Technical Document Integrity Review
    - Review tender-ready drawings, technical specifications, and schedules for:
        - Ambiguities that enable manipulation
        - Over-specification or brand-specific requirements
        - Hidden conflicts between drawings and specifications
    - Support the creation of tamper-proof and audit-compliant design packages.
7. Infrastructure Reporting and Compliance Assurance
    - Regularly report to the client on ethical risks, red flags, and mitigation measures.
    - Maintain a Design Integrity Log detailing interventions, findings, and actions taken.

- Support document control procedures to prevent unauthorised revisions or backdating.

Optional Support Services:

- Conduct design team integrity training.
- Facilitate design decision peer reviews for transparency.
- Advise on secure document version control and approval workflows.

Deliverables:

1. Infrastructure Design Integrity Monitoring Report.
2. Infrastructure Design Specification Integrity Review Memo.
3. Infrastructure Cost Integrity Oversight Note.
4. Infrastructure Scope Change Integrity Log.
5. Conflict of Interest Monitoring Report.
6. Infrastructure Technical Document Integrity Checklist & Review Summary.
7. Monthly Infrastructure Design Integrity Status Report.
8. Final Infrastructure Integrity Compliance Report.

Stage 4: Infrastructure Tender Documentation and Procurement

Definition: The process of establishing and implementing procurement strategies and procedures, including the preparation of necessary documentation, for effective and timeous execution of the project.

Objective: To ensure that all procurement activities—including strategy formulation, bidder selection, documentation preparation, and implementation—are conducted with integrity, transparency, and accountability to prevent fraud, collusion, favouritism, and bid rigging.

Services:

1. Integrity Input into Infrastructure Procurement Strategy Development
    - Advise on the design of procurement strategies to minimise corruption exposure.
    - Ensure the strategy aligns with anti-corruption laws, donor requirements, and industry best practices.
    - Identify and assess corruption risks in procurement structure.
2. Oversight of Infrastructure Prequalification and Tender Processes
    - Review prequalification and invitation-to-tender processes for fairness and objectivity.

- Monitor criteria definition and ensure they are non-discriminatory, measurable, and justifiable.
- Validate the transparency of the advertising and bidder engagement process.

3. Anti-Corruption Review of Infrastructure Procurement Documents

- Provide integrity-focused review of all procurement documentation, including:
  - Instructions to bidders
  - Prequalification questionnaires
  - Tender forms
  - Conditions of contract
  - Evaluation criteria and weightings
- Ensure no bias, ambiguity, or hidden barriers exist that could favour certain bidders.

4. Infrastructure Bid Evaluation Oversight and Compliance Monitoring

- Assist in establishing a bid evaluation committee with ethics and conflict-of-interest controls.
- Monitor the bid evaluation process to detect manipulation, scoring bias, or collusion.
- Review the documentation of evaluations to ensure transparency, consistency, and traceability.

5. Infrastructure Supplier Integrity Due Diligence

- Conduct or oversee due diligence on prospective contractors, suppliers, or service providers.
- Verify legal standing, ownership structure, past misconduct, sanctions history, and affiliations.
- Recommend red flags, exclusions, or enhanced monitoring where necessary.

6. Conflict of Interest Disclosure and Management

- Implement or update conflict-of-interest declarations for all personnel involved in procurement.
- Track compliance and follow up on disclosures to mitigate risks.
- Advise on recusal, role reassignment, or procedural safeguards if risks are confirmed.

7. Infrastructure Procurement Ethics Controls and Whistleblower Protection

- Recommend integrity pacts, codes of conduct, or bidder declarations to be signed by all participants.

- Establish whistleblower protocols for bidders and internal staff to report misconduct confidentially.
- Advise on secure channels, escalation processes, and non-retaliation guarantees.

8. Infrastructure Procurement Risk Register and Mitigation Plan
    - Develop and maintain a procurement-specific corruption risk register.
    - Identify vulnerabilities at each step of the procurement process.
    - Propose risk mitigation actions and assign responsibilities.
9. Infrastructure Reporting and Assurance
    - Prepare regular reports to the client outlining:
        - Risks identified and addressed
        - Oversight activities performed
        - Irregularities encountered
        - Recommendations for improvement
    - Provide a final integrity compliance report for Stage 4, documenting the overall ethical quality of the procurement processes.

