

U4 HELPDESK ANSWER 2025: 29

Corruption risks and anti-corruption framework in Bogotá District

Analysis of corruption risks and anti-corruption mechanisms in Bogotá, Colombia, with a focus on climate adaptation measures and public service providers.

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In Bogotá, decentralised governance, informal political networks and short-term contracting create fertile ground for corruption, including in climate adaptation initiatives. As the city faces mounting climate risks, adaptation projects have attracted growing public investment, but heightened integrity vulnerabilities. While Bogotá has developed robust anti-corruption frameworks and institutional oversight mechanisms, implementation gaps and fragmented accountability continue to enable both grand and petty corruption across the public sector.

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Query

Please provide an overview of corruption and anti-corruption efforts in Bogotá, with a particular focus on climate related projects.

Main points

- Bogotá has established and maintained an integrity and compliance framework at the district level, which has endured across successive administrations and political leaderships. These measures include institutional mechanisms for transparency and integrity, such as risk maps and codes of ethics, that extend to major state entities, including public service providers.
- Bogotá is the only capital city in Latin America that has its own transparency index (TB), specifically designed to measure corruption risks in its public management, in collaboration with Transparency International – Colombia Chapter.
- Bogotá's hybrid decentralised governance model, with public, mixed and private service provision, intends to bring administration closer to citizens. Nonetheless, this has created fragmented accountability structures that increase corruption risks at both central and local levels.
- Political patronage and discretionary contracting practices, especially through short-term service contracts, undermine meritocracy, institutional memory and transparency, making public administration vulnerable to clientelism and mismanagement. This context also serves to discourage individuals' use of whistleblowing mechanisms.
- Petty and grand corruption coexist, with bribery (*mordidas*), irregular local contracting and major embezzlement scandals – like the “contracting carousel” – demonstrating systemic governance failures.
- Urban planning and climate adaptation projects, including water infrastructure and land-use reforms, are targeted by private actors seeking to influence public decisions, often prioritising profit over sustainability or equity.
- Major climate adaptation initiatives, such as the Bogotá River restoration and Canoas Wastewater Treatment Plant, have exhibited procurement irregularities, evidence of bid rigging and high-profile corruption allegations involving both public and private actors.
- Corruption in climate related public services reduces both the quantity and quality of outcomes, weakening resilience, delaying infrastructure delivery and undermining public trust in adaptation efforts.

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Background

Corruption in cities

As cities across the globe rapidly expand, urban governance structures are struggling to keep pace. This is particularly evident in low-income and lower-middle-income countries where the urban population is growing the fastest and governments face the greatest difficulty in meeting rising demands (GIZ 2020). Such conditions create fertile ground for corruption, which in turn undermines efforts to achieve sustainable, inclusive and resilient urban development (Zinnbauer 2019, pp.1, 6-7). Corruption in urban planning carries significant and far-reaching consequences for city development, particularly in relation to fiscal management, access to public services and the safeguarding of human rights affecting millions (GIZ 2020).

International research highlights how corruption in urban governance (including land use, infrastructure, service delivery and municipal oversight) can exacerbate inequality, undermine environmental management and reduce cities' resilience to disasters (Williams and Dupuy 2018). Urban planning decisions are among the most sophisticated and lucrative avenues for corruption in cities. These decisions can often be manipulated for personal enrichment, political patronage or clientelist purposes (Zinnbauer 2019, pp.1, 5, 8). Such practices not only distort public priorities but can also compromise climate adaptation and mitigation measures embedded in local planning. Bribery, collusion and opaque procurement in land-use and infrastructure decisions tend to favour short-term "grey" construction projects over sustainable, nature-based solutions, while diverting scarce climate finance away from resilient and inclusive urban development (Ceballos Oviedo, 2022a).

Informality in urban housing, jobs and services adds complexity to corruption dynamics. Often linked to weak governance, informality can also be a deliberate tool used by elites to secure political or economic gains. While low-income groups face harassment and petty corruption, powerful actors benefit from impunity in large-scale illegal developments. Recognising this duality is key to designing effective anti-corruption strategies (Zinnbauer 2020, pp.8-10, 22).

Bogotá district

Bogotá, the Capital District of Colombia, is the country's largest city and serves as its political, administrative and economic hub. With a population of approximately 7.9

million (Secretaría de Planeación 2018), it is also one of Latin America's fastest growing metropolises (Satterthwaite 2024). The city's institutional and governance framework is defined by Decree [Law 1421 of 1993](#) (known as *Estatuto de Bogotá*), which organises public administration into three main components: the central sector, the decentralised sector and the localities.

Bogotá enjoys substantial constitutional and legal autonomy to determine its own urban development through the adoption of its [plan de ordenamiento territorial](#) (POT), which governs land use, urban expansion and infrastructure provision. Nonetheless, this autonomy operates within the parameters of national legal and regulatory frameworks. These frameworks establish binding minimum standards for public space, social housing and environmental protection, and require the POT to obtain a prior environmental opinion from the *Corporación Autónoma Regional* (CAR), a regional public authority established under the national environmental system (SNA), responsible for managing natural resources and enforcing environmental regulations. Therefore, national authorities function less as day-to-day planners and more as guardians of compliance with overarching legal and policy frameworks.

A prominent example of this national-local dynamic emerged in the early 2000s, when Bogotá's administration sought to urbanise its northern periphery, including land identified for environmental conservation. The national government intervened through technical assessments and regulatory measures, leading to the formal designation of the area as the Thomas van der Hammen Forest Reserve. In 2006, Colombia's council of state upheld this designation, effectively halting the planned urban development. The case underscores that, while Bogotá retains significant discretion in shaping its urban agenda, national institutions retain the authority to block local projects that contravene environmental priorities or higher-order legal norms. In this respect, Bogotá's autonomy in urban planning is substantial but not absolute (Bravo and Zorro 2018).

Concerning public utilities, Bogotá's delivery system is structured around a combination of district-owned companies, mixed-capital enterprises and private operators, regulated both by local statutes and national frameworks. According to [Article 163](#) of the *Estatuto de Bogotá* and [Law 142 of 1994](#), the district is legally responsible for ensuring the provision of essential public services, including water supply, sewerage, waste management, electricity, natural gas and telecommunications. These may be delivered either directly, through public entities that qualify as EICEs or by public-private partnerships, as defined in [Article 164](#) of the same statute.

