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Assessing The Role Of Anti-Corruption Initiatives In Reducing Lobbyist Involvement In E-Procurement: A Case Study Of Mardi

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Abstract

Public procurement is one of the areas that might be exposed to risks of being corrupted and thus need serious attention from the government. In many countries, approximately 20 to 25 percent of public funds had been estimated to have been lost through the corruption in public procurement. In Malaysia, the government spends more than RM150 billion a year in procuring goods and services and this is a sign that the riskiness of public procurement being exposed to corruption and the involvement of lobbyist. Malaysian government has introduced Anti-Corruption Initiatives aims to reduce the corruption practice through lobbyist in the public procurement. The involvement of lobbyists in the public procurement contributes to the leakages of public funds since they offer higher price. They resort to bribery in order to get the information related with the procurement from the officers and then they will sell the information to other interested suppliers at a high price. Hence this study aims to explore how the principles of Anti-Corruption Initiatives which consists of legal and regulatory, transparency, accountability and integrity could reduce lobbyist involvement in the e-procurement system (SPE System). This qualitative single case study interviewed five procurement officers and three suppliers of MARDI who had been using the system since 2011. The study found that these principles were relevant and important in reducing the involvement of lobbyist. The combination of the principles in the system was needed to ensure that the lobbyist involvement remained very minimal. In addition, it helps to build and increase public trust and the people's confidence level on the management of public funds by the procurement officers in the public sector. The participants in the study held the belief that the level of corruption in the public procurement activities would be reduced if such principles were present within the electronic procurement system

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1.0 Introduction

The government has adopted numerous strategies in its effort to reduce and mitigate problems related to the corruption practice especially the lobbyists who have high tendency to engage in unethical behaviour during their dealing with the government agencies. Corruption needs to be controlled by the government to prevent any problems that might occur later if it still exists in the public services. Undoubtedly, most of the countries that initiated the Anti-Corruption Strategies established these strategies because they had to combat corruption (Osei-Tutu, Badu, & Owusu-Manu, 2010).

The implementation of Anti-Corruption Initiatives is the best way to curb corruption in order to reform public procurement practice. However, most of the Anti-Corruption Initiatives in the developing countries have resulted in failure (Heeks & Mathisen, 2012). This is because some of the initiatives are overambitious and its objectives have become blurred in terms of the delivery of the public services. Malaysia started the establishment of the Anti-Corruption Initiatives in 2004 when the National Integrity Plan (NIP) was launched by the former Prime Minister Abdullah Ahmad Badawi. The plan was aimed at increasing efficiency in the public services delivery and also reducing the level of corruption in public and private entities. Consequently, the government introduced the Malaysian Anti-Corruption Commission (MACC) in 2009 with the enactment of *Malaysian Anti-Corruption Act* as a guideline to combat the corruption practice.

Meanwhile, the government has since enhanced its efforts to curb the issue of procurement by developing the Government Transformation Programme (GTP) in January 2010. One of the areas that has been highlighted is public procurement (PEMANDU, 2012). The principles of Anti-Corruption Initiatives embody the following elements: law and legislation, transparency, accountability and integrity (OECD, 2013a). Hegstad, Froystad, and Isaksen (2010) have also affirmed that these principles are essential in designing the strategies or initiatives especially when they relate to the public procurement. There were 20 initiatives developed under the NKRA including the guidelines for lobbyist. This initiative fall under Initiative no. 15 which is directed towards public procurement (NKRA, 2014). Currently, the guidelines for lobbyists are still being developed by the government, waiting to be ready for publication and dissemination to the public soon. In the meantime, while waiting for the guidelines to be ready for implementation, the principles of Anti-Corruption Initiatives can arguably be used in reducing the involvement of lobbyists in the public procurement. The principles of anti-corruption comprising law and regulation, transparency, accountability and integrity are highlighted in E-Procurement aims to reduce the involvement lobbyists in the public procurement.

2.0 LITERATURE REVIEW

2.1 Law And Regulation

One of the principles that include in Anti-Corruption Initiatives framework is law and regulation (OECD, 2013a). Many countries developed the law and regulation in order to combat the corruption practice in their countries such as The Republic of Ghana (Osei-Tutu et al., 2010). The objective of the *Public Procurement Act (Act 663)* is: “to enhance and promote national development, efficiency, transparency and build up the public confidence with the public procurement.”(Osei-Tutu et al., 2010) .“

Anti-Corruption Initiatives create five pillars of legislative reforms on the public procurement act that consists of the following elements: 1) comprehensiveness; 2) transparency; 3) law and institutional framework; 4) clear and standardized procurement documents and processes; 5) control system, efficient procurement officers and the measurement of Anti-Corruption. There are also specific acts that have been regulated (OECD, 2013a) where *Anti-Corruption Act 1997 (575) subsection 17 (1)* required any people to report any unethical such as bribery, promised or offer to the authority.

