Anti-Corruption Helpdesk Answer

Coordinated and inclusive development of National Anti-Corruption Strategies

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National anti-corruption strategies (NACS) are essential tools for coordinating and prioritizing measures to prevent and combat corruption. This Helpdesk Answer highlights the elements that make the development of NACS both coordinated and inclusive. Effective strategies rely on clearly defined drafting responsibilities supported by high-level political commitment to ensure coherence, impartiality, and legitimacy. Inter-agency coordination and engagement with sector-specific expertise strengthen implementation and foster ownership. Broad stakeholder consultation and meaningful public participation enhance relevance, legitimacy, and societal support. Transparency throughout the drafting process, accessible consultation mechanisms, and sufficient time and resources enable substantive engagement and evidence-based policy design.

Caveat: This Helpdesk Answer focuses on the process of developing NACS, while a forthcoming Helpdesk Answer by Brunette (2026) will address standards and best practices for the content included in NACS.

Query

What lessons and best practices from recent national anti-corruption strategies in Europe (and, where relevant, globally) can help inform the process of developing a roadmap towards a national anti-corruption strategy, with particular attention to exchange within and between relevant authorities and/or agencies and stakeholder consultation?

Main points

- The forthcoming EU requirement for national anti-corruption strategies reinforces existing international commitments, but their impact will depend on whether they are developed through coordinated and inclusive processes rather than treated as formal compliance exercises.
- Assign drafting to a small, semi-autonomous body with technical expertise and broad consultative capacity, such as Bulgaria's National Council for Anti-Corruption Policies or France's AFA, to ensure coherence, impartiality, and stakeholder trust while avoiding turf battles among ministries.
- Secure high-level political support throughout the drafting process, including public endorsements, regular engagement, and framing anti-corruption as tied to national interests (e.g., economic growth, security, governance), as illustrated by the new UK strategy.
- Meaningful involvement of all relevant agencies (executive ministries, independent bodies, judiciary, local authorities, and others) is essential, as early and broad participation strengthens inter-agency coordination, fosters ownership, improves implementation, and ensures the strategy reflects the full range of risks, incentives, and technical realities across policy areas.
- Broad, multi-stakeholder engagement, including civil society, the private sector, media, academics, and the public, is essential. This approach enhances the legitimacy, relevance, and efficacy of national anti-corruption strategies and helps build allies to support and advance the strategy, as illustrated by Romania's six-month consultation with 90 entities and Spain's Foro de Gobierno Abierto.
- Structured, evidence-based consultation processes strengthen policy design while reducing risks. Using staged approaches, data-driven discussions, and participatory innovations, such as Lithuania's Maps of Corruption or Mexico's anti-corruption Datathons, helps ensure consultations produce actionable strategies and avoid consultation fatigue or unequal representation.
- Ensuring transparency and providing sufficient time and resources are critical for an effective strategy-drafting process. Accessible public consultation portals, clear responses to stakeholder input, well-publicized processes, and adequate consultation periods allow meaningful engagement.

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Introduction

National anti-corruption strategies are policy documents prepared and adopted by states to assess, prioritise, and coordinate measures and policies to combat corruption. In December 2025, the European Parliament and the Council reached a provisional agreement on a new anti-corruption directive. Building on the 2023 anti-corruption package, the current agreed text of the proposed directive would, under Article 21b, require every Member State to publish a national anti-corruption strategy developed in consultation with civil society and relevant authorities (European Parliament 2025). The European Parliament held a plenary vote for final confirmation of the new rules on 26 March 2026, after which the Council adopted the directive and published it in the Official Journal of the EU. A two-year transposition period will follow, during which member states must adapt their national laws, regulations, and administrative frameworks (UNCAC Coalition 2026). However, for the obligations under Articles 21a(5) and 21b, Member States must bring into force the necessary laws, regulations, and administrative provisions within 36 months of the directive's adoption (European Parliament 2026).

This new EU requirement reflects, however, obligations already embedded in the United Nations Convention against Corruption (UNCAC), which calls on States parties to ensure that anti-corruption policies are effective, coordinated, and regularly assessed. States are expected to develop and maintain comprehensive policies, promote practices aimed at preventing corruption, and periodically evaluate legal and administrative measures to gauge their effectiveness (UNCAC, Article 5). The Convention also requires the establishment of one or more bodies to implement these policies and, where appropriate, oversee and coordinate their execution (UNCAC, Article 6).

Although NACS are not explicitly mandated by the Convention, many countries have recognized them as a key tool for meeting these obligations. International guidance, including the Kuala Lumpur Statement on Anti-Corruption Strategies (2013) and the G20's High-Level Principles (2020), has highlighted their value in preventing and combating corruption. While the scope, detail, and emphasis of NACS can differ, core principles have emerged from these instruments as well as more detailed guidance, including UNODC's *National Anti-Corruption Strategies: A Practical Guide for Development and Implementation* (2015), UNDP's *Anti-Corruption Strategies: Understanding What Works, What Doesn't, and Why* (2017), and OECD's *Public Integrity Handbook* (2020). Although there is no single correct approach, lessons can be drawn from past successes and challenges. This Helpdesk Answer focuses on the process of developing NACS, outlines key principles to guide their design, and provides cases from Europe and beyond to illustrate effective development.

