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## VISITING EXPERTS' PAPERS

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### CORRUPTION CONTROL IN SINGAPORE

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#### I. INTRODUCTION

Since Singapore attained self government in 1959, corruption control has been top of the government agenda. When we took over from the British, corruption was prevalent. The law of Prevention of Corruption Ordinance was weak. Corruption was not a seizable offence and the powers of the Anti-Corruption Bureau were inadequate. Public officers were poorly paid and the population was less educated, did not know their rights and often the way to get things done was through bribery.

For a small city state, it was therefore vital for Singapore to control corruption for our national survival. It was necessary in order to provide a conducive climate and a level playing field to spur economic growth. It is a competitive advantage to attract foreign businesses to invest in our land.

Corruption control has become a strategic tenet for our system of governance. The smooth conduct of government affairs had to be grounded on a rational basis, with clear rules for all to follow. It provides the predictability and the confidence for the public to rely on the government to discharge its duty without bias. There had to be no room to tolerate those who hope for windfalls from powerful friends or from greasing contacts in high places. For Singapore to succeed, we had to operate on a meritocratic principle, where people can see that rewards are tied to the efforts that they put in, and not to corrupt means.

There was much reform required. The law was strengthened. Rigorous enforcement took place. Government administration was improved. All these provided the impetus for Singapore's transformation from a corruption-infested city state to one that is consistently placed very favourably in the league of least corrupt countries in the world by Transparency International and in Asia by the Political and Economic Risk Consultancy. TI has ranked Singapore the fourth least corrupt country in the world and PERC has ranked Singapore the least corrupt economy in Asia.

The mood and resolve to vigorously curb corruption was struck by the government as early as in 1960 when Parliament declared that it: "(was) determined to take all possible steps to see that all necessary legislative and administrative measures are taken to reduce the opportunities of corruption, to make its detection easier and to deter and punish severely those who are susceptible to it and who engage in it shamelessly."

The strong anti-corruption refrain was heard again and again, including this statement, made in 1979 by then PM Lee Kuan Yew, which best explains the need for a corruption-free Singapore: "The moment key leaders are less than incorruptible, less than stern in demanding high standards, from that moment the structure of administrative integrity will weaken, and eventually crumble. Singapore can survive only if Ministers and senior officers are incorruptible and efficient ... Only when we uphold the integrity of the administration can the economy work in a way which enables Singaporeans to clearly see the nexus between hard work and high rewards."

And again by the then PM Mr Goh Chok Tong in Parliament in 1993 "I have every intention to make sure that Singapore remains corruption free. I will not let standards drop. And everyone should know that corruption in any form will not be tolerated. I expect all Ministers, all MPs and all public officers to set good examples for others to follow...."

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## II. POLITICAL WILL

These sentiments reflect the determination and the intense political will in the fight against corruption. Political will, undoubtedly, is a key ingredient in the transformation effort from Singapore's corruption-infested past as it forms that all important sub-structure, upon which all the super-structures of anti-corruption work rest. It provides the soil and the nutrient which allows the seeds of anti-corruption work to germinate and grow; first into a strong sapling, then into a sturdy tree.

But for it to work, genuine political will is not just rhetoric or empty sloganeering. Deeds must match Words. The government mobilized the public, the entire civil service and all apparatus of the state to fight corruption. . .

The year 1975 marked a major turning point in the fight against corruption. The Minister of State Wee Toon Boon, then still a serving Minister in the Government of the ruling party, was convicted of corruption. Such results demonstrated to the public the resolve of the government to keeping Singapore clean. This garnered essential public support in the ongoing fight against corruption. With the efforts put in and with public support over the years, corruption was thus brought under control.

## III. FRAMEWORK FOR CORRUPTION CONTROL

We have approached corruption control through a framework of action which we call the 4 Pillars of Corruption Control consisting of 4As -: "Effective Anti-Corruption Agency", "Effective Acts" (or laws), "Effective Adjudication" and "Effective Administration".

### A. Effective Laws

Effective laws provide the basis for the fight against corruption. The law must define what are corruption offences and their punishments and the powers of enforcement against it. As society and the environment changes all the time, it is necessary to have the law re-visited every now and then to ensure that it is up to date. The powers of enforcement must be well provisioned so that it will have bite.