Currently, Bogotá has several active EICEs, including the *Empresa de Acueducto y Alcantarillado de Bogotá*¹ (EAAB-ESP), Canal Capital, the *Empresa de Renovación y Desarrollo Urbano de Bogotá* (RenoBo, Urban Renewal and Development Company) and the Bogotá Lottery. Among them, EAAB-ESP is responsible for providing water and sewerage services. It is a 100% publicly owned EICE whose shares are held by the district, primarily through the mayor's office. The company is governed by private law in its labour and procurement practices but remains under the strategic oversight of the city council and fiscal scrutiny of the district comptroller. Pursuant to Article 56 of the *Estatuto de Bogotá*, two-thirds of the board members of district public utilities companies are appointed by the mayor, while the remaining third come from user and civil society representatives, a special provision applicable to public utilities, since in other decentralised entities all board members are appointed directly by the mayor.

The city council may authorise EICEs to form partnerships or joint ventures with private actors to fulfil its objectives. One example is Aguas de Bogotá S.A. ESP, a mixed-capital subsidiary created in 2003 (99.2% owned by EAAB) to extend EAAB's operations into solid waste and related services.² Water and sewerage services are not concessioned in Bogotá; they are delivered directly by EAAB under a hybrid regulatory framework combining local agreements and national law.

In the telecommunications sector, the *Empresa de Telecomunicaciones de Bogotá* (ETB) is a publicly listed joint-stock company classified as an official public service provider under Law 142. Although it has minority private shareholders, the district maintains majority control.³

Other Bogotá public utilities are delivered by private or mixed-capital enterprises regulated at the national level. Vanti S.A. ESP, for example, is a fully private company responsible for the distribution of natural gas in Bogotá and several other regions. Although Vanti is the successor to a former state-owned entity, it now operates under national authorisations granted by the energy and gas regulatory commission (CREG) and is not subject to local concession arrangements.

Similarly, the electricity distribution service is operated by Enel Colombia S.A. ESP, a public-private partnership formed after the restructuring of the *Empresa de Energía de Bogotá* (EEB). Today, Enel Colombia is 57.3% owned by Enel Américas – an international corporation – and 42.5% by the Grupo Energía Bogotá (GEB), whose

¹ Aqueduct and Sewage System Enterprise of Bogota

² According to response to a juridical question [Concepto 70941 2015](#).

³ According to the [official website](#).

majority shareholder is the district.⁴ While Bogotá retains significant participation via GEB, Enel exercises majority control. The existence of the GEB-Enel partnership is another example of the private-public partnership authorised by Article 164 of the *Estatuto de Bogotá*.

This diverse landscape of public, mixed and private service provision demonstrates Bogotá's use of various institutional models to fulfil its responsibilities. While it has developed hybrid structures and partnerships independently, it must also navigate overlapping local and national regulatory regimes, which can complicate accountability and create integrity risks.

Given its wide autonomy, Bogotá has developed a range of institutional mechanisms to support transparency and integrity in public administration. The district also facilitates citizen engagement in oversight processes and operates its own integrity reporting platforms.⁵ For example, it joined the Open Government Partnership (OGP) in 2020 as a local programme member, adopting international standards of participatory governance and open data. These efforts reflect the district's proactive role in promoting local integrity.

Beyond the significant progress made to counter corruption, the city remains exposed to corruption risks due to systemic factors. In Bogotá's urban context, corruption is commonly driven by a combination of institutional fragmentation, weak enforcement, short-term contracting and patronage dynamics (Secretaría General de la Alcaldía 2021, p.3). Its urban complexity, high levels of public investment, and decentralised budget execution make it particularly vulnerable to both grand and petty corruption. Recognising this, the city has initiated reforms in integrity planning, risk mapping and citizen engagement to strengthen public sector accountability.

⁴ According to the [official website](#).

⁵ According to article 6 of the *Estatuto de Bogotá*.

Drivers of corruption in Bogotá

Corruption is a multi-faceted phenomenon (Ceballos Oviedo 2022a, p.9). The following drivers of corruption have been identified concerning the Bogotá District particularities and some of them refer to climate adaptation measures specifically.

Bogotá's institutional model: Decentralisation with difficult accountability

While centralised governance structures are often associated with corruption risks – such as opacity, bureaucratic inertia, and elite capture – academic literature also warns that decentralisation, when poorly designed or implemented, may fragment control mechanisms and disperse responsibility, thus facilitating local-level corruption (Bardhan and Mookherjee 2005, pp.3-5) (Gilbert 2019, p.6). In the case of Bogotá, the city's unique hybrid model of governance (established under the *Estatuto de Bogotá*) combines a strong executive mayoralty with 20 semi-autonomous localities, each endowed with their own administrative and budgetary autonomy.

Although this model was designed to enhance proximity to citizens and increase responsiveness, in practice it has exacerbated accountability gaps. Local mayors (*alcaldes locales*), appointed by the central administration, operate with considerable autonomy but limited oversight from external or citizen-based controls. They are responsible for administering their local development funds – amounting to a share of the district's investment budget – and for awarding public contracts for goods, works and services within their territories ([Article 2.6.6.2.10. Decree 2388 2015](#)). In its 2024 report, the city council of Bogotá warned of “persistent and systemic corruption risks” within local administrations, identifying a pattern of mismanagement, opacity in public contracting and political interference that has weakened public trust and institutional legitimacy (Bogotá 2024a).

These concerns are not merely theoretical. The *Carrusel de las Alcaldías Locales* scandal between 2012 and 2015 exposed how local governments in Bogotá became enmeshed in clientelist contracting schemes as contracts were directly awarded to foundations with no prior track record in exchange for political favours (Caracol Radio 2015). Investigations revealed that up to 50% of contracts in several localities were awarded without competitive processes, often to politically connected actors or

firms with questionable capacity (Concejo de Bogotá 2015). Between 2010 and 2019, the *personería de Bogotá* sanctioned 56 local mayors for corruption related offences, and over 500 investigations remain open, most related to irregularities in public procurement and the abuse of administrative discretion (Personería de Bogotá, D.C. 2019).

Far from enabling citizen empowerment, it seems that this decentralised structure has created opportunities for local capture, diluted responsibility and enabled political patronage to flourish with limited institutional consequence. Rather than decentralisation being inherently conducive to corruption, it is the specific design and weak enforcement mechanisms of Bogotá's decentralised governance that have fostered these vulnerabilities (Yagoub 2016).

