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STEVEN SAMPSON

The Dark Side of Policy

The Case of the Anti-corruption Industry

Abstract

Anthropologists of policy have tended to highlight the grand organizational initiatives that are quantitative, standardized and bureaucratic. This article proposes to understand these processes using the term «industry» (as in «development industry» or «human rights industry»). Used here, «industry» is not a pejorative but a collection of features, the opposite of which could be called «craft» (local, qualitative, improvisational, etc.). This article describes the emergence of the anti-corruption industry, based on an ideology of anti-corruptionism and the agendas and unintended consequences embedded in the anti-corruption project. Anthropologists of policy can benefit by identifying those features of social problem solving that lead to an industry-style policies.

Keywords: Policy, Corruption, Anti-corruption, Anti-Corruptionism, Compliance.

Introduction: Everywhere and Nowhere

Policy is everywhere. In international development schemes, in state education laws, in health interventions, in NGO staff procedures, and in private firms trying to prevent employee misconduct. Everywhere we look, someone is trying to formulate, promote, refine, implement, monitor, assess, improve or protest some kind of organized solution to a problem, some kind of guideline for the proper conduct, some kind of policy. Anthropologists can now study the policy process as a special form of discourse and organizational power. We can observe how poli-

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cies are formulated, how they are crafted, how they are revised and implemented, where they «travel», whose agendas they serve, and the impact they have. We can study who decides to turn a social problem into a policy imitative, which policy is aimed at which target group, the tools and incentives deployed, and we can assess whether the outcomes are beneficial, negative or simply irrelevant. When we observe distorted or contested policies, we can draw conclusions about the nature of power and power-wielding, now labeled «governance», and about the ways we are compelled to follow certain policies. We can also study how well-intentioned bureaucracies execute policies for groups viewed as «problematic» or «vulnerable», and what happens when these target groups remain «resistant to change». In other words, policies provide a site for understanding structure and agency, including the kind of agency we now call «contestation». There is plenty for anthropologists to do in the policy field. Little wonder that the Interest Group for the Anthropology of Policy now has hundreds of members and that anthropological careers are now tied to studying policies or attaching oneself to a policy organ or program of some kind. In fact, our research is now supposed to be relevant to some kind of policy, typically migration, health, environment/climate, housing, minority rights, or social inclusion. This is the positive side of the rise of policy for anthropologists.

But there are some obstacles facing policy anthropology as well. The policy domain can be so overwhelming that it becomes diffuse. The policy rhetoric and policy interventions can become so dominant, the web of connections so complex, the nodes so convoluted, the networks and Deleuzian «rhizomes» so intertwined, that we do not know where to start or where we are. The policy process and policy realm seem to have no end. Top-down, in and out, studying up and studying through, studying elites and target groups, actors and networks, nodes and barriers, advocacy and resistance, formulation and implementation, policy and politics, all these processes lead us to experience policy as some kind of water that we swim in. How do we come up for air? How might we imagine a world without policy? Are there any policy-free enclaves left to study? This is the difficult part of policy anthropology, and every anthropologist I know experiences it at one time or another. We hear policy anthropologists complaining that they cannot obtain access to essential data. And five minutes later, they complain that there is simply too much. We cannot get access today, we become too involved tomorrow. What to do?

We are supposed to use our theoretical tools, our conceptual paradigms, and our juicy case studies to reveal the inner workings of a policy process. This task is complicated for several reasons: policy interventions emanate from different starting points (social movements, media outrage, government programs, elite projects, authoritarian regime pressure, etc.). The key actors (or the ones that we can identify) have different agendas, and we may not have access to all of them. Policy domains can overlap, e.g. policies of border control, immigration, asylum and integration of new migrants. Where does one policy stop and another start?

These complications are present in all policy spheres and certainly in those which anthropologists investigate, such as development, environmental protection, migration, health, ethnicity, indigenous rights, gender and social equality. These same complications also arise in the policy complex that I will discuss here: anti-corruption policy (based on my previous research on anti-corruption, including national anti-corruption programs in the Balkans, and with various branches of Transparency International).

Here I wish to propose a possible means of simplifying our effort to understand policy. The solution I propose is to consider certain policy processes in terms of the metaphor of «industry» (as in «the development industry»). In brief, the term «industry» denotes organizational initiatives that are quantitative, standardized and bureaucratic. As used here, however, the word «industry» is not some kind of cynical pejorative. Rather, it is an analytical instrument with discernible content that can be used to elucidate certain policy practices having specific characteristics. As such, not all policies are industries, but many of them are taking on the characteristics that I will outline as «industry». As an example of this approach, I will focus on the «anti-corruption industry». The anti-corruption industry is based on an ideology, or a discourse if you will, that I call «anti-corruptionism». My goal is to show what happens when certain problems and the efforts to solve them, i.e. policies, evolve into industries. Industry, therefore, is at the endpoint of a continuum of how societies determine and solve social problems (the ultimate end points being perhaps Stalin's collectivization of Soviet agriculture or Hitler's «Final Solution»). Because the «industry» aspects of policy lie on a continuum, this means that anthropologists of policy need to deal with certain policy processes which have more direct problem-solving practices, often community-based and improvisational, while others which increasingly take on the characteristics of an industry.

I therefore begin by describing the basic characteristics of an industry, and how it embeds itself into various policy processes from formulation to execution. I then show how one particular complex of problems, the problem of corruption, has been essentially transformed into a veritable anti-corruption industry, such that various grass-roots anti-corruption movements have been subsumed or marginalized from it. I then describe the elements of this anti-corruption industrial complex, how they arose and how they appear today. In particular, I emphasize that anti-corruption policy is in fact a myriad of distinct policies with their own ideological roots, agendas and resources. Finally, I make some suggestions as to how and why an «industry» perspective might help us understand why we should study not just policy but the many policies embedded in an ostensible policy domain. In particular, we need to justify why exactly we should use a policy perspective to study political interventions.

Again, not all policies automatically evolve into bureaucratic, standardized industries. Organizational measures to alleviate a problem, set goals, focus on a

target group, mobilize resources and achieve objectives can certainly be carried out without the process becoming a harsh bureaucratic, standardized procedure. A nuanced perspective on the problem, the active involvement of the target groups and the effective channeling of resources can all serve to make the desired changes without alienating the citizens or wasting funds. Not every policy fails, and not every policy becomes an industry. However, a number of policies in many domains have begun to take on industrial-style characteristics: they operate with over generalized or vague classifications, they misread the problem they are trying to solve, they fail to communicate with or even understand their target population, they expend funds and labour resources without sufficient monitoring, and they begin to focus on their own organization's priorities rather than the needs of the target group. Such policies take on a life of their own, and it is these kinds of policies and execution that turns them into what I call industries. Industries, then, are the dark side of policy. This will become clearer when we examine the rise of the anti-corruption industry below.

The Nature of Anti-Corruption and the Anti-Corruption Industry

Anti-corruption is an artificial term. It brings us all together against something, this something being called «corruption». While there are many definitions and delineations of «corruption», I have never seen a definition of «anti-corruption». The word is simply out there, naturalized. Anti-corruption has parallels with other «anti-» movements, such as «anti-racism», «anti-communism» or «anti-fascism», and like these movements, it brings together diverse sets of actors under a large tent.