In Singapore, the principal law is the Prevention of Corruption Act (PCA). This governs the primary offences of corruption and the powers of the enforcement agency, which is CPIB. The PCA was enacted in 1960 to replace the previous Prevention of Corruption Ordinance. Since then, the Act has undergone numerous amendments to increase the powers of investigation of the Corrupt Practices Investigation Officers, enhance punishments for corruption and to plug loopholes to prevent exploitation by criminals.

The law must support law enforcement with a cutting edge. This is vital as corruption offences are particularly difficult offences to deal with. Unlike general crime where there is a victim who tells us everything that happened, in corruption offences, both the giver and the receiver are guilty parties who have the motivation to hide and not tell the truth. This makes investigation and evidence gathering more challenging. To be successful, the law must provide sufficient teeth for law enforcement.

Some of the distinctive features of our law give us that much needed cutting edge. These are:

- (i) a presumption that any gratification received by a public officer from a person who has or seeks to have dealings with him or her or the department, is deemed to have been received corruptly, shifting the burden of proving otherwise to the defence;
- (ii) an acceptor of a gratification can be guilty even if he or she does not have the power, right or opportunity to return the favour;
- (iii) the "accomplice-rule" which views the evidence of an accomplice as unworthy of credit unless corroborated, does not apply for corruption cases;
- (iv) wealth disproportionate to income is admitted as corroborative evidence of corruption in a trial;
- (v) the Public Prosecutor can order any public officer or persons who can assist in the investigation of a public officer, to furnish sworn statements, specifying property belonging to him or her, his or her spouse and children, including money and property transferred out of Singapore;

- (vi) every person under investigation is legally obliged to give information;
- (vii) extra territorial jurisdiction can be exercised against Singapore citizens committing corruption offences outside Singapore;
- (viii) punishment is sufficiently deterrent. A single charge attracts a maximum fine of \$100,000 or an imprisonment term not exceeding 5 years or both. For offences involving Government contracts or those involving bribery of a Member of Parliament, the maximum jail term is extended to 7 years, although the maximum fine remains at \$100,000.

In 1989, the Parliament enacted The Corruption (Confiscation of Benefits) Act. In 1999, this Act was replaced by the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation and Benefits) Act, Chapter 65A. This Act provides the court with powers to confiscate the pecuniary resources and property which a person convicted of a corruption offence cannot satisfactorily account for or when the properties are found to be benefits of corruption offences. The objective is to ensure that the perpetrators will not benefit from corruption.

The Parliament has also enacted the Parliament (Privileges, Immunities and Powers) Act to ensure that Members of Parliament will not benefit from the debate in the House in which they have a pecuniary interest. It has also enacted The Political Donation Act to ensure candidates standing for political election declare donations they received.

Other statutes regulating Government bodies have also incorporated provisions which deter corruption. One such provision is in the Customs Act which specifically provides for a penalty for receiving bribes, and presumes any monies in the possession of a Customs Officer which cannot be accounted for to be corruptly obtained.

## **B. Effective Enforcement**

Having tough laws is no guarantee that there is effective enforcement. If there are tough laws but lax enforcement, corruption will still flourish because the corrupt escape detection and investigation. The situation will be like having a good battle plan but poor troops. It is therefore crucial to devote priority and attention to setting up an effective enforcement agency.

The CPIB is the sole agency in Singapore empowered to investigate corruption offences. It was formed more than 50 years ago. In fact it was under the British that it was first formed in 1952. With self governance in 1959 and then independence in 1965, CPIB has been transformed and developed to its current state.

CPIB has independence of action. We can investigate any person or corporation in government or the private sector, however high in the hierarchy they may be. CPIB reports directly to the Prime Minister so as to block any undue interference from any quarters and to ensure that CPIB favours no one particular individual, department or agency but operates without fear or favour, regardless of colour, creed or social status. In fact, by 1992, CPIB's independence of action was guaranteed by the Constitution, with provision for the elected President of Singapore to open the doors for investigation to proceed should the government of the day block CPIB.

Our Bureau logo "Swift and Sure" is the message to all corrupt offenders that there will be swift action, certainty of results and justice will take its course. CPIB has always endeavoured to be a crack investigative agency, purpose-driven and committed fully to our mission of "combat(ing) corruption through swift and sure action". Swift action suggests promptness of action, speed and timeliness while sure action suggests certainty of action, resoluteness and result orientedness.

