

**Substantive Progress or Neoliberalism in Disguise? An Analysis of the World
Bank's Discourse on Corruption since 1995**

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Abstract

I undertake a discourse analysis of World Bank documents from 1995 to the present to explore scholarly debates surrounding the question, “To what extent are the World Bank’s efforts to combat corruption evidence of its attempts to further the neoliberal agenda, characterized by the original Washington Consensus?” Since the late 1990’s, the World Bank has been a leader in the fight against corruption, integrating anti-corruption into its operations worldwide and making it a major issue addressed in World Development Reports, Presidential speeches, and specific anti-corruption strategies. While some scholars see this as an evolutionary move away from neoliberalism, others see the focus on corruption as a way for the Bank to continue to advance and expand the neoliberal agenda after the failure of structural adjustment programs. I argue that while the World Bank’s anti-corruption strategy featured distinctly neoliberal ideals in its early years, over time it has moved away from a focus on liberalization and competition to a more holistic focus on transparency and civic participation as pillars of good governance.

Introduction

Over the past thirty years, the global development community has increasingly come to believe that corruption inhibits growth, slows development, and often harms the poor disproportionately. The focus on corruption manifests itself in numerous ways. International organizations like the United Nations (UN) and Organization for Economic Cooperation and Development (OECD) have declarations against corruption, economists produce countless econometric studies modeling the relationship between corruption and growth, anti-corruption NGOs like Transparency International have been established and wield a great deal of influence, and major players in development have incorporated anti-corruption strategies into their operations. The World Bank in particular has become a key player in the anti-corruption movement. In 1998, World Bank President James Wolfensohn famously declared that the Bank was prepared to tackle the “cancer of corruption,” propelling the World Bank into the struggle against corruption in country operations, in its research, and in the international discourse on corruption.

This paper seeks to investigate the question, “To what extent are the World Bank’s efforts to combat corruption evidence of its attempts to further the neoliberal agenda, characterized by the original Washington Consensus?” Scholars including Harrison, Szeftel, Brown and Cloke, and Polzer who critique the international discourse on corruption claim that it is an effort by international organizations like the World Bank to further the neoliberal agenda as embodied by the Washington Consensus.¹ However, the World Bank’s anti-corruption strategy currently focuses broadly on a combination of increasing government transparency and civic

¹ Meier summarizes the ten reforms of the original Washington Consensus as “(1) fiscal discipline, (2) public expenditure priorities, (3) tax reform, (4) liberalization of financial markets, (5) competitive exchange rate, (6) liberalization of trade policy, (7) foreign direct investment, (8) privatization, (9) deregulation, and (10) property rights.” *Biography of a Subject* 92.

participation. Such a strategy does not obviously advance the neoliberal agenda, but whether it truly signals a shift away from neoliberalism or merely disguises neoliberal ideals to escape criticism is unclear. Furthermore, the broader discourse on corruption includes numerous alternative solutions to transparency and civic participation that definitively advance the neoliberal agenda such as reducing the discretionary powers of the state and increasing openness to trade to reduce corruption through global competition. That the Bank is not exploiting such obviously neoliberal solutions suggests that it may be moving away from the neoliberal agenda.

It is important to address anti-corruption solutions in the broader context of the development discourse because recognizing the ideologies and motives shaping the actions of major development agencies like the World Bank is critical in evaluating their legitimacy. Ideally, development institutions should be highly dynamic entities that enact policy shifts based on new evidence, so assessing the extent to which a major player in development like the World Bank is pursuing a single ideology rather than responding to new information is vital to determining its legitimacy and potential effectiveness. Therefore, the research is important because it attempts to objectively assess the Bank's agenda. More broadly, corruption has become a major focus in development, so it is important to recognize hidden agendas in the anti-corruption movement and to distinguish such agendas from results-driven policies striving to curb corruption in an attempt to foster economic growth and development.

I argue that the World Bank's discourse on corruption has changed significantly over time, signaling a shift away from the neoliberal agenda. Furthermore, although transparency and civic participation are considered manifestations of the neoliberal discourse by some scholars, the Bank's use of them has evolved over time from employing them solely as tools to promote efficiency, accountability, and competition to recognizing them as elements to be pursued as

critical components of good governance, which according to recent Bank definitions includes, “the form or nature of the political regime; the processes by which authority is exercised in the management of a country’s economic or social resources; and the capacity of government to design, formulate, and implement policy and deliver goods and services.”² Given that this notion of good governance goes well beyond simple notions of accountability, efficiency, and competition, an approach that uses transparency and civic participation as pieces of a broader governance agenda indicates a move away from neoliberal principles and ideals.

Literature Review

Scholars critiquing the international discourse on corruption agree that the neoliberal agenda is the driving force behind the discourse on the nature, causes, consequences, and solutions to corruption. Opposing them are scholars who argue that the development discourse, and with it World Bank policies and practices, have evolved over time from an exclusive focus on the policies embodied in the Washington Consensus to a recognition of the critical role states and institutions play in development. Situated between these two extremes are those who have observed the shift in World Bank policies from the Washington Consensus to “getting institutions right”, but who argue that the post-Washington Consensus merely broadens the objectives of the neoliberal agenda as well as the tools that can be used to achieve it. These scholars exhibit many similarities with those critiquing the discourse on corruption, but their arguments differ slightly and their methodology tends to focus less on deconstructing the discourse. Despite the wide range of views represented in these three schools of thought, significant gaps remain in their analyses.

² World Bank, “Strengthening Governance: Tackling Corruption: The World Bank Group’s Updated Strategy and Implementation Plan.” (2012): p. 9.

In arguing that neoliberal interests have or have not shaped the international discourse on corruption, few scholars have undertaken a comprehensive analysis of World Bank literature despite the frequency with which it is identified as one of the most neoliberal-leaning international organizations as well as a leader in the fight against corruption. Of the few who have, none have engaged with the full range of arguments concerning the extent to which the Bank's discourse on corruption furthers the neoliberal agenda. Therefore, my contribution lies in undertaking an updated analysis of World Bank literature in the context of the three schools of thought identified here.

Corruption as a means to further the neoliberal agenda

Typically, scholars critiquing the discourse on corruption frame it within the context of structural adjustment and its failure to create economic growth in numerous countries by the early 1990s. In need of an explanation for the failure of structural adjustment, the World Bank and the International Monetary Fund (IMF) focused on excessive state intervention as the cause of corruption, concurrently explaining the failure of structural adjustment by blaming states and identifying a new area for action. As Szeftel, Brown and Cloke, Bedirhanoglu, and Polzer point out, corruption allowed states, rather than failed development policies, to be the unit in need of reform.³ Polzer argues, "the neoliberal paradigm was ultimately protected by shifting attention from international systemic factors, such as 'adverse conditions, unfair markets, or inappropriate economic reforms,' to the local 'lack of proper institutional capacity to manage the necessary process of adjustment.'"⁴ Harrison adds that the anti-corruption discourse became a method of

³ Morris Szeftel, "Misunderstanding African Politics: Corruption and the Governance Agenda," *Review of African Political Economy* 25, 76 (1998): 234.

Ed Brown and Jonathan Cloke, "Neoliberal Reform, Governance and Corruption in the South: Assessing the International Anti-Corruption Crusade," *Antipode* 36, 2 (2004): 287.

Tara Polzer, "Corruption: Deconstructing the World Bank Discourse," London School of Economics Development Studies Institute Working Papers Series (2001): 187.

⁴ Polzer 8.

normalization, as it attempted to restore the prominence of neoliberalism by modeling all states on the West where neoliberalism originated.⁵

The critique of the corruption discourse as a tool to advance the neoliberal agenda typically rests on the construction of corruption as an economic phenomenon. Szeftel, Harrison, and Polzer call attention to the reality that corruption only became objectionable when it appeared that it was imposing severe economic costs, at which point the World Bank portrayed it as an economic issue in order to bring it within the non-political mandate of the Bank.⁶ Bukovansky makes a similar argument, pointing out that the goal continues to be a singular focus on economic growth, but, “How the means to attain that goal are conceptualized has broadened to include such things as institutions, ‘governance’, ‘human capital’, and ‘social capital’.”⁷ Thus, the centrality of corruption as an impediment to economic growth and anti-corruption strategies as a means to foster economic growth, rather than forming their own ends of good governance, form the basis for the critique of the corruption discourse.⁸ Nevertheless, it is worth noting that regardless of the neoliberal tendencies of the World Bank agenda, the Bank’s mandate necessitates that corruption be constructed as an economic issue. To the extent that scholars argue that Bank involvement in anti-corruption efforts is inappropriate as a whole, their argument remains internally consistent; however, the critique becomes contradictory when scholars affirm the importance of addressing corruption in Bank operations but criticize the focus on economics.

⁵ Elizabeth Harrison, “Corruption,” *Development in Practice* 17, 4/5 (2007): 673.

Morris Szeftel, “Misunderstanding African Politics: Corruption and the Governance Agenda,” *Review of African Political Economy* 25, 76 (1998): 675.

⁶ Szeftel 25.
Harrison 676.

Polzer 10.