Over the last three decades, the fight against corruption has become more prominent on the global agenda. This struggle, which advocates tend to call a «movement», has been promoted, sponsored and implemented by five sets of actors: 1) national states, 2) international organizations, 3) private firms, 4) social movements, and 5) elite advocacy organizations which often call themselves «civil society» (the term «civil society» is often used to include both social movements and advocacy organizations, but here I will keep them separate). These many points of origin are not unique to anti-corruption. Many global policies, sometimes called «transnational advocacy networks» (TANs, see Keck and Sikkink 1998) have several points of origin, such that the task of sorting out where the policy actually comes from can be fruitless. This point is emphasized by Shore and Wright in their introductory essay to *Policy Worlds*, and by Wright and Reinhold in the same volume (2011). Policy can come from top down, from the bottom up, from inside out, from local scandal or from the agenda of international organizations egged on by activist organizations or a local humanitarian tragedy. In the end, policy is just out there, like «human rights» or «climate change amelioration» or

«counter-terrorism», to name a few of these grand policy projects. The policy does not «belong» to any single actor, and at best, we can talk about various actors and agendas who exploit a policy scheme to achieve more long-term ends. Anti-corruption is certainly one of these: a specific policy goal is intended to create a more long-term vision of «a world without corruption».

These kinds of grand projects have two characteristics worth noting. First, they do not crystallize into a single, coherent policy but many. To study, say, «migration policy» or «human rights policy» or «anti-corruption policy» is therefore a misnomer. There is a diversity of policies, projects and agendas, some of which harmonize with each other, while others overlap or are in direct contradiction. The second characteristic of these grand projects is their tendency to develop into what I call «industries» with specific industrial style characteristics (to be described below). I will therefore use these two premises, the diversity of policies and the emergence of «industry» and apply them to the case of fighting corruption.

My goal, then, is to use the rise of the anti-corruption industry as a case study of a policy that seems to be «everywhere, all at once». Because when something is everywhere all at once, we don't know if it is difficult to grasp… or if it is grasping us. Or both. To do this, I will try to trace the rise of the global anti-corruption regime and the key actors involved. These actors range from political activists in Africa and Latin America, to World Bank experts bemoaning misused foreign aid, to the major accounting firms seeking to help global companies avoid violating anti-corruption laws, to national governments embarrassed by oil and arms trade scandals. Each of these actors – international, national, local, social, business, etc. – has had various resources at their disposal; some can mobilize public opinion, others can formulate statements of intent, donor organizations can donate money and impose conditions on grants or loans, states can draft laws and regulations, and still other actors can turn anti-corruption consulting and training into a profitable business sideline. These actors are not all equally powerful; some are capable of excluding or marginalizing others from the policy-making process or from implementation. In a typical case, certain «civil society» organizations are «consulted» in forming the policy, but then not allowed to attend governmental meetings, help draft legislation or even monitor progress. In the anti-corruption field, the major actors, each with their own goals, craft a utopian vision of a «world without corruption» and seek to project how such a world could be made. This is the landscape of anti-corruptionism which I will describe here.

In outlining an anti-corruption «industry», I will not dwell on whether there is a more apt metaphor for the anti-corruption activities described here. Metaphors such as «anti-corruption regime», «package», «landscape», «site» and «assemblage» are all useful as a shorthand for describing complex social processes (various labels are used by Sampson 2008, 2010, 2015). The task is both to simplify and to preserve the very sloppiness of policy processes. We want to avoid trying to cover it up with neat models or juicy metaphors about agency or process, as if a regulatory system were a person, as if an action were conducted by some kind

of nebulous «actant», as if the wide range of local responses – resistance, refusal, avoidance or sabotage – could fall under the nebulous rubric of «contestation». There is more going on, and I think that looking for signs of «industry» may be useful as an organizing framework.

Industry *versus* Craft

An industry takes form following some kind of public scandal or recognized dilemma[1]. This leads to a call in the public or the political regime to «do something about…». We soon observe experts promoting certain kinds of solutions, with the usual discussion by politicians as to which are the most important target groups (in the corruption field, it is whether to go after the bribe givers or bribe takers). The campaign to «do something» takes the form of declarations of intent, establishment of new budget lines, ambitious programs, projects, policies and laws. An industry develops its own standardized set of terms, led by an emerging group of experts accompanied by approved research and evaluation methods, statistics and metrics (the Transparency International Corruption Perceptions Index is one such measure). The cadre of experts develop their own international forums and projects to gather data for decision-makers, make assessments, and to then formulate, implement and possibly criticize policies, all while working within its paradigm. These experts have various, often overlapping affiliations: working with government bureaus, NGOs, think tanks, and universities at the same time. At a mature stage, an industry also has its own training regime, certification procedures to ensure adequate expertise, and some sort of standardization to ensure that X organization is carrying out the recommended Y procedures using the most effective Z methods. An assessment and evaluation regime develops. Finally, the mark of a mature industry is that a critical minority emerges who promote a «critique» of the policy. However, this critical group, articulate as they are at various forums, rarely have much essential influence (those familiar with subgroups of «critical trafficking studies», «critical migration studies» and «critical refugee studies» will note the lack of influence beyond academia and fringe politics). Summarizing these features, an industry is professionalized, standardized, routinized, report-oriented, evidence-obsessed, and, most importantly, a reference point for the authorities.

It is no accident that when a global «problem» becomes an industry in which all major actors must be mobilized, the process will tend to be Anglophone, Occidental, quantitative, insular, power-oriented and unabashedly elitist. For all their inclusive features, the industry features of a policy will also tend to exclude local, non-Western, qualitatively-based actors who do not have the power or networks

[1] For an earlier list of industry characteristics see Sampson (2010).

to make themselves heard. In this sense, an industry is «hegemonic» over more locally based, specific projects which might address the same problem.

Industries have ideological components. They construct «models of» and «models for» solving problems, achieving set goals and projecting an envisioned future. The migration management industry, the development industry, the human rights industry, the climate change amelioration industry etc. all contain ideological constructs about what is desirable and undesirable, about what is urgent, about what is achievable for the short and long term, about who are our allies and who are our opponents, about who should be the most vulnerable target group and what methods should be used. Industry, despite all its emphasis on evidence, numbers, standards, and procedures, is ideological.

To clarify the concept of industry used here, we might compare it with its opposite: the opposite of an industry is an activity which is local, oral, improvisational, contextual and nonhierarchical. In this sense, we might call it «craft». Industry is the opposite of craft. Global policies implemented by major international actors are part of «industry», not craft. Local social movements, movements that may reach the media when repressed but which do not evolve into institutions, are «craft». Many specialists working in an «industry» suffer from «craft nostalgia»; they may themselves have been local activists. Nevertheless, it is rare that those in the craft sphere achieve influence within an industry. If not coopted, they are often without (or denied) the recognized skills, techniques, networks, cash or political clout. They speak at the opening ceremony, they might be «content» in a text box of a report, but they do not help form the final document. The craft representatives somehow do not make it to the standing committee or the decision-making board. This is what I mean by the difference between craft and industry.