Clear drafting responsibilities and strong political commitment

The first step in formulating an effective national anti-corruption strategy is designing the process for drafting the document. Decisions about the process are crucial, as they influence both the content of the strategy and the likelihood of its successful implementation. The institutions and individuals responsible for drafting the strategy will vary from country to country, with political considerations, resource constraints, and other factors shaping at least some aspects of the process.

UNODC recommends assigning responsibility for drafting the strategy to a small, semi-autonomous group. A relatively small committee or organization should have primary responsibility for preparing the strategy and a reasonable degree of autonomy in developing the draft. A clear directive from a senior political leader, preferably the Head of Government, outlining the drafting unit's mandate and responsibilities can help clarify roles and prevent "turf battles" among different agencies (UNODC 2015, p. 5). Ideally, the drafting body should be chaired by an individual with sufficient stature, legitimacy, and political influence to act as an effective champion for both the drafting body and the strategy itself. The chair should serve as a liaison with other senior political leaders and as the public face of the national anti-corruption strategy process. While the chair need not be involved in the technical details of drafting, they should provide overall leadership and managerial oversight (UNODC 2015: p.5).

In the United Kingdom, for example, the Prime Minister's Anti-Corruption Champion, established in 2004, collaborates with ministers and officials to strengthen domestic and international anti-corruption efforts, including overseeing the development of the new anti-corruption strategy. The Champion also serves as the government's primary entry point on anti-corruption issues for Parliamentarians, the private sector, and civil society, while engaging internationally to advance UK priorities. The Champion reports directly to the Prime Minister and maintains regular contact with the Minister for Security, the Economic Secretary to the Treasury, and the Minister for Europe, North America, and Overseas Territories (TI UK 2025). In the United States, during the Biden presidency, the President tasked the Assistant to the President and National Security Advisor, in coordination with the Assistant to the President for Economic Policy and the Assistant to the President for Domestic Policy, with developing a US anti-corruption strategy (White House 2021).

The UNODC guidelines further recommend designating a small number of primary drafters responsible for the language and coherence of the document. These individuals must be carefully selected to ensure they can consult broadly with stakeholders and

experts while remaining impartial. Primary drafters should have sufficient authority to be respected, technical expertise to produce a high-quality document, and openness to input from diverse sources. Because these qualities are rarely found in a single person, assigning drafting responsibilities to a diverse committee with complementary skills can help ensure that the strategy is both rigorous and widely trusted. The OECD Public Integrity Handbook (OECD 2020) states that when drafting a strategy involving multiple bodies, one option is to assign primary responsibility for the strategy document to a small committee and provide it with a reasonable degree of autonomy in developing the draft; it is recommended that this committee be composed of representatives from the public bodies responsible for the strategy's implementation.

As for Article 21b of the proposed directive, the text directs its obligations toward Member States (EU 2026). Given the typical constitutional frameworks of EU Member States, this obligation is more structurally inclined to place the duty to initiate drafting within the executive branch. 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, more specialized or appropriately independent anti-corruption bodies to draw on. In this regard, Article 21c of the directive complements Article 21b by requiring Member States to ensure that one or several bodies or organisational units tasked with the prevention of corruption are in place and possess the necessary expertise to combat corruption (EU 2026), in line with the obligations established under UNCAC.

Executive-led NACS in the EU

Most EU countries follow a strong executive-led model. This approach can be effective in states with highly capable, high-integrity administrative systems, as it typically places primary responsibility for drafting the national anti-corruption strategy with the office of the head of government or the relevant ministries. For example, Spain assigns responsibility to its Ministry for the Presidency, Justice, and Relations with the Cortes (Spain, 2025), while Sweden delegates it to its Ministries of Justice and Public Administration (Sweden, 2024). Similar arrangements exist in Finland (2025), Slovakia (2024), Croatia (2021), and Romania (2021). At the more autonomous end of the spectrum, Austria assigns responsibility to the Bureau for Corruption Prevention and Combating (BAK), an institution within the Federal Ministry of the Interior that enjoys significant operational independence (Austria, 2025).

Box by Ryan Brunette.

The drawbacks of the strong executive-led model remain significant. These include insufficient insulation from partisan pressures, reduced objectivity in assessing corruption problems and developing solutions, and potential erosion of public trust in the impartiality of the process (Jenkins and Camacho, 2022).

In light of these concerns, supranational and international recommendations generally favour granting some degree of autonomy, and even countries without independent agencies can adopt a semi-autonomous committee model (OECD, 2020). This is further reflected at the EU level: Article 21c(3) of the directive requires Member States to ensure that designated anti-corruption bodies operate without undue interference (EU, 2026). This consideration is particularly salient in contexts where there is a risk of democratic backsliding or a political shift toward concentrating executive power, making it all the more important that strategies are designed to be future-proofed, with sufficient oversight mechanisms insulated from short-term political pressures.