Meanwhile, the effective and idealist lobbyists are governed by the law and regulations in conducting their tasks (Canada, 2014; Government, 2013; US, 2007). Only registered lobbyists are allowed to involve and engage in the government procurement and it will prevent any possible corruption practice exercised by them in order to fulfil their interest. Even though the lobbying is a global practice, only a few countries in the world have introduced government regulation and legislation. Only one third of the OECD countries regulated lobbyist practice since early 2000s (OECD, 2013b). For certain countries, it is compulsory and mandatory for systems to have regulation for the lobbyists like in Canada and the United State whereas for other countries, like France for example, the regulation for

lobbyists is only voluntary.

On the other hand, Fouloy (2013) suggests that there is no need to have such law for lobbying practices. He states that there is no law that can effectively control the lobbyists. It is important to have registration of lobbyist compared of having a law or regulation for lobbyist. In this case, European Union (EU) does not have any law for lobbyists but it requires the lobbyists to register before engaging in the public services.

Meanwhile, in the E-Procurement System itself, only authorised personnel is allowed to have access to the procurement system. Suppliers who are registered in the system can access the information and will be offered to use the purchasing of goods and services features in the system (Ministry of Finance, 2013). They also have to register with the Ministry of Finance before they are allowed access to the government procurement system. From the findings of several researchers in the area regarding law and regulation concerning the lobbyists in the government services, it has been noted that the enforcement of law and regulations is important to reduce lobbyist involvement in the public procurement.

2.2 *Transparency*

Transparency refers to ability of the public to access the reliable information easily especially on rules and regulations and also processes involved in the public procurement (Abebe, n.d). The public procurement is an important issue that has been discussed in economic and business globally. The processes involved in the public procurement must be transparent and adds value for money to the government. This is because it involves public funds.

One of the Anti-Corruption Initiatives is to focus on the public procurement where the processes and persons involved in the procurement must be transparent. In this regard, the government should provide the suppliers with clear information to ensure that they understand the public procurement procedures (OECD, 2009). Apart from that, all the confidential information should be protected by the government to prevent from any corruption practice during the processes. According to Heggstad et al. (2010) the transparency is important in every stage of procurement cycle.

In view of the lobbyists, they should be transparent in their practice to safeguard the public decision making process. According to OECD (2013b), the transparency of lobbyists can help to reduce problems that might have been caused by the lobbyists. The feedback from a survey conducted by OECD indicates that the stakeholders need the lobbyist to disclose their activities to the public to show that they are practicing integrity and transparency. When the lobbyists disclose their activities, it will provide sufficient information to enable public scrutiny. Otherwise, any supplementary disclosure of the lobbyists should also be considered by the government to ensure the information is properly disclosed before the lobbyists engage in the public procurement or any government services.

Thus, transparency should work both ways, that is, on the part of the procurement officers and procurement system, as well as the lobbyists if they want to be involved in the public procurement to show that they are independent in managing their activities. All the processes in the procurement stages should therefore be transparent and follow the regulation provided accordingly to prevent the intervention of the lobbyist in the procurement processes.

2.3 *Accountability*

The Anti-Corruption Initiatives also stress on the elements of accountability especially on the separation of responsibilities and also on the independent scrutiny. In the case of the public procurement, every decision is made with a consensus by its committee. There is no individual or the respective procurement officer who can make a decision solely and independently (Pacific, 2004). In addition, the government has issued a guideline to ensure that all the parties involved in the procurement are accountable for their tasks and also independent from any personal interest if they continue to do the same job for a long term because they might be vulnerable to corruption in the public procurement. Those who are involved in the procurement and hold sensitive positions should do a job rotation for every three years (active) and five years (non-sensitive position).

According to UNDP (2010), accountability exists when people do the right things, engage with the public official through the independent review, and also the provide disclosure of information for the transparency mechanism.