Having a strong capability is easier said than done. Our current success does not guarantee future success. In a way, it is a race against the corrupt and the criminal minded as they resort to use of technology and more sophisticated modus operandi to commit corruption. There are more and more ways to hide corrupt proceeds. It is incumbent on the enforcement agency to build enough capability to deal with them. For example, in terms of computer forensic capability – ability to extract evidence from computers, financial investigation capability to follow the money trail and uncover hidden corrupt proceeds.

Sufficient time and resources are needed to ensure that capabilities are built and training is given to the officers of the enforcement agency. A proper career scheme is also necessary with a training and learning programme to build professional expertise.

### **C. Effective Adjudication**

Sure detection and strict enforcement of laws, no matter how effective, must however, be complemented by effective adjudication. Detection, prosecution and subsequent court conviction have specific deterrence on offenders. This also has a general deterrence on the like-minded. It is about prevention through sure detection and conviction in a court of law. Aided by the tough laws, the Courts have created a regime of punishment that is deterrent enough to hammer home, loud and clear, the message that corruption does not pay.

There is transparency in the justice process as all court proceedings are open, public hearings. Decisions are documented and subject to public scrutiny. Both the prosecution and the defence can appeal against any decision made by the Courts.

Judgments from the court provide benchmarks as to the severity of offences and their corresponding sentences. For instance, in a recent Appeal case involving a private banker convicted of corruption involving bribes of \$150,000 (*Wong Teck Long vs PP*), when the accused appealed against his conviction and sentence, the prosecution cross appealed on the sentence, and the High Court not only dismissed the accused appeal but enhanced his original sentence from four months to 15 months' imprisonment. In passing this judgment, the CJ said: "To safeguard the overall public confidence in the integrity of our banking and financial industry as well as Singapore's reputation as a regional and financial hub, punishment for deplorable and corrupt acts, such as that of the appellant, must be swift and harsh so that a strong message will be sent out to the offender at hand and would-be offenders that Singapore does not, and will not, without exception, condone corruption."

In another corruption case involving short supply of marine bunker (*PP vs Lim Teck Chye*), a private sector business case which would tend to attract fines rather than imprisonment, the court had this judgment: "It could not be said that only corruption offences involving public servants.... harmed the public interest concern for the preservation of the integrity of the public service and the administration of justice. Corruption offences committed in the private sector may do so as well, as private corporations provided public service functions..... The corrupt actions of the appellant ... had the potential to adversely affect public confidence in the independence of the marine surveyors and Singapore's bunkering industry. It was therefore untenable to draw a strict line between corruption offences committed in the private sector and those committed in the public arena (for the purposes of sentencing), and a custodial sentence was warranted in this case..."

With the court's sentencing, the clear message is sent to the corrupted and to would be offenders to think twice before committing corrupt acts.

As part of sentencing, the court will also impose a financial penalty on the offender equal to the amount of bribes the offender took. If the offender had taken \$1 million in bribe money, on conviction, the court will order him to repay \$1 million to the State and if he fails to do so, he will be imprisoned by default. So this again sends the clear message that the offender is not allowed to enjoy any of his ill gotten gains.

On top of this, in cases involving government procurement or contracts, administrative actions are taken to cancel the contract and/or to debar suppliers who were convicted of corruption offences from future government contracts for up to five years.

Apart from criminal sanctions, the Prevention of Corruption Act also provides for recourse to civil suit for recovery of bribe monies in addition to criminal prosecution. The CPIB had prosecuted a facilities manager in a large private company for corruption. He took bribes of almost \$300,000 in return for awarding contracts. He was convicted and sentenced to ten months' jail and ordered to pay to the State a penalty of about \$300,000, equal to the amount of bribes he had pocketed. After the prosecution was over, his company brought a civil suit against him to recover the amount of bribes he had accepted whilst employed by them. The accused appealed to the court against this, stating that since he had been ordered to pay back the penalty, he cannot be asked to pay twice, and on this second occasion through the civil suit. The Court of

Appeal dismissed his appeal stating that the law expressly provided for two distinct provisions – a criminal proceeding to disgorge benefits and civil proceedings to recover the bribe monies and therefore it is possible that there can be a double disgorgement and it can act as a further deterrence against corruption. This sends the message very clearly to corrupt offenders that they will be made to pay heavily for their corrupt activities.

