



Institutional Effectiveness of Anti-Corruption Agencies in Thailand: A Comparative Study of Singapore and Hong Kong

Suthamma Paripontueasakul*

Faculty of Political Science, Chulalongkorn University, Bangkok, Thailand

Received 2 June 2025; Received in revised form 25 August 2025

Accepted 15 September 2025; Available online 26 June 2026

Abstract

Despite the establishment of multiple anti-corruption agencies, Thailand continues to experience persistent corruption, particularly in the public sector, raising critical concerns about the institutional effectiveness of its anti-corruption framework. This study employs a qualitative comparative analysis of anti-corruption agencies in Thailand, Singapore, and Hong Kong, aiming to identify institutional factors that account for their differential success in combating corruption. The research utilizes data sourced from official reports addressing legal mandates, institutional autonomy, and resource allocation to systematically assess key determinants of agency effectiveness. Findings reveal that Singapore's CPIB and Hong Kong's ICAC consistently outperform Thailand's NACC and PACC, as reflected by superior rankings in international anti-corruption indices and lower corruption prevalence. The superior institutional effectiveness of CPIB and ICAC is attributed to three principal factors. First, the CPIB and ICAC operate under broad legal mandates encompassing public and private sectors, reinforced by stringent penalties, whereas the NACC and PACC maintain narrower mandates focused predominantly on public-sector corruption and impose comparatively lenient sanctions. Second, the CPIB and ICAC benefit from greater institutional independence, enabling operational autonomy with minimal political interference, while Thailand's agencies encounter significant constraints. Third, the CPIB and ICAC exhibit enhanced operational capacity characterized by sufficient resource allocation and manageable caseloads, in contrast to the resource shortages and excessive workloads facing the NACC. To strengthen Thailand's anti-corruption institutions, this study recommends expanding agency jurisdiction, intensifying legal penalties, reinforcing institutional independence, and addressing resource deficiencies.

Keywords

Institutional Effectiveness, Corruption, Anti-Corruption Agency

Introduction

Corruption remains a pervasive global challenge with particularly significant implications for governance and development across many Asian countries. Thailand, Singapore, and Hong Kong, China, share a historical legacy of entrenched corruption within their civil services dating back to the early twentieth century. In response, these jurisdictions established specialized anti-corruption agencies (ACAs) tasked with enhancing the institutional effectiveness of governance by preventing, investigating, and prosecuting corrupt activities.

Thailand's initial anti-corruption efforts began with the creation of the Commission of Counter Corruption (CCC) in 1972, later incorporated within the Prime Minister's Office in 1975 (National Anti-Corruption Commission, 2019). However, the CCC's limited institutional independence, attributable to its proximity to the executive branch, and the absence of comprehensive ethical regulations for public officials compromised its effectiveness (Mutebi, 2008). The 1997 Asian financial crisis precipitated reforms, culminating in the establishment of the National Anti-Corruption Commission (NACC) in 1999 under the Organic Act on Counter Corruption, B.E. 2542 (1999), and the Public Sector Anti-Corruption Commission (PACC) in 2001, supported by the Executive Measures in Anti-Corruption Act, B.E. 2551 (2008). Despite these reforms, both agencies remain confined to addressing public-sector corruption and lack jurisdiction over private-sector offenses or corruption involving ordinary citizens. Moreover, the lenient penalties imposed raise concerns about the agencies' deterrence capacity and overall institutional effectiveness.

In contrast, Singapore's Corrupt Practices Investigation Bureau (CPIB), established in 1952 as a successor to the ineffective Anti-Corruption Bureau (Quah, 2010), and Hong Kong's Independent Commission Against Corruption (ICAC), formed in 1974 as an autonomous agency reporting directly to the Chief Executive (Independent Commission Against Corruption, n.d.a), demonstrate markedly higher institutional effectiveness. Both possess broad legal mandates encompassing public and private sectors, enforce stringent penalties, and maintain significant operational autonomy. Singapore's CPIB has successfully reframed corruption as a high-risk, low-reward offense through the Prevention of Corruption Act 1960, which imposes severe penalties, particularly for government contract-related offenses (Corrupt Practices Investigation Bureau, n.d.a). Similarly, the ICAC operates under key legislative instruments including the Independent Commission Against Corruption Ordinance (Cap. 204) (1974), the Prevention of Bribery Ordinance (Cap. 201) (1971), and the Elections (Corrupt and Illegal Conduct) Ordinance (Cap. 554) (2012), providing a comprehensive legal framework for investigating and prosecuting corruption with stringent penalties (Independent Commission Against Corruption, n.d.a).

These institutional differences are reflected in the 2024 Corruption Perceptions Index (CPI), which ranks Thailand 107th (score: 34/100), significantly lower than Singapore (3rd, 84/100) and Hong Kong (17th, 74/100) (Transparency International, 2024a, 2024b, 2024c). Despite legal and institutional reforms, Thailand's anti-corruption agencies continue to face challenges in achieving comparable effectiveness.

Current literature often neglects comparative institutional analyses of ACAs in Southeast Asia and inadequately applies principal-agent and asymmetric information theories to explain anti-corruption governance challenges. This study seeks to fill these gaps by comparatively examining the legal mandates, institutional autonomy, and resource allocation of ACAs in Thailand, Singapore, and Hong Kong, with a focus on their institutional effectiveness. Employing principal-agent theory, this research explores the inherent difficulties governments (principals) face in ensuring that ACAs (agents) act in the public interest amidst conflicting incentives and imperfect oversight. Additionally, asymmetric information theory is used to elucidate how concealed corrupt practices undermine enforcement efforts. By integrating these theoretical frameworks, the study advances understanding of the institutional determinants of ACA effectiveness and offers policy recommendations to strengthen Thailand's anti-corruption regime.

Literature Review

Corruption is a complex phenomenon, broadly defined as the abuse of entrusted power for private gain, which manifests in various forms such as bribery, nepotism, extortion, fraud, and embezzlement across public and private sectors (Quah, 2001). The historical foundations upon which anti-corruption agencies (ACAs) are established constitute a critical determinant of their institutional effectiveness. ACAs function as specialized public bodies mandated to investigate, prevent, and deter corruption through legal enforcement and institutional oversight, combining both punitive and preventive strategies (Sousa, 2010). The trajectory of ACA development is deeply embedded within the broader political, legal, and administrative heritage of their respective countries. These legacies influence not only the design and operational capacity of the agencies but also the political environment in which they function and the public's expectations of their role.

Singapore and Hong Kong's ACAs illustrate how a colonial legal and bureaucratic inheritance can provide a significant institutional advantage. Both jurisdictions emerged from British colonial rule, which embedded principles of common law, bureaucratic professionalism, and rule-based governance that have informed the evolution of their ACAs. Singapore's Corrupt Practices Investigation Bureau (CPIB), established under British colonial authority in 1952, inherited

an early legal and institutional framework that prioritized administrative integrity and anti-corruption measures as central to public administration (Quah, 2010). Following independence, the CPIB retained and expanded this legacy through the enactment of the Prevention of Corruption Act 1960, which provided the agency with a comprehensive legal mandate and robust investigatory powers. The continuity of colonial administrative practices, coupled with a strong political commitment to good governance, enabled the CPIB to develop institutional resilience and public trust over decades.

Hong Kong's Independent Commission Against Corruption (ICAC), founded in 1974 amidst widespread corruption scandals, similarly capitalized on the British colonial legacy of legal professionalism and bureaucratic discipline. The ICAC was granted extensive powers under the Prevention of Bribery Ordinance (Cap. 201) and supported by political leadership committed to systemic reform (Independent Commission Against Corruption, n.d.a). This historical context allowed the ICAC to institutionalize transparent processes and enforce anti-corruption laws impartially, distinguishing it from less-established counterparts.

Conversely, Thailand's ACA history reflects a more fragmented and politically turbulent context. The establishment of the Commission of Counter Corruption (CCC) in 1972, and its subsequent evolution into the National Anti-Corruption Commission (NACC) under the Organic Act on Counter Corruption, B.E. 2542 (1999), occurred within a governance environment characterized by recurrent political instability, weak rule of law, and frequent institutional reforms (Mutebi, 2008; National Anti-Corruption Commission, 2019). Unlike the relatively stable and rule-bound environments of Singapore and Hong Kong, Thailand's ACAs have faced challenges related to politicization, inconsistent enforcement, and institutional overlap, most notably between the NACC and the Public Sector Anti-Corruption Commission (PACC), created in 2001. The absence of a stable colonial administrative framework, combined with a political system susceptible to elite capture and patronage networks, has hindered the development of a coherent anti-corruption institutional architecture.