They must be consistent with the policies stated by the organisation and give their full commitments to the stakeholders. It is important to engage actively between the government and the public to be more responsible and accountable in managing public funds. Therefore, the good relationship between the government and its citizens will enhance the accountability of the public procurement.

The lobbyists are accountable for their responsibility and obligations to their clients since they are employed and acting on behalf of their clients' respective companies. Sometimes, they tend to do the lobbying to fulfill their personal interest when they receive the insider's perks in performing their jobs. When the lobbyist perform their tasks accordingly and with high level of professionalism, it can eliminate these insider's perks and they tend to be accountable for and responsible in doing their job (Fallon, 2011). According to LeBov (2013), the lobbyists are responsible to do all the right thing accordingly at the right time and in the right order not on behalf of their clients. There might be a potential exposure to the corruption practice if they follow what are required by their clients. Thus, the lobbyists need to be held accountable in managing their tasks in order to be transparent to the public. Only the regulated accountable lobbyists can engage in the public services.

2.4 Integrity

Integrity is another element which is a key requirement in the public procurement. Generally, it is related to the procurement personnel and the suppliers. In Malaysia, there is a regulation that specifically oversees the procurement officers to ensure that they organize and manage the public procurement accordingly. According to Pacific (2004), the public officers should perform their tasks based on *Public Officers (Conduct and Discipline)(Amendment) Regulation 2002*. It states that if any member of the tender board who has personal interest in the tender, the member must declare that interest. Any member with such personal interest is also required to leave the meeting room during the discussion and decision making process to show their integrity and credibility in managing the procurement.

According to Cocirta (2007), the integrity rules is needed as code of conduct for lobbyists since it will contribute to the transparency in lobbying practice. Canada is the only country which has legislated the code of conduct for lobbyists where they need to conduct with openness, integrity and in professional manner (Cocirta, 2007). The lobbyists should be honest in performing their jobs especially when they are in the process of obtaining confidential information. The effective and idealist lobbyists depend on their personal integrity and credibility in performing their jobs. Usually they are regulated with certain code of conducts for lobbyists (McGrath, 2006).

As with any member of the procurement decision making committee have personal interest, the lobbyists are also required to declare any interest that they represent for in the procurement process and they should not offer any interest such as gift, money and others directly or indirectly to induce the public official to give the information or to get the tender offer in the procurement. The lobbyists are prohibited from committing any action or practice that may lead to corruption, illegal and unlawful activity in the government services (Government, 2013). Thus, integrity hinders the lobbyists from committing any unethical actions or making any illegal dealing in the government services if they are honest and full of integrity.

3.0 METHODOLOGY

The study was conducted in a single case study via face-to-face interview with the procurement officers in MARDI and suppliers that involved in MARDI procurement system. Based on Yin (2011), views and opinion from the perspectives of procurement officers and also from the suppliers are required in the study since these two groups are familiar with the electronic procurement as they have been using the system. Thus, the design of this study is based on single design case study of MARDI employing qualitative methodology.

(MARDI) is one of the statutory bodies under Ministry of Agriculture and Agro Based Industry (MOA) that had been mandated to conduct research and development (R&D) activities in food, agriculture and also agro-based industries. There are 19 Responsible Centres or *Pusat Tanggungjawab (PTJs)* and 26 stations around Malaysia including Sabah and Sarawak that are operating in full services and managing all the these R&D processes including the procurement activities. Basically, MARDI has to follow all the procurement procedures that regulated by Ministry of Finance (MOF) based on *Procurement Guidelines Book, Treasury Instruction and Treasury Circulars*

Letter.

The procurement activities are decentralized where every responsible centre (*PTJ*) manage their own purchasing. However, it is restricted to certain limit of amount. Usually for the value of procurement until RM50,000.00, every *PTJ* will purchase the goods and services and manage their procurement process on their own while for the value above RM50,000.00, it will be managed by the Procurement & Purchasing Division. For the purchasing value of RM20,000 until RM50,000, there will be a committee that will decide and approve the procurement made by the responsible centre. This committee is known as *Jawatankuasa Sebutharga B*, chaired by the head of *PTJ*.

Six MARDI procurement officers and five suppliers to this particular Malaysian agricultural R&D agency were invited as participants but only five officers and three suppliers agreed to participate in the study. The face-to-face interview was conducted with these two groups. The suppliers were chosen based on the income for the year and also the quantity of contracts awarded to the suppliers through the system. The procurement officers were chosen based on the number of transactions conducted in the Responsibility Center, or *Pusat Tanggungjawab (PTJ)* via the system. The case study protocol was designed as guidance in conducting data analysis by the researcher.

