

Anti-Corruption Helpdesk Answer

Good Practices for National Anti-Corruption Strategies in European Union Member States

Author: Ryan Brunette

Reviewers: Caitlin Maslen, Maria Constanza Castro (TI),
Tom Shipley

Date: 28 April 2026

The 2026 EU directive on combating corruption requires all member states to adopt national anti-corruption strategies. While many EU countries, particularly former candidate countries, already have in place existing strategic frameworks, one intent behind the directive is to raise the bar for the quality of these strategies. To inform EU countries embarking on anti-corruption strategy processes, this Helpdesk Answer synthesises standards, recent lessons and emerging promising practices, ranging across the issues that these strategies often address.

Caveat:

This Helpdesk Answer is concerned with the content of national anti-corruption strategies in the EU. For further reading on existing international standards and recommendations focused on the process of crafting such strategies, see [Coordinated and inclusive development of National Anti-Corruption Strategies \(2026\)](#).



Query

What lessons and promising practices from Europe and, where relevant, other countries can help inform the content of national anti-corruption strategies for EU member states?

Main points

- The first national anti-corruption strategies were developed by EU candidate countries as a tool for managing the domestic implementation of EU anti-corruption initiatives in a manner that remained responsive to local circumstances.
- The EU anti-corruption directive, for the first time, legally obliges all member states to adopt and publish an anti-corruption strategy. This makes preparatory work an urgent matter for the six states that have yet to do so, including Belgium, Denmark, Germany, Ireland, Luxembourg and the Netherlands, while others may use this opportunity to improve their existing strategic framework.
- The directive imposes wide-ranging obligations on all member states, so even countries with existing national anti-corruption strategies will have to adapt to these obligations in future updates.
- In terms of the normative framing, procedures and authorities of national anti-corruption strategies, recent examples consider domestic and multilateral anti-corruption obligations, preparation by semi-autonomous committees, and facilitation through widespread consultation with civil society.
- National anti-corruption strategies tend to adopt policy definitions of corruption, which are broader than enumerated criminal corruption offences. Mobilising such definitions, they describe evidence led, situational analyses and risk assessments of corruption problems that draw holistically on a wide range of sources and methods. A recent study from the Czech Republic, commissioned in the course of preparing the country's national anti-corruption strategy, sets a new benchmark.
- The EU directive requires national anti-corruption strategies to specify objectives, priorities and measures. To explore this question, this Helpdesk Answer looks at examples from: Australia's new national anti-corruption commission; the maturation of Italy's corruption risk management system; France's recent whistleblower reforms; and the Biden administration's efforts to promote global anti-corruption cooperation.
- Implementation, monitoring and evaluations are gradually moving toward a model of continuous adaptation across the strategy cycle.

Contents

Background	4
The content of national anti-corruption strategies.....	7
Normative framing, authorities and procedures	8
Normative framing	8
Authorities responsible for preparing and drafting the national anti-corruption strategy.....	8
Procedures for preparing the national anti-corruption strategy	10
Problem definition and diagnosis	11
Defining corruption	11
Situation analysis and risk assessment	12
Objectives, priorities and measures in national anti-corruption strategies.....	15
Creation and development of anti-corruption agencies	16
Regulation of political finance and lobbying.....	17
Personnel management, internal control and risk management	18
Public financial management, taxation and procurement.....	20
Sub-national government, state-owned enterprises and the private sector	20
Public reporting, whistleblower protection and transparency	22
Criminal investigation, enforcement and asset recovery	23
Awareness and civil society	24
EU cooperation, global cooperation and national security.....	25
Implementation, monitoring and evaluation.....	26
References	29

Background

A national anti-corruption strategy (NACS) is, according to the UNODC, “a blueprint for a realistic, comprehensive and integrated plan for reducing corruption in that country” (UNODC 2015:2). These strategies are often published formally by governments as a consolidated document. In the European Union (EU), these documents proliferated across candidate and member states from around the turn of the twenty-first century (see Table 1 below). Since then, they have had two complementary aims: first serving as tools for managing the domestic implementation of EU anti-corruption initiatives; and second, doing so in a manner that is responsive to the particularities of local circumstances (Szarek-Mason 2010; EU 2026: 54).

The first countries to adopt national anti-corruption strategy documents were Central and Eastern European candidates for entry into the EU, while older EU member states have lagged behind (see Table 1). In the case of candidate countries, conditions for entry into the EU are set by the European Council (EUCO 1993; 2006; 2011; 2020), with the benefits of membership providing powerful incentives for those countries to meet them. Before the 2007 Treaty of Lisbon, however, the EU’s authority to regulate anti-corruption among its own member states was more limited because the EU’s treaty framework never provided any supranational competency to address anti-corruption in those states directly (Szarek-Mason 2010).

The EU could, on the one hand, issue supranational directives and regulations addressing anti-corruption indirectly, but only to the extent that this was incidental to protecting the EU budget, integrating the common market and dealing with European Community specific issues. It could, on the other hand, address anti-corruption directly through its responsibility for promoting cooperation between members states in criminal matters, but it could not do so supranationally, relying instead on ordinary international conventions that were more difficult to pass and enforce (Szarek-Mason 2010). The result was a fragmented and unevenly binding internal EU anti-corruption architecture, without any positive obligation on member states to adopt national anti-corruption strategy documents.

In the broader international sphere, EU member states were all signatories to a range of international treaty organisations that issued recommendations and conducted country evaluations promoting national anti-corruption strategies, including the Council of Europe (CoE 1997; 1999a; 1999b), the Organisation for Economic Cooperation and Development (OECD 1997; 2017; 2020; Jongen 2021) and the United Nations (UN 2004; UNODC 2015; UNDP 2017). Still, none of this extended to a legal requirement to adopt national anti-corruption strategy documents (see UNODC 2015: 2), even if such adoption was increasingly encouraged.

The institutions of the EU has long promoted a more coherent, comprehensive, and evenly binding EU anti-corruption architecture (EC 1997; 2003), but this architecture would only come together slowly after 2007. In that year, EU member states agreed to the Treaty of Lisbon. The treaty overhauled the EU's treaty framework, while explicitly providing the EU with supranational authority to directly regulate anti-corruption in member states (EU 2012a; 2012b). Under this framework, the institutions of the EU continued to advance their anti-corruption efforts (EC 2011), with the 2014 anti-corruption report (EC 2014a: 8) and the annual rule of law reports (EC 2020: 12-13) explicitly recommending the adoption of national anti-corruption strategies. In the wake of the global financial crisis of 2008 and the COVID-19 crisis of 2020, EU technical support and financial conditionalities increasingly framed and required extensive anti-corruption reforms, including through member state adoption of anti-corruption strategy documents (EC 2014b; EU 2020a; 2021; Stamouli and Gasparinatou 2025).

These developments are now converging in the EU's first comprehensive anti-corruption directive. The European Parliament and Council reached a provisional agreement on this directive in December 2025, the EU's first directive that intends to harmonise criminal laws targeting corruption. The directive sets out to establish a complete and binding legal framework, harmonising the definition of corruption offences, regulating efforts at enforcement and requiring preventive measures (EU 2026). Importantly, it includes the requirement (Articles 21b and 29) for every member state to publish a national anti-corruption strategy after consultation with civil society and the relevant authorities (European Parliament 2025; EU 2025: 26). In light of this new requirement, EU member states that have not yet adopted national anti-corruption strategies will soon be required to do so. Those that have will need to adapt future updates to new legal obligations. This Helpdesk Answer provides a reference framework for this, presenting lessons and practices to assist member states with this requirement.

Table 1: National anti-corruption strategies of EU candidate and member states

Country	Accession	Pre-2009 strategies	Post-2009 strategies
Belgium	1958	–	–
France	1958	–	2020; 2025
Germany	1958	–	–
Italy	1958	–	2013; 2016; 2019; 2022; 2025
Luxembourg	1958	–	–
Netherlands	1958	–	–
Denmark	1973	–	–
Ireland	1973	–	–
United Kingdom	1973	–	2017; 2025
Greece	1981	–	2013; 2015; 2018; 2022
Portugal	1986	–	2020
Spain	1986	–	2025
Austria	1995	–	2018; 2023
Finland	1995	–	2021; 2025
Sweden	1995	–	2020; 2024
Czech Republic	2004	1999; 2006	2011; 2018; 2023
Estonia	2004	2004; 2008	2013; 2021
Cyprus	2004	–	2017; 2021
Latvia	2004	2000; 2004; 2009	2015; 2023
Lithuania	2004	1999; 2002; 2009	2015; 2022
Hungary	2004	2001; 2007	2012; 2015; 2020
Malta	2004	2008	2021
Poland	2004	2002; 2005	2011; 2014; 2018; 2022
Slovakia	2004	2000; 2003	2011; 2014; 2018; 2022
Slovenia	2004	2004	2015; 2023
Romania	2007	2001; 2005	2011; 2016; 2021
Bulgaria	2007	2001; 2006	2015; 2021
Croatia	2013	2002; 2008	2015; 2021
Montenegro	–	2005	2010; 2015; 2019; 2024
Serbia	–	2005	2013; 2024
Albania	–	2007	2015; 2023
N. Macedonia	–	2003; 2007	2011; 2016; 2021
Ukraine	–	2006	2011; 2014; 2018; 2021
Moldova	–	–	2011; 2017; 2023
Bosnia & Herz.	–	2009	2015; 2021; 2024
Georgia	–	2005	2010; 2019; 2021
Kosovo	–	2009	2013; 2021

Source: Search of published documents adopted by specific states to determine, prioritise and coordinate comprehensive policy measures to counter corruption.

The content of national anti-corruption strategies

Article 21b of the directive on combating corruption declares:

“Without prejudice to existing policies, member states shall adopt and publish a national strategy on preventing and combating corruption, establishing objectives, priorities, and corresponding measures and the means to meet these objectives. Member States shall strive to ensure that such national strategy would be developed in consultation with civil society, the relevant bodies or units referred to in Article 21c, independent experts, researchers and other stakeholders, and shall take into account the member states' needs, specificities and challenges” (EU 2026: 54).