In this vein, I want to use the story of the anti-corruption industry to argue that anthropologists of policy need to figure out the limits of what we study when certain policies suddenly seem to dominate the scene, especially policies that take on industry characteristics. Here the story of corruption fighting is instructive. Let me therefore use the rest of this paper to tell the story of how anti-corruption became an industry, and how the ideology of what I call anti-corruptionism crystallized in the early decades of the twenty-first century.

Defining Corruption and Anti-Corruption

Corruption has had two major definitions. One of them, from the ancient regimes, sees corruption as the putrefaction or collapse of the social and political order. This understanding is often used in more grand narratives of collapse, but it is rather marginal (Buchan and Hill 2014). The other, more limited definition, defined corruption as the abuse of public authority for personal gain. It was this latter definition which became the basis for the anti-corruption industry that

arose in the early Nineties. As such, corruption was generally associated with dishonest bureaucrats and politicians, and their ability to use their position to extract private benefits in the form of bribes, political power or to reward relatives and clients. Corrupt acts such as bribery, extortion, kickbacks, political tampering, clientelism or nepotism, were all embedded in an informal economy. Corruption in its petty form was an element of the everyday survival of citizens (as a supplement to inadequate incomes). It was fed by the collusion between politicians and organized crime. Corruption was bad because it violated norms of honesty, transparency and accountability, features associated with modernization and efficient welfare states (Bukovansky 2002, 2006). Corrupt practices led to corrupt societies and corrupt states. Moreover, corruption was also polluting, in the sense that it conflated the two ostensibly separate categories central to modernization: the sphere of the private subject and that of the public office holder. This intermingling of spheres was typified by the bureaucrat who hired his family members or awarded a construction contract to a fellow Lodge or clan member. Complaints about corruption of this kind are not new, and even in the ancient world there were protests about the abuse of power (Hill 2013; Buchan and Hill 2014). Nevertheless, the modern understanding and global initiatives to «fight corruption» are only a few decades old. Today, the definition of corruption has been extended beyond the venal public official. Corruption can include violations of all kinds of public trust, in government, in voluntary organizations or in the boardrooms of private firms. Enlarging on the definition popularized by Transparency International, corruption is now discussed as the «abuse of entrusted power», wherever that trust is located (public, private, voluntary sector). Corruption is the perversion of trust.

Corruption researchers have operated with various typologies of corruption: grand corruption versus petty, political versus economic corruption, and one of the newer terms, something called «state capture» when private actors, rather than violating laws when implemented, seek to influence the very enactment of these laws to their benefit (when state capture of this kind is legal and recognized, we call it lobbying) (Hellman *et al.* 2000; Fiebelkorn 2019). Since all policies, and what I call «industries» begin with classifications, the Nineties is an era of many typologies of corruption, including corrupt sectors (typically oil and military) and corrupt countries (exemplified by Transparency International's Corruption Perceptions Index which ranks countries), and corrupt practices (political/grand/petty).

An early justification for tolerating corruption, especially in the developing world, was that it was simply a form of traditional gift giving and that it could serve positive functions of redistributing income. Today this kind of rationalization is discredited. Where gifts tend to be public, non-monetary and ceremonial, the corrupt gift tends to be private, cash-based, and secret, with money often diverted to expensive luxury items, property, or the off-shore bank account. There is nothing «cultural» about it, as anti-corruption activists in Africa or Latin America remind us.

Anti-Corruption as an Industry

To talk about an anti-corruption industry, then, is to describe the institutional investments made in trying to solve «the problem of corruption». Even though everyone is against corruption, defining the problem of corruption is not always straightforward. Some scholars saw corruption as a necessity for development, as a kind of lubrication mechanism for a stiff bureaucracy. There has also been discussion of whether corruption was a cause of Third World poverty or the consequences, or both, an observation made in Transparency International's (1993) founding statement, subtitled «Major Cause of Poverty». Accusations about the source of corrupt practices have oscillated between blaming the bribe givers, i.e., the Western firms and their unceasing search for profits, versus the developing states with their weak bureaucracies and nepotistic practices (Katzarova 2019). These controversies had a Global North/Global South axis. Following the Enron scandal, however, corruption was viewed as a much larger problem than that of abuse of public authority. Sloppy or bad management, or simply fraud, was now redefined as a corruption problem. Corruption was now an abuse of power. With corruption now being the «abuse of entrusted authority», it could occur in any organization, be it a government department, a private company board of directors, or a non-governmental organization. As the concept of corruption expanded, so has the anti-corruption industry (again, this is hardly surprising if one thinks how similar concepts such as «human rights», «citizenship» and even «violence» have expanded (some would say deluted) to include all kinds of threats to and abuses of human dignity.

Since the mid-Nineties, and especially in this second decade of the Twenty-first century, ever more organizations and institutions have invested increasing resources into elevating corruption as a priority, as something to be combatted, reduced and prevented. But fighting corruption was not always at the top of everyone's list of achieving progress. Experts often ignored corruption as a necessary evil or a stubborn cultural phenomenon. Others saw corruption as too politically sensitive. In a 1995 World Bank paper, corruption was known as «the C word» (World Bank 1995). In the U.S., the Foreign Corrupt Practices Act (FCPA) had been passed in 1977 in the wake of a defense contract scandal, but the act was hardly ever enforced. It was only in the mid-Nineties that corruption began to be considered the kind of problem that required a global, institutional solution[2].

The corruption problem arose in two global arenas: that of global trade, especially after the opening up of the Soviet bloc since 1989, and that of foreign development assistance, in which development was increasingly contracted and outsourced to private consulting firms or NGOs to fulfill demands for neoliberal

[2] According to Tanzi (1998), the «Financial Times» cited the year 1995 as «the year of corruption», while another commentary that same year talks of «the corruption eruption» (Naim 1995).

efficiency[3]. Two themes recur in this narrative about how corruption became an issue of global concern. One is unfair competition among private firms seeking to gain contracts on the global market. As more countries opened up to world trade, the competition to obtain oil concessions, military sales, telecom construction contracts or pharmaceutical supply led to firms bribing foreign officials to obtain the contract. The actual payments for these contracts originated not in the recipient country itself, but with loans or grants from Western donors such as the World Bank, IMF or national development agencies, while the local national ministries organized the bidding. This process gave unfair advantage to those firms who could bribe these officials to obtain the contracts, with the bribes often disguised as «facilitation payments» and payment transferred through intermediaries and offshore accounts. American firms, however, were forbidden to deduct bribes from their business expenses, unlike firms in many other countries. The Americans sought a level playing field, and under US pressure, the OECD enacted the Anti-Bribery Convention in 1997, one of the few times when the US has actually led the way in regulating the free market. Firms who gave bribes, having obtained unfair advantage, were to be sanctioned, embarrassed, penalized or blacklisted. However, enforcement of the OECD Anti-Bribery Convention remained lax, not all countries were members, and the OECD was not a legal enforcement body.

