

COUNTRY SUMMARY - POLAND

POLITICAL - 77%	Defence & Security Policy	Legislative Scrutiny	4
		Defence Committee	4
		Defence Policy Debated	3
		CSO Engagement	2
		International AC Instruments	3
		Public Debate	3
		AC Policy	2
		AC Institutions	3
		Public Trust	3
		Risk Assessments	3
	Defence budgets	Acquisition Planning	3
		Budget Transparency & Detail	4
		Budget Scrutiny	4
		Budget Publicly Available	4
		Defence Income	4
		Internal Audit	2
		External Audit	4
	Other Political Areas	Natural Resources	4
		Organised Crime Links	2
		Organised Crime Policing	2
		Intelligence Services Oversight	3
Intelligence Services Recruitment		1	
Export Controls		4	
FINANCE -63%	Asset Disposals	Asset Disposal Controls	3
		Asset Disposal Scrutiny	3
		Percentage Secret Spending	0
	Secret Budgets	Legislative Access to Information	4
		Secret Program Auditing	0
		Off-budget Spending in Law	4
		Off-budget Spending in Practice	-
	Links to Business	Information Classification	2
		Mil. Owned Businesses Exist	3
		Mil. Owned Business Scrutiny	3
PERSONNEL - 66%	Leadership	Unauthorised Private Enterprise	3
		Public Commitment	4
		Measures for Corrupt Personnel	3
		Whistleblowing	1
	Payroll and Recruitment	Special Attention to Sensitive Personnel	3
		Numbers of Personnel Known	2
		Pay Rates Openly Published	2
		Well-established Payment System	3
		Objective Appointments	2
	Conscription	Objective Promotions	1
		Bribery to Avoid Compulsory Conscription	-
	Salary Chain	Bribery for Preferred Postings	-
		Ghost Soldiers	4
	Values, Standards, Other	Chains of Command and Payment	4
		Code of Conduct Coverage	3
		Code of Conduct Breaches Addressed	3
		AC Training	2
Prosecution Outcomes Transparent		2	
Facilitation Payments		3	
OPS - 35%	Controls in the Field	Military Doctrine	1
		Operational Training	1
		AC Monitoring	1
		Controls on Contracting	1
		Private Military Contractors	3
PROCUREMENT - 55%	Government Policy	Legislation	2
		Transparent Procurement Cycle	3
		Oversight Mechanisms	2
		Purchases Disclosed	3
	Capability Gap	Standards Expected of Companies	1
		Strategy Drives Requirements	2
		Requirements Quantified	2
	Tendering	Open Competition v. Single-Sourcing	2
		Tender Board Controls	3
		Anti-Collusion Controls	2
	Contract Delivery / Support	Procurement Staff Training	4
		Complaint Mechanisms for Firms	1
		Sanctions for Corruption	2
	Offsets	Due Diligence	3
		Transparency	4
		Competition Regulation	2
	Other	Controls of Agents	3
Transparency of Financing Packages		1	
Subsidiaries / Sub-Contractors		0	
Political Influence		2	

Poland is placed in Band C. In terms of **political risk**, the assessment indicates democratic control of the armed forces, transparency of the defence budget and a parliamentary National Defence Committee empowered to scrutinise defence policy. Relevant stakeholders are recognised to be actively involved in debates related to defence, and there are institutionalised consultations with civil society. Poland has signed international anti-corruption instruments including UNCAC and the OECD convention with evidence of compliance. A Bureau of Anti-Corruption Procedures within the Ministry of Defence (MOD) came into existence in 2006 which, inter alia, regularly monitors corruption risk. The most prominent natural resources in Poland are coal and gas, and there is no evidence that defence institutions have any controlling or financial interests in related businesses. However, there is evidence of organised crime in the sector, although this has been recognised by the government and successfully combatted in several instances. There is evidence of the potential for politicisation of appointments of top officials in the intelligence services.

In terms of **financial corruption risk**, the Military Property Agency is responsible for undertaking asset disposals and there are mechanisms for scrutiny. While the percentage of defence and security expenditure allocated to secret items is not publicly available, full information is provided to the Parliament's Committee for Security Services. Audit reports of the same are not produced, however, and thus are not subject to parliamentary debate. There is no legal provision allowing off-budget expenditure or any evidence that it exists in practice. While the MOD does not own any commercial businesses, it does exercise property rights on behalf of the State Treasury over commercial businesses controlled by the state. These are obliged to provide annual financial reporting, which in turn is verified by an independent, statutory auditor and published.

Regarding **personnel corruption risk**, the Department for Combating Organised Crime of Military Prosecutor's Office is recognised to have been effective in punishing personnel for involvement in corrupt activities, which is indicated to be a marked difference from the past. There is no evidence of ghost soldiers, and chains of command are separate from that of payment. A comprehensive Code of Conduct with strict regulations is in place, usually with public reports of prosecutions relating to breaches of the Code. Facilitation payments are strictly illegal although there is evidence of potential shortcomings in implementation. There is no formal legislation to facilitate whistle-blowing and the public availability of details of the numbers of civil and military personnel is not entire. Nevertheless, pay-rates and allowances are made public. Moreover, there are signs of political elements influencing appointments of top military personnel, and promotions are marred by unclear criteria.

Regarding **operations risk**, there is no evidence corruption is addressed as a strategic issue in any documents forming the general framework for operations, nor is there evidence of anti-corruption training for deployed commanders. However, Private Military Companies (PMCs) are assessed to be well-regulated when employed by defence and security establishments within the country, accountable to the Police Commander in Chief.

Pertaining **procurement risk**, The Bureau of Anticorruption Procedures within the MOD supervises public procurement and has in the past suspended suspect procurement contracts. Yet there is no evidence of formal requirements for bidding companies to have compliance programmes or ethical conduct guidelines in place, or for main contractors to ensure subsidiaries or sub-contractors adopt anti-corruption programmes. Furthermore, a substantial amount of defence procurement is recognised to be non-competitive. Nevertheless, there is a comprehensive system of supervision of contract fulfilment and training for procurement staff.

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