

ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

EXAMPLES OF NATIONAL ANTI-CORRUPTION STRATEGIES

QUERY

Can you share a good example of a national anti-corruption strategy? Is there any experience in the world, particularly from developing countries or countries in transition, where the anti-corruption strategy is a synthetic document of coordination of other strategies/policies already in place with strong monitoring and evaluation indicators for each of the anti-corruption areas?

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SUMMARY

There is no one-size-fits-all solution when it comes to the design and implementation of anti-corruption strategies. Experience has shown that the effectiveness of a national anti-corruption strategy will depend to a great extent on whether it has been designed taking into consideration the country's context and main corruption challenges. Furthermore, political will and coordination with other on-going efforts to fight corruption and improve governance in the country is instrumental. In addition, anti-corruption strategies should include a strong and manageable monitoring and evaluation system that provides for participation of civil society organisations and other external stakeholders.

While many countries have adopted strategies aimed at coordinating government efforts in different sectors and institutions, and at monitoring and evaluating progress, there are not so many successful examples when it comes to implementation. In general, the implementation and impact of these strategies have so far been limited. This answer thus looks at the new strategy enacted in Romania, which takes into consideration the lessons learned and failures from previous anti-corruption strategies, and seems to be a more concise document that emphasises coordination as well as monitoring and evaluation.

1. EXAMPLES OF NATIONAL ANTI-CORRUPTION STRATEGIES

Overview

Anti-corruption strategies are policies developed by governments to mainstream and prioritise measures and reforms to fight corruption in a given national context. These policies often cut across different sectors and involve different government institutions. They can thus be developed in a way that they complement, strengthen or compete with each other.

The United Nations Convention against Corruption (UNCAC) in its Article 5 encourages governments to develop and implement coordinated anti-corruption policies. However, how to best achieve coordination and develop such policies is still unclear.

Many countries have opted for a single national anti-corruption strategy. Yet anti-corruption policy-making has taken different shapes and forms and been implemented in a variety of ways, with mixed results. While there is no single best practice, experience has shown that anti-corruption strategies are very likely to fail if they are not based on a country's own specificities and characteristics.

Within this framework, this Helpdesk answer provides examples of anti-corruption strategies, with a particular focus on the content and possible links with sectoral strategies as well as on the monitoring and evaluation framework. In addition, the answer provides lessons learned in designing and implementing anti-corruption strategies.

Country examples

Links to on-going reforms

Several countries have adopted single national anti-corruption strategies, and many of them have made references to on-going reforms. Nevertheless, the actual implementation and coordination of these strategies have been a challenge and have failed in many countries.

For instance, in **Georgia** a revision of the action plan in 2007 made changes to cover areas that the administration had already committed itself to

implementing, such as revenue administration, law enforcement and public finances reforms. The idea was to integrate an anti-corruption component into those areas, but a lack of coordination and external communications as well as the lack of specific indicators make it difficult to analyse the implementation of most measures and to assess the linkages between the implementation of governance reforms and its impact on corruption levels (Hussmann, 2007).

Also in **Indonesia**, the national anti-corruption strategy is linked to a series of governance and anti-corruption reforms, such as the civil service, judicial, procurement and decentralisation reforms, as well as to broader national development plans. The agency responsible for the implementation of the national anti-corruption strategy is also responsible for coordinating the strategy with the other on-going efforts mentioned. In practice, however, many of the public officials working on the abovementioned governance reforms know very little about the anti-corruption strategy and are unaware of the existence of a coordination unit (Hussmann, 2007).

Monitoring and evaluation

With regards to monitoring and evaluation, the assessment of systems adopted in different countries shows that the approaches used are weak and formalistic and do nothing to promote the participation of external stakeholders and civil society groups. In addition, many of the monitoring and evaluation frameworks focus on activities rather than on results, failing to access the real implementation (Hussmann, 2007).

For instance, **Indonesia** created an elaborate monitoring and evaluation system which is supposed to gather data from ministries, provinces and districts. This information is to be analysed by the monitoring agency (MenPan) and submitted to the president in the form of an implementation report twice a year. However, the way in which the implementation has been designed imposes a series of challenges for the collection and subsequent monitoring of data, and in addition, MenPan does not seem to have sufficient capacity, political authority or resources to coordinate this process effectively (Hussmann, 2007).

In **Pakistan**, an implementation committee was

responsible for the monitoring of the anti-corruption strategy. The strategy required quarterly meetings with representatives from the government, civil society and the media to review the implementation plan and provide guidance for improvement. As of 2007, the committee had not met for nearly two years, and civil society organisations had not been involved (Hussmann, 2007).