The second impetus for an anti-corruption initiative came from the sphere of development assistance. Local aid activists, government officials and frustrated World Bank and development experts all criticized the waste of foreign development aid, especially in the former colonies of Africa or the Middle East. Here the guilty parties were both the foreign firms, the bribe giver, as well as local elites in newly independent states (the bribe-taker) who pocketed aid funds as facilitation payments, setting up their own private bank accounts, enriching themselves and their families. The operative word here was kleptocracy, and the wave of democracy and free press led to the publicizing of corruption scandals in many aid-receiving countries. Since many development projects involved payments from international and national development agencies to Western consulting firms who implemented projects, there was a vicious circle of money from the World Bank and other aid donors given to state ministries followed by contracts being awarded to foreign companies under dubious bidding procedures run by dishonest bureaucrats. Typically, the building of a dam, the concession of a port operation or supplying pharmaceuticals to a hospital system could be part of such bidding manipulation. The development aid specialists also noticed the extensive petty corruption among low-level officials in developing countries. Poorly paid, lower-ranking officials (police, customs officers, contract officers) used their positions to collect speed payments, to look the other way, or collect what amounts to rent, simply imitating the high officials on a smaller scale. In

[3] See Tanzi (1998) for more description of why anti-corruption becomes «hot».

the view of experts, economic aid was not enough. Stronger regulation, based on rule of law and good governance, was what was needed.

The failure of so many development projects, blamed on corrupt officials and poor governance, was highlighted by Peter Eigen, who had worked for the World Bank in East Africa. Eigen and his colleagues founded the NGO Transparency International (TI) in 1993 together with Frank Vogl, a former journalist of the *Financial Times* and numerous development consultants, among them Jeremy Pope, former general counsel of the Commonwealth Secretariat; Fritz Heimann, general counsel for General Electric; Hansjörg Elshorst of the German GTZ aid agency; the Argentine anti-corruption prosecutor Luis Moreno Ocampo; and British development economist Lawrence Cockcroft (Transparency International 1993). The informal founding meeting of TI took place at a London conference center owned by the accounting firm of Lyman and Coopers, later known as PWC[4]. Eigen was adamant that TI would not be a protest organization or a mass movement. With his economist training and World Bank roots, TI would try to work with the major actors such as the Bank, the OECD, the UN and Western donors to bring anti-corruption onto the global policy agenda. Up to this point, criticizing recipient countries for corruption had been taboo in the Bank. Forbidden to use «the C word», the Bank could not impose political conditions on loaner countries. Eigen's project was to get the Bank on board, and he succeeded[5]. The «embrace» was proclaimed in 1996 with the speech by World Bank President and former investment banker James Wolfensohn, who criticized what he called «the cancer of corruption». If there is a defining moment when the anti-corruption industry is born, it is surely Wolfensohn's «cancer of corruption speech».

Corruption and corruption control was now connected to World Bank loans and to a much broader «governance» agenda based on rule of law, transparency and democratic participation. Political conditions, including proof of anti-corruption prevention and enforcement measures, were imposed on loans and aid packages. Aid agencies began to establish governance indices and «corruption risk» profiles. Typical for such audit regimes, for example, was to measure how many permits or days were needed to import a container into, say, Nigeria, as compared to Singapore. Each such bureaucratic hurdle was considered a moment in which bribery or extortion could occur. These kinds of risks also entailed a solution: eliminating cumbersome steps, streamlining processes, automating permissions or establishing open bidding. The late Nineties saw the earliest anti-corruption «strategies» and the celebrated success stories of anti-corruption in

[4] Subsequent formal meetings were held in The Hague and with the launching in Berlin, with none other than World Bank President Robert McNamara in attendance; see Eigen (2003) and Vogl (2012) for insiders' accounts, and Transparency International (1993).

[5] Eigen's 2003 book has a chapter entitled «Winning over the World Bank», while Vogl's (2012) account is entitled «Finally, Officials Embrace Anticorruption».

Hong Kong, Singapore and Queensland, Australia. Jeremy Pope and Michael Wiehen of Transparency International proposed establishing an «islands of integrity» approach, whereby a specific department within a government makes a commitment to be «clean». In another example, the «integrity pact» emerges as an exemplary strategy in which a private entity, typically a contractor or a semi-private body like an airport, promises to be non-corrupt in its relations with a government body. Anti-corruption «projects» emerge, many based on «awareness raising» about the problem of corruption, advocating transparency, publishing open contracting data, opening up public bidding processes and monitoring potential kickbacks or backroom deals. The need to detect, fight and prevent corruption spawned an entire gamut of anti-corruption training courses, where officials learn the latest definitions, concepts, and techniques for detecting and fighting corruption, largely in the public sector, but especially in the domain of procurement and contracting, as government services are pushed by donors to become more privatized.

With the scandals of corruption and the neoliberal ethos of government imitating private sector efficiency, the World Bank ratcheted up governance and transparency requirements into their loans. Countries seeking to borrow now had to demonstrate their commitment to good governance by establishing anti-corruption agencies, passing of anti-corruption laws, compelling officials to reveal personal assets or conflicts of interest, enforcing blind bidding for contracts, and giving anti-corruption training to public officials. The «good governance» emphasis at the Bank also led to audit regimes such as the Bank's own Governance Matters dataset. One of the indices in this dataset, called «Control of Corruption», estimates the national government's commitment and capacity for corruption control. One of the variables within the «control of corruption» data was called «state capture», defined as the ability of private actors to illicitly influence laws (as judged by local or foreign «experts»). More corruption was said to take place in high-capture societies. Private firms also jumped into this ratings exercise, ranking countries and sectors on ease of transactions, number of days a container needed to clear customs, or numbers of permits needed to import or export goods. Transparency International's Corruption Perceptions Index (CPI) was used as a naming and shaming device which ranked countries by their level of perceived corruption (Nigeria, and Indonesia being invariably among the most corrupt, with their combination of oil, military rule, and authoritarianism). Today the bottom rung of the CPI is held by the world's failed or war-torn states: Afghanistan, Kosovo, Somalia, Sudan, Myanmar, Kazakhstan, etc. Realizing that bribery was a two-way street, TI also commissioned a Bribe Payers Index and other various corruption surveys, where people were asked whether they have paid a bribe for certain public sector services in the past year.

Backed by the Bank and various Western donor agencies, the anti-corruption industry became a pedagogical project as well. TI, other newly started anti-cor-

ruption NGOs and various private firms took on tasks of training, participated in anti-corruption monitoring, and advocated for more openness and whistleblowing in public administration and in international business transactions.

In the evolution of the anti-corruption industry, the discussion of who was at fault oscillated between blaming the bribe givers or the bribe takers. Should anti-corruption focus on identifying and sanctioning the greedy companies trying to get contracts? Or should it focus on the venal bureaucrats and ministers in various developingcountries who were enriching themselves at the expense of their own citizens? The bribe givers (international corporations seeking contracts or sales) insisted that they had no choice. Bribery was a means of doing business, everyone else was doing it, and they could and did deduct bribes as business expenses. Activist organizations insisted that companies and aid agencies needed to develop ethical policies dealing with «facilitation payments», inflated fees and various «representation» expenses that included luxury perks and trips for cooperating bureaucrats and their families. The nexus of corruption was a complicated affair bringing together Western firms, national politicians, local officials, international financial institutions, and various middlemen who facilitated the legal and financial hurdles, manipulated laws (state capture) and moved funds offshore. In the meantime, numerous scandals emerged in which leaders and officials from aid-receiving countries were found to have massive foreign accounts or real estate holdings in France, New York or California.