Economic factors

No analysis of corruption drivers in Colombia or Bogotá can omit narcotrafficking, given its outsized economic influence. The illegal drug trade injects billions of dollars into the Colombian economy, and a portion of this illicit wealth is systematically used to corrupt officials, law enforcement and society. Over the past ten years, Bogotá – as the nation's political and transport hub – has witnessed multiple corruption cases in which drug trafficking networks have compromised public institutions. A striking example is the corruption of police and airport authorities: in 2020, an extensive investigation revealed that the Clan del Golfo and Mexico's Sinaloa cartel had recruited or bribed hundreds of officers, including those stationed at Bogotá's El Dorado International Airport, to ensure cocaine shipments passed through undetected (El Espectador 2020).

Land and housing access likewise remain critical flashpoints where economic interest fuels corruption. As a rapidly expanding metropolis, Bogotá faces intense pressure on land values and use, and this has led to corrupt practices around urban development and property rights. A notable example is the phenomenon of the "*tierreros*": criminal networks that illegally seize or sell land, often in collusion with corrupt officials. Investigative reporting revealed that these "land mafias" operate through forged titles, squatter invasions and pirate urbanisations (unplanned settlements) on Bogotá's periphery (El Espectador 2012). In localities such as Usme and Bosa, rural parcels are often sold superficially by *tierreros* who subdivide public land or reserve zones without proper legal authorisation (Secretaría de Seguridad, Convivencia y Justicia 2025).

On the other side of the spectrum, some of the wealthiest inhabitants of the cities have sometimes benefited from a lack of enforcement. In Bogotá, repeated

complaints have been filed regarding luxury mansions erected in the Eastern Hills (*Cerros Orientales*), particularly within the legally protected Eastern Forest Reserve (Infobae 2022). Despite judicial rulings confirming their illegality and environmental harm, the demolition of these properties has been repeatedly delayed, prompting criticism of the district administration (Infobae 2024b). This illustrates that corruption in the Bogotá real estate sector cuts across social strata and that complicity in such unlawful practices knows no boundaries.

Discretionary and short-term contracting

Public sector hiring and procurement systems that rely heavily on short-term and discretionary contracts tend to foster environments where loyalty and informality take precedence over merit and accountability. In Bogotá, the widespread use of *contratos de prestación de servicios* (temporary service contracts legally intended for specific and non-permanent tasks, which do not create a formal employment relationship) has become endemic within central and local government units, effectively bypassing competitive recruitment mechanisms. These contracts are frequently renewed informally, lack transparent selection criteria and discourage professionalisation. The structural implications of this fragile and informalised workforce are captured in academic analyses as a key bottleneck in service delivery as they undermine the continuity of public policies and disrupt knowledge management within institutions (Universidad de los Andes 2019). The transitory nature of these roles further undermines institutional memory, accountability and the willingness of individuals to act as whistleblowers.

The risks associated with short-term contracting have not gone unnoticed by the Bogotá District, and the 2022–2023 Transparency Index of Bogotá (ITB) documents concrete improvements in this area. The index highlights advances in contracting practices across several district entities, including greater disclosure of processes through the public procurement platform, SECOP, the inclusion of integrity clauses in contracts, higher levels of competition among bidders and the promotion of citizen-led accountability spaces (Transparencia por Colombia 2023).

Yet, despite these positive developments, local mayors' offices have been repeatedly singled out for the irregular use of service contracts. Recent cases of nepotism demonstrate how these *contratos de prestación de servicios* in particular, have been used to channel benefits to political allies and relatives. In the locality of Rafael Uribe Uribe, both a former and the current local mayor hired their spouses under such service contracts, while investigative reports revealed that parents, siblings and children of ex-mayors were awarded similar contracts across multiple localities (Concejo de Bogotá 2024a; Caracol Radio 2024).

Clientelist and political patronage

One of the most persistent drivers of corruption that arises in Colombia (Transparencia por Colombia 2019) – and, consequently, in the capital district of Bogotá – is the entrenchment of clientelist and patronage based political networks that shape decisions around public employment, contracting and resource allocation. In this context, public administration becomes a mechanism of political exchange, where access to contracts and appointments is often mediated by party affiliations, electoral loyalties or personal networks, rather than by competence or public interest.

The notorious *Carrusel de la Contratación* in Bogotá, during the administration of Samuel Moreno Rojas (2008-2011), represents a paradigmatic case of clientelism at the intersection of political and economic elites. The scandal was not only a matter of bribery and overpricing but also of systemic patron-client relationships embedded within Bogotá's political administration. Positions within the municipal bureaucracy were allocated on the basis of political loyalty rather than technical merit, ensuring that control over procurement channels remained aligned with the governing coalition's networks (Aroca-Dajil 2023, pp.25-27). This exchange of contracts for electoral financing and political backing illustrates the essence of clientelism: asymmetric relationships in which political leaders distribute state resources to private actors and allied legislators in return for continued support.

This problematic has been well documented in the Colombian context. Academic research has collected testimonies from anonymous sources that describe how electoral financing and public procurement are deeply intertwined. One contractor noted (Gilbert 2019 p.11):

‘The origin of all corruption lies in the electoral campaign. Some contractors give money to candidates; others give money and deliver votes. Once elected, the candidate is indebted to the contractor. It's simple.’

According to the same account, some contractors are able to mobilise more votes than members of Congress, acting not as neutral service providers but as embedded political actors (Gilbert 2019, p.11).

The symbiosis between electoral financing and public contracting has been acknowledged at the highest level. A former mayor of Bogotá, who subsequently served as head of the Colombian Chamber of Infrastructure, publicly revealed that in 2015, 65% of municipal contracts and 35% of departmental contracts in Colombia were awarded through manipulated or “tailor-made” contracts designed to benefit a single contractor, bypassing formal procedures and undermining meritocratic norms (Semana 2017).

Patterns of patronage are not confined to high-level scandals. In 2021, Colombia's supreme court of justice summoned former Bogotá congresswoman Tatiana Cabello Flórez (Centro Democrático) to trial for demanding portions of the salaries of her legislative work unit staff between 2014 and 2017. The court confirmed that these practices amounted to the crime of *concusión* (El Colombiano 2021). Beyond their criminal dimension, the case also illustrates the dynamics of political patronage in Bogotá: access to and permanence in public employment were conditioned on loyalty payments to the officeholder, thereby converting legislative staff positions into instruments of political control and personal enrichment.