When passed into law, this will be the primary provision requiring member states to adopt national anti-corruption strategies. The provision allows some flexibility to member states regarding the documentary forms of national anti-corruption strategies. In practice, some countries separate the different components of national anti-corruption strategies across multiple documents, some of which may not be published (for example, BAK 2023).

Although this would be technically consistent with Article 21b of the directive, this model is sometimes criticised for reducing transparency (OECD 2024), and so the more common model, which consolidates all the core components of a national anti-corruption strategy into one document, is often preferred (for example, LRS 2022). This is the model followed here.

The structure of the following sub-sections is generalised from the national anti-corruption strategies of EU candidate and member countries. Each sub-section looks at an issue commonly addressed in these strategies or that has been the subject of EU regulatory attention or international benchmarks. Each starts with the key standards applicable to its subject matter, drawing on the directive, other rules and recommendations arising from the more general EU anti-corruption architecture and those developed by international organisations such as the Council of Europe, the OECD and the UN. These are followed by examples, lessons and practices from existing national anti-corruption strategies and other relevant experiences. This analysis relies primarily on strategies adopted by EU candidate and member countries, plus examples from the UK (CO 2025), the USA (White House 2021), Chile (CIPT 2023) and Mexico (SABG 2025). A full list of EU national anti-corruption strategies is provided in Table 1.

This section begins with the normative framing of national anti-corruption strategies, the allocation of authorities for the preparation and adoption of these strategies, and the procedures that these authorities followed. It then describes how national anti-

corruption strategies define and diagnose problems of corruption, after which it addresses the policy objectives, priorities and measures of national anti-corruption strategies. The section closes with how national anti-corruption strategies address implementation, monitoring and evaluation.

Normative framing, authorities and procedures

Published national anti-corruption strategies in the EU often begin with normative framing, authorities and procedures. The purpose of normative framing is to establish the moral, political and legal foundations for the strategy. These foundations often involve the allocation of authorities to prepare and adopt the strategy. Procedures refers to the process through which the strategy was developed (for example, MJ 2020).

Normative framing

Normative framing typically involves reference to corruption as an ethical issue while emphasising the negative societal effects of corruption. These effects are often expressed in terms of how corruption conflicts with the basic values of government, including the public interest, accountability and trust, democracy and the rule of law, basic rights and social justice, efficient administration and economic development, and the maintenance of social order and national security (for example, Vláša SR 2024; AFA 2025; VCG 2024). National anti-corruption strategies often also contain positive statements of national resolve to curb corruption in accordance with domestic and international commitments (for example, LRS 2022: 5-8). This accords with OECD guidance, which suggests that national anti-corruption strategies should specifically refer to international commitments (OECD n.d.)

Authorities responsible for preparing and drafting the national anti-corruption strategy

The text of Article 21b of the directive can be understood as placing the duty to prepare a national anti-corruption strategy with executive governments of member states, to the extent that these executives are generally tasked with addressing European policy, but it is not prescriptive on how they should allocate implementation responsibilities (EU 2026: 54). In practice, a number of EU countries retain a strong executive-led model where responsibility for preparation is assigned to an executive ministry (Ju and Fi 2024; GdS 2025; BAK 2025). These ministries sometimes dilute executive control through a semi-autonomous committee model, assigning responsibility to a working group that may include representation from academia, related professions, business, trade unions and civil society (MJ 2020; MC 2021; MS 2023). An alternative, autonomous agency model, where preparation is assigned to an independent anti-corruption agency, is also common (LRS 2022; KNAB,2023; AFA 2025; ANAC 2025).

Across these models, the executive cabinet in most countries is responsible for adopting the final national anti-corruption strategy (KNAB 2023; BAK 2025). In some countries, the national legislature finally passes the anti-corruption strategy as a resolution (HS 2021; LRS 2022). The only country where both preparation and implementation of the strategy are led by an independent body is Italy, a consequence of long-standing concerns regarding the politicisation of anti-corruption initiatives (Di Mascio, Maggetti and Natalini 2020).

There is a balance to strike between the advantages brought by the executive model, which includes political ownership, capacity for coordination across government and alignment with broader policy processes, and those of the semi-autonomous model, which include greater insulation from partisan incentives, the potential for more objective assessments of problems and solutions, and enhanced public trust in the impartiality of the process (see Kaufman 1956). These models and their implementation across the EU are addressed in more detail in Box 1. Overall, the UNODC (2015:5) recommends that the responsibility for drafting the strategy is assigned to a small, semi-autonomous group and that this follows from a clear directive from a senior political leader, setting out the drafting unit's mandate and responsibilities. Many countries also establish a supporting group of experts to provide technical guidance during the drafting process (UNODC 2015:6).

Box 1: Models for allocating authority to prepare NACS

In existing practice, a number of EU countries retain a strong executive-led model. The executive-led model can be effective for countries with strong, high integrity administrative systems. It often involves granting primary responsibility for preparation of the strategy to the offices of the head of government or appropriate ministries. A typical example of this model is Spain, which assigns responsibility to its Ministry for the Presidency, Justice and Relations with the Cortes (GdS 2025). Sweden assigns responsibility to its ministries of Justice and Public Administration (Ju and Fi 2024), similarly with Finland (OM 2025), Slovakia (Vláda SR 2024), Croatia (HS 2021) and Romania (GR 2021). At the limits of this model, Austria assigns responsibility to the Bureau for Corruption Prevention and Combating (BAK), which is an institution within the Federal Ministry of the Interior, but with extensive operational autonomy (BAK 2025).

A strong executive-led model may also appeal to countries in the early phases of extensive anti-corruption reforms, where they do not have existing, specialised or appropriately independent anti-corruption bodies to draw on. The model arguably maximises political ownership, capacity for coordination across government and alignment with broader policy processes, and this is part of the more convoluted manoeuvres behind the 2014 emergence of Italy's independent national anti-corruption authority, ANAC (Di Mascio, Maggetti and Natalini 2020). A clearer example may be Portugal's most recent national anti-corruption strategy, prepared by

a working group established under the auspices of the minister of justice, which led directly to the establishment of the independent mechanism for the prevention of corruption, which will likely drive the formulation of national anti-corruption strategies (MJ 2020).

Because of the drawbacks noted above around the executive model, several countries favour an approach led by a semi-autonomous committee (OECD 2020; Jenkins and Camacho 2022). Portugal took a step in this direction by appointing an academic to lead the working group discussed above (MJ 2020). Bulgaria operates a national council for anti-corruption policies (NAPA), chaired by the prime minister or their designate, with permanent members including key ministries and other state agencies, and coordinating with a civil council composed of business, civil society and independent experts (MC 2021). The Czech Republic assigns responsibility to the Ministry of Justice, which works through the Government Council for the Coordination for the Fight Against Corruption, a body composed of representatives from government, business and labour, professional chambers, non-profits and academia (MS 2023).

Those countries with a strong independent anti-corruption agency can pursue a more autonomous bureaucratic approach. The semi-independent French anti-corruption agency (AFA), a body located within the executive branch, under the authority of the ministers of justice and finance, but headed by a magistrate appointed by the president, prepares that country's national anti-corruption strategies through a broadly consultative process (AFA 2025). Lithuania can be placed further along this spectrum, with the more classically independent special investigation service (STT), which stands apart from the executive, and is subject to appointment and dual oversight of the president and the legislature to prepare the country's strategy (LRS 2022). In Lithuania, the executive approves and the legislature passes the national anti-corruption strategy, which is in contrast to the most extreme independent model, which is Italy, discussed above.

Procedures for preparing the national anti-corruption strategy

With regard to procedures for preparation, the directive is more prescriptive. It tends to favour (as described in the next section) preparation to be informed by an objective assessment of compliance obligations, risks of corruption, measures that might be adopted to mitigate these risks, and evidence on the results of prior anti-corruption efforts. Achieving such an assessment requires extensive consultation across government, and Article 21b read with Article 21c explicitly require that this consultation include a broad set of stakeholders, including national anti-corruption bodies, independent experts, researchers and civil society (EU 2026: 54).

Although member states will have considerable discretion on how to implement this requirement, the EU has issued recommendations on how to engage with citizens and

civil society in public policymaking processes more broadly (EC 2023). These recommendations state that participation processes should provide timely information, establish predefined parameters and avoid excessive formalities (EC 2023:10). They should be embedded throughout policy cycles from as early as possible, be inclusive and be transparent as to the outcomes and how participants have shaped them. The recommendations describe innovative forms of participation that involve citizens directly, including online and in-person deliberative and co-creation processes (EC 2023:3). It also states that engagement with civil society actors should be regular, structured and results oriented, while providing adequate funding and resources for effective participation.

These legal provisions and recommendations align with much existing practice in the formulation of national anti-corruption strategies. It is mentioned that many anti-corruption strategies are prepared by committees with academic, professional, business, trade union and civil society representation. Such committees often provide fora for structured, direct engagement with associations and individuals in the sectors that they represent, through approaches for comment and roundtables. They also provide space for the general public to influence the process, through written submissions, electronic consultation platforms and surveys (for example, MJ 2020; KNAB 2023; see CIPT 2023 for inclusion of marginalised groups). In some countries, more formal and institutionalised anti-corruption councils and networks provide important ongoing infrastructure for building participation capacity, which can be useful across subsequent national anti-corruption strategy cycles (MC 2021; JM 2021; OM 2025).

Problem definition and diagnosis

The next key element to an anti-corruption strategy is problem definition and diagnosis. In the directive, Article 21b does not explicitly mention the kind of analysis necessary, but Articles 21a to 21c read as a whole require member states to periodically conduct their own structured assessments of the risks of corruption across sectors (EU 2026: 52-55). Those provisions oblige member states to develop measures to address the main risks thus identified and to adopt national anti-corruption strategies that are responsive to the member state's own "needs, specificities and challenges". The directive goes on, in Article 26, to require members states to gather statistical data on corruption offences and on enforcement actions (EU 2026: 60-61). These provisions are not so much compliance focused as a compliance sensitive as well as evidence based and risk-oriented for developing national anti-corruption strategies. This is in line with recommendations of the EC (2014), GRECO (2019) and the OECD (2017; 2020).

