ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

SUCCESSFUL ANTI-CORRUPTION REFORMS

QUERY

Are there demonstrated success stories of legal reforms in specific countries that have had an impact on corruption? What was their main focus? Was it, for example, a more independent prosecution agency, zero tolerance legislations, whistleblowing legislation, conflict of interest measures, or strong penalties for culprits?

PURPOSE

To inform government reforms in areas where institutions could be strengthened and some reforms could take place, to improve the fight against corruption in the country.

CONTENT

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SUMMARY

Evidence showing that anti-corruption reforms in general and legal reforms in particular have a direct impact on reducing corruption is thin, due to a number of methodological challenges involved in measuring progress and the impact of anti-corruption.

However, several evidence mapping exercises suggest that public finance management reforms, strengthening horizontal accountability mechanisms and transparency tools, such as freedom of information, transparent budgeting and asset declarations can have an impact on controlling corruption.

Lessons drawn from successful approaches indicate that there is no silver bullet against corruption, and that contextual factors linked to the local political economy, as well as the legal and institutional framework, are key to the success of anti-corruption interventions. The effectiveness of anti-corruption approaches is usually maximised by a combination of complementary (top-down and bottom-up) approaches and success driven by the interaction of a number of reforms introduced simultaneously.

1 WHAT WORKS AND DOESN'T WORK IN ANTI-CORRUPTION: REVIEW OF EVIDENCE AND LESSONS LEARNED

Challenges involved in measuring impact of legal reforms

Very few studies have assessed the effectiveness of anti-corruption laws to reduce corruption (Johnson et al. 2012). More generally, evidence of the impact of specific anti-corruption reforms on actual levels of corruption is scarce. While there are a large number of studies measuring corruption, far fewer studies focus on anti-corruption, and almost none look at issues of impact and effectiveness. For example, a U4 review of available evidence found no evaluation of donor-funded anti-corruption programmes, while academic studies rarely focus on assessing impact in systematic and comparative ways (Johnson, Taxell and Zaum 2012). Studies looking at the effectiveness of anti-corruption reforms at a country level often prioritise qualitative over quantitative research, which makes it difficult to ascertain whether a particular intervention had an impact on corruption levels. As a result, there is a wide knowledge and evidence gap on the impact and effectiveness of specific anti-corruption reforms on reducing corruption, and little is known on what works and what doesn't work against corruption (Johnson, Taxell and Zaum 2012).

This is partly due to a number of methodological challenges involved in measuring corruption and its evolution overtime, which have been documented in a number of papers (Knack 2006). As corruption occurs behind closed doors, it is difficult to quantify precisely in an objective manner, collect hard evidence on the incidence of corruption, establish benchmarks and measure its evolution overtime. When it comes to measuring effectiveness of specific anti-corruption interventions on actual levels of corruption, the difficulty is further exacerbated by challenges of causality and attribution, as it is difficult to isolate a specific reform from other types of reforms occurring at the same time. It is especially challenging to attribute a change in corruption to a reform since the "causality chain" between the reform and the eventual reduction of corruption is long. In addition, anti-corruption reforms do not usually produce meaningful results in the short term, while

evaluations are often conducted in a relatively short time frame following the intervention. As a result of this lag between policy implementation and policy impact, there are no valid and reliable indicators that can indicate progress in the fight against corruption in the short term. Furthermore, even if changes have occurred, they may not be instantaneously reflected by indicators based on perceptions, which are often used for measuring levels of corruption, as there may be a time lag before the public notices progress made. An additional problem is that indicators are usually only available at the highest level (for example, survey data for entire countries) whereas reforms usually focus on specific sub-populations (for example, civil service and judiciary) for which no reliable outcome data (that is, reduced corruption rates) is available.

These various factors make it extremely challenging to directly link specific anti-corruption interventions to the reduction of corruption, and the Helpdesk has found neither studies demonstrating that a specific anti-corruption legal reform had a direct impact on reducing levels of corruption in a particular country nor studies assessing the comparative impact of different types of interventions. As a result, this answer will provide examples that are presented in the literature as successful, although their performance and effectiveness on reducing actual level of corruption is not demonstrated in quantitative terms. As the literature does not specifically or exclusively focus on legal reforms, but usually looks at broader programmatic issues, this answer explores the effectiveness of broader anti-corruption reforms that typically have a legal basis.