Along with the Bank's commitment to good governance and anti-corruption, TI and certain European countries had advocated for anti-corruption conventions and other enforcement measures. The most important of these was the OECD convention, promoted by US president Al Gore, followed by various regional conventions against corruption, and associated monitoring and inspection organs such as the Council of Europe's Group of States against Corruption (GRECO). After years of lobbying, the stage was set for a UN convention against corruption, which entered into force in 2005. These regulatory instruments (which, not being national laws, are difficult to enforce) are now supplemented by various monitoring and inspection instruments. Periodically, the participating states and non-government organs meet in the Conference of State Parties (COSP) to assess progress in fulifilling the UN Convention and assess evidence of fulfillment. Not only do most developing countries now have their own anti-corruption agencies, the EU also has its own anti-corruption office, called OLAF, as does the Bank and the IMF. In the aid field, the World Bank now has a debarment system in which contractors convicted of corruption are denied Bank development contracts for a number of years. Every major Western aid agency has its own anti-corruption monitoring unit to ensure that their funds are disbursed properly. Besides corruption fighting, training officials in anti-corruption law, best practice and monitoring are now themselves major enterprises, with academies and NGOs training government officials and civil

servants from around the world. The International Anti-Corruption Academy in Austriais but one such example[6].

Getting the Private Sector on Board

Up to now, the anti-corruption industry had revolved around government agencies and aid. The next task was to get the private sector on board, since there was still a conflict between the bribe givers (who complained of being victimized) and the bribe takers in the developing countries, as well as their many middlemen among donor officers, lawyers, experts and financial service operators. Even in the low corrupt countries of Scandinavia, there were continuing scandals with Norwegian oil and Danish shipping companies violating the oil embargo in Iraq and telecom scandals by the Swedish Telia and Norwegian Telenor.

The first instrument developed by the UN was the Global Compact, in which private firms would sign on to a set of «principles» promising that they would act more socially responsible in their operations. Promoted in 2000 by UN General Secretary Kofi Annan, the Global Compact asked businesses to declare their support for ensuring human rights, fair employment policies, and environmental protection. In 2007 a tenth principle was added: «Businesses should work against corruption in all its forms, including extortion and bribery». Firms who signed on to the Global Compact could thus obtain some positive branding. Hundreds of firms did just that, but there was little monitoring to ensure that they actually adhered to the principles.

With new anti-bribery laws, especially the comprehensive 2010 British anti-corruption law known as the UK Bribery Act (UKBA), firms needed additional guidelines on how to avoid being accused of corruption. The training in the UK law has been partly carried out by TI's UK branch, which effectively became a consulting firm. Under the UKBA, a foreign company that had any kind of business in Britain, even a transfer bank account, could be prosecuted and penalized under the law for corrupt practices commited outside Britain. The most important provision of the UKBA is the stipulation that firms caught in a corrupt act can avoid prosecution if they can demonstrate that they have taken «adequate procedures» against corruption, including anti-corruption and ethics training, whistleblowing provisions and other preventive measures. Businesses that demonstrated adequate procedures and which cooperated in any corruption investigation (conducted by the UK Serious Fraud Office) would be rewarded with reduced penalties and their CEOs could avoid prison.

In the U.S., anti-corruptionism also penetrated the private sector. The American FCPA began to be more vigorously applied, and an entire system of «corporate compliance» began to take shape. The US Department of Justice, in an effort to

[6] See https://www.iaca.int.

establish sentencing guidelines for organizations convicted of crimes, began in 1991 to demand a «culture of compliance» (United States Sentencing Commission 2022). Under these arrangements, companies that admitted organizational breaches of corruption could make a deal with the Securities and Exchange Commission (which investigates financial crimes) and with the US Department of Justice (which investigates bribery) to reduce their fines and keep their CEOs out of jail (Sampson 2016, 2019). Siemens, for example, having been caught in a massive bribery scandal and fined 800 million dollars, was compelled to establish a model compliance program that includes a comprehensive whistleblower system, ethical training in anti-bribery and model transparency of financial transactions. In this understanding, the act of compliance entailed respecting national laws, government regulations, industry standards, and the firm's internal code of conduct. Today, compliance officers in public agencies and public firms meet continually for additional training and networking at various forums. Avoiding the risks of corruption is a major part of this ethics and compliance training.

In addition to this compliance regime, especially after the 2009 financial crisis, new whistleblowing measures were enacted to encourage employees to report corruption. The US Office of the Whistleblower, for example, now provides cash rewards for those who report corruption: up to 30% of the amount. Millions of dollars are paid out yearly to whistleblowers. Firms retaliating against whistleblowers risk especially harsh penalties (Sampson 2019; US Securities and Exchange Commission 2023).

In 2023, the EU now has its own whistleblowing regulations, including compulsory whistleblowing hotlines, and in 2017 the French Sapin II anti-bribery law has set up a national anti-corruption agency and obliges all firms with over 500 employees to have a compliance and anti-corruption program. The explosion of whistleblower risks has led to a whole new branch of law firms that assist firms caught up in a whistleblower complaint.

With these new governmental and EU measures, major firms have little choice but to develop their own corporate anti-corruption and anti-bribery policies. Western Firms operating in China or Central Asia, for example, have formulated guidelines on how to refuse or reject requests by local officials for facilitation payments, assessing whether these restrictions apply only to so-called «foreign officials» or also to foreign subcontracting agents[7]. With increased enforcement of the American FCPA and British UKBA anti-corruption laws, with firms being subjected to hundreds of millions of dollars in fines, and with increased media and social media attention to corporate scandal, firms have found it expedient to establish wide-ranging ethics and compliance programs. Compliance and anti-corruption programs now suddenly make good business sense, at least as an insurance against paying millions in fines and keeping the CEO out of jail. In

[7] The 2020 edition of the US Government's Resource Guide to the FCPA has a chapter entitled «Who Is a Foreign Official»; see US Department of Justice (2020).

the U.S., under flexible arrangements called «non-prosecution agreement» and «deferred prosecution agreement», firms with compliance programs can drastically reduce their fines for corruption or have them eliminated entirely (Garrett 2014; Sampson 2019). The compliance regime, however, has not only compelled firms to act ethically themselves. It is now being extended to their foreign partners and subcontractors, a kind of «compliance creep», as it were. Assisting firms in this effort is the US firm TRACE International[8], which offers vetting of potential subcontractors so firms can be assured that they were working with ethical partners and will not be undermined by the British UKBA «adequate procedures» or American «robust culture of compliance» requirements.

Fighting corruption has now become a global endeavor, and even autocratic regimes such as Zimbabwe or China now have anti-corruption campaigns. For the first time, China even arrested foreign business officials for corruption (the infamous GSK case, see Neate and Monaghan 2013). In the meantime, what Zelikow *et al.* (2020) call «strategic corruption» has become a foreign policy weapon for autocratic regimes. State leaders and opposition politicians can hurl corruption accusations against each other, while even Donald Trump could search out corruption by Biden in his famous telephone call to Ukrainian president Zelensky.