⁷ Mlada Bukovansky, “The hollowness of anti-corruption discourse,” *Review of International Political Economy* 13, 2 (2006): 185.

⁸ Jeff Everett, Dean Neu, and Abu Shiraz Rahaman, “The Global Fight Against Corruption: A Foucaultian, Virtues-Ethics Framing,” *Journal of Business Ethics* 65 (2006): 7.

While understanding the basis of the scholarly critique is critical, it is also essential to go beyond understanding its underpinnings to addressing why corruption as an economic phenomenon is harmful. At a basic level, Everett, et al, argue that economics is, “a discipline that by definition ceases concerns with moral obligations and concerns about the other,” thereby removing moral considerations from the discourse on corruption completely.⁹ However, scholars including Bukovansky, Brown and Cloke, and Polzer see the economics-centric discourse as a way to construct morality in ways that allow developed countries to claim moral high ground without justification by equating “developing” with “corrupt” and “developed” with “not corrupt”, thus using an economic notion of corruption to “other” less developed countries.¹⁰ Compounding the harmful effects of “othering” is the notion that using an economic definition of corruption deprives people in less developed countries of their agency in defining corruption for themselves while ignoring historical contributions to corruption through processes of colonization and inequitable or exploitative trade relations.¹¹ As Schmitz argues, “the ingenious message boils down to trusting in Western benevolence and superior knowledge. Then, and only then, can one make allowances for adaptations appropriate for local conditions.”¹² Equating control of corruption with economic success not only places developed countries on the moral high ground, it also places them in dominant positions to shape anti-corruption policies that are non-contextualized. Bukovansky points out that this is problematic because, “where [institutions] are most legitimate, their norms have been internalized by those who believe in

⁹ Ibid.

¹⁰ Bukovansky 198.
Brown and Cloke 280.
Polzer 11.

¹¹ Bukovansky 198.
Brown and Cloke 280.

¹² G.J. Schmitz, “Democratization and Demystification: Deconstructing ‘Governance’ as Development Paradigm,” in Moore, David B. and Schmitz, Gerald J., (eds.) 1995 *Debating Development Discourse: Institutional and Popular Practices* (London: Macmillan Press), in Polzer: 12.

their legitimacy and who allow their actions to be guided by such norms not out of fear of punishment but rather out of belief in their veracity.”¹³ Without country buy-in, Western, neoliberal anti-corruption policies are unlikely to work, thereby perpetuating the problem.

Discourse scholars also find the construction of corruption as an economic issue troubling because they see the governance agenda as synonymous with the neoliberal agenda.¹⁴ The World Bank claimed to have been addressing corruption for years using the neoliberal agenda, as market distortions created by state intervention provided opportunities for corruption and the neoliberal agenda endeavored to remove such distortions.¹⁵ However, as Polzer highlights, it is unclear why the Bank promoted an increased interest in corruption in the late 1990s if the neoliberal agenda was already addressing the problem.¹⁶ Such contradictions make scholars suspicious. Polzer, Bedirhanoglu, and Brown and Cloke see the Bank’s anti-corruption measures as a way to continue its neoliberal practice of removing power from the state and using knowledge as a way to exercise control over developing countries.¹⁷ This concurrently ignores non-economic forms of corruption and the potential for “good economic policies”, meaning neoliberal policies, to contribute to corruption, leaving the use of corruption as a means to gain political power as well as opportunities for corruption arising from deregulation completely unaddressed.¹⁸

While such critiques should certainly be taken seriously, there are a number of limitations. For one, Polzer is the only scholar to acknowledge that while the World Bank has

¹³ Bukovansky 199.

¹⁴ Harrison 675.

¹⁵ Brown and Cloke 286.

¹⁶ Polzer 14.

¹⁷ Polzer 4.

Pinar Bedirhanoglu, “The Neoliberal Discourse on Corruption as a Means of Consent Building: reflections from post-crisis Turkey,” *Third World Quarterly* 28, 7 (2007): 1241.

Brown and Cloke 276.

¹⁸ Polzer 16.

Szeftel 233.

been central in shaping the corruption discourse, the discourse has also played a significant role in shaping the Bank.¹⁹ Directly addressing corruption placed the credibility of the World Bank at risk and forced it to change its conceptions of development priorities. Those changes have not been widely acknowledged in the critique of the Bank's practices. Rather, scholars have tended to treat the Bank as a non-dynamic institution with constant interests. Scholars who deconstruct the World Bank's discourse on corruption only use documents from the early years of the Bank's operationalization of corruption, at which time the Bank as a whole maintained a strong neoliberal stance. By assessing the Bank's discourse on corruption over a more extensive period of time, I will be able to assess the validity of the non-dynamic conception of the Bank, enabling me to extend and update the work of scholars like Bukovansky and Polzer. Finally, Everett, et al, using a similarly limited sample of documents, argue that the World Bank favors "exit strategies" for reducing corruption, or strategies designed to increase competition, as opposed to strategies increasing civic participation and voice.²⁰ My findings largely contradict their assessment, so I will engage with their argument directly using more updated documents from the World Bank.

The New Development Economics: Anti-corruption as an Evolution of World Bank policy

Scholars who view the discourse on corruption as an evolution of development economics see the focus on governance and anti-corruption as a move from the Orthodox reaction that resulted in the Washington Consensus and structural adjustment to a focus on what governments can do best to make states more efficient.²¹ Rodrik states, "It's fair to say that no

¹⁹ Polzer 5.

²⁰ Everett, et al 5.

²¹ Gerald M. Meier, *Biography of a Subject: An Evolution of Development Economics* (Oxford: Oxford University Press 2005), 93.

one really believes in the Washington Consensus anymore.”²² He argues that there is now a consensus around the necessity of strong institutions including property rights, the rule of law, macroeconomic stability, and civic representation.²³ Scholars like Meier and Fine agree, also acknowledging that the focus on corruption represents an attempt to highlight and understand the importance of institutions and mechanisms for getting institutions right.²⁴

The movement toward institution-building and away from the Orthodox reaction has been termed “the new development economics”.²⁵ It is characterized by the use of governments to shape incentives in private markets and an emphasis on civic engagement as a crucial tool for building strong institutions that allow economies to thrive.²⁶ Scholars arguing for the new development economics insist that nations cannot take advantage of opportunities in the international market without strong institutional support, rendering institutions as important as open and competitive markets.²⁷ As Rodrik argues, “Market or government forces that affect accumulation or productivity changes are much more costly, and hence more deserving of policy attention, than distortions that simply affect static resource allocation.”²⁸ Put otherwise, while the neoliberal agenda focuses exclusively on correcting distortions in markets by moving them closer to perfect competition, the new development economics also focuses on government policies that affect pre-market portions of the production process.

²² Dani Rodrik and World Bank, “Goodbye Washington Consensus, Hello Washington Confusion? A Review of the World Bank’s ‘Economics Growth in the 1990s: Learning from a Decade of Reform,’” *Journal of Economic Literature* 44, no. 4 (2006): 974.

²³ Dani Rodrik *One Economics, Many Recipes: Globalization, Institutions, and Economic Growth* (Princeton: Princeton University Press, 2007), 184.

²⁴ Meier 125.

Ben Fine, “Introduction: The Economics of Development and the Development of Economics,” in *The New Development Economics: After the Washington Consensus*. Jomo K.S. and Ben Fine (eds.) (Shahpur Jat: Tulika Books, 2006), xviii.

²⁵ Meier 125.

²⁶ Meier 126, 136.

²⁷ Meier 150.

²⁸ Rodrik and World Bank 976.

Scholars in this school of thought have provided some analysis of the World Bank's anti-corruption strategy and the extent to which it represents tenets of the new development economics. Meier summarizes the World Bank's institution-building strategy as of 2001/2002 as, "Complement what exists, innovate, connect, promote competition."²⁹ Such an assessment suggests that the World Bank is pursuing a range of policies, some of which, like "promote competition", carry distinctly neoliberal ideas and others that are not obviously aligned with neoliberal objectives, such as "innovate" and "complement what exists." However, Rodrik disagrees, arguing, "there is little evidence that operational work at the Bank has internalized these lessons to any significant extent."³⁰ He cites continuing biases toward identifying governmental impediments to investment, such as legal restrictions, while ignoring potentially inhibiting effects of market factors as evidence.³¹ Furthermore, he argues that the World Bank's reform strategy is still biased toward a best-practice model that "presumes it is possible to determine a unique set of appropriate institutional arrangements ex ante."³² For Rodrik, any attempt to generalize institutional reform efforts, which he sees as a continuing tendency in World Bank policies, is evidence that the Bank has so far failed to completely adopt the agenda of the new development economics.³³ This critique aligns with discourse scholars in the first school of thought who see non-contextual approaches to corruption as a sign of continued adherence to the neoliberal agenda.

Despite the insights provided by scholars arguing for the evolutionary view of development economics and the World Bank, critical questions remain unanswered. For one,

²⁹ Meier 141.

³⁰ Rodrik and World Bank 977.

³¹ Dani Rodrik, "Second-Best Institutions," *The American Economic Review*, 98, no. 2 (2008): 101-102.