Semi-Autonomous-Led NACS in the EU

Several EU countries have adopted semi-autonomous or committee-based arrangements to prepare national anti-corruption strategies, introducing broader participation and a greater degree of institutional independence. Bulgaria operates a National Council for Anti-Corruption Policies (NAPA), chaired by the Prime Minister or their designate, with permanent members from key ministries and state agencies, and coordinating with a Civil Council composed of representatives from business, civil society, and independent experts (Bulgaria, 2021). The Czech Republic assigns responsibility to the Ministry of Justice, which works through the Government Council for the Coordination of the Fight Against Corruption, a body composed of representatives from government, business, labour, professional chambers, non-profits, and academia (Czech Republic, 2023).

Countries with strong independent anti-corruption agencies can pursue a more autonomous bureaucratic approach. For example, the quasi-independent French Anti-Corruption Agency (AFA) prepares the country's national anti-corruption strategies through a broadly consultative process (France, 2025). Latvia and Lithuania fall further along this spectrum, with the more classically independent Lithuanian Special Investigation Service (STT) and the Latvian Corruption Prevention and Combating Bureau (KNAB) taking the lead and engaging in extensive public consultation (Lithuania, 2022; Latvia, 2023). At the extreme end of autonomy, Italy's independent National Anti-Corruption Authority (ACAC) both prepares and adopts the country's national anti-corruption strategies.

Box by Ryan Brunette.

High-level political support is vital for the success of a national anti-corruption strategy, and such support should be maintained throughout the drafting process. Ideally, senior political leaders, preferably the Head of State, should openly and publicly endorse the strategy at the outset (UNODC 2015: p.6). The G20 High-Level Principles (G20 2020: 2) likewise stress that those drafting the strategy should be provided with "the necessary highest level of political support to be effectively autonomous from undue influence

during the design process." The OECD Public Integrity Handbook (OECD 2020) also states that "a strategic approach requires high-level commitment during the strategy design process, as well as ensuring that the approach avoids overly rigid compliance objectives and emphasises promoting cultural change within organisations."

During drafting, support from senior leaders can be demonstrated in various ways, including speeches emphasising the importance of a comprehensive national anti-corruption strategy and public statements encouraging citizens to provide input to the drafting committee. In addition to public endorsements at the beginning and end of the process, it is also helpful for senior leaders to be kept informed and involved throughout the development of the strategy, which may include attending meetings of the drafting body (UNODC 2015: p. 6).

Those drafting the strategy could seek to consolidate political support for reform by highlighting the tangible political and economic benefits associated with lower levels of corruption, while also underscoring commitments made at high-level summits (U4 2017).

For example, the United Kingdom's 2025 anti-corruption strategy links corruption to economic prosperity by showing how bribery and illicit finance undermine investment and fair competition; to national security by highlighting how corrupt insiders can facilitate organised crime and endanger public safety; and to democratic governance by demonstrating how corrupt actors erode trust in institutions and weaken political integrity (Davies 2025, UK 2025). By framing anti-corruption in terms of these tangible national interests, the strategy strengthens the case for reform and helps build broad political and societal support. The responsible entity can also capitalise on specific windows of opportunity, such as a shift in public opinion, a new government, or alignment with a high-priority agenda. Certain policy processes already embed anti-corruption considerations, including EU or OECD accession, providing natural leverage points for advancing reform (Jenkins & Camacho 2022: p. 6).

EU accession as a catalyst for anti-corruption strategies in the Western Balkans

EU accession has been a significant driver for the adoption and updating of national anti-corruption strategies in the Western Balkans. Countries seeking closer integration with the EU have aligned their strategies with EU priorities, often prompting the introduction of new frameworks or revisions of existing ones. Implementation, however, remains uneven (SELDI 2025):

- **Albania (2018–ongoing):** Updated from 2015 to reflect EU goals; implementation inconsistent due to limited resources and poor coordination.
- **North Macedonia (2021–2025):** Slow progress; by 2024 only 18% of planned activities were fully implemented.

- **Bosnia and Herzegovina (2024–2028):** New strategy adopted after a long gap; entity and cantonal alignment still pending.
- **Serbia (2024–2028):** Adopted after six years; weak political will and limited judicial independence hinder implementation.
- **Montenegro (2024–2028):** New strategy and action plan adopted; impact too early to assess.
- **Kosovo (expired 2019):** Drafting a new strategy; progress delayed by weak coordination and political interference.

These experiences show that EU-driven reform alone is not sufficient. Political will is crucial to translate strategies into action. As the Head of the State Commission for the Prevention of Corruption in North Macedonia has noted, limited financial resources, insufficient political support, and administrative obstacles remain the main factors slowing implementation (Nikolik 2025). The pattern is not limited to accession candidates. For example, Bulgaria, a full EU member since 2007, has faced similar challenges, with persistent gaps in political will and effective monitoring undermining implementation of its anti-corruption strategy (OECD 2025).

Once the drafting process is complete, formal legal endorsement of the final strategy may be required. In some countries, such as Croatia and Latvia, the strategy may need to be submitted to parliament for approval through a resolution or legislation; in others, an executive decree may suffice. Even where formal endorsement is not mandatory, it can serve as a useful mechanism for solidifying political support (UNODC 2015; p. 6).