NGO Monitoring and Expansion of the Anti-Corruption Industry

The many laws, conventions, standards and policies cannot stand alone. In order to have an impact, they must be monitored, assessed and if necessary revised or augmented. NGOs jump on this bandwagon by establishing various coalitions. In the world of anti-corruption, the UNCAC coalition of NGOs (driven by TI) attempts to monitor states» compliance with the UN Convention on Anti-corruption. A recently advertised project officer position at the UNCAC office in Vienna pays no less than 28.000 Euro per year[9]. Another advocacy group, the Oslo-based Extractive Industries Transparency Initiative (EITI) founded by Tony Blair in 2002 but with Peter Eigen as board chair, focuses on natural resources management and anti-corruption, and much of its board and programs overlap with those of TI. Finally, there is now a set of industry standards for anti-bribery developed by the International Standards Organization in Geneva, known as the ISO 37001-2016 «Anti-bribery Management System». What remains is for these standards to acquire sanction power and enforcement.

Attached to each of these kinds of policies and organizations are ambitious NGOs in Brussels, Washington, London and, of course, TI in Berlin. Together with their local affiliates in Central Europe or the Global South, they compete

[8] See www.traceinternational.org.

[9] See https://uncaccoalition.org/get-involved/work-with-us/.

for grants and contracts from various donors: aid agencies, foundations, the EU or from European governments interested in reducing corruption or assisting in governance. The anti-corruption industry is thus linked by this triangle of public sector donors, private actors and the NGOs seeking to monitor, activate and «fill gaps».

With the development of the anti-corruption industry, an increasing number of NGOs have begun to market themselves as anti-corruption oriented. «Fighting corruption» moves up the funding ladder, alongside gender equality, environmental protection, social assistance and poverty reduction as a leading item on both the donors aid agenda and NGOs hungry for project funding. Since anti-corruption NGOs are not enforcement organs, many of their projects involve «awareness raising» or encouraging citizens not to bribe or to at least report bribery solicitations by public authorities. For aid donors, fighting corruption becomes a necessary item on the aid budget line for which anti-corruption NGOs can compete. But more NGOs competing for money may also mean some «rotten apples». Hence the need for some kind of certification or quality control regime. TI, for example, now evaluates all its local branches every few years to ensure that they are sincerely committed and have not damaged the brand. As a result, some TI branches, including the US branch, have been «disaccredited»[10]. Inside TI itself, there have been the predictable frictions over relations with donors and the usual organizational power struggles (de Swardt 2021; «Transparency International» in Wikipedia 2023).

One sign of the expansion of an industry (as opposed to a local grass-roots movement) is its extension to include ever more domains of social activity. We might call this «corruption creep» (similar to «mission creep» in the development world). As corruption becomes more diffusely defined to include all kinds of abuse of power, the total amount of corruption «out there», in private industries, government agencies, in all institutions or organizations, has now expanded. Practices linked to what were formerly called an «old boy network», informal contacts, the grey or black economy, political patronage, as informal vetting contractors for a public project, as ordinary fraud, as sloppy management, as ceremonial gifts to a local mayor – all this can now be redefined as corruption, and enter into a donor's anti-corruption budget line. Anti-corruption measures can also be applied inside one's own organization (through codes of conduct), and an anti-corruption ethos can be imposed on aid recipients or third-party contractors. The anti-corruption industry also expands because of the now global scale of corrupt activities. Corrupt practices cross national borders and business sectors: bribery for a local road contract, money laundering in a Cayman Islands account, the luxurious

[10] In anti-corruption as in other such industries, it is hardly surprising to witness the emergence of corrupt or suspiciously corrupt anti-corruption NGOs, with local staff directors having been accused of pocketing grant money for private trips, or taking unsolicited contributions from firms seeking positive publicity, as was the case with the US branch of TI and their ties to the Bechtel Corporation.

villa bought with aid funds in the south of France, arranging for the children of your Chinese partner to study in the UK – all this inflates the problem of corruption and the actors involved, including those charged with detecting, controlling and preventing corruption. Corruption is now a global problem that requires a global policy. The local grass-roots campaign, the «I paid a bribe» in India and other countries for example, the anti-corruption protests in Romania or North Africa, Navalny activists in Russia, these activities add color to the fight against corruption, but they are not any part of the anti-corruption industry as such. It is only those actors with global networks and global reach who can participate and steer this project. The «craft» actors have no place in this scenario. Meanwhile, anti-corruption industry actors are cautious about supporting an outspoken anti-corruption political candidate or party.

Plagiarizing Fassin and Rechtman's «empire of trauma» (2009), what I would call an anti-corruption empire now has a life of its own, with continuing meetings, trainings and guidance protocols that have now diffused to new areas such as corruption in humanitarian aid, corruption and security, corruption in sport, corruption in minerals extraction, corruption in media, and corruption in political campaigns, etc. There seems to be no limit to where corruption can occur, how it can manifest itself and the imperative for corruption to be fought in all manner of ways and to include all so-called «stakeholders». Monitoring corruption, as well as assessing anti-corruption measures, are a means of trying to reinstitute trust. The most prominent concept is that of «corruption risk», which leads to the need for a «corruption risk assessment» tool that enables donors and other organizations to detect ever more vulnerabilities in their activities. Organizations pursuing the global anti-corruption agenda can cultivate vested interests by highlighting corruption risk. Assessing risk requires experts, who use «metrics» to assess and depict corruption risk. The UK branch of TI, for example, provides a variety of such tools in its Global Anti-Bribery Guidance site[11].

Besides global expert groups, the expansion of the anti-corruption industry provides resources for local activist groups to attach themselves to these agendas, pursuing local and universal interests at the same time (Tsing 2011). One notable development has been the use of new digital or cellular technologies to expose corruption, such as the «I paid a bribe» in India or the Romanian bribery maps showing which sectors or regions are most corrupt[12]. TI, under pressure to show that they also oppose corrupt firms, has begun to highlight their Bribe-Payers Index alongside their Corruption Perceptions Index, thus placing greater emphasis on the supply side of corruption.

[11] See https://www.antibriberyguidance.org/guidance/4-risk-assessment.

[12] See http://www.ipaidabribe.com/#gsc.tab=0 and https://www.rri.ro/en_gb/a_map_of_local_corruption_in_Romania_has_been_drawn_up_by_the_clean_romania_coalition-2530009.

Projects *versus* Activism

NGOs play a prominent role in the anti-corruption industry, both the well-connected global organizations such as TI and Global Integrity, as well as various local activist groups. NGOs promote new laws and policies on transparency, raise awareness, reveal private nepotism, and encourage whistleblowing, all laudable activities. The problem with local NGOs, however, is that many of them, besides obtaining grants and carrying out approved projects, may also become politically partisan. They begin to participate in political campaigns, since corruption is not just a World Bank governance issue but a political accusation that is often directed at one's political opponents.