This comparative historical perspective demonstrates that the effectiveness of ACAs cannot be separated from their institutional heritage. The colonial legal traditions and political stability enjoyed by Singapore and Hong Kong have contributed to the emergence of ACAs with clearer mandates, stronger legal foundations, and greater operational independence. In contrast, Thailand's experience suggests that historical discontinuities and political fragility can constrain ACA performance, underscoring the importance of institutional path dependency in shaping anti-corruption governance outcomes.

The comparative literature on ACAs in Asia provides valuable empirical and theoretical insights into the factors underpinning agency effectiveness. Quah (2007) offers a seminal contribution through his identification of six preconditions necessary for successful ACAs: incorruptibility, operational independence, comprehensive anti-corruption legislation, adequate staffing and funding, impartial enforcement, and political commitment. This framework serves as a useful benchmark for cross-national comparisons and highlights the multifaceted nature of anti-corruption agency performance. Singapore and Hong Kong consistently meet these criteria, with ACAs that exhibit institutional robustness and sustained political backing. Quah's analysis attributes the superior performance of the CPIB and ICAC to strong political will, which ensures adequate resources and protects agencies from undue political interference. Moreover, the professionalization of ACA staff and the legal empowerment granted to these institutions have facilitated consistent enforcement and public confidence.

In contrast, Thailand's ACAs, despite formal independence, face significant operational challenges. Mutebi (2008) elaborates on the institutional weaknesses of the NACC and PACC, emphasizing issues such as insufficient budgetary allocations, overlapping responsibilities, and lenient penalty regimes. The relatively weak legal sanctions against corrupt actors diminish the deterrent effect of anti-corruption policies. Furthermore, Mutebi highlights how political proximity to the executive branch undermines the perceived and actual independence of Thailand's anti-corruption institutions, eroding their legitimacy and effectiveness. This has resulted in a less consistent enforcement environment, where high-profile corruption cases are sometimes selectively pursued or dismissed.

The theoretical distinction between bureaucratic and political corruption articulated by Groenendijk (1997) further enriches this comparative understanding. Bureaucratic corruption involves lower-level public officials as agents, whereas political corruption implicates elected representatives and political elites. This differentiation is critical when analyzing ACA roles, as institutional designs must account for the nature of corruption they seek to combat. Singapore and Hong Kong's ACAs have developed mechanisms to address both dimensions effectively, whereas Thailand's fragmented institutional landscape struggles to coordinate efforts across bureaucratic and political levels. Collectively, this body of work underscores the importance of legal and political context in shaping ACA performance, providing a nuanced understanding of why certain ACAs are more successful in achieving their mandates than others.

The principal-agent framework, coupled with the concept of asymmetric information, offers a rigorous analytical lens through which to interpret the challenges and dynamics of anti-corruption institutions. This framework conceptualizes corruption as a problem arising from the

delegation of authority, where principals (citizens or government bodies) entrust agents (public officials or ACAs) with responsibilities that the agents may exploit for personal gain (Groenendijk, 1997).

In Thailand, this model is particularly instructive in explaining institutional inefficiencies. The National Anti-Corruption Commission (NACC) and Public Sector Anti-Corruption Commission (PACC) serve as agents mandated to enforce anti-corruption laws. However, the principal's ability to effectively monitor and hold these agencies accountable is constrained by asymmetric information, where agents possess greater knowledge about their actions and the internal workings of corruption networks than principals (Miller, 2005). This imbalance contributes to moral hazard, where agents may underperform or fail to act in the public interest due to weak oversight and the absence of robust performance incentives. In Thailand, concerns about delayed investigations in high-profile cases and selective prosecution have been widely debated in public discourse and parliamentary scrutiny. The lack of transparency and susceptibility to political interference further exacerbate these problems. For example, observers have questioned investigative inconsistencies in cases involving politically connected figures, suggesting that political elites may exert pressure on anti-corruption agencies, influencing investigative priorities or shielding allies from scrutiny. Furthermore, the absence of clear, outcome-based performance metrics reduces incentives for agents to deliver effective anti-corruption outcomes, fostering agency slack and potentially perpetuating corrupt practices within the institutions tasked with eradication.

Conversely, Singapore and Hong Kong illustrate more effective management of principal-agent challenges. Their ACAs, such as Singapore's Corrupt Practices Investigation Bureau (CPIB) and Hong Kong's Independent Commission Against Corruption (ICAC), benefit from institutional safeguards that mitigate information asymmetry, including statutory independence under dedicated anti-corruption ordinances, authority to investigate high-level officials without prior approval, and formal reporting mechanisms to the executive and legislature. Political leaders in both jurisdictions have demonstrated consistent commitment to anti-corruption goals, supporting agencies with adequate resources and shielding them from undue influence. These conditions enable ACAs to align agent behavior more closely with principal interests, reducing moral hazard risks (Miller, 2005).

Adeoye and Ran (2024) contribute a critical dimension by emphasizing how interpretive factors, such as media framing and organizational culture, affect perceptions of ACA legitimacy and efficacy. In Thailand, highly polarized and politically aligned media environments contribute to divergent public narratives about ACAs, undermining trust and complicating the principal's ability to monitor agents effectively. In Singapore and Hong Kong, more centralized media systems and

formal communication controls shape public discourse in ways that may reduce overt contestation over ACA actions. The possession of sensitive information by ACAs also introduces a complex tension. While such knowledge is essential for prosecuting corruption, it creates further informational asymmetry that requires robust external oversight to prevent misuse or political manipulation. Thailand's experience highlights the risks of selective information disclosure in politically sensitive cases, which can compromise public trust and hinder institutional transparency. Despite substantial contributions to the understanding of ACAs in Asia, the existing literature remains fragmented and predominantly descriptive, lacking a fully integrated theoretical and comparative institutional analysis. Most studies offer country-specific narratives or focus on legalistic and procedural aspects without systematically employing principal-agent theory or asymmetric information frameworks to elucidate the nuanced variations in institutional autonomy, legal authority, and resource allocation. Moreover, while significant attention has been paid to the institutional effectiveness of ACAs in Singapore and Hong Kong, less is known about how these theoretical constructs apply in more politically complex environments such as Thailand. There is a pressing need for comparative research that synthesizes legal, political, and administrative dimensions within a coherent analytical framework to explain differences in ACA performance. This study seeks to fill this gap by conducting a systematic comparative analysis of ACAs in Thailand, Singapore, and Hong Kong. It critically examines how legal authority, institutional independence, and resource distribution interact to shape institutional effectiveness. Drawing upon principal-agent and asymmetric information theories, this research advances an explanatory model that accounts for cross-national variation in anti-corruption governance. The following section details the research design and methodological approach adopted to investigate these dynamics empirically.

Data and Methodology

The empirical foundation of this study is based on secondary data collected from 2022 to 2024. These three recent years were selected to ensure that the analysis reflects the current institutional structures, resource environments, and anti-corruption strategies of the selected ACAs. The data were obtained from a range of official and publicly accessible sources, including: Thailand: National Anti-Corruption Commission (NACC) Annual Reports, Budget Utilization Reports, and Human Resource Development Plans; Public Sector Anti-Corruption Commission (PACC) Annual Performance Evaluation Reports and Operational Expenditure Plans; Singapore: Corrupt Practices Investigation Bureau (CPIB) Annual Reports, Revenue and Expenditure Estimates, and Statistical Performance Summaries; Hong Kong: Independent Commission Against Corruption (ICAC) Annual

Reports, ICAC Complaints Committee Reports, Budget Estimates, and the 2023 ICAC Annual Survey. These documents provide detailed accounts of agency mandates, organizational structures, budgetary allocations, human resources, and enforcement outcomes.

The selection of Thailand, Singapore, and Hong Kong is based on purposeful comparative sampling designed to capture variation in institutional performance within a relatively homogeneous regional setting. All three jurisdictions have formal anti-corruption agencies operating within centralized bureaucratic systems. However, they differ markedly in their institutional outcomes and international reputation. Singapore and Hong Kong are widely recognized for their sustained success in combating corruption and maintaining high public trust in their ACAs. Conversely, Thailand continues to face persistent corruption challenges, despite the presence of multiple anti-corruption institutions. The comparative analysis of these three cases enables a systematic exploration of how differences in legal mandate, institutional autonomy, and resource capacity influence ACA effectiveness.