Review of evidence on approaches that work in anti-corruption

Increasingly aware of this knowledge gap, a number of recent studies and mapping exercises have looked at the available evidence on the impact of anti-corruption approaches and started to draw lessons from the first decades of anti-corruption reforms.

Based on statistical evidence, a 2011 report finds no impact of direct anti-corruption interventions, such as the establishment of anti-corruption agencies or ombudsman or the ratification of the United Nations Convention against Corruption on reducing

corruption. This is explained by a variety of factors such as the institutional environment, the lack of an independent judiciary, government control over such institutions, and so forth. However, the study finds (limited) evidence of the positive impact of freedom of information (FOI) acts and the second generation of transparency tools (such as transparent budgeting and asset declarations) on reducing corruption (Mungiu-Pippidi 2011).

In line with these findings, Djankov et al. have also found evidence that elements of FOI and asset declarations are associated with lower corruption (Djankov et al 2010). Some case studies have corroborated these findings. While there is no systematic assessment of the impact of FOI on social change, case studies from South Africa and India find evidence of a direct impact of FOI on the quality of participation and the ability to demand rights and hold governments accountable (Calland 2011).

A recent DFID report assesses various anti-corruption approaches in terms of their effectiveness on corruption, based on case studies and quantitative analyses and in terms of the amount of evidence backing indications of impact. The report concludes that few of the interventions had an impact and the evidence backing the impact is thin in most cases (DFID 2015). Findings include:

- Public financial management (PFM) reforms are found to be effective in reducing corruption, with a relatively large body of evidence supporting these findings. However, the evidence for the effectiveness of specific PFM related reforms is more limited and less consistent. Interventions that appear to have the strongest potential impact on reducing corruption include monitoring public finance using public expenditure tracking, especially when used repeatedly and in combination with other reforms, including procurement reforms based on monitoring, oversight and transparency and strengthening budget planning and management in the central administration. However, a 2008 literature review of anti-corruption approaches cautions that, while there is evidence that donor supported PFM reforms have been effective on improving financial management and systems, there is so far little evidence of their impact on reducing corruption (NORAD 2008).

- Reforms targeted at strengthening supreme audit institutions (SAIs) are found to be more effective at reducing corruption than other anti-corruption institutions such as specialised anti-corruption authorities, depending on the institutional context, and the types of audits they conduct.

- While evidence is still scarce, transparency and access to information laws can have a positive outcome on institutional responsiveness, corruption, citizen empowerment, and so on. Some country level evidence confirms the potential impact of access to information in countries such as India and Uganda.

- While the body of evidence is relatively small, the few existing studies consistently indicate that freedom of the press can reduce corruption and that the media has an important role to play in the effectiveness of social accountability mechanisms, as a mediating factor between transparency and accountability. Social accountability tools can also have an impact on corruption, depending on the type of mechanism used and a number of critical conditions in place, such as an enabling institutional environment, media freedom, transparency laws and access to information tools.

- Evidence of the impact of direct anti-corruption interventions, such as the establishment of anti-corruption institutions and anti-corruption laws, is more mixed, although there are some questions about the credibility of the evidence.

- Social accountability mechanisms can also have an impact on corruption, although their impact relies on a number of contextual and design factors (DFID 2015).

A joint external evaluation of donor anti-corruption interventions in six countries draws similar conclusions, suggesting the strong relevance of PFM related reforms, with support to SAIs being seen as particularly relevant and effective (NORAD 2011). This evidence is supported by a review of World Bank support for anti-corruption, which put a great emphasis on public finance management, including supreme audit institutions, leading to stronger results on public financial management in general, and anti-corruption and external audit in particular (Migliorisi and Wescott 2011). The relative failure of anti-corruption agencies in meeting their mandate is attributed to domestic factors such, as skilled labour,

leadership, strength of the judiciary, among others (NORAD 2011).