4.0 FINDINGS

MARDI started to reform their procurement process in July 2011 where it used the electronic procurement in the direct purchase process. The system used in MARDI is known as *Sistem Perolehan Elektronik (SPE)*. The SPE system is a system that had been developed by Ministry of Finance for the use of the statutory bodies, SME and other institutions in managing their procurement process. One of the main reasons MARDI adapt SPE is to facilitate suppliers in the procurement process. This SPE is expected to benefit not only MARDI but also suppliers in terms of being time and also cost saving. All the officers involved in the procurement activities are those who are highly experienced and knowledgeable. Those officers have three to four years of experience in managing the procurement activities including through the electronic procurement.

4.1. Law and Regulation

The law and regulation used by MARDI is *Treasury Circular on the Electronic Procurement* (Ministry of Finance, 2013). All the procedures in the circular implemented in the SPE system in MARDI where elements of transparency and accountability are applied in the system. The automated and standardised processes through the system lead to effectiveness and efficiency in the procurement processes. This reduces the opportunities for corruption in the public procurement. In addition, it also reduces the involvement of lobbyist in the procurement processes. Under SPE system, transactions are conducted directly with the respective supplier and there is no communication involved outside the system since the suppliers do not know their competitors during the process. It is difficult for them to predict the price offered by others suppliers. Thus, only the genuinely bona fide companies can enter the procurement processes and this will avoid favouritism among procurement officers and thus allows the fair competition among suppliers and encourages the suppliers to supply better quality of goods and services based on value for money.

All interviewees were asked whether the participation of lobbyist in the procurement could be reduced when MARDI started to implement the electronic procurement. Interviewees agreed that the system had reduced the intervention of human especially lobbyists in their organisation. Previously, the traditional system was exposed to the involvement of lobbyists in the procurement since lobbyists had a chance to communicate and offer bribes to the officer and high prices in the procurement process. Hence, the SPE system was a good solution to minimise this problem.

Even though the system becomes one of the mechanisms in reducing the number of lobbyists in the procurement, the informants suggest that there should have been a specific law that would regulate the lobbyists if they wanted to participate in the public procurement. The lobbyists who wanted to be involved in the procurement would have to register as valid parties and also declare their roles representatives of the respective companies in order to be transparent so that their involvement would not be questionable especially by other suppliers.

4.2 Transparency

In the section, all the processes involved in the procurement processes were observed and reviewed during the study.

All the documents related were also reviewed to ensure that they followed the requirements provided and the documentation are standardized at every *PTJ*. The lists of documents reviewed during the study are as shown in the following table:

Table1: Lists of supporting documents for SPE

No.	Supporting Documents
1	Requisition Form (MDI.01A/ MDI.01B)
2	Specification Form
3	Listing of Suppliers that invite by the officer & succeed in the procurement process
4	Purchase Order generated from SPE
5	Delivery Order generated from SPE
6	Goods Receive Notes
7	Invoice generate from SPE

To ensure that the objective of the study can be achieved, document review was conducted in this study. All the documents required by MARDI for every transaction through the SPE system were listed. All the documents listed above were supported with the payment vouchers before payment was made to the suppliers. Based on the document review, it was found all *PTJs* had complied with the requirements during the procurement process through the SPE System. The processes were transparent and each of the document had been provided and verified by the officers during the transaction. All the processes could also be accessed by the suppliers during the procurement activities.

The information gathered from the interviewees also showed that the specifications prepared by the users at the *PTJs* were clear and not biased to specific products. The clear disclosure of information, process and action being open to the public would improve the transparency and also promote fairness especially to the suppliers in the public procurement (Bernama, 2011). Hence, the system would reduce the involvement of lobbyists in the public procurement when the processes involved in the SPE were automated and transparent. It would minimize the capacity of the procurement official to abuse their power and limit the opportunity to manipulate the procurement processes. Moreover, it also helped the officers to be more accountable in performing their tasks in the procurement process.

Meanwhile, another response that was noted from the suppliers group is as follows:

“The processes in the SPE system are transparent and all the information provided can also be accessed through the system. For example, the specification given by the agencies are very general and it not specific to the special brands of the product. We can also access the action that had been taken by the agencies and also receive the notification by email during the process. The time schedule during the procurement is also adequately reasonable for us to prepare and submit the quotation.”