More recent evidence from Bogotá's local governments underscores the same dynamic at the sub-municipal level. Whistleblowers documented how contracting in six localities (La Candelaria, San Cristóbal, Santa Fe, Kennedy, Usme and Antonio Nariño) was captured by family networks of former local mayors. Mothers, siblings and even children of ex-local leaders secured contracts through local mayors' offices, amounting to tens of millions of pesos in 2024 (Concejo de Bogotá 2024a).

Shaping the rules: Private leverage in local climate adaptation

Local climate adaptation has emerged as a growing field of opportunity, not only for resilience-building but also for private actors seeking to shape public decisions to their advantage. As for regulation, in Colombia, land-use planning and permits are supervised at the local level, along with environmental control, preservation and protection rules according to article 65 of Law 99 of 1993. As adaptation funding increases and infrastructure becomes central to municipal climate plans, the space for undue influence over public resources and policy priorities has expanded.

Private interests, ranging from construction firms to politically connected suppliers, are often well-positioned to influence adaptation agendas, particularly where transparency is weak and institutional oversight is limited. This includes lobbying for favourable treatment (e.g. lower pollution taxes or relaxed licensing) or promoting grey infrastructure solutions that are more lucrative but not necessarily more effective or sustainable. Such projects are typically material intensive, prone to inflated costs and more susceptible to procurement manipulation (Ceballos Oviedo 2022a, p.10).

Beyond infrastructure, climate adaptation mechanisms like carbon credit markets, originally created to mitigate climate change, have proven particularly vulnerable to corruption. Civil society organisations and watchdog groups have voiced concerns

over an inherent conflict of interest, given that most of the actors involved are private entities with commercial rather than stewardship objectives (El País 2023). This has given rise to practices described as “carbon piracy” or “carbon cowboys”, where intermediaries or companies appropriate carbon rights or benefits without the full knowledge or consent of the indigenous or local communities inhabiting the territories. Allegations of misappropriation and opaque contracts have further underscored the risks of capture and elite dominance within these schemes (Global Financial Integrity 2024, p.53).

While such controversies are documented primarily at the national level, they reveal governance dynamics that resonate within Bogotá’s jurisdiction, highlighting the need for particular vigilance when designing or administering adaptation policies in the district.

Extent of corruption

International assessments and indicators

Colombia continues to face significant governance challenges, as reflected in international corruption indices. According to Transparency International's Corruption Perceptions Index (CPI) 2024, the country scored 39 out of 100, ranking 101 out of 180 countries. While this marks a slight improvement from previous years, Colombia remains well below the global average. The score reflects ongoing risks linked to weak enforcement, political interference in public procurement and the limited independence of oversight bodies (Transparency International 2024).

Likewise, the World Bank's Worldwide Governance Indicators (WGI) show that Colombia ranked in approximately the 45th percentile for "control of corruption" in 2023, indicating that the country performs below the global median (World Bank 2023). However, both of these indicators, while useful for cross-country comparison, often fall short in capturing subnational governance dynamics, particularly in decentralised systems such as Colombia's.

In response to a recognised gap, Bogotá positioned itself as a regional pioneer by having its own city-level transparency tool: the [Bogotá Transparency Index \(ITB\)](#), developed by Transparencia por Colombia in coordination with the district and other organisations. Updated periodically, it is the first transparency index in Latin America focused specifically on a capital city, and one of the few global initiatives measuring public integrity at the urban level. The ITB identifies corruption risks within the district by analysing institutional weaknesses in administrative management, based on information provided by the evaluated entities. It is important to note that the ITB does not assess concrete corruption cases or public perceptions thereof; rather, it seeks to identify and prevent the materialisation of administrative corruption risks. To this end, the ITB applies a methodology based on compliance with national and district laws and regulations, as well as selected international conventions ratified by the government, and evaluates three core

dimensions: institutional visibility, institutional capacity, and oversight and sanction.⁶

Since its first edition in 2017, the ITB has served as a critical tool for diagnosing integrity risks and evaluating public sector performance across central entities of Bogotá's District Administration ⁷. It has been applied in three cycles: 2016–2017: (baseline assessment covering 34 entities); 2018–2019 (extended to 36 entities, with methodological updates); and 2022–2023 (same coverage, aligned with Bogotá's anti-corruption policy CONPES Distrital 001 of 2019). Due to methodological revisions in the last cycle, its results are not directly comparable with previous editions.

The 2022–2023 edition of the ITB found that while most district entities have adopted basic transparency standards, particularly in terms of public information disclosure, important institutional weaknesses remain. The average risk level across the district was moderate with 78 points out of 100 (between five categories: very high risk, high risk, medium risk, moderate risk and low risk) with nearly all entities having received a good score, and even one of them being classified as low risk. Areas such as human resource management (with initiatives such as *Talento no Palanca*) and procurement showed some progress, yet challenges persist around merit-based appointments, budget execution and citizen participation (Transparencia por Colombia 2023).

The index also highlighted structural deficiencies in internal control mechanisms, particularly regarding risk analysis, access to public information and the publication of asset declarations (Transparencia por Colombia 2023, pp.7-10, 27-28).

Lastly, while important vulnerabilities remain, the ITB points to a district administration that is strengthening institutional practice and gradually closing gaps across the evaluated dimensions described above.

⁶ Visibility refers to risks associated to information opacity, restrictions to access to public information and low compliance with the Active Transparency Principle. Institutional capacity covers risks generated by irregular behaviours, deficiencies in the processes and procedures of institutional management, and by discretionarily in decision making. Finally, oversight and sanction cover risks related to a low culture of self-regulation, low disposition to external control and scarce sanction mechanisms for corrupt acts.

⁷ These comprised 15 district secretariats, two administrative departments, four special administrative units, 11 public establishments, three oversight bodies and the Administrative Section of the Bogotá Council.

Grand and petty corruption in Bogotá

Corruption in Bogotá manifests across a spectrum ranging from large-scale political manipulation to informal exchanges between citizens and public officials. While grand corruption cases tend to dominate national headlines, petty corruption – typically involving mid or lower-level officials in daily administrative interactions – has a significant and corrosive impact on public trust, particularly in decentralised city contexts such as Bogotá.

Economic hardship – whether in the form of poverty or income inequality, for example – is widely recognised as a facilitator of corruption. While Bogotá is richer than other Colombian cities (World Bank 2024), it still contains pockets of deprivation and stark inequality, as around 19.6% of Bogotanos live in monetary poverty (Infobae 2024a). These socio-economic pressures may lead some individuals to resort to improper practices to cope with or escape their circumstances, thereby creating entry points for more complex and entrenched forms of corruption (Sáenz-Castro & García-González 2019). Recent evidence illustrates the prevalence of petty corruption in Bogotá. In May 2025, the attorney general's office judicially charged 12 Bogotá police officers, including a lieutenant, for engaging in a series of misconducts including extortion, irregular detentions, collusion with criminal actors and falsification of police reports (Infobae 2025a). Though falling under the broader security sector, these actions reflect petty corruption patterns: instances where public officials exploit their position of trust in everyday interactions with people.