Among the anti-corruption strategies reviewed, **Romania** seems to have one of the better-designed. It is based on a sound knowledge base of what has and hasn't worked in the fight against corruption in the country and places great emphasis on changing the behaviour of officials, particularly in sectors deemed to be important and prone to corruption (*prioritisation*). In addition, the strategy emphasises the importance of monitoring and evaluation, establishing a detailed framework. As the strategy is very recent, it remains to be seen whether the implementation will yield the expected results and whether the monitoring and evaluation system will be effectively applied in practice.

The next session analyses in detail the Romanian strategy.

The case of Romania

Main features

In 2012, Romania adopted a new anti-corruption strategy (NAS 2012-2015). The NAS was designed based on the recommendations of an independent assessment of the previous two anti-corruption strategies, and following a very extensive public consultation that lasted over a year and involved more than 500 individuals from public and private entities.

The new strategy certainly builds on the lessons learned from previous strategies and has a strong focus on measuring impact. In addition, the focus of the strategy is on implementation. The government and those working on the strategy considered that Romania already has in place the main laws and institutions necessary to prevent and combat corruption, and therefore that more emphasis should be given to effectively implementing and enforcing these rules.

The strategy also focuses on the promotion of institutional integrity, requiring strong measures from government bodies to discourage unethical and corrupt acts. Prioritisation and sequencing of actions was decided based on the areas identified as priorities at the EU level, such as asset recovery, whistleblower protection, public procurement and political corruption. The plan also aims at implementing GRECO's third evaluation round recommendations.

The implementation of the NAS is the responsibility of the Ministry of Justice, but a special unit will be created to support its monitoring.

Sectoral plans

The strategy contains a dedicated section to discuss existing policies and legal framework.

It first states that the NAS should be the starting point in the development and adoption/adaptation by any institutions and public authorities of their own sectoral plans. The practical aspect of the strategy as well as the tools presented should thus be used in sectoral action plans.

At the same time, the NAS acknowledges existing initiatives at the national level, such as the National Integrity Agency's Strategy 2011-2014 as well as reforms being conducted by the Superior Council of Magistracy for enhancing judicial credibility and accountability. Within this framework, the complementarity of the already-adopted initiatives should be ensured.

Content

The main purpose of the NAS "is to reduce and to prevent the corruption phenomena through rigorous application of legal and institutional framework in order to maximize the impact of corruption measures" (NAS 2012-2015, p. 8).

The NAS focus on the promotion of institutional integrity and a set of benchmarks, such as the implementation of ethical standards, and efficacy of administrative mechanisms of control and enforcement, have been established.

The strategy is structured around four main general

objectives: (i) preventing corruption in public institutions; (ii) increasing the level of corruption education; (iii) combating corruption through administrative and criminal matters; and (iv) approving the sectoral plans and developing a national system to monitor the NAS.

Each of these general objectives is divided into specific objectives that detail the measures to be taken as well as the institution responsible. Whenever the measures to be taken are related to on-going reforms/policies, the NAS refers to these. For example, under the general objective 4 (combating corruption through administrative and criminal matters), the specific objective 1 is to “continue the already-made progress in the process of impartiality investigation and the indictments of the courts of high and local corruption”. Among the required measures is the obligation to *“continue to implement strategies developed by the Prosecutor’s Office to combat local corruption”*.

Additionally, each objective of the NAS is supported by a detailed action plan that contains a description of the measure, indicators to evaluate its achievement, sources of verification, the main risks, the responsible agency, as well as the available resources and the timeframe for implementation (please see annex 3 of the NAS).

While the NAS does not focus on improving/reforming the country’s legal framework, based on the general objectives and specific measures government agencies are required to pursue the NAS highlights the interventions and amendments to the current legal framework that will be necessary (please see p.18 of the NAS).

Monitoring and evaluation

Overview

As mentioned, the Romanian NAS places great emphasis on monitoring and evaluation.

Monitoring is the responsibility of the Ministry of Justice supported by an inter-institutional technical secretariat and by the cooperation platforms created during the consultation process. Five platforms (platform of independent authorities and anti-corruption institutions; central public administration; local public administration; business environment;

civil society) will meet once every two months to discuss progress in the implementation of the NAS.

The strategy relies on a series of monitoring mechanisms to measure progress and success, including: self-assessments, questionnaire-based reviews, feedback mechanisms related to integrity incidents, on-site visits carried out by external expert teams, and increased transparency (open data) among others.

To facilitate the monitoring, the technical secretariat is responsible for developing a methodology for government institutions to carry out the necessary assessments. In addition, an integrated IT system (web portal) to facilitate the transmission, processing and analysis of the reports will be created.