To assess institutional effectiveness, this study employs a multi-method qualitative approach comprising three main analytical techniques. First, qualitative comparative analysis is used to systematically identify patterns across multiple institutional dimensions. Second, content analysis is conducted to examine ACA documentation for recurrent themes relating to mandate execution, operational constraints, and strategic priorities. Third, institutional analysis is applied to evaluate the structural, legal, and political conditions under which ACAs operate. The assessment framework is structured around five core dimensions of institutional effectiveness:

- Corruption perception: Measured using international indices, including the Corruption Perceptions Index (CPI) and the Worldwide Governance Indicators (WGI), to reflect how corruption is perceived externally in each jurisdiction;
- Public trust: Evaluated as an indicator of institutional legitimacy and public confidence in ACA operations;
- Legal authority: Assessed based on the statutory authority of each agency, including jurisdictional coverage, investigative powers, and legal sanctions;
- Institutional independence: Examined in terms of formal autonomy, protection from political interference, and operational discretion;
- Resource capacity: Analyzed by examining agency budgets, staffing levels, caseloads, and technical capabilities.

This multidimensional framework facilitates a rigorous and comparative assessment of each agency's institutional effectiveness within its political and legal context.

To ensure the reliability and validity of the findings, the study employs a triangulation strategy. Data from official ACA reports are corroborated with external assessments, including international governance indicators e.g., Transparency International and the World Bank, independent audits, and legislative oversight documents where available. Priority is given to data sources that are formally verified, independently audited, or subject to public accountability mechanisms. Cross-year comparisons of data from 2022 to 2024 further enhance internal consistency and allow for the identification of emerging trends or institutional shifts.

The integration of recent empirical data with a structured, multidimensional analytical framework provides a robust foundation for evaluating the institutional effectiveness of ACAs. The following section applies this framework to assess the performance of Thailand's NACC and PACC in comparison with Singapore's CPIB and Hong Kong's ICAC. By analyzing institutional configurations across these jurisdictions, the study identifies key structural, legal, and resource-related factors that shape the outcomes of anti-corruption efforts.

Data Analysis

Effectiveness in anti-corruption enforcement is measured by progress toward achieving a corruption-free society (Choi, 2009). Existing literature employs a variety of metrics to evaluate ACA performance. Quah (2015), for example, applies multiple indicators to assess ACAs across five Asian countries, including investigative outputs, per capita expenditure, staff-to-population ratios, and agency performance as reflected in international indices such as Transparency International's Corruption Perceptions Index (CPI), the Political and Economic Risk Consultancy (PERC) survey on corruption, and the World Bank's Control of Corruption governance indicator. Similarly, Meagher (2005) examines ACA effectiveness in developing countries by integrating governance indicators from the World Bank and commercial risk assessments with agency-specific data, underscoring the importance of linking institutional outputs with broader governance outcomes. From an institutional perspective, Choi (2009) evaluates the effectiveness of ACAs in South Korea and Hong Kong by analyzing key enforcement outputs, including detection probability, arrest rates, prosecution rates, conviction rates, and financial penalties imposed. This comprehensive approach emphasizes the entire enforcement process as a critical determinant of institutional effectiveness.

1) Corruption Perception

Two widely recognized indices used for cross-national evaluation of governance quality and corruption are the Corruption Perceptions Index (CPI), developed by Transparency International, and the Worldwide Governance Indicators (WGI), formulated by the World Bank.

The CPI provides an annual ranking of countries based on perceived levels of public sector corruption, drawing on aggregated data from multiple expert assessments and business surveys conducted by independent institutions. Countries are scored on a scale from 0 (highly corrupt) to 100 (very clean), offering a widely utilized proxy for evaluating the perceived integrity of governance institutions (Transparency International, 2024d). Although the CPI does not directly measure actual instances of corruption, it compiles its rankings by standardizing and averaging perception-based data sources using a transparent methodological framework. In contrast, the WGI presents a multidimensional framework for governance evaluation, encompassing six dimensions: voice and accountability, political stability and absence of violence, government effectiveness, regulatory quality, rule of law, and control of corruption. The WGI aggregates data from surveys of households and firms, expert assessments, and data from international organizations, applying a statistical methodology to combine these sources into comparable country scores. These dimensions are scored on a scale from -2.5 to +2.5 and presented as percentile ranks (World Bank, n.d.). Together, the CPI and WGI provide complementary frameworks that allow for a nuanced assessment of both perceived corruption and governance quality and are essential tools for evaluating the performance of ACAs within broader institutional contexts.

The anti-corruption performance of Thailand, Singapore, and Hong Kong, as reflected in both the 2024 Corruption Perceptions Index (CPI) and the 2023 World Governance Indicators (WGI), reveals pronounced disparities in institutional effectiveness across the three jurisdictions. These differences offer insight into the relationship between formal institutional arrangements and perceived integrity in governance.

Table 1 Performance of Anti-Corruption Indicators in Thailand, Singapore, and Hong Kong

Indicators	Thailand	Singapore	Hong Kong
CPI 2024	Score: 34/100 Global ranking: 107/180	Score: 84/100 Global ranking: 3/180	Score: 74/100 Global ranking: 17/180
WGI 2023	Score: -0.49 Percentile rank: 35.85	Score: +2.04 Percentile rank: 98.11	Score: +1.63 Percentile rank: 93.40
Governance and institutional remarks	Persistent governance challenges; limited institutional control of corruption	Strong legal and institutional frameworks; high public-sector integrity	Commendable performance, but impacted by recent political transitions

Source: Compiled by the author

From Table 1, Thailand's performance in both international indicators highlights significant institutional deficiencies. With a CPI score of 34 out of 100 and a WGI score of -0.49 (35.85 percentile), Thailand struggles with persistent corruption challenges and limited institutional capacity to address them. The country's primary anti-corruption agencies, the NACC and PACC, suffer from weak enforcement capabilities, low public confidence, and political interference. Both agencies have faced criticism for their selective prosecution, lack of transparency, and limited investigative reach into high-level corruption. Despite some institutional reforms and anti-corruption campaigns, systemic issues such as political patronage, opaque procurement systems, and regulatory capture continue to undermine effectiveness. Thailand's low percentile ranking in the WGI illustrates not only inefficiencies in enforcement but also broader governance failures, such as weak rule of law, limited administrative accountability, and constrained civic participation, which collectively inhibit anti-corruption progress. In contrast to Singapore and Hong Kong, Thailand's anti-corruption institutions have yet to demonstrate consistent autonomy or the political will necessary to produce transformative outcomes.

In contrast, Singapore's CPI score of 84 out of 100 and WGI control of corruption score of +2.04 (98.11 percentile) indicate an exceptional level of institutional effectiveness in combating corruption. This performance is not merely the result of effective enforcement but reflects a deeper, embedded commitment to public sector integrity. The CPIB, operating under the Prime Minister's Office, enjoys legal and operational independence, extensive investigative authority, and strong public trust. It benefits from a supportive legal framework that criminalizes both active and passive corruption in the public and private sectors, backed by stringent penalties. Moreover, Singapore's high scores also reflect a broader governance culture characterized by meritocratic recruitment, performance-based promotion, and low tolerance for misconduct. Institutional stability, predictable policymaking, and consistent leadership further reinforce its anti-corruption mechanisms. The CPIB's relatively modest size is offset by its efficiency, clear mandate, and political insulation, factors critical to its success.

Similarly, Hong Kong's CPI score of 74 out of 100 and WGI score of +1.63 (93.40 percentile) demonstrate a strong, albeit slightly declining, performance. The ICAC has long been regarded as a model anti-corruption agency, widely credited with transforming Hong Kong from a corruption-ridden colonial outpost into one of Asia's cleanest administrations. The ICAC maintains a three-pronged approach: investigation, prevention, and community education, which has been central to its long-standing effectiveness. However, the recent political shifts following the enactment of the National Security Law in 2020 have raised concerns over institutional independence and the erosion of checks and balances (Amnesty International, 2025). Although

the ICAC remains operationally robust, public trust and perceived judicial independence have experienced some decline, which is reflected in the marginal drop in governance scores. Thus, while Hong Kong remains a relatively clean jurisdiction, its trajectory suggests increasing institutional stress and the potential for reduced effectiveness if political pressures continue to grow.