At the other end of the spectrum, the 2023 findings of the Bogotá comptroller's office revealed extensive irregularities in the management of local development funds (*Fondos de Desarrollo Local*, FDL), which are financial instruments intended to fund infrastructure and public services in the city's most vulnerable areas. Over COP9.39 billion (approx. US\$2.3 million) were flagged as misused across 17 of the city's 20 local mayors' offices between 2020 and 2023, with dozens of projects affected in areas such as roadworks, parks and utility networks (Infobae 2025b). While the destiny of the funds is not completely clear, irregularities included omissions in collecting fines and failures in public works supervision.

In total, the audit identified 66 fiscal findings and 134 disciplinary findings, now under review by the *personería de Bogotá*. While these cases do not involve high-ranking national officials, and not all of them necessarily relate to corruption, they reveal severe shortcomings in the use of funds and their adequate supervision, which can create exploitable corruption risks, undermining the very tools meant to deliver equity and development to the city's most underserved communities (Contraloría de Bogotá 2025).

One of the most emblematic cases in Colombia was the aforementioned, *Carrusel de la Contratación* (contracting carousel) that unfolded in Bogotá. The scandal involved a vast network of public officials, politicians, contractors and intermediaries who colluded to rig public procurement processes in exchange for bribes and kickbacks. Dozens of infrastructure and public service contracts – many worth tens or hundreds of billions of Colombian pesos – were awarded irregularly, particularly in the sectors of health, mobility and public works (Concejo de Bogotá 2019a).

In many cases, the works were poorly executed, overpriced or simply never delivered. The corruption was systematic, not incidental, and relied on abuse of public office at the highest levels of city government.

Authorities uncovered the scheme through testimony from involved contractors and public servants. Judicial investigations led to the conviction of numerous individuals. Mayor Samuel Moreno was sentenced to over 10 years in prison for crimes including bribery, embezzlement and improper contract allocation (Ambito Jurídico 2022). His brother, Senator Iván Moreno Rojas, was also convicted for influence peddling and accepting bribes (WRadio 2023). Other senior officials, such as Héctor Zambrano (secretary of health) and Juan Eugenio Varela (sub-secretary of health), were sentenced for their roles in corrupt health-sector contracting, most notably in the 2009 ambulance procurement case (El Espectador 2024).

Corruption and climate adaptation

Bogotá has been identified as one of the most climate-vulnerable cities in Colombia. According to the Climate Change Vulnerability and Risk Analysis for Colombia, published by the Hydrology, Meteorology and Environmental Studies Institute (IDEAM), the capital faces a very high level of climate risk, particularly in relation to water resource management and food security. These two dimensions are rated as high risk individually, and their combined effect makes a moderate but significant contribution to Bogotá's overall climate vulnerability profile. IDEAM highlights the city's complex urban fabric, population density and infrastructural pressures as key factors contributing to its heightened exposure (Concejo de Bogotá 2019b). A state of climate emergency was officially declared in Bogotá during the administration of Claudia López Hernández (2020–2023) by the [Acuerdo 790 of 2020](#).

Over the last two decades, Bogotá has actively embraced an alternative vision of urban development and land-use planning that prioritises climate change mitigation and adaptation (WWF EDM 2017). Adaptation can be cheaper than mitigation and, done right, can be less vulnerable to corruption. In this regard, the nature-based solutions tend to reduce reliance on large public works contracts, a common entry point for corruption, while community participation and multi-purpose designs strengthen social oversight. In addition, externally funded adaptation programmes, often impose stricter auditing and coordination mechanisms (Ceballos Oviedo 2022b).

The district shift is reflected in a series of major infrastructure and nature-based adaptation initiatives currently underway. These include the expansion and modernisation of wastewater treatment systems (e.g. [Salitre](#) and [Canoas WWTPs](#)), the restoration of the Bogotá River with support from the World Bank (World Bank 2021), the implementation of the Bogotá Water Project with Conservation International (Holcim Foundation 2021) and risk mitigation through sustainable drainage and land-use planning instruments outlined in the city's master plan ([POT 2019](#)).

Corruption scandals involving Colombia's National Unit for Disaster Risk Management (UNGRD) – at the national level – have revealed how emergency and risk-management funds, designed for rapid disaster response, can be systematically diverted through political networks rather than applied to their intended purposes (La Silla Vacía 2025). Such cases, although not specific to Bogotá, highlight the vulnerabilities of emergency-based contracting mechanisms, which often bypass

standard safeguards and create significant opportunities for misuse. Similar dynamics have also been observed at the district level: in 2021, Bogotá's comptroller uncovered a scheme involving several local mayors' offices and the Red Cross, where contracts for humanitarian aid were overpriced and directed toward politically connected contractors. Together, these examples illustrate how emergency resources, frequently allocated under exceptional procedures, remain highly susceptible to political capture and corruption (El Espectador 2021).

Bogotá's climate adaptation sectors constitute domains that require close and sustained attention. The fragmentation of responsibilities across local central agencies, semi-autonomous public utilities and local administrative units has generated gaps in oversight, particularly in procurement and contract supervision (Concejo de Bogotá 2024b).

To mitigate these risks, Bogotá's [public policy on climate action](#) (2023–2050) introduced a dedicated transparency component as part of the city's climate governance agenda. A key tool will be the budget tracker for climate action which provides traceability of funding sources. This tool complements the national monitoring, reporting and verification system for climate finance, established to centralise information on investments in mitigation and adaptation. Although the policy does not prescribe specific reporting duties for EICEs, it is aligned with Bogotá's broader transparency and integrity policy, which requires all public entities to ensure access to procurement and project information. These combined mechanisms aim to safeguard adaptation funds from misuse and strengthen public oversight.

Emerging integrity challenges in climate related projects

The following section provides illustrative examples from public service entities and major infrastructure projects in Bogotá that, although not all directly classified as climate adaptation measures, highlight governance challenges relevant to the integrity of entities responsible for implementing climate-related initiatives. By examining such precedents, it becomes possible to anticipate the types of integrity risks that may similarly threaten the effectiveness and accountability of future climate adaptation and mitigation projects.