Lessons learned

Although some general lessons can be drawn from the literature on what works and doesn't work against corruption, the effectiveness of specific anti-corruption approaches depends on the local political, economic, legal and institutional circumstances of the country. A number of lessons emerge from the literature on how to make anti-corruption reforms more effective:

- Context matters and affects the impact of anti-corruption interventions. Rule of law based approaches, relying on institutional arrangements for prosecuting corruption, had mixed results, as they are often ill-fitted to the local context and have been established by donors in many cases, with unrealistic expectations and lack of local ownership and legitimacy (NORAD 2008). Importing models of institutions from the developed world, which enjoys the rule of law, to a developing context with weak institutions and governance systems has been found to be inadequate in most countries, especially African countries (Mungiu-Pippidi 2011).
- However, in spite of mixed results, the prosecution/enforcement approach towards fighting corruption is important. It is not possible to achieve high standards of accountability without a strong, independent and well-functioning judicial, law enforcement and prosecution services (NORAD 2008).
- There is no one-size-fit-all approach to fight corruption, as anti-corruption is a political not a technical process which must be based on an in-depth analysis of the political economy. Anti-corruption interventions work best when they are locally owned, country-led and supported by collective action from local stakeholders, with the international community playing a role in making them become broad and powerful (Mungiu-Pippidi 2011).
- Strong legal constraints are more likely to work in environments where institutions are well-developed. Repressive approaches are not likely to succeed in weak institutional environments and governance systems where particularism is the

norm as institutions can be captured for the benefit of the few, powerful elites will be above the law and prosecutions can be biased against political opponents or those poorly connected (Mungiu-Pippidi 2011; NORAD 2008).

- Monitoring approaches can only work when the monitor has the power to sanction or reward. This holds true for civil society's monitoring approaches; community monitoring can be successful when the community can punish corruption. Monitoring approaches can prevent corruption by increasing the risks of detection if combined with approaches that provide incentives for not being corrupt, such as a reward for integrity or increased sanctions for corruption (Hanna et al. 2011).
- Effectiveness of anti-corruption approaches can be driven and maximised by a combination of approaches and the interaction of a number of reforms introduced simultaneously. Conventional approaches based on political reforms and regulatory re-structuring can work better when complemented by efforts to inform citizens of their rights and empower them to monitor and challenge abuses of the system (Fjeldstad and Isaken 2008).
- The effectiveness of social accountability mechanisms relies on a number of supportive contextual factors, such as judicial oversight, independent audit agencies, right to information and free media, and are likely to work better if they are combined with horizontal accountability (that is, strengthened government oversight) (DFID 2015).

2   EXAMPLES OF SUCCESSFUL REFORMS IN SPECIFIC COUNTRIES

Rule of law approaches

Rule of law approaches focus on fighting corruption through control and prosecution and typically focus on reforms aimed at strengthening institutional arrangements for prosecuting and enforcing anti-corruption laws. This covers direct anti-corruption interventions, such as the establishment of specialised anti-corruption authorities, and indirect approaches not exclusively aimed at fighting corruption, such as judicial and police reforms. As

already mentioned, the evidence of impact on corruption is limited, usually assessing formal compliance, governance arrangements and outputs, but not exploring their actual impact on corruption (Johnson, Taxell and Zaum 2012).

Anti-corruption authorities (ACAs)

The case of Indonesia

While the literature consistently points toward the lack of effectiveness of ACAs in developing countries with poor governance and high levels of corruption, some argue that the perceived failure of ACAs could be related to issues of measurement or design, rather than actual outcomes and impact (Johnson et al. 2011). Reasons typically invoked for this relative lack of effectiveness include uneven or insufficient financial support, political interference, weak institutional mandates, lack of political will, among others. However, a recent study argues that ACAs can be successful provided they have strong internal controls and accountability mechanisms, build strong alliances with government and non-governmental actors, and focus on preventive and educational efforts in hostile environments (Kuris 2014; DFID 2015).

The Corruption Eradication Commission of Indonesia (KPK) seems to have emerged as an exception and is considered one of the only cases of a successful ACA, succeeding in convicting untouchable high-profile perpetrators, recovering stolen assets, and enjoying a higher degree of public trust and support than the other Indonesian law enforcement agencies (Bolongoita 2010; Schütte 2012).

Reasons for the success of the KPK are attributed to its jurisdiction and autonomy, powers and authority. It has been provided not just with prevention and investigation powers, but also with prosecutorial authority. It has the authority to investigate any public official for corruption, including members of parliament and judges, with the exception of the military, and has all the investigative powers of a law enforcement agency. Institutional arrangements also allow the KPK to establish an independent process to hire and pay the agency's managers and staff according to merit and market, while its collegial leadership allows it to spread workload and to foster internal checks and balances and an environment of greater transparency and accountability in operations (Bolongoita 2010).