2) Public Trust

While global indices such as the CPI and WGI provide broad evaluations of corruption control, national-level evidence, particularly public satisfaction and performance-based data, offers a more refined understanding of how anti-corruption institutions function in practice.

Table 2 Public Satisfaction with ACAs in Thailand, Singapore, and Hong Kong

Categories	Thailand	Singapore	Hong Kong
Public trust in ACAs	Moderate public trust in the NACC	Very high public trust in the CPIB.	Strong public confidence in the ICAC.
Public perception of anti-corruption efforts	Mixed perceptions: High trust in the NACC, but low satisfaction with civil servants and limited perceived effectiveness of anti-corruption efforts.	Extremely positive: The public views the CPIB as effective and fair.	Positive: Though potentially impacted by political changes and perceived erosion of governance autonomy. Nonetheless, the ICAC remains trusted and effective.

Source: Compiled by the author

From Table 2, Thailand’s NACC presents a mixed institutional profile, characterized by limited autonomy and inconsistent operational performance. According to a 2023 public satisfaction survey conducted by the Office of Human Resource Development and Social Engagement, Prince of Songkla University, overall satisfaction with anti-corruption efforts was rated 3.82 out of 5. Confidence in the NACC’s general role was relatively high at 4.62, yet ratings for specific operational activities, particularly investigations into debt and asset-related corruption, were slightly lower at 4.59. Notably, satisfaction with civil servants was the lowest, at 3.62, reflecting public frustration with recurring allegations of procurement irregularities and high-profile asset concealment cases involving senior officials in recent years, which have received sustained media

and parliamentary scrutiny. This pattern indicates broader disillusionment with the effectiveness and integrity of the public sector (Office of Human Resource Development and Social Engagement, Prince of Songkla University, 2023). While the NACC enjoys moderate public trust, its constrained authority and systemic inefficiencies inhibit the translation of trust into tangible anti-corruption outcomes. The Thai case illustrates how institutional form without functional independence undermines the capacity of anti-corruption bodies to perform effectively.

In contrast, Singapore's CPIB is often cited as one of the most effective anti-corruption institutions globally. In a 2022 public perception survey, 96% of respondents rated the government's anti-corruption efforts as effective, an increase from 94% in 2020 (Koh, 2023). This near-unanimous public confidence is associated with the CPIB's clearly defined legal mandate, its direct reporting line to the Prime Minister's Office, and sustained executive backing. Singapore's model demonstrates how hierarchical accountability within the executive, coupled with rule-based governance and institutional professionalism, can produce sustained anti-corruption results. Institutional legitimacy in Singapore is not only a function of public trust but also of demonstrable, outcome-based performance. Similarly, Hong Kong's ICAC continues to be regarded as an effective institution, despite growing concerns over its long-term independence. According to a 2023 public survey, over 98 percent of respondents reported that they had not personally encountered corruption in the previous 12 months, indicating continued operational success (Zhang, 2024). Historically, the ICAC has functioned with a high degree of autonomy, a robust legal foundation, and strong inter-agency cooperation. However, increasing central oversight and other recent political developments pose a significant risk to the institutional autonomy that has underpinned the ICAC's success. While operational outcomes remain strong, the broader political environment raises concerns about a potential erosion of independence, particularly in politically sensitive cases. The ICAC's long-term institutional effectiveness will depend on its ability to maintain autonomy within this shifting governance context.

3) Legal Authority

The scope of authority conferred upon ACAs by national legislation directly impacts their ability to address corruption comprehensively.

Table 3 Legal Frameworks Governing ACAs in Thailand, Singapore, and Hong Kong

Aspects	Thailand	Singapore	Hong Kong
Legal basis	Organic Act on AntiCorruption, B.E. 2561 (2018); Administrative Measures for the Prevention and Suppression of Corruption Act (No. 3), B.E. 2561 (2018)	Prevention of Corruption Act 1960	Independent Commission Against Corruption Ordinance (Cap. 204) (1974); Prevention of Bribery Ordinance (Cap. 201) (1971); Elections (Corrupt and Illegal Conduct) Ordinance (Cap. 554) (2012)
Jurisdiction	NACC: High-ranking officials; PACC: Lower-ranking local/ state enterprise officials; neither covers private sector corruption	The CPIB is authorized to investigate government and private-sector corruption, including extraterritorial jurisdiction.	The ICAC investigates corruption in both public and private sectors; has authority to arrest, search and seize, prevent corruption, and conduct education.
Penalties	More serious bribery penalties: up to 20 years imprisonment and fines up to approximately US\$11,764	Fines up to S\$100,000 (US\$74,000) and imprisonment up to 7 years	At least 7 years imprisonment for certain offences
Additional laws and agencies	AntiMoney Laundering Act, B.E. 2565 (2022); AMLO; Organic Act on AntiCorruption, B.E. 2568 (2025); Whistleblower Protection Unit	Related financial regulations; Attorney-General's Chambers	Related oversight frameworks; Department of Justice; Other committees

Source: Compiled by the author

From Table 3, Thailand's NACC is empowered by the Organic Act on Anti-Corruption, B.E. 2561 (2018), while the PACC operates under the Administrative Measures for the Prevention and Suppression of Corruption Act (No. 3), B.E. 2561 (2018). The NACC focuses on high-ranking officials, including ministers, judges, and members of independent organizations (Organic Act on Anti-Corruption, B.E. 2561, 2018), whereas the PACC investigates lower-ranking officials within local governments and state enterprises (Office of Public Sector Anti-Corruption Commission, n.d.). However, both agencies are limited to public-sector cases and are legally barred from pursuing corruption in the private sector, creating significant enforcement blind spots, especially in areas where private actors engage in corrupt transactions with public officials.

On the other hand, Singapore's CPIB and Hong Kong's ICAC benefit from broader jurisdictional authority. The CPIB is governed by the Prevention of Corruption Act 1960, which authorizes it to investigate and prosecute corruption in both the public and private sectors (Corrupt Practices Investigation Bureau, n.d.a). This includes cross-border offenses involving Singaporean citizens or affecting public interest. Similarly, the ICAC derives its authority from the Independent Commission Against Corruption Ordinance (Cap. 204) (1974) and is also supported by the Prevention of Bribery Ordinance (Cap. 201) and the Elections (Corrupt and Illegal Conduct) Ordinance (Cap. 554) (2012), allowing it to investigate a wide range of actors including civil servants, law enforcement personnel, and private corporations (Independent Commission Against Corruption, 2024b). This broader jurisdiction gives the CPIB and ICAC an institutional advantage, enabling them to target complex corruption schemes that span both sectors. Examples include public procurement bribery, regulatory capture, and corporate fraud. The lack of such jurisdiction in Thailand limits the ability of the NACC and PACC to address inter-sectoral corruption, which undermines the overall effectiveness of Thailand's anti-corruption regime.

The severity and enforcement of penalties are critical to deterrence. Thai law provides for relatively lenient penalties. Under the Organic Act on Anti-Corruption, B.E. 2561 (2018) and related statutes, offenses such as failure to declare assets or engaging in conflicts of interest may result in prison terms of up to three years or fines up to US\$1,764. Serious offenses such as bribery carry penalties ranging from five to twenty years' imprisonment and fines up to US\$11,764. However, the deterrent effect of these sanctions depends not only on their statutory severity but also on the consistency and impartiality of enforcement. Observers have noted that uneven or selective application of anti-corruption laws, shaped in part by informal institutional norms and hierarchical patronage networks, may weaken their practical impact. While these sanctions appear substantial on paper, their effectiveness ultimately hinges on credible and predictable enforcement, particularly when compared to Singapore and Hong Kong. Singapore's PCA provides for fines of

up to S\$100,000 (approximately US\$74,000) and up to seven years' imprisonment for corruption-related offenses (Corrupt Practices Investigation Bureau, n.d.a). Hong Kong's ICAC enforces even harsher penalties. Under the ICAC Ordinance, offenses may lead to a minimum of seven years' imprisonment, and supplementary laws permit asset forfeiture and civil recovery (Independent Commission Against Corruption Ordinance, Cap. 204, 1974). These legal provisions demonstrate a firmer punitive stance that is designed to deter corruption and reinforce public accountability.