Defining corruption

The question of how to define corruption has been long debated in the literature (Buchan and Hill 2014). Since such definitions raise concerns around alignment with

existing legal and political regimes, and since they also drive subsequent analyses, they can be a source of contention in the preparation of national anti-corruption strategies. A number of strategies avoid the issue by not explicitly defining corruption at all, as is the case in recent strategies of the Czech Republic (MS 2023), Austria (BAK 2025) and France (AFA 2025).

One approach for developing a definition of corruption is to start with defined offences (Gardiner 2002). The directive lists a series of such offences in Chapter 2, ranging from bribery and serious unlawful exercise of public functions to various activities that profit from corruption and work to evade detection and punishment (EU 2026: 34-40). These provisions reach beyond classic quid pro quo bribery to include broader distortions of entrusted authority, along with the processes of management and illicit enrichment that surround them. Other international mechanisms such as the UNCAC (2003) identify various forms of corruption, including the criminalisation of bribery of public officials, bribery of foreign officials, embezzlement and diversion of public funds, trading in influence, abuse of office, money laundering of corruption proceeds, among others. An enumerative definition of corruption in terms of criminal offences, however, is in important respects incomplete. Although the directive points to some of the reasons for why – for instance, by moving beyond criminal offences toward preventive reforms (EU 2026: 52-59) – it does not resolve the issue by explicitly defining corruption.

Firstly, such enumerative definitions are incomplete because there are a range of behaviours that can be considered corrupt without necessarily rising to the level of crimes, such as in the case of minor ethical breaches, conflicts of interest or relatively novel and evolving behavioural forms (Gardiner 2002). The latter is recognised, for instance, in the Swedish national anti-corruption strategy which mentions doxxing, threats and harassment, and disinformation as potentially corrupting the impartial operation of official functions (Ju and Fi 2024: 4-5). Secondly, anti-corruption is not simply about individual behaviour. It is also concerned with forms of institutional corruption where the integrity of official functions is undermined not by any single identifiable wrongdoing but by structural incentives that systematically bias processes and outcomes against the public interest (Thompson 1995).

Although no longer a member of the EU, the UK's recent national anti-corruption strategy offers a good example, explicitly asserting that it provides such a policy definition over and above the law to establish a broad enough scope for government analysis and action. The definition it arrives at, developed in collaboration with Sussex University's centre for the study of corruption, is corruption as "abuse of entrusted power for private benefit that usually breaches laws, regulations, standards of integrity and/or standards of professional behaviour" (CO 2025: 83ff).

Situation analysis and risk assessment

Situation analysis in this context involves a systematic account of the nature and extent of corruption in society, the institutional framework within which it operates and the characteristics of the system designed to counter it (UNODC 2015). Risk assessment

extends this analysis into consideration of the likelihood and consequences (the risks) of corruption to make decisions about objectives, priorities and measures to mitigate those risks (OECD 2020). Together, these methodologies should establish relevant types of integrity breaches and who is likely to be involved in them. They should map how their incidence has evolved over time and the risks of their occurrence in specific procedures, sectors and geographies. They should determine what drives these risks, and the successes and failures of prior efforts to address them (OECD n.d.).

The relevant types of integrity breaches are conceptualised in a variety of ways in EU national anti-corruption strategies. The strategies reviewed commonly make reference to conflicts of interest, bribery, embezzlement, misappropriation, extortion, political financing abuse, influence peddling, political interference, vote-buying and electoral manipulation, patronage and favouritism, various kinds of fraud, abuse of office, facilitation of corruption, and illicit enrichment. The UK strategy considers breaches of public trust in general to be a form of corruption (CO 2025: 43-46), while the Finland strategy refers to unethical preparation of decisions outside of formal structures (OM 2025: 9). These types of integrity breaches are often dissected in different ways. They generally include a range of sub-types, and they can also be aggregated into broader syndromes, such as when the former United States strategy referred to state capture and kleptocracy globally (White House 2021).

The actors that could be involved in these integrity breaches are many, effectively encompassing anyone that is trusted with official power and who seeks to influence it. The national anti-corruption strategies reviewed commonly refer to politicians, political executives, political advisers, party donors, members of public boards, civil servants, prosecutors, judges, court officials, various public and private sector professionals, lobbyists, businesspersons, voluntary association leaders, organised crime groups, and ordinary citizens (for example, JM 2021; GR 2021; Vláda SR 2024). A relatively novel addition provided by the UK and former US strategies is foreign kleptocrats who seek to launder corrupt gains through football clubs and real estate (CO 2025) and hostile foreign states that engage in strategic corruption to advance foreign policy objectives (White House 2021).

The functions and sectors that could be affected by integrity breaches are also diverse. National anti-corruption strategies in the EU often identify human resources management, public financial management, internal control and risk management, public procurement, land use management, and professional services as functional risk areas. Relevant sectors include health, education, housing, infrastructure, customs and taxation, the state-owned enterprises sector, various divisions of the private sector, and the voluntary sector. National anti-corruption strategies often consider the geographical divisions of the state, including national and sub-national governments and corruption emanating from transnational flows and foreign countries (HS 2021; LRS 2022; MS 2023; CO 2025). Albania has released an inter-sectoral anti-corruption strategy, which ties anti-corruption objectives to the Sustainable Development Goals (MAPA 2023).

The purpose of situation analysis and risk assessment is, however, not simply to list types of integrity breaches, the categories of people that might be involved in them and the functions and sectors that they affect. The analysis should emerge from an empirical mapping of the character, incidence and consequences of those breaches across the member state in question (OECD n.d.). For this analysis, international guidelines recommend mixed qualitative and quantitative methods, an approach best suited to understanding corruption and the mechanisms that drive it (Jenkins and Camacho 2022; see also, Lieberman 2005).

The qualitative evidence that national anti-corruption strategies often draw on includes the operational insights of practitioners, ethnographic research, criminological examination of case records and convictions, legal and institutional analysis, and political economies of corruption. The role of stakeholder consultations, in part, is to generate qualitative information from individuals and groups with a wide range of perspectives on national corruption problems, and this is an important supplement to research. National anti-corruption strategies often incorporate existing academic studies and they sometimes commission studies of their own (GR 2021; MS 2023; Ju and Fi 2024).

Quantitative sources typically include general or commissioned surveys of households, employees and business managers. These measure how often subjects experience corruption, their perceptions of its prevalence and their level of concern about the problem. They can be derived from international studies, such as the Eurobarometer surveys, or specially commissioned by the country. Most national anti-corruption strategies refer to indicators developed by international organisations, such as Transparency International's Corruption Perceptions Index (for example, MJ 2020; JM 2021; KNAB 2023; see also, UNODC 2015; OECD n.d.).

An important consideration in developing quantitative evidence is to ensure time-series consistency to measure trends over time, and Lithuania's decades-old Map of Corruption remains a gold standard in this area (Jenkins and Camacho 2022: 10; Shipley et al. 2025; STT 2024). A number of countries generate sophisticated data through mixed methods: the Czech Republic's Corruption in Selected Sectors study is a good example (see Box 2).

Box 2: A study of corruption in in the Czech Republic

Corruption in Selected Sectors in the Czech Republic and Possibilities for its Reduction originated from a collaboration between the Czech Academy of Sciences and the Ministry of Justice.

This study moves beyond public opinion surveys to diagnose how corruption actually functions in six key sectors in the Czech Republic: education and science, healthcare, sport, public procurement, debt collection, and construction and land use. Standard measures like perception indexes miss the nuances of how corruption operates in

practice, so the research team adopted a mixed methods approach designed to capture insider knowledge. They began with 31 in-depth interviews with experts from each field, using these insights to design tailored surveys for people working directly within the sectors. Over 1,000 respondents provided data on their direct and indirect experiences with specific corrupt practices, and the findings were validated through a series of expert workshops.

The results found that corruption is not a single problem but a collection of sector-specific dysfunctions. In education and healthcare, the issue is often "petty" corruption rooted in habitual practices, such as parents bribing youth coaches, patients giving gifts for better access, or families leveraging connections to secure school placements. In contrast, sectors involving large public funds, such as public procurement and enforcement proceedings, are vulnerable to grand corruption, including tailor-made tender conditions, clientelism in assigning cases to friendly contractors and opaque lobbying to influence legislation. The study concludes that effective policy must match this complexity: curbing petty corruption requires cultural change and better wages, while grand corruption demands transparency, digitalisation and systemic reform. The findings are now embedded in the Czech government's national anti-corruption strategy. Future rounds of research will inform future strategies (Bašná et al. 2023; MS 2023).

In addition to those methods described above, national anti-corruption strategies of EU countries also often draw on evaluations of past strategies (which will be addressed in more detail below). They typically consider the findings of periodic reviews conducted by the European Commission, GRECO, the OECD Working Group on Bribery and the UNCAC mechanism. They tend to include an assessment of compliance with existing and upcoming domestic and international legal obligations. These assessments and evaluations, which are in line with international recommendations in this area (UNODC 2015; OECD 2020), often provide a more wide-ranging analysis of the policy constraints, the resource limitations and the institutional incentives and gaps that cause corruption and impede reform (MJ 2020; HS 2021; ANAC 2025).

Objectives, priorities and measures in national anti-corruption strategies

The phase of problem definition and diagnosis is then generally followed by the core work of national anti-corruption strategies, which is, in the terms of Article 21b of the directive, that of "establishing objectives, priorities and corresponding measures" to prevent and combat corruption (EU 2016: 54). The directive at no point defines the elements of this requirement. Still, EU jurisprudence tends to begin with simple textual interpretations (Lenaerts and Gutiérrez-Fons 2014: 6-7), with "objectives" referring to the goals that the strategy aims to achieve, "priorities" about focusing attention and efforts in the context of finite resources and competing demands, and measures referring to concrete policy

actions to achieve prioritised goals. (EU 2026: 54; see also UNODC and UNDP 2013 for international benchmarks).

Creation and development of anti-corruption agencies

Almost all EU national anti-corruption strategies address the creation or strengthening of anti-corruption agencies, and a number of such bodies have been formed through strategy processes (for example, DFP 2013; MJ 2020; planned, GdS 2025).