³² Rodrik, "Second-Best Institutions," 100.

³³ Rodrik and World Bank 979-980.

Dani Rodrik, *The New Global Economy and Developing Countries: Making Openness Work* (Baltimore: Johns Hopkins University Press, 1999), 18.

although Rodrik argues that the World Bank has so far failed to embrace the new development economics in full, he does not evaluate the extent to which the World Bank has moved away from the neoliberal agenda. Furthermore, scholars writing on the evolution of development economics tend to focus broadly on institution-building. While anti-corruption policies are certainly a component of institution-building, they have been under-examined as a specific manifestation of the new development economics.

Little Change in the Post-Washington Consensus

Bayliss and Cramer summarize the arguments of scholars who question the real degree of change that occurred in the post-Washington Consensus, stating, “The post-Washington Consensus is really characterized by a broadening of policy tools around a slightly more relaxed version of basically the same core ideas contained in the Washington Consensus.”³⁴ Van Waeyenberge makes a similar argument, pointing out that the post-Washington Consensus merely expands the goals that market-based tools can be used to achieve, or, as Fine puts it, “extends the market-based approach from the market to the non-market arena (for the building of good governance, social capital and so on).”³⁵ Rather than fundamentally changing the objectives of development, the World Bank is merely, “pegging ‘social concerns’ (expenditure reviews, social safety nets, compensatory programs) and ‘participatory measures’ (‘transparency’, ‘ownership’, role of ‘social partners’) onto the core policies of stabilization,

³⁴ Kate Bayliss and Christopher Cramer, “Privatisation and the post-Washington Consensus: Between the lab and the real world?” in *Development Policy in the Twenty-first Century: Beyond the post-Washington Consensus*, Ben Fine, Costas Lapavistas, and Jonathan Pincus (eds.) (London: Routledge, 2001), 55.

³⁵ Elisa Van Waeyenberge, “From Washington to Post-Washington Consensus: Illusions of Development,” in *The New Development Economics: After the Washington Consensus*. Jomo K.S. and Ben Fine (eds.) (Shahpur Jat: Tulika Books, 2006), 34.

Ben Fine, “The New Development Economics,” in *The New Development Economics: After the Washington Consensus*. Jomo K.S. and Ben Fine (eds.) (Shahpur Jat: Tulika Books, 2006), 11.

liberalization and privatization.”³⁶ Scholars adhering to such arguments acknowledge that the Bank has changed its agenda, but see the strategies it employs as fundamentally neoliberal.

Dasgupta offers an insightful analysis of the “new political economy” as the theoretical underpinning that has caused the Washington Consensus to persist into the post-Washington Consensus era. The new political economy sees those in power as non-benevolent, self-interested actors only concerned with maintaining their own power and becoming wealthy through rent-seeking.³⁷ Since rent-seeking is, “associated with controls and other restrictive measures, doing away with all controls in a liberalization package is a major way of handling such behavior.”³⁸ Such policies are nearly perfectly aligned with the Washington Consensus.³⁹ Thus, when corruption became a major issue on the development agenda, Dasgupta argues that the Washington Consensus already had a solution to the problem, one that did not change any of its other policies but merely extended their use to problems of governance. Dasgupta’s argument is important for understanding the World Bank’s policies as well as the position of scholars who argue that the post-Washington Consensus differs little from the original Washington Consensus. However, it requires evidence to substantiate the claim that neoliberal policies were actually employed to combat corruption.

Scholars representing this school of thought typically invoke evidence from specific cases, providing evidence for their view in isolation but failing to assess whether such trends continue today or were merely symptoms of the transition from the Washington Consensus to a distinct post-Washington Consensus. One popular case is the World Bank’s treatment of growth in East Asia, as it involved high levels of government intervention. While acknowledging the

³⁶ Van Waeyendberge 30.

³⁷ Biplab Dasgupta *Structural Adjustment, Global Trade and the New Political Economy of Development* (London: Zed Books, 1998), 31.

³⁸ Dasgupta 38.

³⁹ *Ibid.*

large role that government played, the World Bank highlighted three caveats: the growth was context-specific and the same strategies would not work elsewhere, all countries enjoying growth had gotten fundamentals like financial systems and macroeconomic stability right, and such growth required a high-quality, impartial, and non-corrupt civil service to work.⁴⁰

Such an analysis could provide evidence in support of scholars who see the discourse on corruption as a justification for continued adherence to the neoliberal agenda, as identifying corrupt civil servants as a limitation for growth renders Bank intervention necessary; however the analysis as a whole poses serious limitations. While studying the World Bank's response to the East Asian miracle is illuminating, it is a single case that cannot provide a comprehensive evaluation of the World Bank's commitment to the neoliberal agenda over time. Furthermore, it has now been a decade since Japan commissioned the Bank to report on growth in East Asia, so it is possible that Bank positions have evolved over time in the manner put forward by scholars who argue that the Bank moved from the Washington Consensus to the new development economics. These scholars also share a deficiency with those arguing for the new development economics in their broad focus on institutions rather than a focus on corruption. Therefore, my work will examine their arguments in the specific case of corruption.

Conclusion

Views on the World Bank's corruption discourse are diverse, but each group of scholarly arguments and approaches exhibits limitations and scholars espousing different perspectives rarely directly engage with one another. Recognizing the full range of views will ground my analysis in a richer theoretical framework than any school of thought could provide alone, ensuring that my analysis accounts for trends of continuing or expanded neoliberalism as well as evidence of an evolution away from the Washington Consensus. By updating some scholars'

⁴⁰ Dasgupta 256, 301-302.

work and focusing specifically on corruption while expanding the theoretical underpinnings of the analysis, I can provide a rigorous evaluation of the extent to which the Bank's discourse on corruption attempts to further the neoliberal agenda.

Research Design

Case Selection

The World Bank represents a key case when examining the effect of the neoliberal discourse on anti-corruption policies. It provides an influential case in the study of anti-corruption measures because its early involvement in the field and the high priority it has placed on corruption over the last fifteen years have rendered it an international leader in approaches to anti-corruption. Concurrently, the Bank has played a significant role in shaping the discourse on corruption through its anti-corruption strategies, speeches by World Bank presidents that focus on corruption, and references to corruption in its annual World Development Reports. Given that the IMF and the World Bank were largely responsible for promoting structural adjustment policies around the world, the Bank could feasibly be motivated to shape the discourse in such a way that alleviates responsibility for past failures while simultaneously providing an avenue to continue pursuing the neoliberal agenda underlying structural adjustment through anti-corruption measures. Since the World Bank employs its own anti-corruption strategy while concurrently producing research on corruption, it possesses multiple avenues for influencing the discourse. This combination of policy and research enables it to pursue a neoliberal agenda on numerous fronts. Therefore, it is an important case in examining the extent to which anti-corruption measures are being used to pursue the neoliberal agenda because it represents an organization with a history of adhering to a neoliberal agenda and a possible motive for continuing to do so.

Propositions

The question under investigation is the degree to which World Bank publications addressing corruption reflect a focus on advancing the neoliberal agenda. There are a number of critical propositions to consider when answering this question. Most obvious are those stating that the policies outlined in the original Washington Consensus, specifically those addressing privatization, liberalization, and competition, indicate adherence to the neoliberal agenda. Others have been taken from the literature critiquing the neoliberal discourse on corruption as ways to identify neoliberal influence, as a discourse based on neoliberal theory has a number of symptoms identified by scholars. These are useful because they augment the more obviously neoliberal propositions taken directly from the Washington Consensus to expand the basis of my analysis of World Bank anti-corruption documents, highlighting patterns to look for in the approach of the World Bank that could help discern the extent to which the Bank's anti-corruption policy is aligned with the neoliberal agenda. These propositions are outlined below:

Neoliberalism struggles to define corruption: Scholars including Brown and Cloke, Everett, et al, and Bedirhanoglu argue that the neoliberal discourse exhibits a lack of clarity when addressing what acts constitute corruption.⁴¹ Such definitional confusion stems from the problem that, “too much is expected of corruption as a single term, it cannot encompass so many different types of behavior and motivations.”⁴² In their examination of the international anti-corruption discourse, Everett, Neu, and Rahaman identify twelve different types of corruption ranging from “petty” and “grand” to “official” and “productive.”⁴³ They further argue that acts

⁴¹ Brown and Cloke 284.
Everett, et al 3.
Bedirhanoglu 1245.

⁴² Brown and Cloke 284.

⁴³ Everett et al 3.

included under corruption are so ill-defined that scholars authoring a 2001 study, “list no less than *sixty* acts one might qualify as corrupt.”⁴⁴

Such ambiguity in defining corruption is far from accidental in the minds of discourse scholars. Polzer asserts that connecting corruption, a phenomenon associated with impeding economic growth and thus an economic issue within the mandate of the World Bank, with a wide range of issues and actions enables the international development community to become involved in a host of capacities as, “‘administrators’, ‘institutions’, and even ‘governments’ became non-political and open for intervention.”⁴⁵ Thus, Bank documents allowing the definition of corruption to remain broad or advocating action in a multiplicity of capacities will demonstrate continued adherence to a neoliberal agenda, while specific, nuanced definitions will provide evidence against neoliberalism.