Effective ACAs require not only clear statutory mandates but also robust supportive legislation and coordinated institutional frameworks to maximize their efficacy. In Thailand, the Anti-Money Laundering Act, B.E. 2565 (2022) significantly enhances the capacity of the Anti-Money Laundering Office (AMLO) by granting it authority to conduct comprehensive financial investigations. This enables AMLO to complement the efforts of the NACC and PACC by facilitating the identification, tracing, and seizure of illicit assets, thereby strengthening Thailand's anti-corruption enforcement mechanisms (Anti-Money Laundering Act, B.E. 2565, 2022). Furthermore, the 2025 amendment to the Organic Act on Anti-Corruption, B.E. 2568 introduces expanded protections for whistleblowers, including immunity from prosecution and confidentiality guarantees, which are essential to encouraging the reporting of corrupt activities and mitigating risks of retaliation (Organic Act on Anti-Corruption, B.E. 2568, 2025).

Similarly, Singapore's CPIB and Hong Kong's ICAC maintain comprehensive legal and institutional frameworks that support their respective ACAs. The CPIB collaborates closely with the Attorney-General's Chambers, responsible for prosecution, and financial regulatory agencies such as the Monetary Authority of Singapore. This integrated approach ensures effective coordination between investigation, prosecution, and financial oversight, facilitating rapid and decisive anti-corruption action (Corrupt Practices Investigation Bureau, n.d.c). Oversight of the ICAC is strengthened through multiple independent advisory and review bodies. These include the Advisory Committee on Corruption, Operations Review Committee, Citizens Advisory Committee on Community Relations, and Corruption Prevention Advisory Committee. These bodies typically comprise between 10 and 20 members drawn from the Legislative Council, the judiciary, professional sectors, and civil society, and they report directly to the Chief Executive, enhancing both transparency and public accountability (Independent Commission Against Corruption, n.d.d). Collectively, these frameworks underscore the critical importance of legislative support and inter-agency collaboration in augmenting ACA effectiveness. While recent legislative reforms in Thailand, such as the 2018 Organic Act on Anti-Corruption and subsequent amendments strengthening asset declaration requirements and inter-agency coordination, reflect progress toward a more integrated anti-corruption system, the more expansive and cohesive structures

observed in Singapore and Hong Kong demonstrate the advantages of comprehensive legal and institutional ecosystems in sustaining effective anti-corruption governance.

4) Institutional Independence

The effectiveness of ACAs is fundamentally contingent upon the degree of institutional independence they are afforded. Institutional independence, defined as the ability of an agency to operate autonomously from political authorities and external pressures, is widely recognized as a critical determinant of impartiality, credibility, and operational efficacy. In the absence of sufficient autonomy, ACAs risk becoming instruments of political expediency or succumbing to institutional inertia, thereby diminishing their capacity to combat corruption effectively.

Table 4 Institutional Independence of ACAs in Thailand, Singapore, and Hong Kong

Criteria	Thailand	Singapore	Hong Kong
Legal status	NACC: Structured as an independent agency under the Organic Act on Anti-Corruption, B.E. 2561 (2018); PACC: Established as an independent body but under the supervision of the Prime Minister	Operates under the Prime Minister's Office, but with strong legal safeguards	Established under the ICAC Ordinance (1974) and protected by the Basic Law
Leadership appointment	NACC: Nine commissioners appointed by the King on Senate recommendation based on a list from a politically influenced Selection Committee; PACC: Appointed by Parliament, creating direct links with political actors	Director appointed by the President, with protections against arbitrary removal	Commissioner nominated by the Chief Executive of the HKSAR, appointed by the State Council of the PRC
Reporting obligations	NACC: Must submit annual reports to Parliament, potentially exposing it to external political pressures; PACC: Subject to oversight by the Prime Minister, indicating reduced autonomy	Reports directly to the Prime Minister, but protected by legal mechanisms ensuring autonomy	Protected by law to operate independently from political interference

Source: Compiled by the author

From Table 4, the institutional frameworks of the NACC and PACC in Thailand illustrate how structural and procedural dependencies can undermine an agency's independence. The NACC is established as an ostensibly independent body under the Organic Act on Anti-Corruption, B.E. 2561 (2018). However, the process through which its leadership is selected reveals significant susceptibility to political influence. Commissioners are nominated by a Selection Committee with close ties to political actors and subsequently appointed by the King upon the Senate's recommendation. Although this multilayered appointment structure may convey an appearance of legitimacy, it inherently allows political interests to influence the composition and direction of the commission. Moreover, the NACC's statutory obligation to submit annual reports to Parliament, a political body, may subject it to indirect pressures, particularly when its findings challenge the interests of powerful political stakeholders. While transparency and accountability to the legislature are normatively desirable, in practice, such reporting requirements may constrain the commission's autonomy and limit its effectiveness (Organic Act on Anti-Corruption, B.E. 2561, 2018). The PACC's institutional design presents even more pronounced challenges to independence. Despite being formally designated as an autonomous agency, the PACC operates under the direct supervision of the Prime Minister and its members are appointed by Parliament (Office of Public Sector Anti-Corruption Commission, n.d.). This direct subordination to the executive and legislative branches effectively entangles the PACC within the political establishment it is mandated to monitor. Consequently, its capacity to initiate investigations or enforce anti-corruption measures impartially is compromised. The risk of selective enforcement, politicization of investigations, or bureaucratic inertia becomes increasingly pronounced in such contexts. Collectively, these limitations not only undermine the operational capacity of the PACC and NACC but also erode public trust in their independence and effectiveness.

In contrast, the CPIB in Singapore exemplifies institutional models where legal and structural safeguards facilitate high levels of independence and operational credibility. Although the CPIB is situated administratively within the Prime Minister's Office, it enjoys legal protections that insulate it from undue political interference. Most notably, the Director of the CPIB is appointed through a formal process and is not easily subject to removal by the executive, providing a measure of security of tenure and decision-making autonomy. Furthermore, the CPIB is empowered to investigate corruption in both the public and private sectors, enabling it to address misconduct comprehensively across institutional domains (Corrupt Practices Investigation Bureau, n.d.b). These structural attributes contribute to the CPIB's reputation as a credible and effective anti-corruption institution. Similarly, the ICAC in Hong Kong benefits from a robust legal authority that ensures both structural and functional independence. Established under the Independent

Commission Against Corruption Ordinance (Cap. 204) (1974) and further protected by the Basic Law, the ICAC operates with a high degree of insulation from political interference. The Commissioner is nominated by the Chief Executive of the Hong Kong Special Administrative Region and formally appointed by the State Council of the People's Republic of China. Although the centralization of the appointment process may raise concerns in other contexts, within the framework of Hong Kong's administrative structure, this model serves to protect the ICAC from local political entanglements. The agency has built a reputation for impartial and rigorous investigations, regardless of the political status of those under scrutiny, which has contributed to high levels of public confidence and international recognition (Independent Commission Against Corruption, n.d.b; Watt, 2024).

5) Resource Capacity

Resource allocation is a critical determinant of the institutional effectiveness of ACAs. A comparative examination of Thailand's NACC and PACC, Singapore's CPIB, and Hong Kong's ICAC reveals significant disparities in budgetary resources, staffing levels, and caseloads, which directly impact operational performance.

Table 5 Comparison of Budget, Staffing, and Corruption Cases for the NACC, PACC, CPIB, And ICAC In 2023

Criteria	Thailand	Singapore	Hong Kong
Amount of budget	NACC: US\$83.69 million; PACC: US\$15.69 million	US\$41.97 million	US\$174.75 million
Number of employees	NACC: 2,742; PACC: 579	247	1,552
Number of corruption cases	NACC: 4,894; PACC: 433	215	2,001

Source: Compiled by the author

In the 2023 fiscal year, the NACC operated with a substantial budget of 2.85 billion baht (US\$83.69 million) and employed 2,742 personnel (National Anti-Corruption Commission, 2023a). Of these, 939 were designated as investigating officers; however, only 58 corruption investigators and 3 investigation officers were directly tasked with handling corruption cases (National Anti-Corruption Commission, 2023b). This imbalance is particularly concerning given that the

NACC received 4,894 complaints in the same year, the highest among the four agencies (National Anti-Corruption Commission, 2023c).