#### IV. EFFECTIVE ADMINISTRATION AND GOOD GOVERNANCE

##### A. Preventive and Administrative Measures in the Public Sector

Alongside the statutory measures dealing with corrupt offenders, a proactive approach to curb corruption was adopted by the Government. With the full support of Parliament and the heads of Government departments, strict rules and regulations have been formulated to govern the conduct of public officers. A high standard of discipline is demanded of these officers such as:

- (i) a public officer cannot borrow money from any person who has official dealings with him;
- (ii) a public officer's unsecured debts and liabilities cannot at any time be more than three times his monthly salary;
- (iii) a public officer cannot use any official information to further his private interest;
- (iv) a public officer is required to declare his assets at his first appointment and also annually;
- (v) a public officer cannot engage in trade or business or undertake any part-time employment without approval;
- (vi) a public officer cannot receive entertainment or presents in any form from members of the public.

The commitment of Ministers and heads of Government had similarly resulted in the establishment of administrative measures to reduce the chances of public officers getting involved in corruption and wrongdoings. These measures include:

- (i) identifying and removing opportunity for corruption in Government work procedures;
- (ii) streamlining cumbersome administrative procedures and slashing red tape to provide an efficient and transparent civil service so that no one needs to recourse to corrupt civil servants to get things done;
- (iii) reviewing public officers' salary regularly to ensure that they are paid adequately and comparable to that of the private sector;
- (iv) reminding Government contractors at the time when contracts are signed that bribing public officers administering the contract may render their contracts terminated. A clause to this effect forms part of the standard contract conditions.

##### B. Efficient Administration

Effective administration is also a key to reducing corruption. The civil service in Singapore initiated major reforms in May 1995 under the "Public Service in the 21<sup>st</sup> Century" (PS21) to attain sound administrative governance, organizational excellence and service orientedness. Such improvements in efficiency and effectiveness in public service delivery can act against corruption and reduce its opportunities. This is because service excellence and the need to maintain high standards, in compliance with standard operating procedures, are incompatible with corrupt practices. A service delivered promptly and with no hassle leaves no room for corruption, compared to a service which takes a long time and involves tedious processing stages.

Under PS21, there were several major initiatives to reduce bureaucracy and cut red tape, such as:

- (i) Pro-Enterprise Panel Movement which consists of the Pro-Enterprise Panel (PEP) The PEP receives and vets suggestions from the public to help ensure that government rules and regulations are supportive of a pro-business environment in Singapore. The panel is headed by Head of Civil Service and comprises members from the private sector, e.g. CEOs of companies. The public and companies can provide suggestions through the internet ([www.pep.gov.sg](http://www.pep.gov.sg)) and suggestions accepted may result in rule changes;
- (ii) Zero-In-Process (ZIP) which aims to reduce inefficiencies in services whereby the public has to visit several agencies for related reasons. In the past, issues which cut across agencies were tossed around from one agency to another. In some instances, cases were lost in the bureaucratic maze. The ZIP makes sure that such cases do not slip between the cracks by identifying lead agencies and forming ZIP teams to zero-in on difficult cross-agency issues and propose solutions within a 30 to 60

days timeframe; and

- (iii) POWER (Public Officers Working to Eliminate Red-tape) which aims to reduce bureaucracy by eliminating obsolete public sector rules. The goal of this initiative is to give public officers greater flexibility at operational issues and raise awareness that we should enforce the spirit and intent of the regulations rather than complying with it mindlessly. It allows public officers to cut red tape whenever they can. A POWER website has been set up to receive suggestions from public officers and to channel them to respective regulators;
- (iv) There is a Cut Waste website where the public can submit their observations/suggestions on areas where government can cut any wasteful expenditure. The government Ministry concerned will have to respond to the public's query and have their reply posted in the website for all to see. This helps to keep government on its toes and help to minimize wastage of government spending, if any.

The Singapore Government's main aim of undertaking the PS 21 initiative is to improve efficiency and effectiveness in the provision of its public services. Nonetheless, they have an important side benefit of corruption prevention. Firstly, by empowering and engaging officers for continuous improvement, we hope that the Public Servant becomes more engaged. An engaged officer takes pride in his/her work and is less likely to succumb to corruption. Secondly, by cutting red tape, making services easier and more accessible, it provides less opportunity for public officers to exact bribes to grease a transaction. By seeking feedback from the public and being transparent in its policies and service standards, it leaves little room for public officers to solicit for bribes.