The choice between these options has important implications for both the durability and effectiveness of the strategy. Legislative approval can enhance future-proofing by embedding the strategy within a more stable legal framework, making it less vulnerable to political turnover, while also strengthening parliamentary oversight, reporting obligations, and accountability for implementation. By contrast, adoption through executive decree may allow for greater flexibility and speed but can be more easily altered or discontinued and may rely on internal government mechanisms for monitoring and enforcement. While there is limited comparative analysis assessing the relative effectiveness of these approaches, country experience illustrates these dynamics. In the United States, for example, the 2021 anti-corruption strategy adopted under Joe Biden demonstrates how executive-led frameworks, while impactful, remain dependent on shifting political priorities across administrations, rather than being institutionally enshrined through legislation.

Senior political leaders may sometimes have different views about the causes of corruption or the priorities for addressing it, and there are legitimate concerns that their involvement could influence the drafting process in ways some anti-corruption advocates might view as weakening the strategy. Nevertheless, a national anti-corruption strategy is inherently a “top-down” mechanism that depends on the engagement of government ministries, agencies, and institutions to succeed. Without

high-level political support and a sense across all levels of government that senior leadership backs the strategy and its drafters, even the most well-crafted strategy is unlikely to be effective. In cases where senior leadership is unwilling to support a robust strategy, it may be better to focus initially on building a broad-based consensus on the problems and potential solutions, deferring the drafting of a formal strategy to a later date (OECD 2020).

Inter-agency coordination

The national anti-corruption strategy-drafting process should ensure the meaningful participation of all government agencies responsible for implementing any part of the strategy. This includes executive branch entities such as the ministries of justice and interior, specialised anti-corruption agencies, the ombudsman, the police, financial intelligence units, public procurement authorities, and civil service commissions or other bodies responsible for recruiting, promoting, and disciplining public employees.

Where the strategy affects or requires action by agencies outside the direct control of the executive, such as the judiciary, the legislature, independent entities like the national audit office, regulatory commissions, or regional and local governments, these actors should also be included in the drafting process (UNODC 2015: p. 9).

For example, in Mexico, the development of the national anti-corruption strategy (PNA) follows a systems-based approach. The Coordinating Committee of the National Anti-Corruption System (Comité Coordinador del Sistema Nacional Anticorrupción) defines the strategic direction for addressing corruption in Mexico and articulates the State Anti-Corruption Systems (Sistemas Estatales Anticorrupción, SEA). The SEA are a cornerstone of the National Anti-Corruption System, serving as inter-institutional coordination and collaboration bodies for authorities responsible for preventing, detecting, and sanctioning administrative misconduct and acts of corruption at the state level. These collegiate bodies are tasked with issuing and implementing comprehensive anti-corruption policies and regulations within their respective states. Each SEA provides quarterly reports to the Coordinating Committee on the progress and challenges of implementing the PNA at the state level (SNA 2025).

While domestic inter-agency coordination is essential, it is also important to coordinate with international actors who can provide insights into risk assessments and the content of national anti-corruption strategies. Sources of rich comparative information include the OECD's Integrity Reviews and GRECO's recommendations, which can inform the design, implementation and monitoring of national strategies. Engaging with these international mechanisms helps ensure that strategies are aligned with global standards, draw on best practices, and reflect lessons learned from other jurisdictions, thereby enhancing both credibility and effectiveness.

Anti-corruption efforts will likely touch on many different policy fields, so the consultation process should consider potential links with other national policies in related areas, such as asset recovery, organised crime, foreign bribery, money laundering, fraud, digitalisation, public administration reform and so on (Jenkins & Camacho 2022). Heywood and Pyman (2020a, 2020b: 9) contend that it is highly advantageous to work closely with sector-specific experts to enable those designing the strategy to better understand the various incentive structures, risks, and idiosyncrasies in different policy fields.

Measuring coordination and inclusiveness in Anticorruption Strategies

The OECD Public Integrity Indicators (PIIs) are the OECD's first standardised indicators on public integrity and anti-corruption. Grounded in the OECD Recommendation of the Council on Public Integrity (2017) and aligned with other international instruments, including UNCAC, a core design principle of the PIIs is the exclusive reliance on primary data rather than expert assessments or proxies (OECD n.d.). The data collection process works as follows: for each country, a designated focal point responds to a questionnaire and may invite other public officials with relevant expertise to contribute. The OECD Secretariat then analyses the responses to assess whether each criterion is met and to calculate numerical indicator scores. The methodology combines a review of the regulatory framework governing consultation with an assessment of practice, reflecting a deliberate choice to capture what countries actually do, not just what their rules say (Johnsøn 2025).

Among the PIIs, several indicators focus specifically on national anti-corruption strategy frameworks, covering whether countries have adopted a strategy at the highest level of government, how it was developed, and how implementation is monitored. One set of indicators examines directly the inclusiveness and transparency of consultation processes, assessing the extent to which strategies are developed in a consistent and open manner across institutions and with the public. In essence, it tries to answer a deceptively simple question: was the strategy written behind closed doors, or did it emerge from a genuine process of dialogue?