It would be convenient to include in the anti-corruption industry the various social movements against corruption, arising in countries and contexts as diverse as Brazil, Bulgaria, Ukraine (2014) or Romania, all in quite different political conjunctures. Yet these movements have had little impact on the industry as such. They function more as confirmation within the anti-corruptionist ideology for why corruption is bad, and who the corrupt forces and their enablers are (i.e., those who assist corrupt actors or refuse to enforce anti-corruption regulations).

These social movements share an anti-corruptionist ideology with the industry, but they are not part of the anti-corruption industry's «model of» or «model for». Anti-corruption in this social movement sense is far from the kind of Good Governance agenda envisioned by the World Bank in the mid-Nineties with Wolfensohn's «cancer of corruption» speech. Anti-corruption social movements, both those succeed in ousting corrupt leaders and those that fail, have models of social reality that go far beyond NGO projects or public servant training. These anti-corruption activists and their followers are on the streets demonstrating, clashing with police, demanding reform, throwing out their leaders (Ukraine in 2014) or being thrown in jail by autocratic regimes (Navalny in Russia). NGOs such as TI, with funding from international organs, government ministries and corporations, thus find themselves in a dilemma. The line between a genuine movement and an industry is vague and can therefore be manipulated. The goals of those who fight corruption may be the same, but their agendas and methods may differ markedly. The project of the anti-corruption industry is to limit corporate or bureaucratic power, based on a combination of effective regulation and ethical uplift. Anti-corruption movements want to oust their leaders and remake the world, which is why they are often not included in the activities of the anti-corruption industry.

As a result, we observe a dual process in which various institutional actors attempt to steer the anti-corruption discourse – the Bank, the EU, TI, the OECD, the major accounting firms – but where political dynamics generate an anti-corruption activism that transcends these kinds of projects (the Arab Spring and the Ukrainian Maidan revolt of 2014 are two examples). These kinds of anti-corruption movements proceed along their own path, seemingly oblivious

to the various anti-corruption laws, agencies, conventions, declarations, forums, projects and trainings. These social movements are nowhere to be found in the annual meetings of anti-corruption actors (Global Forum and the International Anti-Corruption Conference). They cannot afford, or are not invited to, the various anti-corruption training courses offered to countries receiving aid or seeking to enter the OECD or EU. The expert advisors holding seminars, the revision of the latest anti-corruption laws, the conferences on whistleblowing and retaliation against whistleblowers, and the Master's degree in Anti-corruption offered by the University of Sussex – all these seem to be in a different world from the anti-corruption movements that seem to come out of nowhere.

We observe widespread activism against corruption together with a veritable anti-corruption industry that has now consolidated itself. We can follow the anti-corruption industry developments in various online forums, such as the «FCPA blog», the «FCPA professor», and the Anti-Corruption Activist Network (ACAN). Almost all major law firms have their own anti-corruption updates detailing the latest prosecutions, penalties and legal decisions. Compliance and anti-bribery training for firms and organizations is carried out by training organizations such as the Society for Corporate Compliance and Ethics and the Ethics Resource Institute. Former convicted executives from Enron now make speeches at such conferences. Compliance officers can attend these courses and receive points or credits, eventually becoming a «certified compliance officer»[13].

As described here, the anti-corruption industry could also be called a «regime» or a «policy assemblage» (Savage 2020). What I have described is a particular mode of policy implementation that brings together a wide range of individual actors (activists, officials, consultants, and company compliance officers). It also includes a host of different organizations: international organizations, government agencies, non-profit NGOs, and private firms, as well as various issue-oriented coalitions and consortia. And like other industries, anti-corruption policy implementation is grounded in a set of principles, policies and procedures ranging from a generalized view that corruption is bad to the practical benefit (countries that fight corruption will attract more foreign investment), all with the help of specialists who either measure corruption (the Bribe Payers Index, the State Capture Index), monitor corruption or train people to understand and control corruption. This is anti-corruptionism.

Like other policy implementation processes, actors in the anti-corruption industry endeavor to acquire knowledge, mobilize people, and procure material resources for their project. They conduct campaigns, formulate initiatives, carry out trainings, set up programs, implement projects, hold conferences, pursue policies and decide what is «best practice». In the anti-corruption industry, the declared aim of all this is to enhance «integrity» in public administration and commerce. Integrity can be achieved if there is more transparency, supplemented

[13] For more on corporate compliance see Sampson (2016, 2021).

by enhanced ethical awareness, and where awareness is lacking, more control by state agencies, civil society monitors or firm codes of conduct. There is the ethical command to «do the right thing» and if that fails, the possibility of a «deferred prosecution agreement» with the U.S. Department of Justice or the UK Serious Fraud Office. Policies are established in order to eliminate the grey zones, the areas where trust might be lacking or guidelines unclear. As one compliance officer explained, «good people can do bad things» (Sampson 2021).

A successful industry mobilizes massive resources (money, people, knowledge) with an effective moral mission. In this sense the anti-corruption industry has certainly proved successful. We are left with the proverbial elephant in the room: the question of impact. After all, the goal of all these programs, campaigns, laws and regulations is to «reduce corruption». Yet we continue to hear about one corruption scandal after another, financial (e.g., Panama Papers), business-related and political. Anti-corruption campaigners often insistt that the very fact that these scandals come to light indicates that the global anti-corruption project is working. Measuring the impact of anti-corruption, of course, requires evidence, and evidence requires some kind of baseline. The typical discussion of baseline corruption is now taking place in Ukraine, where the national anti-corruption bureau has recently arrested several officials for bribery and suspicious activities, thus indicating either that corruption is still widespread, or that anti-corruption is working. Or both.

By «both» I mean that there is a possibility that corruption as a practice and the anti-corruption industry coexist in two parallel worlds. Corruption, the abuse of power for private gain, continues, evolving and becoming ever more sophisticated as electronic and crypto funds replaces sacks of cash. Anti-corruptionism, with its ever-expanding domains of intervention, its moral entrepreneurs, policies, programs and declarations, as well as condemnation of corruption and appeals for a better world, also continues. As anthropologists of policy, we need to figure out how these parallel worlds operate.

Conclusion: An Anthropology of Policies?

Anti-corruption policy implementation has taken the form of an «industry». Local, grass-roots movements to protest political oppression and inequality have been marginalized in favor of an institutionalized means of solving a problem using a set of planned interventions, elite coalitions, and various laws, regulations, prescriptions and stipulated procedures on how to do the right thing. Policies are courses of action intended to compel (or nudge) people to act a certain way or to prevent people from acting in a disapproved way. But in order to achieve their goals, policies require some degree of «commitment» or «engagement». Policies are successful only if they can get the key persons, target group or institutional actors «on board» (the compliance industry now offers «onboarding training»).

Getting people «on board» is the hidden work of policy, and the activist NGOs and advocacy organizations, many of which are only marginal to the industry, carry out this work by offering dramatic statistics or extending the corruption problem to include ever more domains of human activity, such as «corruption in sport» or «corruption in humanitarian aid». The anti-corruption industry therefore takes on a life of its own, and this, I submit, is the dark side of policy. Like other industries, its hundreds of specialists are embedded in a myriad of programs, initiatives and institutions, using hundreds of millions of dollars to combat an undesirable social phenomenon which is hard to define, hidden from view, often tolerated, and difficult to measure. Within this framework, they need to mobilize support, raise funds, formulate and implement projects, and show that they are successful in order to repeat the exercise.