A parallel move to upgrade the civil service and to position Singapore as a leading government to better serve the nation in the digital age was also embarked upon through the e-Government Action Plans. The first such plan was from 2000 to 2003, the second from 2003 to 2006 and we are now in the third plan, known as iGov2010, running from 2006 to 2010. iGov aims at delivering excellent public services as well as connecting the citizens to the government. Electronic services already in place or to be implemented target higher levels of convenience, efficiency and effectiveness for the public. E-governance measures serve to engage citizens more widely through use of infocomm technology.

One of the many e-services initiatives is the introduction of e-Citizen portal where citizens can access government services from the comfort of their homes, for example, to lodge a police report or to renew their passports. They can also use it to lodge a corruption report with CPIB. The service standards of various departments are also published in the portal so that the public can know what to expect. Another e-government initiative is the business.gov.sg portal. This portal provides the public with information and assistance in planning their businesses and starting companies. One of the services provided by this portal is the OBLs (online business licensing service) built in 2002. With OBLs, someone starting a new business can apply and get the relevant permits and licenses from the comfort of his or her home or office without having to physically go to the various government departments. Some 69 licences from 19 government agencies are on OBLs. The turnaround time to obtain all the licences was cut from 21 days to just eight days. The service was very well received and in 2005 won the prestigious UN Public Service Award.

Another service is the Gebiz – the government procurement portal on the internet. Today most of the Government procurement is done through the Internet and it is open to all, including international businesses, who wish to take part. In Gebiz, the posting of the tender requirements is online, the submission of the bids are online, the deadline is controlled by the computer and the results at the end of tender are automatically published for all to see. This leaves little room for corruption or abuse compared to the manual system.

Although the primary driver behind our e-government action plans was not corruption control, it does have such an important side benefit. It reduces visits to government service counters, service turnaround time and cost of delivery. If we think about it, if a government service can now be obtained from the comfort of our homes, at the click of mouse, what chance is there for someone to interfere in between to exact a bribe for the purpose of greasing the transaction?

This inter-relationship between efficiency and corruption control is succinctly summed up in an old article on corruption control in Singapore by Bob Crew of the South China Morning Post when he said:

“The theory is that the administration is so tight, so efficiently run and controlled, that there is no room for corruption, which thrives much better in an inefficient administration in which there are plenty of loopholes for it to flourish unnoticed and unchecked, where there is scope for hoodwinking and beating the system.”

This was an article from way back in 1970s but it is equally relevant today.

## **V. REGIONAL AND INTERNATIONAL EFFORTS**

### **A. Study Visits**

As the sole anti-corruption agency in Singapore, CPIB has been the destination for various study visits and attachments for public officials and counterpart agencies, including countries in the Asia Pacific Region. The visitors are attracted to Singapore mainly because of its international reputation for being effective in controlling corruption. In the spirit of regional co-operation and networking, CPIB hosted official visits and attachments by Government officials from various countries. In recent years, officials visited from countries such as China, Bangladesh, Brunei, Indonesia, India, Nepal, Bhutan, Cambodia, Thailand, Vietnam, Macau, Hong Kong, Australia, Kenya, Ghana, Zimbabwe, Kuwait, Jordan, Solomon Islands, Qatar, Russian Federation, Pakistan, etc.

To be knowledgeable of the latest international developments in anti-corruption matters which could impact on Singapore, CPIB has increased its participation in various corruption-related overseas conferences and seminars.

CPIB has actively established good working relationships with its counterparts in the region and beyond. Assistance is also provided to foreign counterparts in the area of law enforcement, where appropriate, with the understanding of reciprocal assistance from them in the future.