Indicators

The strategy encompasses a number of indicators aimed at monitoring and evaluating its implementation.

The overall efforts of the government will be monitored by analysing citizens’ perceptions of corruption. Therefore, external indicators will be used such as Transparency International’s Corruption Perception Index (CPI) and Global Corruption Barometer, as well as the World Bank’s Business Environment and Investment Performance, the Global Integrity Report and the Freedom House Nations in Transit report. The aim is to achieve at least EU averages by 2014 – for instance, for the CPI the country’s score will have to improve from 3.6 to 6.37 (on a scale from 0, very corrupt to 10, very clean) (for all targets, please see p.5 of the NAS).

In order to monitor the specific objectives, a set of very specific indicators is included (annex 3). A separate annex deals only with indicators related to the benchmark areas around integrity (preventive measures) that have to be adopted by government institutions. For instance, with regard to asset declaration, agencies will be obliged to report on the number of persons who failed to submit the declaration within the deadline, the number of persons who failed to submit it at all, the number of administrative measures adopted in order to eliminate the causes or circumstances that have favoured the breaching of rules, the number of training activities concerning asset declarations, and

the degree of knowledge of the rules by employees – to be measured via evaluation questionnaires, among others.

Similar indicators are available for codes of conduct, gifts declaration, conflicts of interest, ethics advisors, incompatibility, transparency in decision-making, access to information and whistleblower protection.

However, there is no baseline or subsequent targets against which these indicators should be measured, which it makes difficult to assess what will be considered an improvement, for example. The NAS states that it is the responsibility of the technical secretariat to centralise the initial situation for all indicators related to preventive measures, using 2011 data, within three months of the adoption of the strategy. The Helpdesk could not access whether this baseline has already been set.

For more information, please see:

[National Anticorruption Strategy 2012-2015 \(Annex 1\)](#)

[Inventory of Anticorruption Preventive Measures and Evaluation Indicators \(Annex 2\)](#)

[The National Action Plan for the Implementation of the National Anticorruption Strategy for the period 2012-2015 \(Annex 3\)](#)

2. GOOD PRACTICE IN DESIGNING AND IMPLEMENTING ANTI-CORRUPTION STRATEGIES

The design and implementation of anti-corruption strategies

As mentioned, there is no blueprint for designing and implementing an effective anti-corruption policy, and to be successful, it is fundamental that the strategy is tailored to the country's context.

Nevertheless, based on recommendations put forward by international organisations such as the World Bank, United Nations Office on Drugs and Crime (UNODC) and the United Nations Development Programme (UNDP), and taking into consideration the experience with anti-corruption policies so far, it is possible to identify key features

that are instrumental in the design and implementation of any anti-corruption strategy. A U4 report analysing anti-corruption policies in six countries (Georgia, Indonesia, Nicaragua, Pakistan, Tanzania and Zambia) underscores some of these key features (Hussmann, 2007).

Anti-corruption strategy design

An effective design will depend on a variety of factors, including:

- **National ownership:** national ownership in the design of the anti-corruption strategy is key to ensuring its effective implementation. In countries where anti-corruption strategies have been adopted as an immediate response to corruption scandals or pressure from donors, rather than based on a genuine political commitment, their implementation has mostly failed. A successful implementation will depend to a great extent on a credible and committed leadership that demonstrates continued political will.
- **Participation:** the involvement of political and social actors, including civil society groups, in the design as well as the implementation of anti-corruption policies is important not only to ensure the buy-in and commitment of those involved, but also to guarantee that the most pressing issues are tackled and that the state has the necessary capacity to implement the agreed reforms/activities.
- **Knowledge base:** a sound knowledge and information base can be particularly helpful in ensuring focused and practical action plans that are in line with the country's main corruption problems. It also helps to ensure the correct prioritisation and sequencing of actions, as well as effective monitoring and evaluation of the progress made. This knowledge base can draw on corruption assessments, diagnostic tools, surveys and feedback from citizens, among others. In practice, however, very few anti-corruption strategies are based on concrete analysis of corruption challenges in a given country.
- **Content:** the content of an anti-corruption

strategy will vary according to the type of strategy chosen by a country (for instance, focus on prevention rather than enforcement, focus on regulations, or focus on internal control). A previous evaluation will help to define which kind of strategy would yield better results in the short and long term in that specific context (McKuster, 2006). Nonetheless, as previously mentioned, the great majority of countries have adopted a holistic approach, opting for national anti-corruption strategies that cover administrative and legal measures, as well as institutional strengthening (Hussmann, 2007).