Strengthening investigation and prosecution of corruption in Europe and Central Asia

While adequate specialisation, institutional and procedural autonomy and resources remain an issue in the region, many European and Central Asian countries have demonstrated progress in meeting international standards concerning anti-corruption law enforcement bodies (OECD 2013). Despite this progress, a recent report on lessons learned from fighting corruption in Eastern Europe and Central Asia finds that law enforcement agencies in these regions remain largely under resourced and exposed to political pressures, and have poorly trained staff. With the exception of Azerbaijan, prosecutors often lack the specialisation and the technical capacity to effectively prosecute complex corruption cases (OECD 2013).

Croatia, for example, has been effective in bringing high-level politicians to justice (SELDI 2014). The Office for the Suppression of Corruption and Organised Crime (USKOK) was created in 2001 with a broad mandate to investigate, prosecute and prevent corruption and organised crime. The office has access to several special investigative techniques, such as the interception of telephone conversations and simulated bribe giving, among others. It also enjoys extensive confiscation powers and can freeze assets of perpetrators during an investigation. According to the Criminal Procedure Act 2009, all perpetrators' assets are considered to be acquired as pecuniary gain unless the perpetrator can prove that it was acquired legally. Investigations have to be conducted within six months. While more attention should be paid to checking and limiting judicial discretion in decisions to investigate/prosecute allegations of corruption or not, substantial progress has been made in the fight against corruption in Croatia, with law enforcement agencies demonstrating a firm commitment to prosecute high-level corruption (Martini 2014a). More information on the Croatia USKOK can be found here.

While more could be done too in Azerbaijan to strengthen its budgetary independence, the Anti-Corruption Department (ACD), within the Prosecutor

General's Office, has the competence and powers to detect, investigate and prosecute corruption. The material and technical capacity of the department is an exception in the region where there is a need to build the capacity of investigators and prosecutors to use modern investigative methods and to conduct financial investigations. The department is staffed with 40 prosecutors and investigators with experts, detectives and specialists seconded to the ACD. It can also engage external experts on business, accounting, IT, forensics, and so on (OECD 2013).

Judicial reforms: the Kenya example

In many African countries where the separation of powers is weak and courts and prosecutors are subject to political influence, fighting corruption in the judiciary constitutes a great challenge. A number of reforms have helped prevent political influence and reduce certain types of corruption in a number of countries, such as the introduction of an adequate case management system, ethical and technical training for judges, court staff and prosecutors, appropriate salaries and benefits, the adoption of clear rules for the appointment, promotion, discipline, transfer and removal from office of judges and prosecutors and the use of technology to enhance transparency and accountability to the general public (Martini 2014b).

In Kenya, for example, although it is too early to judge its impact on corruption, the enactment of a new constitution in 2010 has paved the way to a set of institutional reforms in the judiciary that have been positively received by local observers (Ndungu 2012). A number of steps have been taken to strengthen oversight, capacity, accountability and management based on a set of comprehensive recommendations made by a task force on judicial reforms, including:

- Strengthening the role of the Judicial Service Commission – the body in charge of appointing and removing judicial officers and magistrates as well receiving and investigating cases against them – and widening its composition to include members of the public.
- The creation of the Judicial Transformation Steering Committee to oversee internal management issues as well as the introduction of vetting of judges and judicial staff to determine their competence.
- Increasing salaries and the introduction of a mortgage scheme for judicial officers to address poor working conditions and uncompetitive salaries.
- The creation of an ombudsman to allow citizens to hold public officials, including judicial officials, accountable.
- The use of ICTs and digitalisation of court documents to address issues of capacity and backlogs as well as transparency to ease citizens' access to information.

Police reforms and zero tolerance to corruption: the case of Georgia

Prior to the 2003 Rose revolution, Georgia was perceived to be one of the most corrupt countries in the region. Supported by a strong leadership commitment to anti-corruption reform, the country managed a quick transition to eradicating petty corruption in a very short period of time, and is often referred to as a success story in anti-corruption. Reforms included economic liberalisation, cutting red tape, several high-profile anti-corruption campaigns, including the prosecution of senior corrupt officials and a zero tolerance policy towards crime and corruption (Oxford Analytica 2013).