According to the OECD Public Integrity Indicators, 11 EU countries require that public integrity strategies undergo both inter-institutional and public consultation processes before adoption. Conversely, such consultation is not mandatory in six countries, although the absence of a formal requirement has not prevented most of them from carrying out consultation processes. The OECD PIIs further note that, of all EU countries with available data, all except the Slovak Republic have ensured that at least one key integrity body was consulted and provided input through regular inter-institutional or public consultation procedures for at least one existing public integrity strategy.

Inter-institutional and public consultation	EU Countries
Mandatory and comprehensive [1]	Bulgaria, Croatia, Czech Republic, France, Greece, Italy, Latvia, Lithuania, Romania, Slovenia, Sweden
Not mandatory and partial [2]	Austria, Estonia, Finland, Hungary, Netherlands
Absent [3]	Slovak Republic

[1] Countries in which criteria 3 of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator was deemed compliant: **all public integrity strategies in force have undergone mandatory inter-institutional and public consultation processes**.

[2] Countries in which criteria 5 of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator was deemed compliant, but not criteria 3: **at least one key integrity body has been consulted and provided inputs through regular inter-institutional or public consultation procedures for at least one existing public integrity strategy,** but this does not extend to all strategies in force nor is consultation mandatory across the board.

[3] Countries compliant **with neither criteria 3 nor criteria 5** of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator.

Source: OECD Public Integrity Indicators, Strategy dataset, Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator, criteria 3 and 5.

While some representatives may resist reforms, which is a common but not always justified concern, early involvement helps address their concerns and reduce later resistance. Consultations should include both political leadership and technical staff or career civil servants responsible for implementing the strategy. Engaging multiple agencies during drafting enhances inter-agency coordination, improves cooperation on implementation, monitoring, and evaluation, and strengthens the strategy's overall success. Agencies contribute diverse expertise, identify overlooked challenges, propose innovative solutions, and provide essential financial and budgetary information. Involving those responsible for implementation also fosters ownership and increases their support for the strategy (OECD 2020).

Stakeholder consultation and public participation

Strategy drafters should actively engage stakeholders outside the government, including civil society organisations, the business community, the media, academics, and the general public. These stakeholders can provide valuable information and practical recommendations to help design a strategy that is better tailored to the country's specific needs and circumstances. Incorporating a broad range of voices also helps build a common vision and enhances the legitimacy of the strategy, strengthening political support in society. Stakeholders who feel their perspectives have been considered are more likely to become allies in advancing the strategy and ensuring its effective implementation (UNODC 2015: p.8).

Romania provides an example of broad stakeholder engagement during the drafting of a national anti-corruption strategy. The National Anti-Corruption Strategy was developed through an extensive public consultation process led by the Ministry of Justice that lasted approximately six months and involved around 90 entities from civil society, public institutions, private companies, and business associations. The consultation process was complemented by research conducted jointly by the Ministry of Justice and the law faculties of the Universities of Bucharest and of Amsterdam, with the support of the National Anticorruption Directorate and the Prosecutor's Office attached to the High Court of Cassation and Justice. The study sought to better understand the causes of corruption and the personal and professional consequences of corruption convictions by engaging individuals with direct experience of the Romanian justice system, including people convicted of corruption offences. The research included a nationally representative survey of 1,365 public officials to capture "insider" perspectives on corruption and its drivers, as well as in-depth interviews with individuals convicted of corruption to explore potential motives and identify early warning signs (Antifraud Knowledge Centre n.d.).

Hungary provides a case of engagement with specific sectoral stakeholders. In April 2025, a conference was organised to address the National Anti-Corruption Strategy's challenge of reducing one-off public procurement and increasing market competition. The event focused on promoting pre-market consultations and brought together professional chambers, the Authority's cooperating partners, members of the Public Procurement Council, and representatives of major contracting authorities. Panel discussions featured stakeholders from the health, construction and investment, financial, and insurance sectors, who shared sector-specific experiences and discussed how chambers could encourage the use of pre-market consultations among their members (Hungary's Corruption Prevention Authority 2025). While the event illustrates targeted engagement with key professional sectors, participation was largely limited to established business and professional groups. Broader civil society, media, or public perspectives were largely absent.

While stakeholder consultation and public participation are distinct concepts, they are closely intertwined in the context of strategy development: the public is itself a key stakeholder, and the quality of any consultation process depends on the same core principles that underpin meaningful participation more broadly. The European Commission's 2023 Recommendation on Promoting the Engagement and Effective Participation of Citizens and Civil Society Organisations in Public Policymaking emphasises that inclusive and effective engagement should be actively promoted across all stages of the policy cycle (EC 2023).

A growing body of evidence suggests that deliberative approaches can strengthen democratic decision-making in several ways. By fostering greater consensus on complex issues, they enhance the legitimacy of decisions. Broader consultation processes, in turn, tend to improve both the relevance and the creativity of policy solutions. At the same time, creating space for individuals with diverse interests and backgrounds can help depolarise contentious debates by enabling deeper engagement with issues and exposure to alternative perspectives (Mansbridge 2019).