In comparison, the PACC, with a budget of 533.4 million baht (US\$15.69 million) and a staff complement of 579, received 433 complaints (Office of Public Sector Anti-Corruption Commission, 2024a, 2024b). While significantly smaller in scale, the PACC's caseload was proportionate to its resources, suggesting a more narrowly focused operational model. The CPIB operated with a budget of S\$56.24 million (US\$41.97 million) and 247 permanent staff in 2023, handling 215 cases (Corrupt Practices Investigation Bureau, 2023). Despite having fewer personnel, the CPIB maintained high levels of effectiveness, attributed to its specialized structure and narrower investigative scope. The ICAC, in contrast, had the most substantial resource base, with a budget of HK\$1.37 billion (US\$174.75 million) and 1,552 staff members, managing 2,001 cases (Independent Commission Against Corruption, 2024a; Independent Commission Against Corruption, n.d.c). This balance between resources and caseload enabled the ICAC to maintain operational efficiency while addressing a wide spectrum of corruption-related matters.

The question of whether resource allocation is the primary determinant of ACA effectiveness remains the subject of considerable academic and policy debate. One perspective contends that formal independence, legal authority, and political backing are more critical than material resources in ensuring anti-corruption efficacy. Conversely, a growing body of scholarship highlights that financial sufficiency, adequate staffing, and technical expertise are indispensable for executing complex investigations and sustaining institutional credibility. The NACC's experience provides a salient case. Despite a substantial budget and staff, its disproportionate caseload and limited number of specialized investigators have led to concerns over operational bottlenecks and case backlogs (National Anti-Corruption Commission, 2023b; National Anti-Corruption Commission, 2023c). This illustrates that resource availability alone does not guarantee effectiveness; rather, organizational design and internal allocation practices are equally vital. On the other hand, the operational models of the CPIB and ICAC demonstrate how the efficient deployment of comparatively modest resources can yield high institutional effectiveness. The CPIB's relatively small team is supported by clear investigative priorities and strong political will, allowing it to focus on high-impact cases without overextending its capacity (Corrupt Practices Investigation Bureau, 2023). Similarly, the ICAC's integrated structure and well-distributed budget enable it to address both preventive and investigative functions effectively (Independent Commission Against Corruption, 2024a). These examples challenge the notion that higher budgets automatically translate to improved outcomes, emphasizing instead the importance of strategic resource alignment. Accordingly, while the debate continues, evidence suggests that effective anti-corruption

enforcement requires not only adequate resources but also judicious institutional governance and policy coherence.

The analysis of ACAs in Thailand, Singapore, and Hong Kong for fiscal year 2023 reveals significant variation in institutional effectiveness, as measured by procedural timelines, case clearance, and prosecution outcomes. These disparities underscore the complex interplay between resource capacity, institutional structure, and legal authority. Thailand's NACC demonstrates considerable challenges in managing its investigative workload efficiently. Despite setting a target completion rate of 80 percent for formal investigations initiated in fiscal year 2021 to be concluded within two years, the NACC achieved only 14.13 percent (National Anti-Corruption Commission, 2023b). This shortfall indicates severe operational inefficiencies, which may stem from inadequate human resources, procedural bottlenecks, or systemic institutional constraints. Such protracted investigative durations can erode public trust and weaken the deterrence effect essential to anti-corruption efforts. The NACC's underperformance highlights the risk of resource misalignment and potential gaps in investigative capacity.

In contrast, Thailand's PACC exhibits comparatively stronger performance metrics, likely facilitated by a smaller caseload and possibly better resource allocation, or potentially selective neglect of duty. The PACC's zero percent rate of cases requiring extensions beyond the legally mandated timeframe, well below the 20 percent target, and the completion of fact-finding and evidence collection at 80.75 percent suggest more efficient case management and procedural compliance (Office of Public Sector Anti-Corruption Commission, 2024a). This performance indicates the positive impact of manageable workloads and well-structured operational processes on institutional effectiveness. Singapore's CPIB further exemplifies high operational efficiency, with an 84 percent clearance rate and a 99 percent conviction rate for fiscal year 2023 (Corrupt Practices Investigation Bureau, 2023). The CPIB's ability to investigate and resolve a substantial proportion of cases while securing near-universal successful prosecutions demonstrates both robust investigative capacity and effective collaboration with prosecutorial authorities. The high conviction rate also reflects a strong evidentiary standard and judicial confidence in the CPIB's work, reinforcing the bureau's deterrent impact. Similarly, Hong Kong's ICAC maintains performance metrics close to its targets, achieving an 89.1 percent rate of investigations completed within 12 months against a 90 percent target (Independent Commission Against Corruption, 2024a). The ICAC's well-resourced and segmented operational framework, encompassing investigation, prevention, and community education, likely contributes to this efficiency. This structural organization facilitates prioritization and effective resource allocation, ensuring responsiveness without compromising thoroughness.

The following section further explores how differences in legal authority, institutional independence, and resource capacity collectively influence ACA performance in Thailand, Singapore, and Hong Kong.

Discussions

The institutional effectiveness of anti-corruption agencies (ACAs) depends on a combination of structural design, legal authority, and public trust. A comparative assessment of ACAs in Thailand, Singapore, and Hong Kong reveals how variations in institutional independence and enforcement capacity shape anti-corruption outcomes. For example, Thailand's National Anti-Corruption Commission has faced challenges in prosecuting high-level political corruption cases, reflecting constraints in institutional autonomy and political interference. In contrast, Singapore's Corrupt Practices Investigation Bureau has successfully pursued both senior public officials and private sector actors, reinforcing deterrence through swift and certain enforcement. Similarly, Hong Kong's Independent Commission Against Corruption has combined prosecution with preventive and community education strategies, strengthening public confidence following major corruption scandals in the 1970s. These differences align with principal-agent and information asymmetry perspectives, which suggest that corruption persists where monitoring is weak, incentives are misaligned, and the probability of detection remains low. Corruption perception indices are often used as proxies for assessing the integrity and effectiveness of public institutions. In Thailand, high levels of perceived corruption persist, undermining both domestic and international confidence in its governance institutions, including the National Anti-Corruption Commission (NACC) and the Public Sector Anti-Corruption Commission (PACC). This perception is symptomatic of systemic weaknesses in oversight and enforcement, and it perpetuates a cycle of impunity that discourages citizen engagement. When public officials are perceived to act in their self-interest with limited consequences, citizens are less likely to trust public institutions or participate in monitoring efforts. In contrast, both Singapore and Hong Kong consistently rank among the least corrupt jurisdictions globally. These favorable perceptions are closely tied to the visibility and credibility of their ACAs, Singapore's Corrupt Practices Investigation Bureau (CPIB) and Hong Kong's Independent Commission Against Corruption (ICAC), which have established strong reputations for impartial enforcement. High public trust in these agencies reflects a positive feedback loop, whereby successful anti-corruption performance enhances institutional legitimacy, which in turn increases the public's willingness to support and cooperate with anti-corruption efforts. This outcome aligns with asymmetric information theory, which posits that improved information flows and credible enforcement reduce the discretion of agents to act against the public interest.

Legal authority is foundational to the operational scope of ACAs. In Thailand, the NACC and PACC are limited by statute to addressing corruption within the public sector. This restriction leaves significant gaps in oversight, particularly in cases where public and private interests intersect. Moreover, relatively lenient legal penalties for corruption offenses reduce the expected cost of engaging in corrupt behavior, weakening deterrence mechanisms. Such legal constraints exacerbate information asymmetries and limit the effectiveness of principal-agent enforcement dynamics by reducing the credibility of punitive threats. In contrast, both Singapore and Hong Kong provide their ACAs with broad legal mandates that include jurisdiction over both public and private sector corruption. The CPIB and ICAC possess the authority to investigate a wide range of offenses, including bribery, corporate fraud, and money laundering. Additionally, the imposition of severe penalties, such as extended prison terms and substantial fines, significantly increases the risk associated with corrupt behavior, thereby enhancing the deterrent effect. These features reinforce the central tenets of principal-agent theory, where credible monitoring and punitive mechanisms realign the incentives of public officials with the interests of the citizenry.