The directive does not explicitly require the creation of a dedicated anti-corruption body, but Article 21c and Article 21d require that one or more government bodies are resourced and tasked to engage in prevention and enforcement (EU 2026: 54-55). The provision goes on to assert that such bodies must operate free of undue interference, in a manner that is known to the public, according to transparent procedures where appropriate, and report on their main activities and results (EU 2026: 54-55; see also, UNODC 2012; 2020).

A number of EU countries, such as Lithuania, Latvia, Poland, Italy, France, Portugal, Spain and the Czech Republic have moved, or plan to move, toward a specialised anti-corruption agency model. The case for a dedicated, centralised agency rests primarily on specialisation and visibility. A single body can develop deep expertise in corruption detection, investigation and prevention, avoiding the dilution of effort that occurs when responsibilities are scattered. It provides a clear institutional focal point for political commitment, public awareness and international cooperation (OECD 2008). The potential disruption and cost of creating a specialised agency may not be justified where existing institutions have effectively suppressed corruption, which is part of the reason why some EU states with low levels of corruption, such as the Netherlands, Germany, Denmark, Sweden, Finland and Estonia, tend to operate with more dispersed anti-corruption functionalities (Schöberlein 2020: 12). Indeed, the Colombo Commentary on the Jakarta Principles for Anti-Corruption Agencies (a benchmark for international standards) does not state whether one body or multiple are preferred; instead it emphasises that responsible agencies should have a clear mandate to counter corruption (UNODC 2020:7).

Anti-corruption agencies typically have some combination of four clear objectives: to tackle corruption through prevention, education and awareness raising, investigation and prosecution (UNODC 2020:7). Countries that decide to establish dedicated agencies can adopt one or a combination of models (OECD 2013). The first is an enforcement focused agency with powerful criminal investigative and prosecutorial functions, a prominent example of which is Romania's national anti-corruption directorate. The second is a prevention focused agency, with powers to investigate institutions, compel compliance and reform, and to train and educate on anti-corruption measures, such as France's anti-corruption agency (AFA) or Italy's ANAC. The classic model of an anti-corruption agency combines these features, like Latvia's Corruption Prevention and Combating Bureau (KNAB) and Australia's new national anti-corruption commission (NACC), which has some distinctive features (see Box 3).

Box 3: Australia's national anti-corruption commission (NACC)

Australia has a long track record of operating specialised anti-corruption agencies. New South Wales established its agency in 1989, and all Australian states and territories have since followed suit. Serious discussions for a national anti-corruption agency started in the 1990s, and were picked up again in the 2010s when a series of scandals rocked the Commonwealth government. A convergence of civil society, academic and political advocacy resulted in the creation of the NACC, through the National Anti-Corruption Commission Act of 2022.

The act addresses corruption exclusively in the public sector, but otherwise defines it broadly. It refers to any conduct that constitutes a breach of public trust, an abuse of office, the misuse information or documents that could affect the honest or impartial exercise or performance of public powers and functions. The NACC can receive complaints, and all relevant complaints received by other bodies must be forwarded to it. It has whistleblower protection functions. It can investigate on request or on its own. It has broad powers to search and seize assets, as well as to summon witnesses, and it can hold public hearings. The NACC can both refer persons for further action and recommend institutional reforms.

The NACC model has also been criticised for its statutorily entrenched focus on "serious" corruption, which will tend to marginalise concern for more petty instances. The model has also been criticised for its reliance on referral for enforcement and the fact that its whistleblower protection mandate does not extend to supporting aftercare for whistleblowers. State-level experience in Australia suggests that, given these features, most matters will be referred back to executive functions for internal treatment; that adjudication will often deviate from NACC findings; and that whistleblowers will come away dissatisfied with the process (Prenzler and Ransley 2024). The model is also more inquisitorial and, in relation to institutional reform, advisory than major anti-corruption agencies among EU member states, such as the older ANAC in Italy and AFA in France, which are more focused on preventive action and have more peremptory institutional reform powers.

Regulation of political finance and lobbying

The directive covers political finance and influence measures with its Chapter 2 prohibitions on bribery and trading in influence (EU 2016: 34-40). In the sphere of corruption prevention, Article 21a issues softer guidance, stating that member states must put preventive tools in place, which may include transparency of political funding, rules addressing revolving door situations and rules regulating interactions between the public and private sectors. GRECO, the OECD and the UNCAC all also favour extensive regulation of political finance and influence, which can be rolled out through a range of measures.

In relation to political finance, these measures can include public funding systems to reduce dependence on private finance, restrictions on electoral spending, caps on donations, mandatory disclosure of donations, beneficial ownership information on donors, restrictions or bans on donations from non-natural persons, auditing procedures and fines for transgressions. The European Parliament has published details on such measures for EU member states (Reed et al. 2021). Lithuania (LRS 2022), Latvia (KNAB 2023) and Spain (GdS 2025) are among recent national anti-corruption strategies that address political finance extensively.

Efforts to regulate political influence are also widely promoted in EU member state national anti-corruption strategies. These measures can include registration of lobbying organisations, disclosure of their identities and operations, publication of the diaries and meeting logs of senior officials, and cooling-off periods for former officeholders. Such measures often rely on expansive definitions of lobbying to cover a broad range of individuals and organisations to preclude evasion efforts. The European Parliament has also covered political influence in EU member states (Bauer et al. 2021). In Spain's most recent national anti-corruption strategy, a commitment is made to compel lobbying organisations to publish their policy footprints (GdS 2025). Similar measures are being adopted in the Czech Republic (MS 2023) and Latvia (KNAB 2023).

Personnel management, internal control and risk management

The importance of professionalisation and meritocratic recruitment in the public sector is widely recognised and has long been important in EU accession processes and recommendations (Dahlström, Lapuente and Teorell 2012). Similarly, GRECO evaluations have called for the introduction of integrity checks prior to the appointment of senior officials, codes of conduct covering all relevant integrity matters, and continuous integrity training. Articles 21a and 21e of the directive require member states to promote a public service culture based on anti-corruption principles, including through capacity building and training (EU 2026: 52-56). ISO 37001 provides standards for the professionalisation of compliance and integrity management in the public sector (ISO 2016)

As for personnel management, member states can limit exposure to corruption by practicing staff rotation and limiting tenure. They can discipline and also bar civil servants found guilty of corruption from serving in government office, and can require integrity checks for appointments, especially for high-risk positions. Internal control and risk management systems include measures to continuously identify high-risk positions, as is the case in, for instance, Romania (GR 2021) and Slovakia (Vláda SR 2024). Other national anti-corruption strategies propose expanding the presence of integrity officers, along with officials specially designated to coordinate strategy implementation (for example, BAK 2025; AFA 2025). A broader suite of internal control and risk management measures can include appropriate segregation of duties; multiple authorisation and decision committees; simplification and elimination of unnecessarily burdensome regulations and procedures; internal and external auditing and oversight; and automation and digitisation to reduce discretion and enhance legibility.

A notable consideration, especially relevant to the development and implementation of national anti-corruption strategies, is how to construct and integrate corruption risk management systems into routine operations of state organisations and how those operations can be leveraged to inform the development of national anti-corruption strategies. The experience of Italy's specialised anti-corruption agency, ANAC, is useful here (see Box 3).

Box 3: Italy's corruption risk management system

Italy has experienced significant corruption challenges and holds instructive lessons on mitigating these risks. The approach to corruption risk management adopted in Italy's successive national anti-corruption plans, beginning in 2013, with the most recent in 2025, involves an attempt to centrally steer risk management activities through a sprawling national administrative system.

In the course of legal reforms starting in 2012, Italy compelled its state organisations to adopt corruption risk management approaches and empowered a new national anti-corruption authority, ANAC, to supervise implementation. ANAC has done so through consultations, inspections and financial sanctions on officials, and by issuing triennial national anti-corruption plans (PNAs). These plans operate as Italy's equivalent to national anti-corruption strategies. A key distinction is that, rather than simply identifying national corruption risks, they prescribe a methodology that all state organisations must use to conduct risk assessments and frame their own anti-corruption plans. If they fail to do so, ANAC can facilitate the process through guidance, public shaming and financial sanctions on officials. It also supplements these decentralised institutional corruption risk assessments with its own investigations and data gathering exercises, such as through its expansive procurement red-flagging system (Brown and Granickas 2022).

Aggregating these diverse sources of data, ANAC is then tasked with developing subsequent PNAs, which adapt the corruption risk management methodologies. In the process, ANAC has been attempting to move from a system that has been criticised as overly formulaic, often uninformative and administratively burdensome, into one that is more streamlined, substantial and integrated into broader planning exercises (ANAC 2016; 2019; 2022; 2025). While ANAC continues to have various issues – for example, the system has recently been criticised for not addressing political executives in its assessment of corruption risks (GRECO 2024) – it usefully illustrates the challenges of attempting to integrate corruption risk analysis into state operations and to build national risk maps from the bottom up.

Public financial management, taxation and procurement

Public financial management, taxation and procurement are also policy areas commonly addressed in recent EU national anti-corruption strategies. Specialist EU supranational law is also relatively well developed in this area, including through the PIF (Protection of the Financial Interests of the EU) directive on countering fraud affecting the EU budget (EU 2017; 2018a), the conditionalities regime on access to EU resilience and recovery funds (EU 2020a; 2021) and EU procurement rules (EU 2014a; 2014b; 2014c).

These rules have already moved EU member states toward financial traceability, standardised financial controls, digitalisation, transparency and open competition in procurement, backed by debarment and enforcement procedures. Most recent national anti-corruption strategies aim to facilitate incremental improvement of these types of measures, especially by leveraging the advantages of e-government solutions. These are often used, among other things, to: simplify procedures; automate or centralise decision-making to reduce discretion; improve coordination between and legibility for oversight processes; and expand transparency and opportunities for public participation. Countries increasingly aim to address these issues through the adoption of artificial intelligence technologies (examples include JM 2021; LRS 2022; Ju and Fi 2024; MK 2024; GdS 2025).