Existing multi-stakeholder platforms, such as those under the Open Government Partnership, illustrate how participation can be operationalised in national anti-corruption strategies. In Chile, for example, the government is implementing the National Public Integrity Strategy (ENIP) through a co-created process focused on more than 200 measures, including beneficial ownership transparency, public participation, open contracting, and budget transparency (OGP 2024). In Ukraine, the 2021–2025 Whole-of-Government Anti-Corruption Strategy uses a participatory approach to tackle 73 identified high-risk corruption problems across 15 priority areas, supported by a new monitoring platform (OGP 2024). At the same time, it is important to note that relying exclusively on such mechanisms risks narrowing participation, highlighting the need to maintain a diversity of consultation channels.

Institutionalized Civil Society Participation: Foro de Gobierno Abierto

Spain's *Plan Estatal de Lucha contra la Corrupción* (2025) was developed with input from civil society experts, technical staff from the OECD's Anti-Corruption and Integrity Division, as well as proposals from the Council of Europe's GRECO and the European Commission. Several contributions were channelled through the Foro de Gobierno Abierto, providing an institutionalised mechanism for civil society engagement in the drafting process (Spanish Government 2025, p. 10).

Established in 2018, the Foro de Gobierno Abierto constitutes a permanent and formalised space for dialogue between public administrations (state, regional, and local) and civil society. It is composed on a strictly equal basis of 64 members: 32 representing public administrations and 32 representing civil society (Foro de

Gobierno Abierto, n.d.). Civil society representation includes organisations such as Access Info Europe and Transparency International Spain, alongside members of the Royal Academy of Moral and Political Sciences, university professors, and representatives of national consumer confederations. This composition reflects a broad and pluralistic understanding of civil society, extending beyond advocacy organisations to include academic and professional expertise (Foro de Gobierno Abierto, n.d.).

The Forum's parity structure moves beyond ad hoc consultation by embedding civil society participation within a standing governance body. It creates predictable, structured opportunities for civil society actors to shape policy design rather than merely respond to pre-formulated proposals. This process was closely linked with Spain's Open Government Partnership (OGP) 2025–2029 Action Plan, under which the Anti-Corruption Strategy was submitted as part of the "Integrity and Accountability" category (OGP). Under this plan, a state-level Open Government Plan is aligned with an Open Parliament Plan, integrating not only the commitments of the General State Administration but also the most innovative initiatives promoted by autonomous communities and local entities, the latter represented by the Spanish Federation of Municipalities and Provinces (OGP 2025). By connecting the Foro de Gobierno Abierto with the OGP framework, Spain demonstrates how institutionalised civil society participation can be reinforced and amplified through international transparency and accountability mechanisms.

The U4 (2017) has argued that gathering the views of local communities and ensuring the anti-corruption strategy addresses their concerns is more important than conducting tick-box exercises to satisfy international observers. Focusing on the preferences of citizens and businesses helps avoid simply transplanting strategies from other countries that may have limited relevance to local realities. A human rights-based approach makes anti-corruption strategies more sustainable, legitimate, and effective. This approach is particularly important for recognising the voices of corruption victims and whistleblowers, who possess deep insight into the adverse effects of corruption and the mechanisms that enable corrupt transactions (Pasteknik 2025).

In line with the EU directive, civil society consultations should be designed to be inclusive and respect fundamental freedoms, such as freedom of association and expression. A key challenge is ensuring that consultations occur within an open civic space where independent organisations can participate meaningfully. In Hungary, the *Transparency of Public Life* bill, proposed in May 2025 by the ruling Fidesz party, grants the government powers to target, restrict funding for, and dissolve organisations designated as a "threat to Hungarian sovereignty," including those receiving foreign or EU funding. The law affects both foreign and domestic funding, applies anti-money laundering obligations to managers of listed organisations, and limits judicial recourse. Observers have noted that these provisions could significantly constrain independent civil society, while government-aligned organisations may continue to operate and participate, creating the appearance of consultation without providing genuine access

to a broad range of voices. Civil society organisations have labelled the legislation "Operation Starve and Strangle", highlighting its potential to reduce the space for independent actors in Hungary (TI 2025).

The private sector warrants particular attention as a key stakeholder in drafting national anti-corruption strategies. Engaging businesses through discussion forums, focus groups, online surveys, and formal consultation processes can help identify how bribery and corruption occur, and translate these insights into the NACS. The Basel Institute on Governance notes that such engagement during drafting also fosters buy-in for implementation: in Jordan, for example, a standing committee with strong representation from the leading business association was established specifically to guide the NACS process and its implementation, ensuring participation from all relevant stakeholders. At the same time, drafters should remain vigilant to the risk that well-organized business lobbies could overshadow smaller enterprises or leverage the process to shape rules in their own favour (Basel Institute on Governance 2022).