The degree of autonomy afforded to ACAs is a critical determinant of their capacity to operate effectively and impartially. In Thailand, the institutional independence of the NACC and PACC is limited by structural ties to political authorities. The NACC's commissioners are appointed by a politically influenced selection committee, and the agency is required to submit annual reports to the legislature, introducing avenues for political interference. The PACC operates under the direct supervision of the Prime Minister, further compromising its independence. These arrangements hinder the ability of the agencies to investigate high-level corruption, particularly when politically powerful actors are involved, thereby weakening accountability mechanisms central to principal-agent theory. In contrast, Singapore's CPIB enjoys statutory protections that insulate it from political influence. The Director is appointed by the President and can only be removed under narrowly defined legal conditions. Similarly, Hong Kong's ICAC is protected by the Basic Law, which guarantees its operational autonomy. These safeguards are essential for ensuring that anti-corruption enforcement is conducted impartially and without regard for political expediency. From a theoretical standpoint, such independence reduces information asymmetries and enhances the credibility of enforcement, thereby strengthening deterrence and reinforcing public trust.

Adequate resourcing is necessary for ACAs to conduct investigations, prosecute cases, and engage in preventive and educational initiatives. Despite its substantial budget (US\$83.69 million) and 2,742 staff, Thailand's NACC faces significant case backlogs, handling 4,894 cases. The disparity is particularly acute in staffing, with only 58 corruption investigators and 3 investigation

officers assigned to these cases, suggesting significant operational inefficiencies. The PACC, with a smaller budget of US\$15.69 million and 579 staff, manages a lighter caseload of 433 cases, indicating a more focused operational model, albeit with limited scope and outreach capacity. In comparison, Singapore's CPIB operates with a relatively modest budget of US\$41.97 million and 247 staff, handling 215 cases. This reflects a highly efficient and targeted approach to resource utilization. Hong Kong's ICAC is similarly well-resourced, with a budget of US\$174.75 million and 1,552 staff, enabling it to manage 2,001 cases. The operational efficiency of both the CPIB and ICAC underscores the importance of aligning financial and human resources with institutional mandates. As Quah (2010) notes, the effectiveness of these agencies is closely tied to the political will of their respective governments, which manifests in robust funding and personnel support. These findings further validate the predictions of principal-agent and asymmetric information theories, which emphasize the role of monitoring and enforcement capacity in shaping agent behavior.

Taken together, this comparative analysis highlights that institutional coherence, particularly in legal authority, operational independence, and resource alignment, is central to ACA effectiveness. Where these elements are fragmented or politically constrained, enforcement credibility weakens and public trust erodes. By contrast, institutional arrangements that integrate oversight, transparency, and credible deterrence create reinforcing cycles of accountability. These patterns underscore the importance of sustained political commitment in maintaining effective anti-corruption regimes. The next section outlines policy recommendations to address identified institutional gaps.

Policy Recommendations

This study's comparative analysis of the anti-corruption agencies (ACAs) in Thailand, Singapore, and Hong Kong highlights key institutional shortcomings in Thailand's National Anti-Corruption Commission (NACC) and Public Sector Anti-Corruption Commission (PACC). Drawing on the findings, and grounded in principal-agent and asymmetric information theories, a series of prioritized policy recommendations are proposed to strengthen the institutional effectiveness of Thailand's ACAs. These recommendations address critical gaps in legal authority, institutional independence, and resource capacity, while also acknowledging the feasibility and challenges associated with their implementation.

A primary and urgent reform concerns the process by which commissioners are selected for the NACC and PACC. As revealed in the analysis, the current appointment procedures, particularly the dominant role of politically appointed actors in the Selection Committee and the PACC's direct subordination to the Prime Minister, create structural risks of political influence,

undermining institutional independence. The NACC's commissioners are chosen by a politically influenced Selection Committee, while the PACC operates directly under the Prime Minister's supervision. These arrangements compromise the agencies' ability to function autonomously and diminish public trust. To address this, it is recommended that the selection process be restructured to emphasize transparency, merit-based criteria, and independence. Establishing a non-partisan selection panel comprising members from the judiciary, academia, and civil society could enhance credibility and reduce political interference. Although this reform may encounter resistance from incumbent political officeholders who benefit from existing appointment powers and oversight leverage, it is foundational to safeguarding impartial enforcement and restoring institutional legitimacy.

The second major reform involves expanding the jurisdiction of the NACC and PACC to include investigations into private-sector corruption. Currently, both agencies are deliberately confined to public-sector cases, reflecting long-standing political sensitivities surrounding private-sector accountability and limiting their ability to address corruption at the public-private interface. In contrast, Singapore's Corrupt Practices Investigation Bureau (CPIB) and Hong Kong's Independent Commission Against Corruption (ICAC) have broad mandates that encompass both public and private sectors, enabling them to investigate cases of corporate fraud, bribery, and collusion. Extending the jurisdiction of the NACC and PACC would align Thailand's ACAs with these more comprehensive models and allow for the prosecution of complex and high-impact corruption cases. In the short term, selected cases could be strategically transferred from the NACC to the PACC to rebalance caseloads and optimize institutional capacity. While legislative amendments would be required, and resistance from politically connected conglomerates may constrain implementation, such expansion remains necessary for narrowing existing enforcement gaps.

Third, the study recommends revising Thailand's penal framework to impose stricter sanctions for corruption-related offenses. Currently, penalties enforced by the NACC and PACC are relatively lenient compared to those in Singapore and Hong Kong, where longer prison terms and higher fines serve as stronger deterrents. From a principal-agent perspective, increasing the cost of corrupt behavior is essential to modifying incentives and discouraging misconduct. Adopting harsher penalties would not only enhance deterrence but also signal a stronger political commitment to anti-corruption enforcement. The implementation of this recommendation is legally feasible but would require consistent and impartial enforcement to maintain credibility and fairness, particularly in a context where selective prosecution and entrenched patronage networks have historically weakened deterrent effects. In addition to these legal and institutional reforms, the establishment

of an independent oversight mechanism is strongly recommended. An external body, comprising legal and judicial experts, could provide continuous monitoring of the NACC and PACC's activities, ensuring compliance with legal standards and shielding the agencies from undue political influence. This oversight function addresses the core asymmetries in information and accountability identified by the principal-agent model. While institutionalizing such a mechanism may be politically sensitive for incumbent political elites and senior officials who would face greater external scrutiny, it would serve as a crucial check to reinforce transparency, impartiality, and public confidence in anti-corruption governance.

Finally, the operational capacity of both agencies must be strengthened through more strategic resource allocation and internal restructuring. Enhancing staff specialization, streamlining case management systems, and reallocating investigative responsibilities between the NACC and PACC would improve efficiency and reduce systemic bottlenecks. In particular, transferring lower-priority cases to the PACC could enable the NACC to focus on complex, high-impact investigations. The following conclusion synthesizes the key findings and outlines their broader implications for institutional reform in Thailand.

Conclusions

In conclusion, the comparative evaluation of ACAs in Thailand, Singapore, and Hong Kong underscores that institutional effectiveness relies on the convergence of comprehensive legal authority, meaningful institutional independence, and strategically aligned resource capacity. In Thailand, the NACC and PACC, although established under dedicated legislative mandates, operate within narrowly defined legal jurisdictions, most notably, the exclusion of authority over private sector corruption. This limitation significantly constrains their capacity to address the full continuum of corrupt practices, particularly those involving public–private sector collusion. In contrast, Singapore's CPIB and Hong Kong's ICAC are empowered with broad legal authority to investigate and prosecute corruption across both public and private domains. This jurisdictional breadth equips them to pursue complex, cross-sectoral cases and enhances their ability to act as comprehensive and credible anti-corruption bodies. The expansive legal mandates of the CPIB and ICAC thus constitute a fundamental institutional advantage, enabling a more holistic and integrated approach to corruption control than that currently achievable under Thailand's fragmented legal framework.

Institutional independence presents a further point of divergence. While the NACC and PACC are formally autonomous, their appointment processes and reporting obligations embed them within the political apparatus, exposing them to potential influence and compromising the

impartiality of their operations. In contrast, Singapore's CPIB and Hong Kong's ICAC benefit from structural safeguards that insulate them from political interference, thereby reinforcing their credibility and operational autonomy. These conditions have enabled both agencies to sustain high levels of public trust and legal efficacy.

Resource capacity represents a third critical dimension. Despite the NACC's comparatively large budget and staffing levels, inefficiencies in internal resource allocation, particularly the low number of specialized investigators, have led to significant delays in case processing. Conversely, the CPIB and ICAC, though operating with smaller or proportionate resources, demonstrate how targeted deployment, institutional coherence, and strategic prioritization can enhance investigative outcomes and institutional performance. High clearance and conviction rates in both agencies exemplify the benefits of well-calibrated resource governance.