Optional Support Services:

- Facilitation of training for procurement teams on ethical procurement.
- Participation in pre-bid meetings or clarification sessions to observe bidder interaction.
- Real-time monitoring of high-risk procurement events.

Deliverables:

1. Infrastructure Procurement Strategy Integrity Review Report.
2. Infrastructure Procurement Documentation Integrity Review Memo.
3. Infrastructure Bid Evaluation Ethics Protocol.
4. Conflict of Interest Declaration and Tracking Register.
5. Infrastructure Supplier Integrity Due Diligence Report(s).
6. Infrastructure Procurement Risk Register and Mitigation Plan.
7. Infrastructure Procurement Oversight Logs and Red Flag Tracker.
8. Whistleblower Protocol for Infrastructure Bidders and Staff.
9. Infrastructure Procurement Integrity Compliance Report.

Stage 5: Infrastructure Construction Documentation and Management

Definition: The management and administration of the infrastructure contracts and processes, including the preparation and co-ordination of the necessary documentation to facilitate effective execution of the works.

Objective: To ensure that the construction phase is managed and administered with transparency, integrity, and effective anti-corruption controls—minimising risks of corruption in project and site-level interactions.

Services:

1. Oversight of Infrastructure Contract Mobilisation and Start-Up
   - Monitor processes for contractor mobilisation, site handover, and issuance of notice to proceed to ensure transparency and compliance with preconditions.
   - Review contractor start-up documentation for authenticity and completeness (e.g., bonds, insurance, subcontractor declarations, staffing plans).
2. Integrity Review of Infrastructure Contract Administration Procedures
   - Advise on procedures for site instructions, variation orders, interim payments, extension of time claims, and contract communications.
   - Ensure that documentation workflows are tamper-proof, fully auditable, and appropriately approved.
   - Review systems for tracking deliverables, milestones, and quality inspections.
3. Infrastructure Anti-Corruption Monitoring of Claims and Payments
   - Review contractor claims for variations, payments, and time extensions for signs of inflation, manipulation, or collusion.
   - Track payment processing against performance metrics and site verification reports.
   - Assess delays and EOT justifications for possible abuse or fabrication.
4. Oversight of Subcontractor and Supplier Appointments
   - Monitor the process of subcontractor and supplier selection for transparency and compliance with contract terms.
   - Conduct random or risk-based integrity checks on subcontractors for undisclosed relationships, conflicts of interest, or shell company risks.
   - Recommend controls for avoiding "pass-through" fraud and inflated invoices.
5. Infrastructure Site-Level Integrity Monitoring
   - Conduct periodic site visits or audits to assess:
     - Material deliveries
     - Workforce deployment

    - Progress vs. payment
    - Health and Safety/Quality/Environmental/Social safeguards
- Identify red flags such as ghost workers, under-delivered quantities, or off-book site instructions.
- Facilitate anonymous whistleblower reporting on-site for workers and subcontractors.

6. Infrastructure Variation Order Integrity Control

- Establish review criteria for variations to ensure:
    - Legitimate technical or scope-based need
    - Proper approvals
    - Documented cost impact analysis
- Flag variation patterns suggestive of "scope creep" or backdoor procurement.

7. Integrity of Infrastructure Project Documentation and Record-Keeping

- Monitor document management practices.
- Check for missing, post-dated, or manipulated documentation.
- Promote secure, time-stamped digital records for audit readiness.

8. Compliance with Infrastructure Anti-Corruption Clauses

- Track contractor compliance with contractual anti-corruption, audit, and reporting clauses.
- Monitor contractor and consultant reporting on potential corruption incidents.
- Recommend corrective actions in cases of breach or non-reporting.

9. Infrastructure Integrity Risk Register

- Maintain a live register of construction-phase corruption risks.
- Update risks related to payment processes, supply chains, labour, and supervision.
- Recommend mitigations and escalation where red flags persist.

10. Infrastructure Reporting and Final Stage Integrity Assurance

- Prepare regular progress reports highlighting integrity issues, actions taken, and results achieved.
- Submit a final Stage 5 Integrity Compliance Report summarising the ethical performance of the construction phase and recommendations for project closeout.