Neoliberalism constructs a public/private dichotomy: Attempting to draw definitive boundaries separating the public and private sphere is another symptom of the neoliberal discourse with a number of serious consequences for policy.⁴⁶ The broadest of these is a focus on reducing the size and influence of the state. Since corruption often involves a blurring of the public and private sphere when officials use government offices for personal gain and firms use money to buy political influence, the neoliberal solution is to impose complete separation. Szeftel argues that this often occurs by, “reducing the size and activities of a state that is ‘too big’ and fostering the growth of a ‘civil society’ of NGOs and associations which at present is ‘too small’ and ‘too weak.’”⁴⁷ However, Brown and Cloke highlight the issue with such a

⁴⁴ E.G. Caiden, P.O. Dwivedi and J. Jabbra, *Where Corruption Lives* (Kumarian Press, Bloomfield: 2001) in Everett et al 3.

⁴⁵ Polzer 10-11.

⁴⁶ Harrison 673.
Szeftel 234.

Polzer 19.

⁴⁷ Szeftel 234.

policy—those agencies that are cut when government is being scaled down are often important for maintaining transparency and accountability.⁴⁸ For instance, Szeftel points out that when states are required to reduce their size, agencies like audit structures tend to be lacking, diminishing the strength of the state along with its size.⁴⁹ This presents a complex issue in addressing the extent to which World Bank policies reflect the neoliberal agenda, as the past decade has seen an increasing focus on rebuilding state capacity reflecting the realization that, “a ‘strong’ state, not only a ‘minimal’ one, is needed.”⁵⁰ Although some scholars argue that rebuilding state capacity where it had been previously diminished by structural adjustment is evidence of neoliberalism, I will consider any attempts to increase the power of the state or the size of the state as evidence of a shift away from neoliberalism.

Another consequence related to the broader theme of the public/private dichotomy is that the role individuals play in giving and accepting bribes is often ignored. Szeftel argues, “Seminars, handbooks and education are important and uplifting, and economic sanctions worrying for *governments*, but they are unlikely to influence *individuals* being offered thousands of dollars by multinationals or by drug dealers.”⁵¹ A related consequence is a heavy emphasis on government officials who are taking bribes while those offering bribes go unaddressed, which Bukovansky attributes to the neoliberal consensus that foreign investment generates economic growth. Having identified multinationals as an important source of capital, neoliberals divert attention away from those paying bribes to those who receive them, thereby ignoring the demand for bribery and focusing exclusively on the supply.⁵² The neoliberal agenda goes further than just protecting corruption in the private sector in the name of economic growth. As Polzer puts it,

⁴⁸ Brown and Cloke 287.

⁴⁹ Szeftel 234.

⁵⁰ Polzer 9.

⁵¹ Szeftel 233.

⁵² Bukovansky 187.

“While in the private sector, firms and individuals are expected to seek personal profit and enrichment, organizations and individuals in the public sector are expected selflessly to fulfill a duty to a greater public good,” adding an ideological impetus to ignore private acts of corruption and to focus on the role of public officials.⁵³ Therefore, evidence that the World Bank’s updated strategy includes provisions to address the demand for corruption alongside its supply will suggest an evolution of the World Bank’s strategy away from neoliberal aims.

Neoliberalism unifies the neoliberal discourse with the democratization discourse:

Harrison states, “anti-corruption is closely associated with the governance agenda in development, itself a manifestation of greater intrusion of neo-liberalism in the architecture of aid.”⁵⁴ Using this perspective, democratization efforts that comprise parts of the World Bank’s anti-corruption discourse must be considered evidence of a neoliberal bias. Szeftel explains the logic behind such strategies, stating:

“The proposition that democracy can limit the worst excesses of corruption by making it easier to scrutinize and regulate the operation of the state—because public institutions are more responsible, transparent and accountable and because political and legal costs are more easily imposed on corrupt officials—is the core language of conditionality, liberalization, good governance and democratization, of donor and local democrat alike.”⁵⁵

It follows logically that the critical components of the solutions associated with democratization involve more political competition.⁵⁶ Therefore, an emphasis on democratization will signal neoliberalism if it is being used in an effort to increase political competition and efficiency rather than constituting its own end as an objective of good governance.

⁵³ Polzer 18-19.

⁵⁴ Harrison 675.

⁵⁵ Szeftel 224.

⁵⁶ Szeftel 225.

Neoliberal solutions to corruption are technical in nature: Polzer explains the increasing tendency toward technical solutions as following, “from the idea...that the main issues of political contestation have been solved—through liberal economic management and democracy—and that the only remaining task is to manage the most efficient achievement of these goals [democracy and free market capitalism] around the world.”⁵⁷ Brown and Cloke as well as Harrison support Polzer’s analysis, arguing that neoliberalism is inhibited by its technocentric solutions to corruption and that it has hindered the development of non-technical solutions by directing the most funding toward models and formulas.⁵⁸ Therefore technical assistance, particularly in the absence of other anti-corruption efforts, represents a sign of neoliberalism.

One related consequence of technocratic solutions to corruption is that, “data is not only intended to inform or challenge political judgment; it is constructed so as to *replace* the need for political judgment.”⁵⁹ While the use of data to obviate the need for discretion will be difficult to identify within World Bank documents, it is important to bear in mind when evaluating anti-corruption solutions.

Neoliberalism takes an ahistorical, non-contextual approach to corruption: Szeftel, Bedirhanoğlu, and Brown and Cloke all argue that the neoliberal discourse treats corruption as entirely endogenous to a state, ignoring historic factors as well as market factors that increase opportunities for rent-seeking.⁶⁰ This proposition provides a strong indicator for non-neoliberal objectives, as any mention of market or historical factors contributing to corruption will

⁵⁷ Polzer 7.

⁵⁸ Harrison 676.
Brown and Cloke 289.

⁵⁹ Polzer 17.

⁶⁰ Szeftel 238.
Bedirhanoğlu 1241.
Brown and Cloke 280.

constitute evidence of a shift away from the neoliberal agenda. Conversely, its absence will speak to a continuing ahistorical view of corruption that fails to criticize the role of markets in providing opportunities for rent-seeking. This is also manifested in policies that are generalized across countries, as one-size-fits-all solutions to corruption fail to acknowledge specific historical and contextual variables that could seriously affect the success of such policies.

Comparative propositions: The study will primarily focus on how closely the World Bank's anti-corruption strategies are aligned with neoliberal objectives. However, in assessing the degree to which the Bank's programs reflect the neoliberal agenda, it is necessary to examine alternative solutions to corruption as well. Scholars, states, and other international organizations have contributed to the neoliberal discourse on corruption and multiple solutions have been identified that are not employed by the World Bank but which reflect neoliberal interests, while other solutions attempt to move away from neoliberalism. To fully understand the degree to which the Bank's policies align with neoliberal objectives, the degree to which alternative solutions align with those goals is a key proposition. For almost every solution proposed, it is critical to note that some scholars have argued for it and some against, demonstrating the lack of consensus around most anti-corruption measures.

Among the most obviously neoliberal solutions are recommendations to increase competition and reduce the size of the state, typically using privatization, openness to trade and reductions in the discretionary power of the state. Ades and Di Tella recommend openness to trade along with anti-trust laws and other measures to decrease the presence of rents and Treisman concurs, noting that while the effect of open markets on corruption is small, "A sober evaluation of the limits of liberalization policy should not, of course, obscure the fact that it is

one of the few possible effective levers that central reformers have."⁶¹ However, Serra finds no robust tie between openness and corruption and Rodrik argues that openness is not a solution to corruption because strong institutions are required to actually benefit from free trade.⁶²

Similarly, Tanzi and La Porta, et al, argue for decreased state power to reduce opportunities for corruption, but Serra and Khan both argue that there is little evidence that decreasing regulation will reduce corruption.⁶³ In a similar vein, Tanzi argues for increasing the wages of public officials to increase the opportunity cost of corruption and to make the civil service more competitive, but La Porta, et al, Treisman, and Khan disagree, arguing that wage increases represent a superficial solution at best.⁶⁴

Another range of solutions that are commonly characterized as neoliberal, although they are less obviously so than open and competitive markets, are those relying on democracy and civic participation. Serra argues that democracy is strongly, inversely related to corruption while Treisman finds that states must enjoy over forty years of continuous democracy for it to have a significant, negative effect on corruption.⁶⁵ On the other side of the debate are Tanzi, who sees numerous opportunities for corruption in democratic societies, and Khan, who argues, "the

⁶¹ Alberto Ades and Rafael Di Tella, "Rents, Competition, and Corruption," *The American Economic Review* 89, no. 4 (1999): 992.

Daniel Treisman, "The causes of corruption: a cross-national study," *Journal of Public Economics* 76 (2000): 441.

⁶² Danila Serra, "Empirical Determinants of Corruption: A Sensitivity Analysis," *Public Choice* 126, no. 1/2 (2006): 240.

Rodrik, *The New Global Economy and Developing Countries*, 100.