Thus, it showed that the system provided a clear specification and reasonable time for the suppliers in providing the quotation. It also indicated that the suppliers agreed and were satisfied with the SPE System in the public procurement. They could also monitor the processes flow accordingly. Hence, more transparency in the system would help the officers to make reliable decision on the purchasing of goods and services.

4.3 Accountability

The other principle of Anti-Corruption Initiatives is accountability. The objective of accountability refers to individuals such as officials and suppliers in conducting their tasks and duties accordingly in their area of responsibility. This principle needs to be applied in the E-Procurement to ensure that the officials are responsible with their duties in the procurement processes and at the same time reduces the involvement of lobbyist in the procurement.

The responses from several officers on the accountability of the procurement officer in the procurement processes indicated that MARDI had provided courses related with the procurement process via online to ensure they understood the processes and could perform their job properly and accordingly. Other than that, the selection of the officers involved in the procurement process was based on their experience in managing and conducting the

procurement activities. In the study, most of the officers involved in the SPE system had three to four years of experience since the implementation of the system in MARDI. Hence, they had reasonable experience with the system and were knowledgeable about it.

All *PTJs* kept their documents and records on the decision making process effectively and accordingly to enable others to review that information later. It was a way to ensure accountability in providing the true and fair views on information to the public. During the document reviewing process, all records involved in the procurement process were reviewed especially the ones that were related to decision-making on the suppliers selection for certain procurement. It was found that records and documentation were properly managed.

Meanwhile, for the procurement needed for technical specification, there was a committee that consisted of procurement official and also the users who were responsible to decide and select the suppliers that would provide the goods and services to MARDI. This had been stated in the MARDI Financial Guidelines (MARDI, 2014). The officers were appointed by their respective Heads of *PTJs* as committee members. This indicated that the officers that had been appointed needed to be accountable and responsible for their duties. Moreover, the decision made was also not influenced by other parties unless the committee members themselves and this suggested that the corruption could be prevented from the procurement processes. Document review also revealed that different officers were in charge at various procurement processes indicating that the system was very transparent. No single officer was allowed to make a decision, and instead all the decisions were made by the committee.

During the interview, a few officers mentioned that MARDI had organized the training for the officers in MARDI to enable them to organise and understand the system. Most of the training sessions were conducted in-house by the Procurement and Purchasing Division upon implementation of the system. An officer said:

“We attended the courses conducted by the vendor several times. The purpose of the training is to ensure that we are able to conduct the tasks given and at the same time able to build accountability in managing the procurement through the system.”

Likewise, the suppliers are also given an opportunity to attend the courses organised by MARDI on the usage and implementing the SPE in the procurement processes. The responses gathered from the suppliers showed that the training was useful in enabling them to use the system during the procurement activities. In term of reducing the unethical activities and also reducing the involvement of lobbyist in the procurement process, they said that the awareness programme focusing on reducing corruption among officers and also lobbyist involvement in the public procurement should be organised by MARDI since the public procurement was highly vulnerable to the unethical activities. At the same time, the suppliers also needed an assurance that the officers were accountable and abide the procurement guidelines. Most importantly, the decision-making process should be transparent from intervention of lobbyist in the procurement process either through SPE or traditional system.

However, the responses from the officers also indicated that MARDI had yet to organise awareness programme for their own officers. They found that it was important to organise such programme and have planned to conduct it soon and collaborate with the Integrity Unit of MARDI and Malaysia Anti-Corruption Commission (MACC). Thus, the implementation of training and programmes could promote transparency and enhance accountability of the officers as well as suppliers in the procurement processes so that they became aware of the possibility of the lobbyist involvement in the processes if they were not responsible in carrying out their tasks.

4.4 Integrity

The objective of this section is to identify whether the integrity can reduce the lobbyist involvement in the procurement activities. Integrity is defined as a set of moral that is consistent with action and behaviour embraced by individual that will prevent from the corruption (Bernama, 2011). This principle is applied in the procurement process to ensure that the system complies with the relevant law and regulation. It will enhance fairness and promote open competition in providing a quality product at a fair price when non-discretionary manner is applied in the procurement. Moreover, all processes involved should comply with the regulation provided and eventually this will

limit the officers from discretionary decision making in the procurement process. The principle of integrity in the procurement can build the public trust and raise confidence level in carrying out various transactions through the system.