Sub-national government, state-owned enterprises and the private sector

Sub-national government, state-owned enterprises and the private sector are often addressed in EU national anti-corruption strategies, a move encouraged by the OECD public integrity indicators and the GRECO sixth round of evaluation (OECD n.d.). However, these can be challenging areas for national governments to effectively regulate.

Sub-national governments have their own bases of legitimacy and institutional autonomy. They tend to fragment national regulation and oversight, to have weaker professional capacity and to be embedded in dense informal local networks. These factors can create fertile ground for corruption. At the same time, the role of local governments in implanting national parties into grassroots constituencies can make sanctioning corruption politically costly (Meza and Pérez-Chiqués 2024). The GRECO sixth round of evaluation has been primarily concerned with ensuring that national anti-corruption architectures are appropriately extended and adapted to local conditions (GRECO n.d.).

In national anti-corruption strategies, this is typically addressed by reducing regulatory gaps; building capacity in local government; creating specialised local government regulatory bodies, such as the UK's proposed local audit office (UK 2025); and developing transparency platforms that encourage comparison and competition

between local authorities (for example, HS 2021). A related focus of anti-corruption efforts has been to leverage the closeness of sub-national government to communities, through enhanced transparency and participation procedures, an approach that has been developed by the Congress of Local and Regional Authorities (CLRA) within the Council of Europe (CLRA 2018; 2019).

State-owned enterprises have their own specific anti-corruption issues. Being outside of the civil service and yet still subject to political control, state-owned enterprises are often hotbeds of political appointments and patronage operations. Facing pressures of public accountability and considerations of commercial fairness and competition, they are often subject simultaneously to company law, sectoral regulation and fragments of public sector integrity law, which compounds legal ambiguities and omissions (Koppell 2003; OECD 2018).

Addressing these issues often involves creating a professional ownership function, appointing boards without political interference and monitoring commercial performance. The legal perimeter of state-owned enterprises should also be carefully examined for consistency and regulatory gaps (OECD 2019). Recent national anti-corruption strategies addressing state-owned enterprises suggest a wide array of measures, including the development of codes of ethics, meritocratic and transparent selection of officials, the development of institutional risk maps, the construction of compliance and integrity offices, and independent audits (MC 2021; ANAC 2025; GdS 2025).

The private sector also comes with its own particular anti-corruption challenges. Government involvement in corruption control is constrained by the absence of hierarchical authority and the specific difficulties involved in intervening legally in property and voluntary relations. The private sector often self-regulates to limit legal exposure; profit and related incentives work against deterrence, and cross-border activities fragment regulation and enforcement. The potential for corrupt relationships between the public and private sector is often addressed by governing how the public sector transacts with business and voluntary associations, but the directive is also concerned with corruption that is confined within the private sector economy. The directive aims to address these issues by criminalising private sector corruption and requiring states to foster the ability to impose sanctions on legal persons. It also provides for cooperation in criminal matters between the EU and member states (EU 2016), and broader EU law addresses issues such as money laundering (EU 2015; 2018b; 2018c).

A number of countries in the EU go further by incentivising businesses to develop independent anti-corruption functions. This can be done by allowing companies to raise the compliant operation of those functions as a defence against corporate liability for corruption. France provides for administrative sanctions where such functions are not established, a model which is in the course of being adopted by Spain in its national anti-corruption strategy (GdS 2025). The UK has gone further by making failure to prevent corruption grounds for legal liability, while still allowing the establishment of independent anti-corruption functions as a defence (HMSO 2010; MoJ 2010).

Countries often involve the private sector in discussions on innovative anti-corruption solutions, particularly with regard to collective action and addressing the demand side of corruption. For example, the US Congress complemented the Foreign Corrupt Practices Act (FCPA) with the Foreign Extortion Prevention Act (FEPA), and free trade agreements can be used to strengthen the rule of law in trading countries.

Public reporting, whistleblower protection and transparency

Most EU national anti-corruption strategies include measures for public reporting, whistleblower protection and transparency. This is generally by way of incremental development of existing, often quite complex platforms, meaning that few contain the details of very fundamental reforms.

The new directive will require marginal adjustments to future measures. Article 22 of the directive asserts that member states must take all necessary measures to ensure that the corruption offences laid out in Chapter 2 are reportable (EU 2026: 56). This must be in accordance with the minimum standards established for the protection of whistleblowers required by the EU directive on whistleblowing (EU 2019). That directive requires that whistleblowers have access to confidential and secure reporting channels, that they are protected from retaliation and adverse consequences for reporting in good faith, and that their reports are investigated and acted upon appropriately.

The new directive also asserts that whistleblowers must be provided with whatever additional protection, support and assistance is provided under domestic law (EU 2026: 57), which often includes confidential advice and information services, legal assistance and representation, psychological and social support, and financial assistance and compensation. The Dutch House for Whistleblowers is a model for the provision of pre-reporting advice, psychological services and legal support. The post-2022 reforms to the French whistleblower framework provide one model for financial assistance (see Box 4). No EU country provides positive compensation for whistleblowing, such as those under *qui tam* laws in the United States, but in its most recent national anti-corruption strategy, Latvia indicated that it is considering doing so (KNAB 2023: 48).

Box 4: France's post-2022 whistleblower reforms

In the course of transposing the EU's 2019 whistleblower directive into domestic law, France also went beyond it in several respects. The country's previous whistleblower framework was widely criticised by civil society groups, international monitoring bodies and the courts for its narrow eligibility criteria, its rigid hierarchy of reporting channels and the absence of meaningful financial and procedural support for individuals facing retaliation. These discussions were informed by a number of high-profile cases, such as that of Yasmine Motarjemi, who exposed public health risks in

Nestlé products, but faced years of professional harm and received little support from the state.

The reforms initiated in 2022 substantially expanded the French regime. They broadened the definition of whistleblower by removing a requirement of “disinterested” reporting and extending protection to facilitators, relatives, former employees and applicants. They abolished mandatory sequencing in reporting channels, allowing direct external reporting and, in defined circumstances, protected public disclosures. They further strengthened anti-retaliation rules by placing the burden of proof on retaliators to prove their actions were unrelated to the act of whistleblowing. The reforms formalised avenues for guidance and referral through the French defender of rights and crucially they empowered courts to provisionally order alleged retaliators to pay the legal costs of whistleblowers, and even to provide allowances to cover deterioration of the financial circumstances of whistleblowers (Koumpli 2023).

The directive also explicitly requires the use of transparency to prevent corruption. Article 21a requires member states to take measures to ensure a high level of transparency in public administration and public decision-making, with a view to countering corruption (EU 2026: 52). Article 26 requires member states to collect and publish anonymised statistical data on corruption cases processed under the directive (EU 2026: 60-62). Transparency is a well developed feature of EU law in relation, for instance, to public procurement (EU 2014b; 2014c). Good practice national models reflect this approach by promoting the proactive publication of information, especially in high-risk corruption areas, with strong reactive access-to-information regimes, which are bolstered by independent supervisory bodies (OGP 2024). The most recent Italian national anti-corruption strategy contains measures to: automatically feed databases into a single transparency platform; use web crawling and scraping tools to verify compliance with transparency rules and assess data quality; and develop an index file that maps URLs to help search engines and citizens navigate data (ANAC 2025: 24-25, 175-176).

Criminal investigation, enforcement and asset recovery

National anti-corruption strategies in the EU address issues of criminal investigation, enforcement and asset recovery. Chapter 2 of the directive develops a range of corruption offences (EU 2026: 34-52), which member states will have to transpose into domestic law. They will also need to establish the capacity to enforce them. Article 23 requires member states to develop effective and proportionate tools for investigating and prosecuting corruption. Article 21e further requires member states to take measures to train law enforcement and judicial authorities to handle corruption offences. Article 23a requires member states to take measures to enable the tracing, identification, freezing and confiscation of instrumentalities and proceeds from corruption offences (EU 2026: 56-57). The directive requires a comprehensive architecture for investigating, enforcing and recovering assets from corruption.

A number of member states already go beyond the directive's proposed minimum standards. While Article 11 of the proposed directive enables states to limit the corruption offence to certain categories of public officials (EU 2026: 38), Spain has long applied its crime of administrative prevarication to all officials (Ceuva 2016). In relation to investigation and enforcement, France has centralised the investigation and prosecution of complex corruption and financial crime with its national financial prosecutor (PNF), concentrating expertise in financial forensics, international cooperation and deferred prosecution mechanisms (Boutros 2019). Spain's current national anti-corruption strategy proposes the establishment of specialised anti-corruption sections in courts (GdS 2025). The UK's latest strategy promotes the use of machine learning models to curb corruption, including by piloting an artificial intelligence corruption assistant for law enforcement agencies (CO 2025).

Awareness and civil society

National anti-corruption strategies often promote awareness of corruption and civil society activism, which are also concerns addressed directly in the directive. Article 21a of the directive requires member states to take action to raise public awareness about the harms of corruption. Whenever a member state identifies a sector or occupation as being a high risk of corruption, Article 21a also requires member states to adapt awareness raising to the specificities of those sectors and occupations. Civil society, academia, non-governmental organisations and community based organisations must be involved in anti-corruption activities, where appropriate. Article 23d goes on to require member states to allow civil society groups access to criminal proceedings addressing corruption, where such access is granted in other criminal proceedings (EU 2026: 54-60).

Cultural awareness is widely understood as important to developing the shared public understanding and norms necessary to effectively combat corruption. A large number of current EU national anti-corruption strategies include awareness raising initiatives. These often provide youth education. Lithuania proposes teaching tools such as comic strips and animations (LRS 2022). Latvia is developing interactive anti-corruption games (KNAB 2023). Estonia encourages university students to give corruption themed lessons to high school students (JM 2021). Portugal encourages higher education institutions to offer curricular units on integrity (MJ 2020). Many countries also have more general public awareness campaigns, with Portugal (MJ 2020) conducting these annually in December, through posters, television and radio.