⁶³ Vito Tanzi, "Corruption Around the World: Causes, Consequences, Scope, and Cures," *Staff Papers—International Monetary Fund* 45, no. 4 (1998): 565.

Rafael La Porta, Florencio Lopez-de-Silanes, Andrei Shleifer, and Robert Vishny, "The Quality of Government," NBER Working Paper no. 6727 (1998): 245.

Serra 240.

Mushtaq H. Khan, "The new political economy of corruption," in *The New Development Economics: After the Washington Consensus*. Jomo K.S. and Ben Fine (eds.) (Shahpur Jat: Tulika Books, 2006), 133.

⁶⁴ Tanzi 588.

La Porta, et al, 263.

Treisman 436.

Khan 133.

⁶⁵ Serra 249.

Treisman 432.

relevant political reforms cannot be generalized and certainly have little to do with the promotion of democracy or of civil society, or other such bland objectives.”⁶⁶ Some of these debates arise from the difference between democracy in strong democratic governments, which typically exhibit low levels of corruption, and processes of democratization, which provide numerous opportunities for corruption. Nevertheless, scholars have failed to reach a consensus on the role of democracy in anti-corruption efforts. Similarly, Serra and Rodrik insist that civic participation is critical to reducing corruption, as transparency will only be effective if civil society has a strong voice, but Ades and Di Tella and Treisman fail to find evidence that political rights decrease corruption.⁶⁷ Related to such measures are attempts to strengthen the judicial system and increase the penalties associated with corruption to alter the calculations of civil servants contemplating corrupt behavior, which Damania, et al, support as the most important anti-corruption measure but which Tanzi views as infeasible given significant opportunities for corruption within the judiciary.⁶⁸

Among all of the solutions to corruption that I encountered, there are only two without arguments against them. The first is to increase transparency.⁶⁹ Although some scholars add the caveat that it must be coupled with a democratic political system to ensure electoral consequences for corrupt behavior, making information about government operations more freely available seems to be one solution enjoying a consensus. The other solution centers on

⁶⁶ Tanzi 571.

Khan 133.

⁶⁷ Serra 250.

Rodrik, *The New Global Economy and Developing Countries*, 97.

Ades and di Tella 987.

Treisman 436.

⁶⁸ Richard Damania, Per G. Fredriksson, and Muthukumara Mani, “The Persistence of Corruption and Regulatory Compliance Failures: Theory and Evidence,” *Public Choice* 121, no. 3/4 (2004): 379.

Tanzi 575.

⁶⁹ Tanzi 588.

Serra 250.

Rodrik, *The New Global Economy and Developing Countries*, 97.

norm-shifting.⁷⁰ Sandholtz and Gray find that membership in international organizations represents a successful method for changing and diffusing anti-corruption norms, while Bukovansky insists that anti-corruption measures will be futile without concurrent shifts in the norms of a society.⁷¹

Although this represents at best a broad overview of current thinking on anti-corruption strategies, the range of solutions and the debates over many solutions illustrates the wide array of policies the World Bank can choose to endorse. Understanding the controversies surrounding various measures as well as the extent to which each aligns with neoliberal objectives should illuminate the World Bank's discourse on corruption.

Table 1 summarizes the range of propositions being used to determine to what extent the World Bank's anti-corruption discourse reflects neoliberal values and an attempt to further the neoliberal agenda.

Table 1: Propositions

Proposition	Evidence for proposition	Evidence against proposition
The policies outlined in the original Washington Consensus, specifically those addressing privatization, liberalization, and competition indicate adherence to the neoliberal agenda.	<ul style="list-style-type: none"> • Solutions that prioritize Washington Consensus policies over other alternatives • Failure to consider alternative solutions to corruption • Identifying corruption as the reason for the failure of structural adjustment 	<ul style="list-style-type: none"> • Solutions including and prioritizing policies not enumerated in the Washington Consensus • Acknowledgement of the limitations inherent in market-based solutions to corruption
Neoliberalism struggles to define corruption.	<ul style="list-style-type: none"> • Multiple definitions of corruption within a single document • Vague definitions of 	<ul style="list-style-type: none"> • Clear definitions of corruption • Acknowledgement of varied and multiple

⁷⁰ Jamie D. Collins, Klaus Uhlenbruck, and Peter Rodriguez, "Why Firms Engage in Corruption: A Top Management Perspective," *Journal of Business Ethics* 87, no. 1 (2009): 94.

⁷¹ Wayne Sandholtz and Mark M. Gray, "International Integration and National Corruption," *International Organization*, 57, no. 4 (2003): 780. Bukovansky 205.

	<p>corruption</p> <ul style="list-style-type: none"> • Failure to define corruption • Solutions requiring Bank intervention in a multiplicity of capacities 	<p>manifestations of corruption</p> <ul style="list-style-type: none"> • Clear limits to the areas in which the Bank will intervene
<p>Neoliberalism constructs a public/private dichotomy</p>	<ul style="list-style-type: none"> • Focus on the state as the primary perpetrator of corruption • Failure to acknowledge the role of private companies in contributing to corruption • Solutions pertaining only to the state 	<ul style="list-style-type: none"> • Acknowledgement of the role private firms play in corrupt transactions, particularly large multinational corporations • Acknowledgement of state limitations in dealing with corruption
<p>Neoliberalism unifies the neoliberal discourse with the democratization discourse</p>	<ul style="list-style-type: none"> • Transparency and political/electoral competition solely for the purpose of punishing corrupt officials and increasing accountability • Democracy solely as a means to increase competition 	<ul style="list-style-type: none"> • Transparency and political/electoral competition as components of good governance to be pursued for their own sake • Democracy as a goal rather than a tool of development
<p>Neoliberal solutions to corruption are technical in nature</p>	<ul style="list-style-type: none"> • Technical solutions to corruption coupled with a lack of non-technical solutions 	<ul style="list-style-type: none"> • Solutions including significant non-technical components
<p>Neoliberalism takes an ahistorical, non-contextual approach to corruption</p>	<ul style="list-style-type: none"> • One-size-fits-all solutions to corruption • Focus on “best practices” in eliminating corruption 	<ul style="list-style-type: none"> • Attempts to encourage country-driven solutions. • Moves away from generalized “best practices” for reducing corruption
<p>Comparative propositions</p>	<ul style="list-style-type: none"> • World Bank solutions that match those identified as neoliberal by scholars 	<ul style="list-style-type: none"> • World Bank solutions that match those identified as non-neoliberal by scholars

Methodology

To evaluate to what extent the World Bank’s anti-corruption policy is designed to allow it to pursue neoliberal objectives, I perform a discourse analysis on the World Bank’s anti-corruption strategies from 1997 and 2012, World Development Reports since 1995, and speeches by World Bank Presidents that deal with corruption. Table 2 identifies all of the speeches used for the analysis, which were chosen from all of the presidential addresses housed on the World Bank’s website because they address corruption in significant depth. When performing the analysis, I specifically focus on the propositions described above to identify words, phrases, and concepts that reflect neoliberalism such as competition, reduced government intervention, and privatization as well as those that counter neoliberal principals such as expanding government powers, protecting individuals or firms from competition, and punishing bribers. Evaluating the basic frequency of each provides a general sense of the extent to which the World Bank’s strategy is or is not aligned with neoliberal goals, but I also assess each overall document to ascertain the relative importance of neoliberal versus anti-neoliberal ideas within it. By conducting a discourse analysis, I will be able to assess the degree to which the Bank is pursuing a neoliberal agenda through its current anti-corruption program as well as the evolution of its anti-corruption stance over time to determine if its policies have become more or less aligned with neoliberal objectives in the past fifteen years.

Table 2: Presidential Speeches Addressing Corruption

Speaker	Speech	Date
James Wolfensohn	“People and Development.”	Oct. 1, 1996
James Wolfensohn	“The Other Crisis: 1998 Annual Meetings Address.”	Oct. 6, 1998
James Wolfensohn	“Remarks at the International Conference on Democracy, Market Economy and Development.”	Feb. 26, 1999
James Wolfensohn	“Remarks at the 9th International Anti-Corruption Conference.”	Oct. 11, 1999
James Wolfensohn	“Development Choices in a Changing World.”	Nov. 11, 1999