Finland's First NACS Consultation Process

Finland's first national anti-corruption strategy for the period 2021–2023, adopted in 2021, was developed with substantial input from civil society. At COSP11, the Director for Anti-Corruption at the National Council and the Director of the Criminal Law Department at the Ministry of Justice explained that workshops were central to this process, allowing civil society organisations to provide views and proposals that directly shaped the strategy. Finland's long-standing tradition of openness and transparency is reflected in a public online portal where organisations can submit comments; these submissions are published alongside explanations of how they were considered, ensuring meaningful public participation in anti-corruption policy.

She also highlighted Finland's national anti-corruption network, which brings together joint working groups, research organisations, labour unions, and an integrity centre to regularly update the national action plan and monitor implementation through workshops. One proposal submitted to the government emphasized raising awareness of civil society's role through an annual anti-corruption program organized in cooperation with Transparency International, featuring events with civil society actors and investigative journalists. She stressed that investigative journalism remains critical in uncovering corruption, complementing formal policy measures (QNA 2025).

Broad-based consultations carry certain risks, and while steps can be taken to minimise them and ensure productive dialogue, strategy drafters need to remain mindful of these challenges. Public participation can be difficult to manage for several reasons. The political context must be conducive, and in some situations precautionary measures may be needed to allow citizens to express themselves freely and safely. Participation also requires significant time and financial resources for both organisations and participants, including organizing meetings, facilitating discussions, and disseminating

results. Overuse of participatory processes can lead to consultation fatigue and discourage engagement, especially if citizens feel their contributions have little impact. Decision-makers may face a loss of administrative or political control over the process, and meaningful consultation requires sufficient time, which can be constrained by tight deadlines. Ensuring balanced representation of diverse public views can also be challenging, particularly in including marginalized groups affected by the decision. Finally, consultation topics can be complex or highly technical, and the public must be adequately informed to contribute effectively (Zinnbauer 2015).

One way to navigate these risks is to structure consultations in stages. The first stage could solicit general input on the country's corruption challenges, followed by the preparation of a preliminary draft or outline, and then a second stage of more focused consultation. For example, in Lebanon, the anti-corruption strategy was developed through consultations with a wide range of actors representing all three branches of government, as well as public sector officials, civil society, and the private sector. Over the course of ten months, 22 meetings were held, leading to the development of a draft strategy. This draft was then evaluated and revised, with the main recommendation being the creation of a dedicated implementation framework. With support from UNDP, a second round of consultations was conducted, resulting in an implementation framework with detailed, targeted, and achievable outcomes (Republic of Lebanon 2020:6, 12-13).

A complementary approach is to frame early consultations around recent findings on the country's corruption problems. For example, if a survey reports citizens' experiences with bribery across different government agencies, drafters could seek stakeholders' perspectives on these findings and gather suggestions on possible responses. Lithuania provides a useful example. The 2015 to 2025 National Anti-Corruption Programme begins with an in-depth assessment of several sociological surveys, including the European Commission Eurobarometer, Transparency International's Global Corruption Barometer, dedicated private sector surveys, and the Lithuanian Map of Corruption. The Map of Corruption is a recurring survey that examines public attitudes toward corruption, the reported incidence of bribery across government bodies, common corrupt practices, and the willingness of citizens, businesses, and civil servants to support reform. Results from the 2014 edition helped establish baseline indicators for the Programme, with 31 percent of respondents reporting paying a bribe in the previous five years and the Programme setting a 2025 target of 10 percent to measure progress. By tracking these patterns over time, the Maps of Corruption help identify hotspots, inform policy design, monitor implementation, and assess the overall impact of anti-corruption measures (Seimas of the Republic of Lithuania, 2015: 34).

Datathons as a Form of Consultation

Since 2018, the Sistema Nacional Anticorrupción (SNA) of Mexico, with the National Digital Platform and the Executive Secretariat of the National Anti-Corruption System (SESNA), has organized annual anti-corruption Datathons. These events bring together

participants, including young people and women, to develop proof-of-concept solutions using government data on public procurement, asset declarations, and commitments from Mexico's National Anti-Corruption System Strategy, as well as other transparency-relevant sources.

Over three to four days, teams mentored by experts and supported by data engineers pitch innovative solutions. The most promising are recognized as winners and submitted to the National Anti-Corruption System to inform future policies and strategies.

By making government data transparent and accessible, the Datathons encourage broad participation, generate practical insights, and feed directly into subsequent strategies. This cycle: transparency enabling participation, participation producing insights, and insights shaping stronger strategies—is reinforced by support from partners including USAID, GIZ, UNODC (PND 2022).

Transparency and resources

In addition to consulting stakeholders, the drafters of a national anti-corruption strategy should prioritise transparency throughout the process, while recognising that documents or discussions may be withheld only when legally required, such as to protect internal deliberative processes or other sensitive matters. Clear legal frameworks should define when confidentiality is justified, helping to balance openness with the need to safeguard certain internal discussions. Transparency is not only a matter of principle but also a practical tool: it builds trust in the process, signals the government's accountability, and helps prevent perceptions of bias or undue influence (UNODC 2015, p.10).