National anti-corruption strategies often promote funding to civil society organisations, investigative journalists and research institutions engaged in anti-corruption work (for example, HS 2021; MS 2023; CO 2025). These measures carry risks around politicisation of funding, especially in countries where there has been recent democratic backsliding, such as in Poland and Hungary (Roggeband and Krizsán 2021). More broadly, the UK's strategy moves to promote civil society activism around corruption by proposing measures against strategic lawsuits against public participation (SLAPPS). These

measures include promoting legal guidelines that warn solicitors against them and allowing courts to dismiss them early in view of their use to undermine anti-corruption reporting and activism (CO 2025:29). Spain's strategy sets out to implement integrity pacts and citizen audits in high-risk procurement processes (GdS 2025). A number of strategies aim to address corruption in voluntary associations, especially in sporting bodies (for example, MC 2021; CO 2025).

EU cooperation, global cooperation and national security

Many states within the EU and beyond (for example, AFA 2025; US 2021; GR 2021; LRS 2022) promote multilateral cooperation and national security measures through their national anti-corruption strategies. The directive also has extensive provisions in this regard to shape how national anti-corruption strategies address these issues in future.

Article 23b requires the use of Europol's secure information exchange network application (SIENA) for law enforcement information exchange. Article 24 obliges competent authorities in cross-border cases to consider referral to EU bodies and to cooperate, within their mandates, with Europol, Eurojust, EUPO and OLAF, with Eurojust providing coordination support. Article 25 entrusts the EC with mapping sectoral risks, facilitating expert exchange, issuing guidance and publicising available EU funding (EU 2026: 58-60). There are also a range of such provisions entrenched in the OECD Anti-Bribery Convention (OECD 1997) and the United Nations Convention against Corruption (UN 2003).

In practice, member states may go beyond these baseline duties by actively strengthening the international anti-corruption framework itself. This entails sustained diplomatic support, adequate financial contributions and high-level political defence of the treaty regimes established under the OECD, the UN and related conventions. It might also involve promoting other forms of bilateral and multilateral cooperation, such as the new anti-corruption alliance between Switzerland, France and the UK. In the context of increasing geopolitical strain on multilateral legal cooperation, visible commitment to peer review, collective enforcement standards and coordinated action is essential to safeguard the durability and authority of the global anti-corruption architecture (Lang, Alvarez and Hovic 2025). A number of national anti-corruption strategies argue that these efforts have become central to national security with threats of strategic corruption of democratic and administrative processes by hostile foreign powers becoming a significant area of concern. The most important recent example of a national anti-corruption strategy that has put these issues at its centre is the Biden administration's strategy on countering corruption (see Box 5), and although EU countries do not have the same range of global regulatory capacities, the shelving of that strategy under Trump will require them to redouble efforts to maintain (and shape) a fairer global multilateral anti-corruption framework.

Box 5: The United States Strategy on countering corruption

In the context of mounting concerns about democratic backsliding, the rise of kleptocracies, transnational illicit finance and the exploitation of the US financial system by foreign corrupt actors, President Joe Biden designated corruption as a core national security interest. This led, among other things, to the creation of the anti-corruption director position on the US national security council and the office of the coordinator on global anti-corruption. The United States strategy on countering corruption (2021) devised a wide-ranging effort to counter the corruption threat in significant part through measures for global cooperation and regulation.

The strategy aimed to enhance US led research and analysis into corrupt actors and their networks. It sought to establish better communication channels with international partners and create dedicated task forces in foreign policy bodies such as the Department of State and USAID. The strategy planned to expand efforts to suppress international illicit financial flows, including by expanding anti-money laundering obligations across a broader set of professional facilitators, beneficial ownership transparency and stronger regulations on transactions involving digital assets, real estate, and arts and antiquities.

The strategy worked through the Democracies Against Safe Havens (DASH) initiative to multilateralise American international anti-corruption tools, such as targeted sanctions and visa restrictions to better target corrupt actors and prevent evasion. The strategy aimed to increase foreign assistance to rapidly make funds available to investigative journalists, whistleblowers and activists engaged in anti-corruption work, and often facing repression in their home countries (US 2021).

The Trump administration has rolled back the measures in this strategy, demonstrating the limits of anti-corruption strategies not rooted in a broad domestic consensus. The strategy's transnational focus also overshadowed much needed domestic anti-corruption reforms, while its national security framing risked the instrumentalisation of international anti-corruption measures to achieve broader and unrelated geopolitical goals. The strategy remains an important model for efforts to bolster the multilateral anti-corruption regime, but illustrates how strategies can fall victim to political developments.

Implementation, monitoring and evaluation

Strategies tend to fall short at the stage of implementation, while monitoring and evaluation are typically regarded to be weak links in the strategy process (Jenkins and Camacho 2022; Shipley et al. 2025). The directive aims to address this, with its Article 21a requiring member states to periodically evaluate the effectiveness of their measures to fight corruption. Although a full discussion of implementation, monitoring

and evaluation processes is beyond the scope of this discussion, national anti-corruption strategies should clearly set out how they intend to manage implementation and the assessment of results (OECD n.d.).

With respect to choosing indicators to monitor changes, Johnsen et al. (2011) argue these should be SMART: specific, measurable, attributable, realistic and time-bound. Target indicators are specific when they measure only the objective or measure to be attained, without confusing objectives and measures with each other. Being measurable could involve either qualitative or quantitative indicators, provided that the extent to which a target is met is objectively verifiable and unambiguous. Attributable means that the indicator is a valid measure of the problem concerned and the strategy can be plausibly credited with any measurable changes in that problem. The indicators must be realistic in the sense that it will be feasible to collect the necessary data. They must be time-bound in terms of the time spent on data collection, the timing of collection given seasonal and other rhythms of statistical administration and the time-lag that might be expected between implementation activities, outputs and outcomes (see Shipley et al. 2025 for more detail on indicators).

Johnsen et al. (2011) add that, given those parameters, there are a number of pitfalls to avoid in indicator development. Strategists should not make data collection too resource intensive. Similarly, strategists should avoid the proliferation of too many indicators, which can raise costs and complicate implementation. Care must be taken to avoid the problem where implementation tends toward metrics at the expense of a more holistically strategic approach to anti-corruption (Choi, Hecht and Tayler, 2013). This can be addressed by using baskets of qualitative and quantitative measures to best approximate corruption problems by continuously monitoring implementation, updating measures to avoid strategic deviation and by developing properly contextualised, bespoke indicators specific to countries (Shipley et al. 2025).

When target indicators are set, the recommended next step is to establish a framework for implementation (see LRS 2022 for a good example). This should involve assigning ownership over implementation, establishing coordination structures and assigning responsibilities for pursuing measures and monitoring progress (UNDP 2015: 34-38). Sufficient financial and human resources should be allocated to conduct these activities with the directive, importantly, requiring that the measures expressed in anti-corruption strategies must be met with the “means” to achieving them (EU 2026: 54).

Countries typically separate the overarching strategy (typically spanning five to ten years) from shorter cycle action plans that are periodically reviewed and updated (Hoppe 2013). This way the long-term strategy provides stable and overarching direction, signalling commitment to officials, citizens and international partners. The shorter action plans then keep the strategy responsive to changing circumstances. But this practice is not universal, and it can come with drawbacks. Strategies and action plans can become disconnected, the indicators developed in each can grow misaligned, the objectives and measures of excessively long-term strategies can become overly rigid and maladapted to changing circumstances, while very short-term

action plan reviews may not allow sufficient time for change and become formulaic (see Bryson 2011).

Once the implementation modalities are established, a framework for monitoring and evaluation must be set. This framework often involves regular reporting to the strategy's owner and coordination structure, together with the head of government and the legislature (LRS 2022). A number of countries provide for participatory oversight by civil society, experts, the media and other relevant actors, as proposed in Spain's current strategy (GdS 2025). Countries generally also provide for regular reporting to the public, with the UK planning to provide regular updates to external partners through an external engagement group and to publish annual progress reports on the GOV.UK website (CO 2025).

The OECD public integrity indicators suggest that evaluations of national anti-corruption strategies should involve non-state actors. They should be published online for public consideration. They should also be used to inform future anti-corruption strategies, and, in this sense, they should be integrated into anti-corruption strategy formulation and adaptation processes (OECD n.d.). Recent academic analyses favour treating strategy assessment not as a one-off exercise but rather as a feature embedded as a continuous, adaptive function throughout the life of the strategy (Shiple et al. 2025).

References

- AFA. 2025. Agence française anticorruption. [Plan national pluriannuel de lutte contre la corruption 2025–2029](#). France.
- ANAC. 2016. Autorità Nazionale Anticorruzione. [Piano Nazionale Anticorruzione 2016](#). Italy.
- ANAC. 2019. Autorità Nazionale Anticorruzione. [Piano Nazionale Anticorruzione 2019](#). Italy.
- ANAC. 2022. Autorità Nazionale Anticorruzione. [Piano Nazionale Anticorruzione 2022](#). Italy.
- ANAC. 2025. Autorità Nazionale Anticorruzione. [Piano Nazionale Anticorruzione 2025](#). Italy.
- BAK. 2018. Bundesamt zur Korruptionsprävention und Korruptionsbekämpfung, Bundesministerium für Inneres. [Nationale Anti-Korruptionsstrategie](#). Austria.
- BAK. 2023. Bundesamt zur Korruptionsprävention und Korruptionsbekämpfung, Bundesministerium für Inneres. [Nationales Antikorruptionsprogramm, 2023–2025](#). Austria.
- Bašná, K., Bureš, R., Fadrný, D. and Pospíšilová, J. 2023. [Korupce ve vybraných sektorech v české republice a možnosti jejího snížení \[Corruption in Selected Sectors in the Czech Republic and Possibilities for Its Reduction\]](#). Research Report. Prague: Institute of Sociology of the Czech Academy of Sciences.
- Borlini, L. and Anema, F.J. 2023. 'Money Laundering Regulation in the European Union', in McCarthy, K.J. (ed.) [The Money Laundering Market: Regulating the Criminal Economy](#). Cambridge: Cambridge University Press, pp. 55–85.
- Bovis, C. 2006. [EC Public Procurement: Case Law and Regulation](#). Oxford: Oxford University Press.
- Boutros, A. 2019. 'France', in Funk, T.M. and Boutros, A.S. (eds.) [From Baksheesh to Bribery: Understanding the Global Fight Against Corruption and Graft](#). New York: Oxford University Press, pp. 151–180.
- Brown, T. and Granickas, K. 2022. '[Behind Italy's "Small Revolution" in the Fight for Corruption-Free Contracts](#)'. Open Contracting Partnership, 21 September. (Accessed: 4 March 2026).
- Bryson, J.M. 2011. [Strategic Planning for Public and Nonprofit Organizations \(4th ed.\)](#). Jossey-Bass.
- Buchan, B. and Hill, L. 2014. [An Intellectual History of Political Corruption](#). Basingstoke: Palgrave Macmillan.
- Calderoni, F. 2010. [Organized Crime Legislation in the European Union: Harmonization and Approximation of Criminal Law, National Legislations and the EU Framework Decision on the Fight Against Organized Crime](#). Berlin/Heidelberg: Springer.
- Ceuva, L.M.. 2016. '[Reflexiones acerca del delito de prevaricación Desde su interpretación extensiva a su motivación reduccionista](#),' Revista de Derecho, Empresa y Sociedad, 9, pp. 16-47.
- CIPT. 2023. Comisión de Integridad Pública y Transparencia, Secretaría General de la Presidencia. [Estrategia Nacional de Integridad Pública 2023–2033](#). Chile.
- Choi, J., Hecht, G.W. and Tayler, W.B. 2013. '[Strategy Selection, Surrogation, and Strategic Performance Measurement Systems](#)'. Journal of Accounting Research, 51(1), pp. 105-133.
- CLRA. 2018. Congress of Local and Regional Authorities. [Transparency and Open Government](#). Council of Europe.