James Wolfensohn	“Speech at the Multi-Sectoral Conference on Partnerships for Governance and Development.”	Feb. 26, 2000
James Wolfensohn	“Remarks at the 2nd Global Forum: A Democratic State and Governance in the 21st Century.”	May 30, 2000
James Wolfensohn	“Empowerment, Security and Opportunity Through Law and Justice.”	July 9, 2001
James Wolfensohn	“Opening Address to the Third Conference of International Investigators of United Organizations and Multilateral Financial Institutions.”	Mar. 7, 2002
James Wolfensohn	“A Moment for Kenyans to Act.”	July 23, 2003
Paul Wolfowitz	“Parliaments Valuable to Fight Corruption, the Parliamentary Network at the World Bank, Helsinki.”	Oct. 22, 2005
Paul Wolfowitz	“Good Governance and Development—A Time for Actions, Jakarta.”	Apr. 11, 2006
Paul Wolfowitz	“Investing in Sustainable Development: The Value Question, International Corporate Governance Network (ICGN) Conference, Washington, D.C.”	July 6, 2006
Paul Wolfowitz	“Coordinating for Good Governance, Development Committee, Annual Meetings, Singapore.”	Sep. 18, 2006
Paul Wolfowitz	“Path to Prosperity, Annual Meetings, Singapore.”	Sep. 19, 2006
Paul Wolfowitz	“Transparency in Extractive Industries, EITI Conference, Oslo.”	Oct. 16, 2006
Paul Wolfowitz	“International Conference on Improving Governance and Fighting Corruption, Brussels.”	Mar. 14, 2007
Robert B. Zoellick	“Launch of Stolen Asset Recovery Initiative.”	Sep. 17, 2007
Robert B. Zoellick	“Modernizing Multilateralism: Learning from Military History.”	Oct. 6, 2008
Robert B. Zoellick	“The Middle East and North Africa: A New Social Contract for Development.”	Apr. 6, 2011
Robert B. Zoellick	“Conrad H. Hilton Humanitarian Award.”	Apr. 16, 2012
Jim Yong Kim	“World Bank Group President Jim Yong Kim Speech on Anti-Corruption at the Center for Strategic and International Studies.”	Jan. 30, 2013

Results

Patterns Emerging Over Time

There are clear patterns that emerge over time in the World Bank discourse, creating a general trend from a strictly neoliberal discourse in the early years that the Bank began addressing corruption to an increasingly nuanced discussion of the issue in the most recent

speeches of Bank Presidents, World Development Reports (WDRs), and its 2012 updated anti-corruption strategy. I present them loosely in blocks of years, but it is worth noting that the change is gradual and there are rarely definitive shifts from one year to another.

In the first three years that corruption became a major item on the Bank's agenda (1995-1997), the discourse on corruption is virtually identical to the neoliberal discourse as a whole. The Bank maintains the stance that the policies outlined in the Washington Consensus will address corruption and argues that privatization and liberalization are baseline conditions that must be met for the eradication of corruption to be possible. Take for instance this passage from the 1997 World Development Report:

*"In general, any reform that increases the competitiveness of the economy will reduce incentives for corrupt behavior. Thus policies that lower controls on foreign trade, remove entry barriers to private industry, and privatize state firms in a way that ensures competition will all support the fight. If the state has no authority to restrict exports or to license businesses, there will be no opportunities to pay bribes in those areas."*⁷²

Similar arguments are prevalent throughout the Bank's 1997 anti-corruption strategy, "Helping Countries Combat Corruption." In fact, the list of "Macroeconomic policy and sector policy reforms that contribute to the expansion of markets and the reduction of rents," is in many ways identical to the Washington Consensus, as it includes,

"Lowering tariffs and other barriers to international trade. Moving from dual to single exchange rates, with market-determined rates. Introducing competitive credit markets. Eliminating price controls. Cutting subsidies to enterprises. Reducing regulations, licensing requirements, and

⁷² World Bank, *World Development Report 1997: The State in a Changing World*, (Oxford: Oxford University Press, 1997), 105.

*other barriers to entry for new firms, both domestic and foreign. Privatizing government assets in clearly competitive markets. Abolishing monopoly export marketing boards.*⁷³”

Such results strongly align with discourse scholars critiquing the World Bank’s anti-corruption policies as a means to further the neoliberal agenda. In addition to statements that explicitly advocate for measures to increase competition and decrease government power, there is a strong public/private dichotomy throughout the documents in the early years. The Bank focuses exclusively on reducing state intervention to reduce opportunities for corruption while failing to acknowledge the role of private firms in corrupt transactions. The only nuance comes with small caveats regarding the manner in which privatization is conducted, for instance, “Liberalization, demonopolization, and—*if transparent*—rapid privatization are key steps to reducing these two sources of huge economic rents.”⁷⁴ Thus, it is fair to say that the Bank maintained a strong neoliberal stance in these early years, supporting the argument of scholars who say that the anti-corruption agenda is merely another way for the World Bank to advance the neoliberal agenda.

The last years of the twentieth century see an increasing acknowledgement of the importance of the state, although competition and free markets continue to be preferred solutions. Within the WDRs, this period exhibits the same strong public/private dichotomy as the early period, but speeches by President James Wolfensohn begin to highlight roles that the state must take on along with responsibilities shared by private actors. He increasingly speaks of a financial system that, “monitors and supervises banks and the private sector,” and also

⁷³ World Bank, “Helping Countries Combat Corruption: The Role of the World Bank,” (Sep. 1997): 35-36.

⁷⁴ World Bank, *World Development Report 1996: From Plan to Market*, (Oxford: Oxford University Press), 144, emphasis added.

discusses the critical regulatory capacity of states.⁷⁵ The difference between the discourse in President Wolfensohn's speeches and the WDRs of this period illustrates a consistent trend—that presidential speeches tend to lead the discourse, exhibiting shifts one to two years before the shifts are mirrored in the WDRs. Even with these early shifts in thinking, this period continues to largely support the argument that the anti-corruption policies coming out of the World Bank were heavily informed by neoliberalism.

In the early twenty-first century (2000-2005), the public/private dichotomy begins to slowly erode from the discourse on corruption. There remains a significant discussion of the role of the state as a creator of opportunities for corruption, but it is increasingly coupled with an acknowledgement of the need to regulate the private sector and hold firms, particularly those from developed countries, accountable for corruption. Again, this shift is undertaken first by presidents, as when President Wolfowitz said, "Every corrupt transaction, when you think about it, has to have at least two parties—sometimes, it's a whole conspiracy—and often, the bribe-giver in a developing country comes from a developed country."⁷⁶ While the public/private dichotomy diminishes in the international sphere during this time period, domestic firms are often still constructed as victims of corruption. For instance, the 2003 WDR states, "Corruption is a major risk entrepreneurs face, because government officials seeking bribes can undermine the viability of an entire investment. Paying bribes to continue business operations also lowers returns, reducing the incentive to invest."⁷⁷ Thus, although the public/private dichotomy is

⁷⁵ James Wolfensohn, "Remarks at the International Conference on Democracy, Market Economy, and Development," (Speech, Feb. 26, 1999).

<http://web.worldbank.org/WBSITE/EXTERNAL/NEWS/0,,enableDHL:TRUE~menuPK:34472~pagePK:34410~piPK:34521~theSitePK:4607,00.html>.

⁷⁶ Paul Wolfowitz, "Parliaments Valuable to Fight Corruption." (Speech, Oct. 22, 2005 Helsinki).

<http://web.worldbank.org/WBSITE/EXTERNAL/NEWS/0,,enableDHL:TRUE~menuPK:34472~pagePK:34410~piPK:34521~theSitePK:4607,00.html>.

⁷⁷ World Bank, *World Development Report 2003: Sustainable Development in a Dynamic World* (Washington, DC: Oxford University Press, 2003), 138.

significantly reduced in highlighting the role of multinational firms, at a domestic level it remains in place, blaming governments and portraying firms as victims rather than participants in corruption.

Concurrently, the discourse on corruption starts to be unified with the democratization discourse in this era as the role of civic participation and transparency move to the forefront of the solutions being proposed. As early as 2002, the WDR states, “Political institutions such as constitutional rules, the division of power among levels of government, independent agencies’ mechanisms for citizens to monitor public behavior, and rules that inhibit corruption all succeed in restraining public officials of the state from arbitrary action, and good governance will likely take root.”⁷⁸ From this time onward, the prevalence of the market-based solutions of the early years in the Bank’s anti-corruption efforts is replaced with an emphasis on transparency, democracy, and civic participation. At this point, the arguments of scholars who see the anti-corruption discourse as a manifestation of the Bank’s neoliberal agenda begin to break down as the Bank expands its areas of engagement and moves away from market-based solutions.

These trends are intensified and heightened from 2006 to the present. The public/private dichotomy diminishes even further as Presidents Wolfowitz and Zoellick repeatedly condemn the involvement of firms from developed countries in corrupt transactions while WDRs increasingly focus on how to build state capacity rather than criticizing state involvement in the market. Simultaneously, there is a shift away from generalized, universal solutions to an appreciation for country-specific factors and contexts. WDRs from 2006 forward feature numerous text boxes highlighting successful policy innovations from different countries that address the problem of corruption in diverse but effective ways, and presidential speeches

⁷⁸ World Bank, *World Development Report 2002: Building Institutions for Markets* (Washington, DC: Oxford University Press, 2002), 115.

increasingly focus on local ownership of anti-corruption strategies. In a 2006 speech, President Wolfowitz declared, “We cannot ignore problems or challenges, instead we must find solutions which are innovative and flexible and which respect the unique constituents and conditions in each country.”⁷⁹ This change signals a move toward acknowledging historical factors, highlighting the non-contextual nature of the earlier discourse. President Kim continues the trend away from generalized solutions, explicitly saying, “We need to be focused more upon solving real-world problems than the traditional “best practice” model of institutional development.”⁸⁰ This appears to be a shift toward the new development economics, suggesting that a more evolutionary view of the Bank might be more appropriate than arguments that paint the Bank as a static institution driven by the tenets of neoliberalism.