Beyond openness, proactive communication is essential. Governments are recommended to actively publicise the work of the strategy-drafting body, making it clear that public and stakeholder input is valued, and demonstrating that anti-corruption is a policy priority (UNODC 2015, p.10). Well-designed communications strategies serve multiple functions: they can publicise the drafting process, encourage broader and more diverse participation, enhance the perceived legitimacy of the strategy, reinforce the government's commitment to fighting corruption, and sustain public attention over time—particularly important given that developing a comprehensive strategy can be a prolonged process (UNODC 2015, p.10). At the same time, it is important to distinguish communications efforts from consultation processes: while communications can inform and engage the public, consultations designed to solicit input should remain neutral and not be managed by government messaging offices, which may have their own political or messaging priorities.

In line with these principles, the availability of public consultation portals is an example of a concrete mechanism to operationalise transparency and proactive communication. According to the OECD Public Integrity Indicators, 10 EU countries have a portal containing the draft strategy and all supporting materials, of which seven also provide a summary sheet with responses to submitted comments during the consultation. Seven countries do not have a portal with draft strategies and supporting materials. Such portals not only make the drafting process more accessible but also demonstrate that public input is valued, reinforce accountability, and help sustain trust in the strategy's legitimacy over time.

Public consultation portal	EU Countries
Draft strategy, supporting materials and summary sheet with responses to comments [1]	Bulgaria, Croatia, Czech Republic, Greece, Italy, Latvia, Romania
Draft strategy and supporting materials [2]	Lithuania, Slovenia, Slovakia

No portal with draft strategy [3]	Austria, Estonia, Finland, France, Hungary, Netherlands, Sweden

[1] Countries in which criteria 2 and 7 of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator was deemed compliant: **The public consultation portal contains the draft strategy, including all supporting relevant materials** and **the public consultation portal contains a summary sheet for all draft strategies with responses to all submitted comments provided during the public consultation.**

[2] Countries in which criteria 2 of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator was deemed compliant, but not criteria 7: **The public consultation portal contains the draft strategy, including all supporting relevant materials** but it does not contain a summary sheet for all draft strategies with responses to all submitted comments provided during the public consultation.

[3] Countries compliant **with neither criteria 2 nor criteria 7** of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator.

Source: OECD Public Integrity Indicators, Strategy dataset, Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator, criteria 2 and 7.

The effectiveness of the drafting process depends critically on adequate time and resources. Developing a national strategy is a complex endeavour that requires careful analysis of existing policies, review of relevant data, identification of knowledge gaps, and the design of well-reasoned, coordinated policy proposals. Expecting a drafting committee to achieve these goals within only a few weeks is unrealistic. Sufficient time and dedicated resources allow for meaningful stakeholder engagement, careful policy design, and thorough vetting of proposals ((UNODC 2015, p.10).

Several factors influence the time required to draft a strategy. These include whether the strategy builds on a previous framework, the scope and quality of existing research, the ease of obtaining information from multiple government agencies, and the logistical demands of nationwide consultations. Planning for these factors ensures that the process is not only thorough but also inclusive, providing stakeholders with the opportunity to contribute substantively and ensuring that the final strategy reflects a well-considered, evidence-based approach (OECD 2020).

Legislative provisions on consultation periods show how time and process affect the quality of strategy drafting. In seven EU countries, a minimum duration of at least two weeks for inter-institutional and public consultation is established, giving stakeholders sufficient time to engage meaningfully with draft strategies. In the remaining countries for which data is available, no minimum consultation period is required, which may limit the depth of stakeholder input.

Mandatory Consultation Periods	EU Countries
Minimum 2-week consultation period mandated [1]	Bulgaria, Greece, Italy, Latvia, Romania, Slovakia, Slovenia

No minimum consultation period mandated [2]	Austria, Croatia, Czech Republic, Estonia, Finland, France, Hungary, Lithuania, Netherlands, Sweden

[1] Countries in which criteria 1 of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator was deemed compliant: **A minimum duration of at least 2 weeks for inter-institutional and public consultation period is established in legislation.**

[2] Countries compliant **not compliant with criteria 1** of the Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator.

Source: OECD Public Integrity Indicators, Strategy dataset, Inclusiveness and Transparency of Inter-Institutional and Public Consultations indicator, criteria 1.

While two weeks may meet a legal minimum, it is generally recognized that longer periods are needed for stakeholders, particularly civil society organisations with limited resources, to provide substantive feedback on comprehensive strategies. The OECD Guidelines on Citizen Participation Processes suggest that even simpler participatory processes may require several months to allow meaningful engagement (OECD 2022), and related OECD indicators on stakeholder engagement often reference consultation periods of four weeks or more (OECD 2025). Ensuring adequate consultation time, alongside accessible portals and transparency measures, is therefore a key element of a well-resourced and effective strategy-drafting process.

In sum, transparency and adequate resources are key to an effective national anti-corruption strategy. Accessible consultation portals, clear responses to stakeholder input, and well-publicized drafting processes help build trust and encourage participation, while enough time and dedicated resources make it possible for stakeholders to engage meaningfully and for policies to be carefully developed and reviewed. Countries that combine these elements are more likely to produce strategies that are both practical and based on solid evidence. Focusing on transparency and providing sufficient resources is therefore essential for creating strategies that work in practice and have public support.

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