- CLRA. 2019. Council of Local and Regional Authorities. [Revised Code of Good Practice for Civil Participation in the Decision-making Process](#). Council of Europe.
- CO. 2025. United Kingdom Cabinet Office. [UK Anti-Corruption Strategy 2025–2030](#). United Kingdom.
- CoE. 1997. Council of Europe. [Twenty Guiding Principles for the Fight against Corruption](#). Council of Europe.
- CoE. 1999a. Council of Europe. [Criminal Law Convention on Corruption](#). Council of Europe.
- CoE. 1999b. Council of Europe. [Civil Law Convention on Corruption](#). Council of Europe.
- Craig, P. and de Búrca, G. 2008. [EU Law: Text, Cases and Materials. 4th edn](#). Oxford: Oxford University Press.
- Craig, P. and de Búrca, G. 2024. [EU Law: Text, Cases and Materials. 8th edn](#). Oxford: Oxford University Press.
- D'Alterio, E. 2025. [Public Finance Law and Public Administrations: The Shaping Power of Public Finance in the European Union](#). London and New York: Routledge.
- Dahlström, C., Lapuente, V. and Teorell, J. 2012. 'The Merit of Meritocratization: Politics, Bureaucracy, and the Institutional Deterrents of Corruption'. *Political Research Quarterly*, 65(3), pp. 656–668.
- DFP. 2012. Dipartimento della Funzione Pubblica. [Piano Nazionale Anticorruzione](#). Italy.
- Di Mascio, F., Maggetti, M. and Natalini, A. 2020. 'Exploring the Dynamics of Delegation Over Time: Insights from the Italian Anticorruption Agencies (2003–2016)'. *Policy Studies Journal*, 48(2), pp. 367–400.
- Eser, A. and Kubiciel, M. 2005. [Institutions Against Corruption: A Comparative Study of the National Anti-Corruption Strategies Reflected by GRECO's First Evaluation Round](#). Baden-Baden: Nomos.
- EC. 1997. European Commission. [Communication from the Commission to the Council and the European Parliament on a Union Policy against Corruption, COM\(97\) 192 final, 21 May 1997](#).
- EC. 2003. European Commission. [Communication from the Commission to the Council, the European Parliament and the European Economic and Social Committee on a Comprehensive EU Policy against Corruption, COM\(2003\) 317 final, 28 May 2003](#).
- EC. 2011. European Commission. [Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee: Fighting Corruption in the EU, COM\(2011\) 308 final, 6 June 2011](#).
- EC. 2014a. European Commission. [Report from the Commission to the Council and the European Parliament: EU Anti-Corruption Report, COM\(2014\) 38 final, 3 February 2014](#).
- EC. 2014b. European Commission. [The Second Economic Adjustment Programme for Greece: Fourth Review](#). European Economy Occasional Papers 192.
- EC. 2020. European Commission. [Rule of Law Report: The Rule of Law Situation in the European Union](#). COM (2020) 580 final. Brussels, 30 September 2020.
- EC. 2023. European Commission. [Commission Recommendation \(EU\) 2023/2836 of 12 December 2023 on Promoting the Engagement and Effective Participation of Citizens and Civil Society Organisations in Public Policy-Making](#)

[Processes](#). Official Journal of the European Union, L, 2023/2836, 20 December 2023.

EU. 1999a. European Union. [Council Regulation \(EC\) No 1260/1999 of 21 June 1999 laying down general provisions on the Structural Funds](#). Official Journal of the European Union, L 161, 26 June 1999, pp. 1–42.

EU. 1999b. European Union. [Commission Decision 1999/352/EC, ECSC, Euratom of 28 April 1999 establishing the European Anti-Fraud Office \(OLAF\)](#). Official Journal of the European Union, L 136, 31 May 1999, pp. 20–22.

EU. 2002. European Union. [Council Regulation \(EC, Euratom\) No 1605/2002 of 25 June 2002 on the Financial Regulation applicable to the general budget of the European Communities](#). Official Journal of the European Union, L 248, 16 September 2002, pp. 1–48.

EU. 2012a. European Union. [Consolidated Version of the Treaty on European Union](#). Official Journal of the European Union, C 326, 26 October 2012, pp. 13–45.

EU. 2012b. European Union. [Consolidated Version of the Treaty on the Functioning of the European Union](#). Official Journal of the European Union, C 326, 26 October 2012, pp. 47–390.

EU. 2014a. European Union. [Directive 2014/23/EU of the European Parliament and of the Council of 26 February 2014 on the award of concession contracts](#). Official Journal of the European Union, L 94, 28 March 2014, pp. 1–64.

EU. 2014b. European Union. [Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC](#). Official Journal of the European Union, L 94, 28 March 2014, pp. 65–242.

EU. 2014c. European Union. [Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement](#)

[by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC](#). Official Journal of the European Union, L 94, 28 March 2014, pp. 243–374.

EU. 2015. European Union. [Directive \(EU\) 2015/849 of the European Parliament and of the Council of 20 May 2015 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation \(EU\) No 648/2012 and repealing Directive 2005/60/EC and Commission Directive 2006/70/EC](#). Official Journal of the European Union, L 141, 5 June 2015, pp. 73–117.

EU. 2017. European Union. [Directive \(EU\) 2017/1371 of the European Parliament and of the Council of 5 July 2017 on the fight against fraud to the Union's financial interests by means of criminal law](#). Official Journal of the European Union, L 198, 28 July 2017, pp. 29–41.

EU. 2018. European Union. [Regulation \(EU, Euratom\) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations \(EU\) No 1296/2013, \(EU\) No 1301/2013, \(EU\) No 1303/2013, \(EU\) No 1304/2013, \(EU\) No 1309/2013, \(EU\) No 1316/2013, \(EU\) No 223/2014, \(EU\) No 283/2014, and Decision No 541/2014/EU and repealing Regulation \(EU, Euratom\) No 966/2012](#). Official Journal of the European Union, L 193, 30 July 2018, pp. 1–222.

EU. 2020a. European Union. [Regulation \(EU, Euratom\) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget](#). Official Journal of the European Union, L 433I, 22 December 2020, pp. 1–10.

EU. 2020b. European Union. [Regulation \(EU, Euratom\) 2020/2223 of the European Parliament and of the Council of 23 December 2020](#)

[amending Regulation \(EU, Euratom\) No 883/2013 as regards cooperation with the European Public Prosecutor's Office and the effectiveness of the European Anti-Fraud Office investigations.](#)

Official Journal of the European Union, L 437, 28 December 2020, pp. 49–73.

EU. 2021. European Union. [Regulation \(EU\) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility.](#) Official Journal of the European Union, L 57, 18 February 2021, pp. 17–75.

EU. 2026. European Union. [Provisional Agreement Resulting from Interinstitutional Negotiations: Proposal for a Directive of the European Parliament and of the Council on Combating Corruption.](#) PE782.345v01-00, 9 January 2026.

EUCO. 1993. [European Council in Copenhagen, 21–22 June 1993. Conclusions of the Presidency.](#)

EUCO. 2006. [Brussels European Council, 15–16 June 2006. Presidency Conclusions.](#)

EUCO. 2011. [European Council, 24–25 March 2011. Conclusions.](#)

EUCO. 2020. [Special Meeting of the European Council Meeting, 1–2 October 2020. Conclusions.](#)

European Parliament. 2025. [Agreement Reached on the First EU-Wide Criminal Law Rules against Corruption.](#)

Fox, E.M. and Gerard, D. 2023. [EU Competition Law: Cases, Texts and Context. 2nd edn.](#) Cheltenham: Edward Elgar Publishing.

Gardiner, J.A. 2002. 'Defining Corruption', in A.J. Heidenheimer and M. Johnston (eds.), [Political Corruption: Concepts and Contexts. 3rd edn.](#) New Brunswick, NJ: Transaction Publishers, pp. 25–40.

GdS. 2025. Gobierno de Espana. [Plan Estatal de Lucha contra la Corrupción 2025–2030.](#) Spain.

GR. 2021. Guvernul României. [Strategia Națională Anticorupție 2021–2025.](#) Romania.

GRECO. 2019. Group of States Against Corruption. [Evaluation Report on Spain. GrecoEval5Rep \(2019\)8.](#)

GRECO. 2024. Group of States Against Corruption. [Evaluation Report on Italy. GrecoEval5Rep \(2023\)9.](#)

GRECO. No date. [Group of States against Corruption. Sixth Evaluation Round: Preventing Corruption and Promoting Integrity at the Sub-national Level.](#) (Accessed 16 March 2025).