More specifically, anti-corruption efforts focused on a few key areas of reform (Kupatadze 2011):

- Prosecution of high ranking officials: between 2003 and 2010, 1000 public officials have faced corruption charges, including corrupt officials in the Shevardnadze government but also officials from the new authorities' inner circles to avoid critics of politically motivated prosecutions.
- New anti-corruption legislation was passed, and an anti-corruption strategy and action plan were developed promoting a zero tolerance policy and focusing on prevention, institutional reform, liberalisation of the business environment, as well as public participation in anti-corruption efforts as the main priorities. Economic liberalisation policies reduced red tape and eliminated many opportunities and incentives for bribery while further reforms have cut the bureaucracy dramatically, with a 50 per cent reduction of public sector employees while the salaries of the

remaining civil servants increased roughly 15-fold.

- The new government also undertook a complete overhaul of the Georgian police firing 15,000 police personnel (over half of the national police force), raising the salaries of remaining police officers and disbanding the traffic police, which was perceived to be highly corrupt. Competitive recruitment systems were established and efforts were made to train in criminal law and the criminal procedural code as well as administrative and physical training.

However, while reforms have been largely successful in eradicating petty bribery, observers underline that the country benefited from unique circumstances that allowed such a drastic approach to anti-corruption, and critics argue that corruption patterns have evolved from rampant bribery to the more clientelistic forms of corruption, with the ruling regime discretionarily allocating resources in order to generate the loyalty and support it needs to remain in power (Kupatadze 2011).

Public administration and system improvements

PFM reforms

PFM reforms are considered in a number of evaluation exercises to have achieved greater impact than public sector reforms (Migliorisi and Wescott 2011). A wide range of reforms and initiatives can be envisaged to improve the budget process, ensure more responsible budget execution, better manage resources collected and ensure proper oversight.

Evidence drawn from case studies conducted in a number of countries suggests that stronger budget management systems and processes at the central administration level can contribute to reduce corruption, even in fragile states (DFID 2015). A qualitative comparative assessment of PFM reforms conducted by the World Bank in eight fragile and post-conflict states indicated that substantial progress had been achieved across all dimensions of public expenditure management (budget preparation, budget execution, accountability and oversight), in four countries, some progress had been achieved in two countries and two countries, including Afghanistan, only showed limited progress (World

Bank 2012; ODI 2012). In particular, efforts to strengthen budget execution processes and systems was found to be the most promising entry point for PFM reforms and exhibited the most rapid and advanced performance improvement. Reforms in this area typically included revised charts of accounts, centralised cash management through establishment of a treasury single account (TSA), automation of central treasury functions and strengthened fiscal reporting (World Bank 2012; ODI 2012).

As part of such reforms, promoting transparency in budget execution through the publication of online data has proven instrumental to prevent fraud and corruption, and help to identify potential wrongdoing and leaks in countries such as Brazil, South Korea and Georgia (Martini 2014c). In Brazil, the relatively low-cost Transparency Portal enables civil society organisations, the media, public officials and citizens to monitor and verify how the budget is being executed. It contains information on government revenues and expenditures, procurement processes, and federal transfers to municipalities and states, among others. While more complex and costly, South Korea's fiscal portal is also considered to be innovative in providing information on budget execution and also serves as the main financial management tool in the country. Some countries, such as Georgia, have also created dedicated procurement platforms, contributing to simplifying and making procurement more efficient and less prone to corruption. A previous Helpdesk answer has documented these various reforms and can be accessed here.

Strengthening oversight: the role of supreme audit institutions (SAIs)

A few studies have provided evidence of the critical monitoring and oversight role that auditing agencies can play in fighting corruption (Olken 2007; Di Tella and Schargrodsky 2003). For example, an often cited study shows a 10 per cent reduction in procurement prices following increased monitoring and auditing of procurement officers in Buenos Aires (Di Tella and Schargrodsky 2003).

In particular, SAIs have an important role to play in identifying waste, wrongdoings and corruption, as it is their mandate is to examine whether public funds are spent efficiently and in compliance with existing laws

(DFID 2015). Country examples tend to indicate that factors such as the political economy, the institutional infrastructure, level of funding and human capacity, institutional, financial and functional independence, integrity, transparency in the appointment of SAI staff and effective reporting mechanisms have a major impact on the effectiveness of such institutions (DFID 2015). SAIs also need to be supported by an enabling legal and institutional environment, including public access to information (Wickberg and Martini 2014). The effectiveness of SAIs may also be determined by the types of audits they are conducting, with specialised audits (for example, forensic and performance audits) more likely to be effective in detecting and reducing corruption (DFID 2015). In addition, a recent U4 review of supreme audit institutions (SAIs) in Croatia, Macedonia, Montenegro and Slovenia indicates that the effectiveness of SAIs is determined by a range of other equally important factors, including the accessibility and communication of audit reports and findings, as well as engagement with other stakeholders, including NGOs, parliaments and the media at all stages of the audit cycle (Reed 2013).