### **B. Specialized Workshops**

CPIB regularly organize an international workshop, known as Anti-Corruption Expertise (ACE) Workshop, with regional participation. We have conducted three runs so far with the following themes – “Excellence in Investigations”, from 2 to 4 August 2006; “Excellence in Computer Forensics” on 10 September 2007; and “Excellence in Management of Anti Corruption Agencies, held from 14 to 16 October 2008. Speakers at the workshop came from Singapore, Malaysia, Hong Kong, Korea, United States, United Kingdom, Australia and France. The workshop was conceived as a means for CPIB, Singapore to share its expertise and to bring professionals together for cross-learning. The conduct of the workshop is also in line with our commitment through the MOU with ASEAN counterparts (re: para 24), and is consistent with our readiness to meet requests for learning visits from foreign agencies. Future ACE workshops will continue to be organized by CPIB to benefit officials from the region.

We also conduct a customized Anti Corruption Management and Investigation Course – a five-day programme done for regional counterparts at cost recovery basis. Officials from Bhutan’s Anti Corruption Commission and from Cambodia’s Anti Corruption Unit have attended.

### **C. International Fora**

The CPIB is actively engaged in international fora and meetings that discuss corruption matters. It is a pioneer member of the ADB-OECD Anti Corruption Initiative. This Initiative meets twice a year. In 2008, Singapore played host to the 12<sup>th</sup> meeting as well as hosted the 6<sup>th</sup> Regional Anti Corruption Conference, in which more than 120 participants took part. CPIB has joined the IAACA (International Association of Anti Corruption Authorities). It is a member of APEC Anti Corruption Task Force (ACT) and, in 2009, we are chairing the discussions of the ACT. Within the ASEAN region, there is a MOU on Preventing and Combating Corruption amongst anti-corruption agencies of the ASEAN region in which CPIB is involved. CPIB is one of the first four agencies which signed the MOU in December 2004 in Jakarta, along with the agencies of Malaysia, Indonesia and Brunei. The objective of the MOU was to enhance mutual sharing, institutional and capacity building and to strengthen collaborative efforts in anti corruption matters.

## **VI. LESSONS LEARNT**

There are four main points to highlight when we reflect on what has been done.

Firstly, mere systems, structures and processes do not necessarily provide the template for success. The magic is in the sincerity of purpose; genuine efforts – not less than honest labour – and the overall operating climate. CPIB has the structures, systems and processes that are allowed to work, given the right operating environment created by a strong political will. Unless the will to succeed is forged, much of any anti-corruption programme will remain a passive idle declaration. Clearly, it is as much a question of fixing hearts and minds as it is a question of fixing the system.

Secondly, it is strategic to focus on the three related areas of enforcement, legislation (or law) and adjudication, as a package. Any weaknesses in any one link in this three-link chain can be fatal. Strong and effective legislation that will make detection and conviction of offenders easier is tactical as this provides the cutting edge for more effective enforcement and ultimately, more effective adjudication. All three areas are essential in anti-corruption work.

Thirdly, we adopted, from the onset, a simple, no-frills and largely enforcement-oriented approach, in the belief that deterrence through sure detection, prosecution and ultimately conviction in a court of law is the most tactically tenable and strategically sound plan of action. By single-mindedly taking strong action against the offenders, we avoided being side-tracked unnecessarily by the bark when we should be directing efforts on the bite. The maxim is: “Keep it simple, do it well”. Early success was thus possible through focused action and unity of purpose. Success, eventually, begets success; almost inevitably. This generates a momentum of its own, creating a virtuous spiral.

Fourthly, public support, so vital in any anti-corruption programme, is best won through successful action against the corrupt, regardless of colour, creed or station in life and executed without fear or favour, firmly and fairly. Such clear, demonstrable success is the surest way of winning public assent.

## **VII. CONCLUSION**

Today, Singapore has curbed corruption. However, we are mindful that our past success is no guarantee for the future and we do not for a moment think that corruption will never take root in Singapore. We know complacency will lead to a downfall. Therefore, the fight against corruption is still a necessary job for all of us. I quote from Mr Lee Kuan Yew when he addressed the Forum on World Ethics and Integrity held in Kuala Lumpur in April 2005: “Singapore has to keep fighting corruption wherever it exists and however difficult it may be politically. The system works because everyone knows the Singapore Government is prepared to act against the most powerful in the land.”

I hope my sharing has been useful to you. The experience of Singapore may not be replicated in other countries as every country has its own characteristics and peculiarities. However, as corruption is a human behaviour which is exhibited across national boundaries with varying degrees of similarities, the systems and mechanisms we put place may bear some similarity and allow us to learn from each other.