- The Canoas Wastewater Treatment Plant (PTAR)– alleged embezzlement and bid rigging (2024): the Canoas PTAR, set to be the largest environmental infrastructure project in Bogotá, has been linked to the alleged diversion of COP48 billion (approx. US\$12 million). Investigative reports and audits revealed

possible irregularities in the bidding process, including collusion among bidders, bribes to public officials and inflated invoices for preliminary works. The case sparked political controversy due to the project's strategic role in the city's climate adaptation agenda. The mayor's office confirmed the opening of disciplinary and fiscal investigations, and national media outlets uncovered possible links between contractors and political actors. As of mid-2025, investigations remain ongoing (RTVC 2024).

- EAAB – findings by the comptroller's office (2023): in October 2023, the comptroller's office of Bogotá identified over COP22 billion (approx. US\$5.5 million) in financial irregularities in EAAB's procurement operations. The audit revealed inconsistencies in supplier selection, inadequate documentation and non-compliance with public contracting norms. The findings point to systemic weaknesses in internal oversight mechanisms within EAAB. Although specific individuals were not named at the time of the report, the case triggered internal investigations and calls for enhanced transparency in future procurement cycles (Radio Nacional de Colombia 2023; WRadio 2024).
- EAAB – IT procurement controversy (2024): in early 2024, a public bidding process for an IT platform contract at EAAB drew over 900 formal complaints, many alleging undue favouritism, the use of highly restrictive technical specifications and inflated cost estimates. Critics, including Councilman Daniel Briceño, accused EAAB of structuring the process to benefit a specific contractor by excluding other qualified bidders (Concejo de Bogotá 2024b). The case prompted a public hearing by the Bogotá city council in September 2024, where EAAB was required to explain the design and selection criteria. Though the procurement was ultimately suspended pending review, it revealed significant vulnerabilities in how public tenders are structured and justified (Bogotá 2024).

Corruption in Colombia's water and climate adaptation sector has systematically undermined public trust and diverted critical resources away from vulnerable communities. The embezzlement of COP46.8 billion (approx. US\$9.8 million) from the National Unit for Disaster Risk Management (UNGRD), meant for water tankers in drought-stricken La Guajira, left Indigenous Wayúu communities without reliable access to water, despite severe shortages (El País 2024a). Similarly, in Cartagena, opaque contracting in Acuacar led to inflated tariffs and service failures, disproportionately affecting low-income neighbourhoods (Cambio Colombia 2024). In Barranquilla, bribes in the Triple A utility stalled sewerage expansions, exacerbating sanitation risks (Corrupción & Castigo, n.d.).

These cases illustrate a broader pattern: corruption does not just waste funds, it deepens inequality and environmental vulnerability. When contracts are awarded

through kickbacks or political favouritism, projects are often delayed, overpriced or abandoned, leaving communities with crumbling infrastructure.

Final considerations

Bogotá's experience demonstrates both the persistence and adaptability of corruption risks in complex urban settings. Despite a solid integrity and compliance framework, gaps in enforcement, oversight and coordination continue to enable irregular practices across local administrations and service entities. Short-term contracting, political patronage and fragmented accountability remain structural weaknesses that undermine meritocracy and public trust. At the local level, the concentration of discretion in the appointment of local mayors and the management of development funds has generated recurrent episodes of mismanagement and corruption, exposing the vulnerabilities of a hybrid governance model designed to promote proximity but often resulting in diluted responsibility.

At the same time, Bogotá stands out for its institutional innovation and policy coherence. Through instruments such as the Transparency Index of Bogotá, the district has established a preventive and evidence-based approach to integrity management. The incorporation of transparency and accountability mechanisms into climate and public service projects reflects an emerging understanding that integrity is essential to effective and equitable urban governance. These efforts are reinforced by the district's public policy on transparency, integrity and zero tolerance for corruption (CONPES Distrital 001 of 2019), which seeks to embed ethical standards across planning, contracting and service delivery.

However, systemic challenges remain, particularly within decentralised and mixed-capital entities, where autonomy in management and procurement can lead to inconsistencies in oversight and ethics compliance. The coexistence of grand and petty corruption—from large-scale collusion in infrastructure contracts to everyday bribery and misuse of public resources—continues to erode institutional credibility and limit citizens' confidence in public administration.

In the climate adaptation sector, the stakes are particularly high. As Bogotá channels increasing investment into water infrastructure, land-use planning and risk mitigation, integrity safeguards will determine whether these initiatives achieve their intended social and environmental goals. Recent cases, including procurement irregularities in the Canoas wastewater project and within district utilities, illustrate that climate-related spending can mirror the vulnerabilities of traditional public works unless strong preventive and accountability mechanisms are applied. The district's new transparency component within the climate action policy offers an important step towards ensuring traceability of climate finance and public participation in oversight.

Ultimately, Bogotá illustrates a dual reality: a city capable of pioneering anti-corruption reforms while still contending with systemic vulnerabilities rooted in its decentralised governance model. Consolidating progress will depend on translating policy commitments into consistent implementation, ensuring that transparency, integrity and citizen oversight become integral features of all public sector operations, including those driving the city's climate adaptation agenda. By aligning political will, institutional capacity and social accountability, Bogotá can move closer to transforming its anti-corruption framework from a compliance requirement into a culture of integrity that strengthens both democracy and urban resilience.

Annex I – Anti-corruption policy and legal framework

Colombia is a presidential, unitary state with a decentralised and participatory multi-level governance system. It features three tiers of directly elected authorities operating within a framework where national law prevails but must be implemented at the local level. As a result, anti-corruption laws and policies established by the central government cascade down to subnational entities, including Bogotá, which are tasked with developing and enforcing their own regulatory and institutional measures in accordance with national standards. This dynamic is crucial to understanding how Bogotá shapes its anti-corruption framework within Colombia's broader legal and policy context. It is important to note, however, that the district does not have the authority to legislate independently on criminal or disciplinary matters, which remain under the jurisdiction of national institutions.