Promoting public sector integrity through interests and assets declarations

While there is little empirical evidence that promoting high ethical standards across the public sector through the enforcement of conflict of interest regulations and asset declarations has a direct impact on reducing corruption, there is anecdotal evidence that they may help to reduce opportunities for corruption by increasing public scrutiny and empowering citizens to hold public officials accountable. Disclosure requirements make it possible to monitor the financial situation of public officials over time, ask for an explanation for an unusual increase in assets or extravagant expenditures, and identify potential conflicts of interest and bias in decision making. Prosecuting and convicting corrupt officials is also easier when there is a financial disclosure law and when such laws make it a crime to file a false declaration that can carry stiff penalties (Messick 2009).

In 2013 for example, the independent anti-corruption commission in Slovenia released a report criticising the prime minister and the leader of the opposition for hiding high value assets and for not listing potential

conflicts of interest, sparking a public outcry and calls for their resignation (Transparency International 2013). More recently, the United States Department of Justice charged US Senator Robert Menendez in relation to gifts and hospitalities he had received from a Florida ophthalmologist, alleging that he used his position as a member of the US Senate to advance Dr Melgen's personal and business interests. As such allegations are extremely difficult to prove, the requirement for public officials to report annually any gift received from any friend above a modest amount – which Senator Menendez did not do – make such allegations easier to prove and can allow authorities to impose strong penalties for failure to disclose (Messick 2015b). This case demonstrates how law enforcement can use financial disclosure requirements to break the cycle of impunity as well as the potential of such regulations to detect and punish cases of political corruption.

Transparency, accountability and citizen engagement

Government openness

Countries such as Denmark, New Zealand, Finland, and Sweden are consistently ranked among the countries that are perceived to be the least corrupt by Transparency International's corruption perceptions index. Although there is little research on countries that are perceived to be successful in controlling corruption, they all seem to share common features and enabling conditions, such as high levels of media freedom and government openness, and prioritise human right issues, such as gender equality and freedom of information (Martini and Chêne 2011).

For example, a study analysing the Finnish model finds that the combination of citizen empowerment and government policies to keep the system open and transparent is a critical factor for success in controlling corruption. A comprehensive system of e-governance and effective channels of communication provide citizens with direct access to law and policy makers, fostering a culture of social trust, transparency and civic activism (Zook 2009). The case study concludes that, contrary to Singapore's top-down approach to anti-corruption, which is economically unsustainable for most countries, this bottom-up model based on public

trust, transparency and social capital is affordable, transferable and adaptable to very different political contexts.

Access to information

While evidence of impact is still scarce, some studies based on experimental methodologies point to the potential positive impact of access to information (ATI) laws on reducing corruption and leading to greater state responsiveness to citizens' demands (DFID 2015). For example, a randomised field experiment in New Delhi shows that using ATI laws are almost as effective as bribery in helping slum dwellers access ration cards (Peisakhin and Pinto 2010, see also Calland and Bentley 2013).

Organised civil society, media freedom and citizen engagement

There is statistical evidence linking the number of civil society organisations per capita to control of corruption (Mungiu-Pippidi 2011), and panel country data confirms a positive correlation between the strength of civil society and the reduction of corruption, especially if conditions such as political competition, press freedom, and government transparency exist in the country (Grimes 2013). In line with these findings, there is strong empirical evidence that a lack of press freedom leads to higher levels of corruption, confirming the power of information to strengthen public demand for anti-corruption measures (Bruenetti and Weder 2003; Larreguy, Marshall and Snyder 2014). Based on case study evidence from Brazil, India, Indonesia and Mexico, some studies suggest that civil society is more likely to have an impact on corruption if citizens' action is integrated into supportive legal and institutional frameworks, including transparency legislation, participatory governance and horizontal accountability institutions (DFID 2015).

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