In addition, according to the U4 report, many countries have designed their anti-corruption strategies in such a way as to reinforce on-going anti-corruption efforts in other sectors or institutions.

Similarly, in the countries analysed in the U4 report, their national anti-corruption strategies refer to links with governance and core reforms in several areas, such as financial management, justice sector reform, public procurement and decentralisation, among others. However, in practice, such reference has not led to better integration and coordination. In fact, the report underscores that in practice the integration of anti-corruption strategies and on-going efforts is non-existent. In many cases, sectoral governance reforms continue to lack an anti-corruption component (Hussmann, 2007).

Anti-corruption strategy implementation

The literature and experiences with anti-corruption strategies have shown that implementation remains a challenge (Hussmann, 2007; McCusker, 2006, Chêne, 2010). Either due to a lack of political will or simply due to a poorly designed strategy, countries have been struggling to implement reforms and show results. Often, anti-corruption strategies are too ambitious in relation to the country's capacity; this means that effective implementation would require great investments in expertise, personnel and technology, among others.

Implementation is also hampered by poor coordination and a lack of communication. These issues will be discussed in more detail in the next section.

Monitoring and evaluation

The establishment of a strong monitoring and evaluation framework is instrumental not only in assessing progress in the implementation of the strategy but also in identifying possible adjustments that should be made throughout the implementation cycle (UNODC, 2003).

An effective monitoring and evaluation mechanism will depend on a series of factors, including (Chêne, 2010b; Hussman, 2007):

- **Strong monitoring agency:** the agency responsible for monitoring the implementation of the anti-corruption strategy should have sufficient authority, resources, capacity and political backing to carry out its mandate and compel ministries and other government institutions to implement measures and report on progress.
- **Adequate resources and capacities:** the design of the monitoring framework should take into consideration the country's capacity and resources. Extensive and ambitious objectives, for instance, might pose significant challenges to effective monitoring. In order to facilitate the process, countries should invest in information technology and conduct reviews on a periodic basis.
- **Simple, meaningful, measurable and manageable indicators:** the collection of quality information is a difficult task in many countries. Therefore, monitoring and evaluation systems should focus on establishing indicators that it is feasible to collect, process and analyse according to the country's capacity.
- **A variety of monitoring methods:** the reliance on self-assessments can prove to be problematic, particularly in countries where high-ranking officials may wish to maintain the status quo. Countries should thus rely on

different types of assessment to monitor progress, including internal and external assessments. Monitoring mechanisms should involve a combination of monitoring methods including self-assessments, expert reviews, peer reviews, surveys and feedback mechanisms, among others.

- **Involvement of non-state actors:** the involvement of civil society organisations, universities and other external stakeholders can both give credibility to the system and exercise pressure for change. Nevertheless, very few anti-corruption strategies provide for clear mechanisms to involve civil society or other groups in the process.

For more information on monitoring anti-corruption efforts, please see a previous U4 Helpdesk Answer: [Corruption and Public Sector Reform Monitoring Systems](#).

Main challenges in designing and implementing anti-corruption strategies

- **Political will:** broad national anti-corruption strategies are often a long-term endeavour, particularly if they involve reforms in different spheres and areas of government. Based on the cases analysed in the U4 report, it can be inferred that a high level of political will is very difficult to maintain throughout the whole strategy or implementation plan cycle. Moreover, political will can also be hindered by changes in government (Hechler & Hussmann, 2007).
- **Sequencing and prioritisation:** officials and agencies responsible for the coordination of anti-corruption strategies have not yet found the balance between adopting a broad and comprehensive anti-corruption strategy and being able to prioritise and sequence its implementation.
- **Lack of autonomy of coordination agencies:** many countries have established a dedicated agency to coordinate and monitor the implementation of the anti-corruption strategy. However, these agencies often lack

the necessary power and authority to compel high-ranking officials to deliver on their responsibilities as well as the autonomy to report on progress achieved. In addition, many of these agencies lack the necessary personnel, technical capacity and resources to conduct their tasks. For instance, in the countries analysed, monitoring and evaluation frameworks, when they exist, are extremely ambitious, placing a heavy burden on the agency and making the collection and analysis of data a very difficult, if not impossible, task.

- **Lack of involvement of other stakeholders:** early involvement of key stakeholders, such as civil society organisations, the media, and citizens as well as implementing agencies could help to build more support and pressure for the implementation of the strategy.
- **Lack of diagnostics:** the content of anti-corruption policies are not always decided based on adequate diagnostics. Furthermore, integration of the anti-corruption strategy with other government policies and reforms may take place on paper, but rarely in practice.

3 REFERENCES

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