- Colombia's penal code: it forms a cornerstone of the country's anti-corruption legal framework by explicitly criminalising a range of corrupt practices. This includes bribery, embezzlement, abuse of authority, illicit enrichment and fraud within the public sector. The code imposes penalties such as imprisonment, fines and disqualification from public office, aiming to deter corrupt behaviour and hold perpetrators accountable. This legal foundation is further supported by specialised anti-corruption laws and procedural mechanisms designed to strengthen investigation and enforcement efforts.
- *Estatuto anticorrupción*/anti-corruption statute (2011): as the foundational legal instrument of Colombia relating to anti-corruption measures, it provides the national legal foundation for prosecuting corruption related offences, promoting transparency in public administration and improving public contracting processes. Law 2195 of 2022 reinforced and updated these provisions, placing greater emphasis on corporate accountability, preventive measures and the management of conflicts of interest. The reform introduced new obligations for both public and private entities, such as enhanced integrity programmes, stricter reporting duties for irregularities in contracting and extended sanctions for companies involved in corrupt practices. Bogotá aligns its local strategies with this statute, ensuring consistency between national priorities and district-level actions.
- District public policy on transparency, integrity and zero tolerance for corruption (2019): this comprehensive policy sets out long-term institutional commitments to integrity and anti-corruption in Bogotá. It introduced the standardisation of corruption risk maps across all district entities, mandatory ethics training

programmes for public servants, mechanisms for the protection of whistleblowers and the creation of performance and compliance indicators. The policy is designed as a forward-looking planning instrument, aimed at integrating anti-corruption efforts into district-wide strategic planning and public investment. It explicitly calls for collaboration between government agencies, civil society, academic institutions, professional associations and citizens to build a culture of public integrity.

In line with this framework, all public entities, including EICEs, are required to produce annual anti-corruption and citizen services plans, accompanied by detailed risk maps that identify and mitigate corruption vulnerabilities in key areas such as procurement, hiring and service delivery. For instance, the EAAB maintains an internal integrity matrix and ethics compliance programme, which has flagged critical risks in water quality monitoring, particularly around data manipulation, unauthorised disclosure and systemic weaknesses in IT systems. Other entities, such as the *Instituto Distrital de Gestión de Riesgos y Cambio Climático* (IDIGER), have implemented whistleblower channels and digital reporting tools to enhance transparency and citizen oversight. These applied measures exemplify how Bogotá's integrity policy is operationalised across climate relevant institutions.

- District development plan (2016 onwards): since 2016, successive district development plans have incorporated explicit anti-corruption objectives and performance benchmarks (e.g. [Plan de Desarrollo Distrital 2016-2020; 2020-2024; 2024-2027](#)). These plans function as multi-year governance roadmaps and include structural commitments to transparency, institutional strengthening and public participation. They are also used to embed accountability frameworks into sectoral policies and budgeting exercises.
- Anti-corruption legal management model ([Decree 610/2022](#)): local decree 610 established a legal and administrative framework for coordinating and implementing anti-corruption strategies across Bogotá's public sector. It was designed as a regulatory instrument to operationalise the commitments set out in the 2019 district public policy on transparency, integrity and zero tolerance for corruption. The model introduces unified guidelines for the planning, implementation, monitoring and evaluation of anti-corruption actions, ensuring that all entities align with shared standards of transparency, legal compliance and institutional ethics.

Importantly, the decree explicitly applies to all district entities, including state-owned EICEs. These entities are required to integrate the model's principles into their internal control systems, adopt the standardised corruption risk-management tools and report on progress through official planning instruments like the anti-corruption and citizen services plan (PAAC). EICEs must also ensure alignment with the broader objectives of the district development plan and the

transparency policy, particularly in areas where service delivery is vulnerable to integrity risks. By reinforcing a unified approach across administrative and service sectors, the decree strengthens coherence between preventive mechanisms and legal enforcement at both the policy and operational levels.

- Open data and e-governance portals: the mayor's office of Bogotá maintains several digital platforms to facilitate transparency and citizen oversight: (i) *Gobierno Abierto de Bogotá* integrates datasets related to budget execution, policy outcomes, citizen participation and audit results, promoting cross-sectoral accountability; (ii) *Contratación a la Vista* is a dedicated platform for public procurement, offering real-time data on contract awards, bidding processes, suppliers and execution status. These portals are designed to reduce opacity and enable data-driven public scrutiny.
- Whistleblowing channels and citizen reporting mechanisms: Bogotá actively promotes citizen reporting of corruption through multiple digital and mobile tools, including: (i) *Línea 195*, a general purpose public service hotline; (ii) the *Botón Anticorrupción*, a digital form accessible on institutional websites; (iii) SuperCADE Virtual, which allow citizens to file complaints, track their status and access information about administrative procedures. These mechanisms are not limited to external users; they are also available to public officials and staff across district entities, including local mayors' offices and EICEs. In addition, labour regulations require all public institutions to establish internal reporting channels for misconduct, supported by internal disciplinary offices. Together, these systems ensure that both citizens and public employees have formal, accessible means to report wrongdoing and contribute to institutional integrity.
- Integrity policies and human resources management: Bogotá has adopted district-wide integrity codes for public officials, harmonised with Colombia's national integrity strategy. These include obligations to declare conflicts of interest, systematic job rotation in sensitive areas to prevent capture or collusion, and the promotion of merit-based hiring practices. The civil service framework is increasingly oriented towards ethics, transparency and accountability, aiming to professionalise public employment and reduce informal influence networks within the administration.

EICEs, however, operate under a more decentralised model. While they are expected to uphold general principles of public integrity, most have developed their own codes of conduct and internal ethics frameworks. For instance, EAAB, ETB and GEB each publish distinct codes that define behavioural expectations, ethics training and internal compliance procedures in different ways. This autonomy allows for contextual adaptation but may also lead to fragmentation in integrity standards, especially where enforcement and oversight capacities differ between entities, making external control more difficult. For example, GEB

operates a formal ethics and compliance programme that reports administratively to the company's president and functionally to the audit and risk committee, a governance structure not mirrored in other EICEs of the district. Similarly, EAAB maintains a specific code of ethics for internal auditors, setting out professional duties and standards of independence that have no direct equivalent within the other utilities providers. The lack of a unified district-wide ethics framework for EICEs can create gaps or confusion among staff, and even open opportunities for regulatory arbitrage across systems.

Recognising this challenge, Bogotá's anti-corruption legal management model (Decree 610/2022) encourages institutional convergence around shared standards of transparency, but full harmonisation – particularly among EICEs – remains an ongoing need.

The alignment between national and local regulations aims to close gaps that enable corruption. Bogotá's public entities are monitored according to national standards, while the city has also gone further by developing its own strategies tailored to its specific institutional context.