For anthropologists of policy, the «industry» concept developed here might be useful for identifying specific kinds of policy practices in the public or private sectors. Not all social problems are reformulated and converted into «industries». Certain problems, however, become institutionalized into the kind of specialization, professionalization, standardization and certification regimes that characterize the anti-corruption industry. The anti-corruption problem, for example, arose only when the dilemmas of EU expansion into Eastern Europe, a newly free media and neoliberal free market aspirations, clashed with the expectation of greater human rights and social dignity in formerly socialist or authoritarian states. With a major policy proclamation by the head of the World Bank, anti-corruption became a platform for moral entrepreneurs as well as a new cause for global development elites. The fact that anti-corruption could be piggy-backed onto various political regimes – post-socialist, newly democratic, anti-bureaucratic, neoliberal, authoritarian, even Donald Trump's famous phone call to the Ukraine – helped convert the anti-corruptionist discourse into an industry, with the characteristics of an assemblage described above.

How, then, should we discern when a solution to a given social or political conflict can evolve into the kind of policy implementation that I call «industry»? One suggestion here is that anthropologists of policy need to search out the kind of resources that lie behind any policy project: the knowledge, actors, people, institutions, networks, money and symbols that make them operate. This search requires ethnographic engagement with the issue, be it face-to-face, online, formal, or informal. In determining whether an industry is in formation, we need to follow many strands, or rhizomes.

Second, we need to assume that the actors within a given policy domain have different and sometimes conflicting agendas: World Bank consultants are not political activists. Fighting corruption by pursuing «good governance» is not the same project as fighting corruption by overthrowing a corrupt authoritarian leader. An industry has its own unique inner tensions which differ from the tensions within other social organizations or movements. Both industries and social

movements can spawn disillusioned participants. Within any policy implementation framework, and especially within those of the «industry» variety, lie different, often conflicting agendas or sub-policies) could feed on or undermine each other. These agendas need to be extracted as part of our fieldwork and analysis.

Third, policies, understood as ways in which organizations mobilize to achieve goals, need to be distinguished from alternative forms of social action in which the institutional is not so prominent. Here the difference between industry and a metaphorical «craft» is important. Not all anti-corruption fighters are anti-corruption activists with a political project. NGOs and think tank staff may want to reduce corruption, but they also want well-rounded CVs, good salaries and stable employment. Who doesn't? But, as ethnographers, we still need to be able to answer some questions. What does it feel like to be engaged in the world of anti-corruption? What does it feel like to have a mission? How do the engagement of the political activist, the NGO, the think tank and the consulting unit differ from each other when subjected to the pressures of the industry? We can therefore try to search out those features that make a policy campaign of an industry different from activities that retain their socially engaged, craft-like character. We need not suffer from craft nostalgia, but it is important to identify when engagement becomes professionalization, and when disillusionment with organization leads to contestation. In Alberoni's (1984) understanding, we need to understand the oscillation between «movement and institution», or what I call between «craft» and «industry», between uploaded videos of «I paid a bribe» to yet another training on the British anti-corruption regulations.

Fourth, we need to distinguish between policy interventions that deploy industry techniques to solve a problem versus those which are informal, non-institutionalized, improvisational, or local (craft-level) interventions. Who is using which methods to solve which problem? This is just another way of saying that not all efforts to deal with a problem become policies, nor do all policies take on the characteristics of an industry in its most developed form. Some social practices are organized by social activists, but they are not policies. Other policies are formulated and implemented, but seem to lack the characteristics of industry outlined above. Instead of interventions, they create spaces for innovation. In the Ukraine war, for instance, there seems to have been a policy to allow for and even stimulate innovation in improvised military drone building, and Ukrainian drone-building soldiers have engaged with the policy in an enthusiastic way.

Fifth, the fact that policies can emerge from anywhere – elites, grass-roots, inside/outside, or even from nowhere, out of some kind of scandal – needs to be integrated into our research. Policy interventions of the industrial type, with their massive resources, sophisticated diagnostics, the experts, the well-funded institutions, are elite projects, and elites have their own interests and agendas. The difference is that some so-called elites are more elite than others: World Bank officers making decisions about millions of dollars in aid are not as elite as Transparency International project managers. But their interests and agendas

may be tied to the kind of moral entrepreneurship required in an industry-type of policy implementation. Finally, not all anti-corruption campaigns reflect an anti-corruptionist ideology of openness and accountability. Donald Trump's phone call to Zelensky, inquiring about Biden's son, was hardly part of an anti-corruption campaign.

The anti-corruption industry developed as a morally valued, feel-good initiative to do something about «rotten states» (Holmes 2006) that had now to be integrated into the EU or to ensure that aid funds were used effectively. Alongside this was the need for international business to have a more predictable export climate, to reduce «corruption risk». An anthropological approach to policies such as anti-corruption must begin by highlighting the dissonance between anti-corruptionist ideology and the actual practices of anti-corruption actors. An «industry» framework for viewing anti-corruption can help us determine why certain policies are successful and why others waste resources or even cause harm. Anthropologists have demonstrated that ordinary people and communities can find solutions without having elite institutions and authorities designing projects, programs and procedures. At times, no policy may be better than a bad policy. As so many social movments have shown, fighting corruption can take place without an industry-style anti-corruption policy. Social initiatives to combat corruption resemble similar activities taking place in areas of migration assistance, climate change amelioration, health provision, anti-trafficking, human rights, and community development. The local, dialogue-based, improvisational activity of «craft» may be more effective than the professionalized, evidence-based «industry». Despite World Bank pronouncements and Good Governance measures, there are still a lot of rotten states out there.

One of the «lessons learned» in viewing anti-corruption as an industry, or as a «policy assemblage» whose component parts are not necessarily fully integrated with each other, is that it forces us to consider the issue of «where does a policy come from?». The lesson of anti-corruptionism is that instead of trying to identify a single policy, it more fruitfuil to search out the relevant actors, resources and agendas at work. Anti-corruption discourse – the ideology of what corruption is, who does it, how to stop it and why to stop it, the vision of a world without corruption – does not spawn or sustain a single policy. It spawns both grass-roots social movements as well as entire configurations of interventions in governments, bureaucracies, organizations, NGOs and private firms «dressed up» as coherent policies. These interventions can reach down and mobilize, sometimes drawing in activists as well. A whole gamut of policies, agendas and sub-agendas are at work underneath, some of which may be undermining the policy «on top». Instead of an anthropology of policy we need an anthropology of policies.

Such an anthropology of policies requires a more refined typology of «industry» characteristics than I have outlined here. There is more to policy anthropology than top-down, bottom-up or studying through. We need to understand when social problem-solving is evolving into an industry and when it remains a craft or

becomes a wide-range social movement. We also need a craft-based anthropology – local, ethnographic, intimate – that can elucidate the policy «industries» that surround us. Let's get started.

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