HMSO. 2010. [Bribery Act 2010 \(c. 23\).](#) United Kingdom.

Hoppe, T. 2013. [Designing and Implementing Anti-Corruption Policies: Handbook.](#) Eastern Partnership-Council of Europe Facility Project on “Good Governance and Fight against Corruption”

HS. 2021. Hrvatski sabor. [Strategija suzbijanja korupcije 2021.–2030.](#) Croatia.

ISO. 2016. [International Standards Organisation. 37001: Anti-bribery Management Systems.](#) Geneva: Switzerland.

Jenkins, M. and Camacho, G. 2022. [Core Principles for the Development of Anti-Corruption Strategies: Practices from around the World.](#) Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute.

JM. 2021. Justiitsministeerium. [Korruptsioonivastane tegevuskava 2021–2025.](#) Estonia.

Johnsøn, J., Hechler, H., De Sousa, L., and Mathisen, H. 2011. [How to Monitor and Evaluate](#)

- [Anti-Corruption Agencies: Guidelines for Agencies, Donors, and Evaluators](#). Bergen: Chr. Michelsen Institute (U4 Issue 2011:8)
- Jongen, H. 2021. '[Peer Review and Compliance with International Anti-Corruption Norms: Insights from the OECD Working Group on Bribery](#)', *Review of International Studies*, 47(3), pp. 331–352.
- Ju and Fi. 2024. Justitiedepartementet och Finansdepartementet. [Regeringens handlingsplan mot korruption och otillåten påverkan 2024–2027](#). Sweden.
- Kaufman, H. 1956. '[Emerging Conflicts in the Doctrines of Public Administration](#)', *American Political Science Review*, 50(4), pp. 1057–1073.
- Khan, A., Krishnan, S. and Dhir, A. 2021. '[Electronic Government and Corruption: Systematic Literature Review, Framework, and Agenda for Future Research](#)', *Technological Forecasting and Social Change*, 167.
- KNAB. 2023. Korupcijas novēršanas un apkarošanas birojs. [Korupcijas novēršanas un apkarošanas pasākuma plāna 2023–2025](#). Latvia.
- Koumpli, C. 2023. 'The New Whistleblowing Laws of France', in S. Gerdemann (ed.), [Europe's New Whistleblowing Laws: Research Papers from the 2nd European Conference on Whistleblowing Legislation](#). Göttingen: Universitätsverlag Göttingen, pp. 95–122.
- Lenaerts, K. and J.A. Gutiérrez-Fons. 2014. '[To Say What the Law of the EU Is: Methods of Interpretation and the European Court of Justice](#)', *Columbia Journal of European Law*, 20, pp. 3–61.
- Lang, B., J. Pozsgai-Alvarez and N. Hovic. 2025. '[Strategic Corruption: Conceptualizing the Geostrategic Dimensions of Transnational Corruption](#)', *Public Integrity*.
- Lieberman, E.S. 2005. '[Nested Analysis As a Mixed-Method Strategy for Comparative Research](#)', *American Political Science Review*, 99(3), pp. 435–452.
- LRS. 2022. Lietuvos Respublikos Seimas. [2022–2033 m. nacionalinė darbotvarkė korupcijos prevencijos klausimais](#). Lithuania.
- MAPA. 2023. Ministria e Shtetit për Administratën Publike dhe Antikorrupsionin. [Inter-Sectoral Strategy Against Corruption, 2024–2030](#). Albania.
- MC. 2021. Министерски съвет. [Национална стратегия за превенция и противодействие на корупцията 2021–2027](#). Bulgaria.
- Meza, O. and E. Pérez-Chiqués. 2024. [The Structure of Systemic Corruption: How Corruption Consolidates in Local Governments](#). Cham: Springer.
- Mitsilegas, V. 2013. 'The Aims and Limits of European Union Anti-Corruption Law', in J. Horder and P. Alldridge (eds.), [Modern Bribery Law](#). Cambridge: Cambridge University Press, pp. 140–168.
- MJ. 2020. Ministério da Justiça. [Estratégia Nacional Anticorrupção 2020–2024](#). Portugal.
- MK. 2024. Magyarország Kormánya. [A 2024-2025 közötti időszakra szóló középtávú Nemzeti Korruptióellenes Stratégia](#). Hungary.
- MoJ. 2010. [Bribery Act 2010: Guidance about Procedures which Relevant Commercial Organisations can put in Place to Prevent Persons Associated with them from Bribing \(Section 9 of the Bribery Act 2010\)](#). United Kingdom.
- MS. 2023. Ministerstvo spravedlnosti. [Vládní koncepce boje proti korupci na léta 2023 až 2026](#). Czech Republic.
- OECD. 1997. Organisation for Economic Cooperation and Development. [Convention on Combating Bribery of Foreign Public Officials in International Business Transactions](#).

- OECD. 2008. Organisation for Economic Cooperation and Development. [Specialised Anti-Corruption Institutions: Review of Models](#).
- OECD. 2009. Organisation for Economic Cooperation and Development. [Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions](#).
- OECD. 2013. Organisation for Economic Cooperation and Development. [Specialised Anti-Corruption Institutions: Review of Models, 2nd Edition](#).
- OECD. 2017. Organisation for Economic Cooperation and Development. [Recommendation of the Council on Public Integrity](#).
- OECD, 2018. Organisation for Economic Cooperation and Development. [State-Owned Enterprises and Corruption: What Are the Risks and What Can Be Done?](#)
- OECD. 2019. Organisation for Economic Cooperation and Development. [Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises](#).
- OECD. 2020. Organisation for Economic Cooperation and Development. [OECD Public Integrity Handbook](#).
- OECD. 2024. Organisation for Economic Cooperation and Development. [Anti-Corruption and Integrity Outlook 2024: Country Notes – Austria](#).
- OECD. No date. Organisation for Economic Cooperation and Development. [Quality of Strategic Framework](#).
- OM. 2025. [Oikeusministeriö. Valtioneuvoston periaatepäätös kansalliseksi korruptionvastaiseksi strategiaksi ja toimenpideohjelmaksi 2025–2027](#). Finland. Open Government Partnership (OGP). 2024. [Open Gov Guide](#). Washington, D.C.: OGP Support Unit.
- Philp, M. 2002. 'Conceptualizing Political Corruption', in A.J. Heidenheimer and M. Johnston (eds.), [Political Corruption: Concepts and Contexts](#). 3rd edn. New Brunswick, NJ: Transaction Publishers, pp. 41–58.
- Prenzler, T. and Ransley, J. 2024. '[Australia's New National Anti-Corruption Commission: Background and critique](#)', *Public Integrity*, 26(5), pp. 507–519.
- Reed, Q., Jouan Stonestreet, B., Devrim, D., Krieger, T., Kubeková, V., Blomeyer, R. and Heinemann, F. 2021. [Financing of Political Structures in EU Member States](#). Study for the Policy Department for Budgetary Affairs, PE 694.836.
- Roggeband, C. and Krizsán, A. 2021. '[The Selective Closure of Civic Space](#)', *Global Policy*, 12(S5), pp. 23–33.
- SABG. 2025. Secretaría Anticorrupción y Buen Gobierno. [Programa Sectorial de Anticorrupción y Buen Gobierno 2025–2030](#). Mexico.
- Schoberlein, J. 2020. [Anti-corruption agencies in Europe: Typology and case studies](#). Transparency International Anti-Corruption Helpdesk Answer.
- Shiple, T., Elizabeth Dávid-Barrett, Robert Barrington, Rebecca Dobson Phillips and Georgia Garrod. 2025. [International approaches to recording corruption and monitoring intervention outcomes at the national level](#).
- Stamouli, E. and M. Gasparinatou. 2025. 'Anti-Corruption Measures in Greece: Key Issues and Challenges', in Joseph Pozsgai-Alvarez and Roxana Bratu (eds.), [The Routledge Handbook of](#)

[Anti-Corruption Research and Practice](#). New York: Routledge.

STT. 2024. Specialiųjų tyrimų tarnyba. [Map of Corruption in Lithuania 2023–2024](#). Lithuania.

Szarek-Mason, P. 2010. [The European Union's Fight Against Corruption: The Evolving Policy Towards Member States and Candidate Countries](#). Cambridge: Cambridge University Press.

Thompson, D.F. 1995. [Ethics in Congress: From Individual to Institutional Corruption](#). Washington, DC: Brookings Institution Press.

UN. 2004. [United Nations Convention against Corruption](#).

UNDP. 2017. United Nations Development Programme. [Anti-Corruption Strategies: Understanding What Works, What Doesn't and Why? Lessons Learned from the Asia-Pacific Region](#). Bangkok: United Nations Development Programme.

UNODC. 2012. United Nations Office on Drugs and Crime. [Jakarta Statement on Principles for Anti-Corruption Agencies](#).

UNODC. 2015. United Nations Office on Drugs and Crime. [National Anti-Corruption Strategies: A Practical Guide for Development and Implementation](#).

UNODC. 2020. United Nations Office on Drugs and Crime. [Colombo Commentary on the Jakarta Statement on Principles for Anti-Corruption Agencies](#).

UNODC and UNDP. 2013. United Nations Office on Drugs and Crime and United Nations Development Programme. [Kuala Lumpur Statement on Anti-Corruption Strategies. Kuala Lumpur, 21–22 October 2013](#).

VCG. 2024. Vlada Crne Gore. [Strategija za borbu protiv korupcije za 2024–2028](#). Montenegro.

Vláda SR. 2024. Vláda Slovenskej republiky. [Národná protikorupčná stratégia Slovenskej republiky na roky 2024–2027](#). Slovakia.

White House. 2021. [United States Strategy on Countering Corruption](#). United States.

*Transparency International
International Secretariat
Alt-Moabit 96
10559 Berlin
Germany*

*Phone: +49 - 30 - 34 38 200
Fax: +49 - 30 - 34 70 39 12*

*tihelpdesk@transparency.org
www.transparency.org*

*transparency.org/en/blog
facebook.com/transparencyinternational
twitter.com/anticorruption*