The evidence suggests that Bogotá's efforts to strengthen its anti-corruption framework are visible, as a comprehensive assessment carried out by researchers from Colombia's Central Bank indicates that the capital occupies an intermediate position in the national landscape: it is neither among the territories most prone to systemic corruption nor among those with the lowest risks, but rather reflects its dual role as both a local government and the seat of national institutions (Ayala-García, et al. 2022).

Annex 2 – Identification of stakeholders

State institutions

National level

- Attorney general's office of Colombia (*Fiscalía General de la Nación*): the *fiscalía* is the chief prosecutorial authority responsible for investigating and prosecuting criminal offences, including corruption. It plays a central role in ensuring legal accountability in high-profile cases involving public officials, both at the national level and in the capital district.
- Office of the inspector general (*Procuraduría General de la Nación*): this national entity conducts disciplinary investigations into misconduct by public officials, including corruption related infractions. It can impose administrative sanctions and disqualify individuals from holding public office. Its reach extends to district-level officials in Bogotá, providing an additional layer of oversight beyond the local disciplinary system.
- Superintendence of public services (*Superintendencia de Servicios Públicos Domiciliarios*): a national regulatory authority that supervises the performance of public utility providers. It can intervene in cases of mismanagement, irregular contracting or service delivery failures; particularly relevant for EICEs involved in climate related infrastructure and adaptation services.

District level

- Bogotá comptroller's office (*contraloría de Bogotá*): this is the city's fiscal oversight authority, responsible for auditing the management and use of public resources by district entities. It investigates budgetary anomalies, misappropriation of funds and inefficiencies. However, it has faced criticism for politicisation: in 2022, the city council's election of the district comptroller drew criticism after the shortlist was dominated by senior officials from the national comptroller's office, raising concerns over lobbying and political capture in the appointment process (Razón Pública 2022). Former comptrollers have been investigated or accused of misconduct, raising questions about its independence

and effectiveness (Noticias RCN 2018; Asuntos Legales 2017). It must be said that the comptroller is appointed by the city council.

- *Bogotá personería*: acts as Bogotá's disciplinary authority, ensuring ethical conduct among public servants and enforcing compliance with public service regulations. It also supports and certifies citizen oversight groups (*veedurías ciudadanas*), strengthening participatory mechanisms for monitoring local governance. The *personero* is appointed by the city council.
- District oversight office (*veeduría distrital*): a preventive control entity focused on promoting transparency, accountability and citizen participation. It evaluates the performance of district entities, promotes integrity policies and coordinates initiatives such as the Bogotá transparency index. It operates as an early-warning mechanism to detect corruption risks. The *veedor* is appointed by the city mayor.
- Anti-corruption district committee (*Comité Distrital de Lucha contra la Corrupción*): this inter-institutional body brings together the comptroller's office, the *personería* and the *veeduría distrital* to coordinate Bogotá's anti-corruption efforts. It is responsible for producing diagnostic reports on corruption patterns in the district and formulating an integrated anti-corruption programme to consolidate and guide city-wide actions.
- City council of Bogotá (*Concejo de Bogotá*): functions as the city's legislative and political oversight body. It exercises political control over the executive branch through debates, inquiries and motions. Council members often initiate public complaints and investigations related to corruption, serving as a key accountability channel between citizens and local institutions.

Civil society

- Citizen oversight groups (*veedurías ciudadanas*): organised civil society actors who monitor public projects, procurement processes and service delivery. These groups operate under the legal framework established by Article 6 of the *Estatuto de Bogotá*, which explicitly recognises community participation and social oversight. The *veedurías ciudadanas* are formed at the initiative of a number of citizens or different types of civil organisations, and must be formally registered with the *personería de Bogotá* (or another competent authority according the jurisdiction), according to the Law 850 of 2003. In practice, groups such as the Observatorio Ambiental de Bogotá exemplify how citizen initiatives contribute to local accountability by tracking environmental and infrastructure related projects.

- Civil society organisations: Colombia has a diverse and active network of civil society organisations working on anti-corruption and transparency. These include:
 1. *Transparencia por Colombia*, the national chapter of Transparency International, which leads policy advocacy, citizen mobilisation and institutional monitoring. It also coordinates the *Movimiento Ciudadano Anticorrupción*, a multi-actor platform for civic engagement and oversight.
 2. The *Instituto Anticorrupción*, an independent organisation specialising in investigative research, strategic litigation and public alert mechanisms related to high-impact corruption cases.
 3. Other influential entities such as *Fundación Paz y Reconciliación (PARES)*, *Bogotá cómo vamos*, *Probogotá* and *the Corporación Excelencia en la Justicia (CEJ)* contribute through legal analysis, institutional monitoring, and the production of public policy recommendations.
- *Comisión Nacional Ciudadana para la Lucha contra la Corrupción*: established under [Article 66](#) Law 1474 of 2011, this national multi-stakeholder body includes representatives from civil society, academia, the private sector and media. It serves as a platform for citizen participation in the monitoring and evaluation of the national anti-corruption policy framework and fosters dialogue between state and non-state actors.

Media

- National press: print and digital media outlets play a fundamental role in identifying, documenting and disseminating information on corruption cases across the country. Prominent national newspapers such as *El Espectador*, *El Tiempo* and *El Colombiano* routinely cover public sector irregularities and judicial investigations, often setting the agenda for broader public debate. It also found that corruption tends to be more visible in areas with a strong media presence and active citizen engagement, conditions present in Bogotá, which ranked among the most reported territories (Monitor Ciudadano de la Corrupción 2021, p.66). However, it is important to note that, according to Reporters Without Borders, “Colombia remains one of the most dangerous countries on the continent for journalists”, underscoring the risks faced by investigative reporters working to expose corruption (Reporters Without Borders 2025).
- Investigative digital media (e.g., *Cuestión Pública*, *La Silla Vacía*, *El Armadillo*): Independent outlets that publish high-impact investigations on corruption, public contracting, environmental mismanagement and political capture. Often funded by international donors and civil society networks.

- Whistleblowers and independent journalists: outside institutionalised media channels, freelance reporters and whistleblowers play a critical role in exposing misconduct, often under precarious or risky conditions. Local journalists, particularly in peripheral areas or high-risk sectors like extractives or public contracting, frequently face threats, harassment or legal retaliation. Many choose to collaborate anonymously with larger outlets or NGOs to publish sensitive investigations while safeguarding their identity. These actors are essential to uncovering corruption in contexts with weak institutional oversight, and yet they often lack formal protections, leaving them vulnerable despite their public value (Transparencia por Colombia 2021, p.13; El País 2024b).

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