Taken together, these findings suggest that strengthening Thailand's anti-corruption architecture requires an integrated reform agenda. Expanding legal authority to encompass private-sector corruption, securing institutional autonomy through depoliticized appointment mechanisms, and aligning resource deployment with operational mandates are essential preconditions for improved performance. While recent legislative and administrative reforms represent incremental progress, they remain insufficient to overcome longstanding structural limitations. In this regard, the institutional experiences of the CPIB and ICAC offer instructive, though context-specific, lessons. Their integrated legal, administrative, and operational frameworks demonstrate how coherent institutional design can enhance enforcement credibility, even if such models must be adapted to Thailand's distinct political and constitutional context.

Funding The research was funded by the Faculty of Political Science, Chulalongkorn University.

Competing interests The author declares no competing interests.

References

- Adeoye, O., & Ran, B. (2024). Government transparency: Paradoxes and dilemmas. *Public Management Review*, 26(8), 2194-2217. <https://doi.org/10.1080/14719037.2023.2181981>
- Administrative Measures for the Prevention and suppression of corruption act (No. 3), B.E. 2561. (2018, May 13). *Royal Thai government gazette*, 135(33A), 39-42.
- Amnesty International. (2025). "The State Can Lock Up People, But Not Their Thinking" How Hong Kong's National Security Law Undermined Human Rights in Five Years. <https://www.amnesty.org/en/documents/asa17/9556/2025/en/>

- Anti-Money Laundering Act, B.E. 2565. (2022, October 25). *Royal Thai government gazette*. 139(66A). 38-42.
- Choi, J. W. (2009). Institutional structures and effectiveness of anticorruption agencies: A comparative analysis of South Korea and Hong Kong. *Asian Journal of Political Science*, 17(2), 195-214. <https://doi.org/10.1080/02185370903077485>
- Corrupt Practices Investigation Bureau. (n.d.a). *Prevention of corruption act*. <https://www.cpiib.gov.sg/about-corruption/legislation-and-enforcement/prevention-of-corruption-act/>
- Corrupt Practices Investigation Bureau. (n.d.b). *Roles and functions*. <https://www.cpiib.gov.sg/who-we-are/our-work/roles-functions/>
- Corrupt Practices Investigation Bureau. (n.d.c). *Singapore's corruption control framework*. <https://www.cpiib.gov.sg/about-corruption/prevention-and-corruption/singapores-corruption-control-framework/>
- Corrupt Practices Investigation Bureau. (2023). *Revenue and expenditure estimates for the financial year 2023/2024*. Ministry of Finance.
- Groenendijk, N. (1997). The Principal-agent model of corruption. *Crime, Law & Social Change*, 27(3), 207-229. <https://doi.org/10.1023/A:1008267601329>
- Independent Commission Against Corruption Ordinance, (Cap. 204). (1974, February 15). *Independent Commission Against Corruption*.
- Independent Commission Against Corruption. (n.d.a). *ICAC Powers*. <https://www.icac.org.hk/en/about/power/index.html>
- Independent Commission Against Corruption. (n.d.b). *Institutional strength*. <https://www.icac.org.hk/en/intl-persp/control/institutional-strength/index.html>
- Independent Commission Against Corruption. (n.d.c). *Complaint figures*. <https://www.icac.org.hk/en/rc/figures/complaints/index.html>
- Independent Commission Against Corruption. (n.d.d). *Collaboration with other regulators*. <https://www.icac.org.hk/en/law/collaboration/index.html>
- Independent Commission Against Corruption. (2024b). *Hong Kong: The facts ICAC*. Hong Kong.
- Koh, G. (2023). Strengthening integrity in political governance in Singapore. *SID Directors Bulletin*, Q4, 12-17.
- Meagher, P. (2005). Anti-corruption agencies: Rhetoric versus reality. *The Journal of Policy Reform*, 8(1), 69-103. <https://doi.org/10.1080/1384128042000328950>
- Miller, G. J. (2005). The political evolution of principal-agent models. *Annual Review of Political Science*, 8, 203-225. <https://doi.org/10.1146/annurev.polisci.8.082103.104840>

- Mutebi, A. M. (2008). Explaining the failure of Thailand's anti-corruption regime. *Development and Change*, 39(1), 147-171. <https://doi.org/10.1111/j.1467-7660.2008.00472.x>
- National Anti-Corruption Commission. (2019). *NACC history*. <https://www.nacc.go.th/categorydetail/2019112416310492/20191124163234>
- National Anti-Corruption Commission. (2023a). *Summary of the operational and budget expenditure plan for fiscal year 2023*. Nonthaburi.
- National Anti-Corruption Commission. (2023b). *Human resources report for fiscal year 2023*. Nonthaburi.
- National Anti-Corruption Commission. (2023c). *Knowledge uggets...fight corruption topic: Statistics on allegation acceptance for fiscal year 2023 (October 1, 2022 - April 30, 2023)*. <https://www.nacc.go.th/categorydetail/2021110415414676/20230807114215>
- Office of Human Resource Development and Social Engagement, Prince of Songkla University. (2023). *Survey project on stakeholders' confidence in the operations of the National Anti-Corruption Commission (NACC) for fiscal year 2023 (Final Report)*. Prince of Songkla University.
- Office of Public Sector Anti-Corruption Commission. (n.d.). *About PACC*. <https://www.pacc.go.th/home/about/12>
- Office of Public Sector Anti-Corruption Commission. (2024a). *Evaluation report on the Performance and Budget expenditure plan for fiscal year 2023*. Nonthaburi.
- Office of Public Sector Anti-Corruption Commission. (2024b). *Statistical report on case files of the Office of Public Sector Anti-Corruption Commission (PACC) for September 2023*. https://www.pacc.go.th/index.php/home/view_content/45/10657
- Organic Act on Anti-Corruption, B.E. 2561. (2018, July 2). *Royal Thai government gazette*. 135(52A). 1-80.
- Organic Act on Anti-Corruption, B.E. 2568. (2025, June 5). *Royal Thai government gazette*. 142(38A). 1-5.
- Quah, J. S. T. (2001). Combating corruption in Singapore: What can be learned?. *Journal of Contingencies and Crisis Management*, 9(1), 29-35. <https://doi.org/10.1111/1468-5973.00151>
- Quah, J. S. T. (2007). Anti-corruption agencies in four Asian countries: A comparative analysis, *International Public Management Review*, 8(2), 73-96. <https://ipmr.net/index.php/ipmr/article/view/34>
- Quah, J. S. T. (2010). Defying institutional failure: Learning from the experiences of anti-corruption agencies in four Asian countries. *Crime, Law and Social Change*, 53, 23-54. <https://doi.org/10.1007/s10611-009-9213-1>

- Quah, J. S. T. (2015). Evaluating the effectiveness of anti-corruption agencies in five Asian countries: A comparative analysis. *Asian Education and Development Studies*, 4(1), 143-159. <http://dx.doi.org/10.1108/AEDS-10-2014-0050>
- Sousa, L. de. (2010). Anti-corruption agencies: Between empowerment and irrelevance. *Crime Law Soc Change*, 53, 5-22. <https://doi.org/10.1007/s10611-009-9211-3>
- Transparency International. (2024a). *Corruption perceptions index 2024: Hong Kong*. <https://www.transparency.org/en/cpi/2024/index/hkg>
- Transparency International. (2024b). *Corruption perceptions index 2024: Singapore*. <https://www.transparency.org/en/cpi/2024/index/sgp>
- Transparency International. (2024c). *Corruption perceptions index 2024: Thailand*. <https://www.transparency.org/en/cpi/2024/index/tha>
- Transparency International. (2024d). *Corruption perceptions index 2024*. <https://www.transparency.org/en/cpi/2024>
- Watt, W. Y. (2024). The Hong Kong model-building an effective anti-corruption agency. *Global Public Policy and Governance*, 4(4), 287-296. <https://doi.org/10.1007/s43508-024-00090-9>
- World Bank. (n.d.). *Worldwide governance indicators*. <https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access>
- Zhang, S. (2024, May 22). *HK corruption-free culture lauded*. China Daily. <https://www.chinadailyhk.com/hk/article/583835>