Meanwhile, the creation code of conduct for those who involved in the procurement processes are required to be applied in the organisation. This code provides a guideline for the officers on their moral obligation to be committed to ethics and at the same time refrain them from accepting bribes from the suppliers especially the lobbyists. Several officer responded during the interview that they had conformed to all regulations with regard to integrity in performing their duties during the procurement processes. All officers involved were required to disclose their financial asset including any sources of non-government income and declare any relationship that might exist between them and the suppliers. This was to avoid any conflict of interest that could contribute to unethical behaviour and the decision made by the officer would be subjected questions and suspicions from the suppliers. Hence, it was found that the officers were performing their job in integrity and the public could rely on the decisions made by the officers.

Meanwhile, all processes in the system themselves had a different officer responsible for each stage in the procurement cycle. The separations of duties among the officers showed that they were accountable and had promoted integrity in the procurement process. This was supported by the organisation chart of Procurement and Purchasing Division in MARDI which showed delegation of the tasks to a different officer for each stage. Generally, the authorised personnel comprised the Finance Director and Assistant Director, as well as support staff members among officers in the division. No one conducted the same tasks during the procurement process in the system.

All officers responded to the question related to the offence committed by the procurement officers by indicating that there had been no identifiable case since the implementation of SPE system in MARDI. This suggested that the system had been designed according to the nature of procurement to be transparent and promoting integrity among officers involved in the processes. The role of the officers had been determined and tasks had been assigned accordingly. Previously, there had been a number of fraud cases detected under the traditional system. The action taken is according to the regulation provided in the *Treasury Circulars on Incompliance of Government Procurement* (Kramer, 2012). One case had been forwarded to the Disciplinary Committee in the agency. The case had been investigated under Malaysian Anti-Corruption Committee (MACC). However, the offender was found not guilty by MACC. In that case, the administrative or judicial processes were imposed to the offender rather than the dismissal of the officer from the agency. Based on the responses obtained from the officers interviewed, it was found that the offender had performed his job for more than three years in the procurement activities.

According to Bernama (2011), the agency should conduct the job rotation regularly for the officers involved in a sensitive position like procurement process. However, several officers responded that their *PTJs* had yet to implement job rotation in the organisation. Most of them who were involved in the procurement processes through the system had been around for two to three years in the service. Therefore, it had reached the time for the management to conduct job rotation for their officers involved in the process in order to maintain integrity. Thus, if the officers promote integrity in their jobs, this gives a sign that the system was transparent and efficient in performing procurement activities. It would eliminate bad attitude among the officers and would also reduce the intervention of lobbyist in the procurement processes that might lead to corruption.

The responses on the aspect of integrity in the procurement system were also obtained from the suppliers. The suppliers must also have some integrity in their roles as independent and transparent to the agencies. The validity of the suppliers could be measured based on how they reacted and their roles in the procurement activities. Only registered suppliers were acceptable to be involved in the procurement. One of the suppliers' responses is as follows:

“Overall the processes in the system are transparent and we can see how the officers express their action with integrity and accountability. We also have to comply with all regulations. All the information related with the specification is gathered in the system and we didn't get it from any other parties including the officers in the agencies.”

The response indicated that the suppliers were free from any unethical practices during the procurement. They obtained the information through the system without lobbyist involvement. As mentioned by one of the suppliers during the interview session, if they had used the lobbyist as their intermediate parties with the officers, this might incur a lot of financial implications. It was also confirmed that it was difficult for the lobbyists to deal with the officers through the system because all the transactions were conducted online and that there was no communication that existed between the lobbyist and the respective officers.

5.0 Conclusion

The implementation of SPE system in MARDI was a good reform to enhance the effectiveness and efficiency of the procurement process in the eyes of the public and for their own benefits. Even though the system was still at the early phase, it showed positive results so far and could therefore be viewed as having been successfully implemented. The numbers of transactions through the system increased and this indicated that the users among officers started to adapt to the system in their *PTJS*.

It can be summarised that the findings of the study indicated that the principles of Anti-Corruption initiatives comprising of law and regulation, transparency, accountability and integrity in the electronic procurement system are able to reduce the involvement of lobbyist in the procurement process. Elements of transparency and integrity were found to be important in developing strategies to curb issues related to corruption. The result of the findings also concurred that the development of guidelines for the lobbyists is necessary in order to control their involvement in the government services and their roles should be transparent and clear to the public oversight.

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