Since 2006, civic participation and transparency have become dominant in the corruption discourse. The updated anti-corruption strategy released in 2012 centers on transparency and civic participation almost to the exclusion of all other methods to combat corruption. This includes methods for gathering and disseminating information as well as efforts to increase civic participation and to build institutions in which citizens can be meaningfully involved. Such a finding contradicts the argument of Everett, et al, that the Bank favors strategies designed to promote competition over those focusing on civic participation and voice.⁸¹ Policies explicitly focusing on market competition are no longer present in the World Bank discourse on corruption, so the question becomes to what extent transparency and civic participation are indicative of continued adherence to the neoliberal agenda. If they are in fact moves away from

⁷⁹Paul Wolfowitz, “Coordinating for Good Governance,” (Speech, Sep. 18, 2006 Singapore).
<http://web.worldbank.org/WBSITE/EXTERNAL/NEWS/0,,enableDHL:TRUE~menuPK:34472~pagePK:34410~piPK:34521~theSitePK:4607,00.html>.

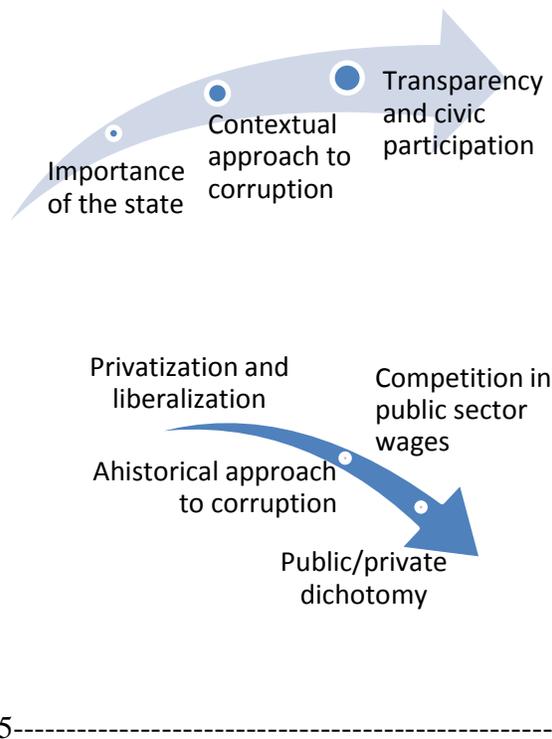
⁸⁰ Jim Yong Kim, “Speech on Anti-Corruption at the Center for Strategic and International Studies,” (Speech, Jan. 30 2013).
<http://web.worldbank.org/WBSITE/EXTERNAL/NEWS/0,,enableDHL:TRUE~menuPK:34472~pagePK:34410~piPK:34521~theSitePK:4607,00.html>.

⁸¹ Everett, et al 5.

neoliberalism, they will comprise significant evidence for the evolutionary view of development economics at the World Bank.

Figure 1 summarizes the progression of the Bank's discourse on corruption over time.

Figure 1: The World Bank's discourse on corruption over time



The World Bank Discourse in the Context of the Larger Discourse on Corruption

The World Bank discourse moves along the spectrum of neoliberal to non-neoliberal over time. After the late 1990s, trade liberalization and privatization diminish in their significance and are less frequently cited as primary solutions to corruption. In many instances, the World Bank explicitly highlights the large opportunities for corruption inherent in privatization processes that are not transparent, moving the discourse away from competitive solutions and toward democratic solutions. Concurrently, the focus on the real wages of civil servants declines as the emphasis shifts from making the civil service competitive with a high opportunity cost for

job loss to building a stronger, more capable civil service held in check through electoral accountability.

The dominance of transparency coupled with civic participation is unsurprising in that transparency is one solution enjoying a consensus in the broader discourse on corruption; however, civic participation is not an uncontroversial measure in the literature. As discussed previously, multiple authors have failed to find that civic participation and democracy have a significant effect on corruption, while others have found both to be important. The Bank's silence on such debates may provide evidence for the claim that the democratization discourse is merely another way for the Bank to impose conditionality and to exercise power over less developed countries, but it is also possible that the Bank does not discuss it because transparency is less powerful in the absence of civic participation and democratic processes. I will explore the extent to which transparency and civic participation represent neoliberal interests shortly.

Perhaps the least neoliberal measure in the literature on corruption is norm-shifting. While norm-shifting is not a measure that the World Bank can explicitly address in WDRs, there are multiple instances of Bank presidents highlighting the role the Bank has played in bringing corruption to the forefront of development. President Zoellick argued in 2008, "the Bank needs to do more than just investigate, prosecute, and penalize fraud and theft. We need to set standards, live them, and promote their broader adoption."⁸² Even as early as 1999, President Wolfensohn demonstrated his awareness of the norm-diffusing role of the Bank, saying, "Everybody talks about corruption...we put it at the center of the Finance Ministry's agenda.

⁸² Robert Zoellick, "Modernizing Multilateralism: Learning from Military History," (Speech, 2008) . <http://web.worldbank.org/WBSITE/EXTERNAL/NEWS/0,,enableDHL:TRUE~menuPK:34472~pagePK:34410~piPK:34521~theSitePK:4607,00.html>.

That was an enormous step forward.”⁸³ Such statements show that the Bank is aware of the power it exercises over the discourse on corruption and that it has endeavored to exercise that power to mainstream corruption as a critical issue in development.

Key Propositions

As the preceding results demonstrate, there are four broadly represented propositions that inform the extent to which the World Bank’s discourse surrounding corruption furthers the neoliberal agenda. While each proposition is critical in itself, the most informative aspect of each derives from the way in which it changes over time.

Explicit components of the Washington Consensus: Between 1995 and 2005 there has been a clear, rapid decline in the frequency that policies associated with the Washington Consensus such as privatization and liberalization are touted as solutions to corruption. Such a definitive decline suggests that the Bank began moving away from obvious and explicit neoliberalism in the twenty-first century.

Public/private dichotomy: Tracing the shift from an exclusive focus on states as the causes and perpetrators of corruption to increasingly balanced views that acknowledge the role of private firms and individuals in corrupt transactions is strong evidence that the Bank began to move away from its strong neoliberal focus in the late 1990s. While firms, particularly small enterprises, are often still portrayed as victims of corruption, the Bank has recognized the pressures governments face from large multinational corporations. Without absolving governments of responsibility, the Bank has opened a nuanced discussion of the roles played by

⁸³ James Wolfensohn “Remarks at the 9th Annual International Anti-Corruption Conference,” (Speech Oct. 11, 1999 Durban, South Africa).
<http://web.worldbank.org/WBSITE/EXTERNAL/NEWS/0,,enableDHL:TRUE~menuPK:34472~pagePK:34410~piPK:34521~theSitePK:4607,00.html>.

public and private actors, eroding the public/private dichotomy and moving away from the neoliberal agenda.

Unification with the democratization discourse: As the results demonstrate, the language of civic participation has become dominant in the past eight to ten years. This constitutes evidence of continued adherence to neoliberalism, as scholars critiquing the discourse on corruption see the democratization discourse as equivalent to the broader neoliberal discourse. Thus, although there has been a decreased prevalence of the public/private dichotomy, it has arguably been offset by the reliance on the democratization discourse and the dominance of civic participation.

Ahistorical and non-contextual approaches to corruption: Along with the declining reliance on the policies of the original Washington Consensus and the public/private dichotomy has been an increasing appreciation for historical and market factors that shape corruption. This is evidenced most clearly by the growing number of country case studies included in WDRs over the past decade that identify contextual factors shaping country strategies as well as presidential speeches advocating for a move away from generalized best-practices. As this is the type of approach touted by Rodrik, a proponent of the new development economics, it suggests that the Bank may truly be abandoning neoliberalism and undergoing a comprehensive shift to the new development economics in its discourse and policies.

Other propositions: Although some of the other propositions identified as indicators of neoliberalism did surface occasionally in my analysis, they did not provide definitive evidence of the Bank's agenda. The Bank addresses confusion defining corruption in its 2012 updated anti-corruption strategy, acknowledging that the definition has been broad and vague, but in general WDRs and other documents deal very little with defining corruption. This could itself be

considered evidence of neoliberalism, as the Bank fails to consider the wide net it is casting with broad discussions of corruption; however, the documents examined do not necessarily demonstrate that the Bank has used its vague definitions to intervene in a multiplicity of areas. Thus, while confusion defining corruption may be present in the Bank's discourse, the principle concerns associated with such ambiguity seem to be unfounded since the Bank has narrowly focused its anti-corruption efforts on transparency and civic participation. Somewhat similarly, technical solutions were interspersed throughout the documents covered, but since all of the sources were broad, overarching documents meant to address global issues in general terms it was difficult to assess the preference for technical solutions.