Optional Services:

- Training for site staff and contract administrators on corruption red flags.
- Live monitoring of high-value progress payment milestones.
- Confidential feedback sessions with subcontractors and workers.
- Participation in site progress and contract review meetings from an integrity assurance role.

Deliverables:

1. Infrastructure Mobilisation Integrity Compliance Checklist.
2. Infrastructure Contract Administration Integrity Oversight Protocol.
3. Monthly Infrastructure Integrity Monitoring Report.
4. Infrastructure Claims and Payments Integrity Review Notes.
5. Infrastructure Variation Order Risk Assessment Register.
6. Infrastructure whistleblower platform.
7. Subcontractor and Supplier Integrity Screening Reports.
8. Site Visit Infrastructure Integrity Observation Logs.
9. Infrastructure Project Documentation Audit Checklist.
10. Updated Construction-Phase Corruption Risk Register.
11. Infrastructure Integrity Compliance Report.

Stage 6: Infrastructure Project Closeout

Definition: The process of managing and administering the project closeout, including preparation and co-ordination of the necessary documentation to facilitate the effective operation of the project.

Objective: To provide oversight and anti-corruption assurance throughout the project closeout phase, ensuring that all closeout activities are conducted transparently, all necessary documentation is complete and authentic, and risks of fraud, misrepresentation, or withholding of critical information are mitigated—thereby enabling smooth and effective operational handover.

Services:

1. Infrastructure Closeout Process Integrity Oversight
    - Monitor and verify all closeout activities to ensure compliance with contractual and regulatory requirements.
    - Assess whether all parties are acting in good faith, without manipulation or concealment of defects, incomplete works, or contractual obligations.
2. Review and Verification of Infrastructure Closeout Documentation

- Evaluate the completeness and authenticity of all required closeout documents, including:
    - As-built drawings and technical documentation
    - Operation & maintenance manuals
    - Test and commissioning reports
    - Warranty certificates and defect liability documentation
    - Compliance and certification documents
- Identify and flag any inconsistencies, missing elements, or suspicious alterations.

3. Infrastructure Defects and Snag List Integrity Management

- Oversee the compilation, verification, and resolution of defect and snag lists.
- Ensure defect rectifications are properly recorded, time-bound, and resolved without artificial delays or omissions.
- Verify that warranties and guarantees are properly documented and enforceable.

4. Infrastructure Financial Closeout Assurance

- Review final payment requests, retention releases, and bond releases for legitimacy and compliance.
- Scrutinise final cost reconciliations and variations for inflated claims or irregularities.
- Ensure that all financial closeout documentation aligns with actual project delivery.

5. Infrastructure Project Handover and Transition Oversight

- Monitor the formal handover process, ensuring clear, transparent transfer of assets, documentation, and operational responsibilities.
- Confirm that handover certificates and acceptance documents are complete, accurate, and fairly executed.
- Facilitate stakeholder communication to avoid disputes or withholding of critical operational information.

6. Infrastructure Archiving and Record Keeping Integrity

- Ensure secure, tamper-proof archiving of all project records to maintain auditability and future accountability.
- Recommend and assist with digital archiving solutions that preserve document authenticity and accessibility.

7. Final Infrastructure Anti-Corruption Reporting and Recommendations

- Compile a comprehensive final integrity report summarising oversight activities, findings, and corrective actions taken during closeout.
- Provide lessons learned and recommendations to strengthen anti-corruption measures in future projects and operational phases.

8. Optional Support for Post-Closeout Monitoring

- Advise on mechanisms for ongoing integrity monitoring during warranty and defects liability periods.
- Support establishment of whistleblower channels and complaint mechanisms for operational phases.

Deliverables:

1. Infrastructure Closeout Integrity Compliance Checklist.
2. Infrastructure Defects and Snag List Verification Report.
3. Infrastructure Closeout Documentation Review Memo.
4. Infrastructure Financial Closeout Integrity Assessment.
5. Infrastructure Project Handover and Acceptance Oversight Report.
6. Infrastructure Project Records and Archiving Audit Report.
7. Final Infrastructure Anti-Corruption Compliance Report.