Overall, the evidence is contradictory. Certain neoliberal elements have declined significantly over time, such as the reliance on Washington Consensus policies to address corruption, the public/private dichotomy, and non-contextual approaches, but there has been a strong, persistent increase in the unification with the democratization discourse. According to discourse scholars critiquing the Bank's anti-corruption strategy, intertwining the anti-corruption discourse with the democratization discourse demonstrates continued adherence to the neoliberal agenda. Therefore, the extent to which the World Bank is acting to advance neoliberal interests reduces to the question of the extent to which democracy, civic participation, and transparency are methods for furthering the neoliberal agenda. If the Bank is not using transparency and civic participation solely to increase political competition, it will be significant evidence that the Bank is evolving toward the new development economics rather than maintaining or expanding its neoliberal tendencies.

Discussion: “How neoliberal” are transparency and civic participation?

An important question to address before evaluating the degree to which a focus on transparency and civic participation embodies neoliberalism is whether it matters for evaluating the legitimacy of the World Bank. That the World Bank’s discourse on corruption has evolved over time from an obviously neoliberal agenda to a focus on institutions, transparency, and civic participation demonstrates that the Bank is not simply pursuing a neoliberal agenda without regard to which strategies are the most effective. However, the problem arises that the increased focus on transparency and civic participation could merely be indicative of the expanded post-Washington Consensus that continues to adhere to the principles of the original Washington Consensus and merely increases the range of issues it is designed to address to cover traditionally non-economic realms such as politics and governance.

The simple answer is to argue that if neoliberalism is strictly limited to the ten policies enumerated in the Washington Consensus, then transparency, democracy, and civic participation are not neoliberal and therefore the Bank is not acting to advance the neoliberal agenda. However, discourse scholars identify unification of the corruption discourse with the democratization discourse as a symptom of the neoliberal agenda. Therefore, answering the fundamental question about the relationship between transparency, civic participation, and neoliberalism requires a re-examination of the justification for identifying unification with the democratization discourse as evidence of neoliberalism. Szeftel argues that making states easier to scrutinize and hold accountable is, “the core language of conditionality, liberalization, good governance, and democratization.”⁸⁴ His argument suggests that democratization is associated with neoliberalism to the extent that it is a means to the end of creating a more competitive environment for governments by opening them to scrutiny and electoral consequences rather

⁸⁴ Szeftel 224.

than being pursued as its own end of good governance. The critical question now becomes whether transparency, democracy, and civic participation are being used merely as ways to increase competition within the government or are viewed as goals in themselves that will promote good governance.

Returning to the documents provides an answer. From 1995 to 2004, virtually any quote regarding transparency, civic participation, or democracy explicitly states that the purpose of such reforms is to increase efficiency and competition. For instance, the 2000-2001 WDR states, “Another important measure is disseminating information to allow people to monitor public service. Using newspapers and other popular information sources to disseminate information in budget allocations and spending enables people to hold civil servants accountable, reducing inefficiency and corruption.”⁸⁵ In this passage, making information available is not an end, but a means of “holding civil servants accountable, reducing inefficiency and corruption,” making the goal monitoring the government rather than building a stronger government. Similarly, the 2003 WDR says, “Civil society and the media also play an important monitoring role—for example, improving accountability and reducing incentives for corruption in government. The commercial exploitation of natural resources is particularly susceptible to corruption...An active civil society makes it easier for environmental officials and others to publicize mismanagement.”⁸⁶ Again, the Bank promotes an active civil society because it has powers to curb corruption in natural resource rents, not because it constitutes an important component of good governance. At this point, the argument becomes slightly problematic since presumably reducing inefficiency by monitoring government officials also contributes to goals of good governance, but as the passages demonstrate, it is possible to distinguish between using transparency and civic

⁸⁵ World Bank, *World Development Report 2000-2001:Attacking Poverty*, (Oxford: Oxford University Press, 2001-2002), 101.

⁸⁶ *World Development Report 2003* 41.

participation as a tool to create more competitive forces for government officials and pursuing them as necessary elements of good governance.

To further illustrate that such a distinction can be drawn, consider this passage from the 2011 WDR, “Conflict, Security, and Development”: “Institutional legitimacy is the key to stability. When state institutions do not adequately protect citizens, guard against corruption, or provide access to justice; when markets do not provide job opportunities; or when communities have lost social cohesion—the likelihood of violent conflict increases.”⁸⁷ Here, democratic rights like access to justice, security, and an absence of corruption are not touted as means to the end of increasing government efficiency and accountability, but as critical components of a well-governed, peaceful state. Although the 2012 updated anti-corruption strategy as well as recent WDRs continue to highlight the role of transparency and civic participation in heightening the efficacy and effectiveness of the state at times, since 2005 the discourse has begun to move away from an exclusive focus on transparency and civic participation as tools rather than ends. Thus, the evidence moves away from supporting scholars arguing that transparency and civic participation are manifestations of neoliberalism to supporting proponents of the new development economics. Coupled with the increasing appreciation for historical and other contextual factors shaping institutions and governance, the shift manifests itself as a conversation between the Bank and developing country citizens. The Bank describes its “updated approach to institutional reform” in the following manner:

“Focusing on ‘binding constraints’ in designing programs of support, rather than on a presumed solution based on institutional and organizational forms elsewhere; ensuring the Bank

⁸⁷ World Bank, *World Development Report 2011: Conflict, Security, and Development* (Washington, DC: The World Bank, 2011), xi-xii.

identifies the same problem as the client; engaging flexibly and systematically with stakeholders over an extended period of time to identify both the problem and the likely solution.”⁸⁸

The move away from best practices and predetermined, non-contextual solutions creates space and demand for greater participation from in-country stakeholders in institution building, rendering transparency and civic participation critical components of good governance that must be in place for such participatory strategies to be effective. Although the shift away from transparency and civic participation as tools is far from complete, the direction of change is clear.

Conclusion

Scholars critiquing the World Bank’s discourse on corruption as a manifestation of continued adherence to the neoliberal agenda were justified in the early years of the Bank’s involvement when the policies outlined in the Washington Consensus were taken as those that would be most effective in reducing corruption. Since then, the Bank has gradually moved away from neoliberalism toward the new development economics as it has reduced its reliance on competition, diminished the public/private dichotomy, and fostered a greater appreciation for individual country contexts. However, the anti-corruption discourse has become increasingly unified with the democratization discourse, suggesting that the Bank may still be pursuing a neoliberal agenda through the creation of political competition under an augmented Washington Consensus that uses economic tools in non-economic spheres. Closer examination of the discourse specifically surrounding transparency and civic participation reveals that while the Bank did initially view transparency and civic participation solely as tools to achieve greater

⁸⁸ World Bank, “Strengthening Governance: Tackling Corruption. The World Bank Group’s Updated Strategy and Implementation Plan,” (2012): 32.

government efficiency and to reduce corruption, in recent years they have come to be recognized as critical components of good governance, or as end goals in and of themselves.

Such results serve to clarify scholarly discourses surrounding the World Bank while deepening our understanding of the institution. By bringing together a diverse range of scholarly views, I was able to search for numerous manifestations of neoliberalism from the obvious policies enumerated in the Washington Consensus to more subtle signals such as non-contextual approaches and the public/private dichotomy. Concurrently, understanding the arguments of scholars like Meier and Rodrik ensured that notions of what constitutes neoliberalism remained limited and functional, ultimately enabling me to distinguish between the unification of the democratization discourse with the corruption discourse and a genuine shift toward incorporating transparency and civic participation into anti-corruption programs as pillars of good governance. My analysis provides strong support for the evolutionary view of the World Bank espoused by Rodrik and Meier while recognizing the legitimacy of arguments accusing the Bank of following a neoliberal agenda in the first years it dealt with anti-corruption. The fact that the Bank has moved away from relying on neoliberal strategies to reduce corruption and has begun to push for governance reforms for their own sake suggests that the Bank is attempting to move toward the new development economics. Even if the Bank still exhibits symptoms of neoliberalism, the shift in its discourse demonstrates that it is capable of changing over time in response to the policies it has found effective and ineffective, which lends the Bank legitimacy as an international development institution.

There are a number of limitations of the study. For one, the analysis is limited to the World Bank's discourse on corruption as it is manifested in global documents such as anti-corruption strategies and WDRs. The discourse may be different in the strategies for individual

countries. Similarly, the discourse I studied may not reflect the actual policies being implemented at the country or community level. Even if the Bank as a whole is attempting to move away from generalized solutions and best practices, individual country offices may not be following suit and specific Bank policies could contradict the global discourse. In fact, changing the discourse in highly public documents like the WDRs would be a relatively easy way for the Bank to address criticisms of its neoliberal tendencies without making substantive changes to its operational policies.

Given the limitations of this study, future research should extend the analysis to specific cases and include interviews with World Bank personnel. Examining the discourse of country-specific strategies and comparing it to the Bank's global discourse will shed light on the extent to which the global discourse is being operationalized. Undertaking analyses of anti-corruption budgets for specific country case studies to determine where anti-corruption funds are being used and comparing the results to expected outcomes based on the global discourse is another important step forward. Interviews with Bank personnel would also clarify distinctions between the anti-corruption discourse and anti-corruption practices, as employees of the Bank likely have a better sense of the extent to which discursive shifts are being operationalized. Any work that delves deeper into the World Bank's approach to anti-corruption will serve to rigorously evaluate the Bank's legitimacy beyond what this analysis could achieve.

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