

## Transparency International Anti-Corruption Helpdesk Answer

# Water and corruption in Latin America

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Water is a complex sector, characterised by large infrastructure projects with big information asymmetries, making it vulnerable to corruption. Although more specialised research on the topic in Latin America is needed, various studies and reports by investigative journalists have identified instances of corruption in the sector. The water value chain from policymaking and sectoral regulation through to procurement processes and operations to the point of service delivery is exposed to numerous corruption risks.

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## Query

Please provide an overview of governmental and private sector control mechanisms that exist in water management to prevent corruption. In addition, we would like to have more information and data on corruption in the water sector in Latin America.

## Contents

1. The water sector in Latin America
  - a. Background context
  - b. The impact of corruption on the water sector
  - c. Scale of corruption
2. Key players in the sector
3. Overview of corruption risks in the water sector
  - a. Policymaking/regulatory level and organisational resources
  - b. Procurement
  - c. Operational level
  - d. Point of service delivery
4. Anti-corruption approaches
  - a. Enhancing accountability in the water sector
  - b. Public sector
  - c. Service providers and utilities
  - d. CSOs and citizen initiatives
  - e. Holistic sectoral approaches
5. References

## The water sector in Latin America

### Background context

Latin America holds about a third of the world's freshwater reserves, with a per capita availability of

## Main points

- Although access to drinking water in the region has improved significantly since the 1990s, there are notable differences between countries in the region and a great gap between urban and rural water access.
- Corruption in the water sector affects the most vulnerable, who can end up paying more for water than the wealthier segments of society.
- Big infrastructure water projects entail several corruption risks because of their complexity and the size of the investment.

the scarce resource that is 300 per cent higher than the world average (Campos & Santiso 2018). Despite this, access to water across the continent has been disproportionate, and the quality of the service is often poor (Bertoméu-Sánchez & Serebrisky 2018). Up to 26 per cent, roughly 166 million people, in Latin America and the Caribbean do not have adequate access to drinking water (CEPAL 2020). In response to this problem, most countries in the region have adopted a series of reforms since the early 1990s to try to extend water services to the entire population while also

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improving the efficiency and financial viability of this sector (Bertoméu-Sánchez & Serebrisky 2018).

From 1990 to 2015, access to sources of drinking water increased significantly in the region, from 81 per cent to 95 per cent, which was remarkable progress compared to other regions of the world (Bertoméu-Sánchez & Serebrisky 2018). However, this improvement was mainly seen in urban areas (Beroméu-Sánchez & Serebrisky 2018) and, even today, most people without access to water supply have low incomes and live in rural areas (UNESCO 2019).

Yet, even in urban environments, while access to water is existent on paper, it can be highly unreliable in practice. Informal settlements are especially vulnerable as the provision of water is complicated by “high population density; unplanned and uncoordinated construction of housing and roads; undocumented or contested land tenure rights; diverse and often unstable livelihoods; and often pollution and environmental problems” (WIN 2021: 38).

For example, in Colombia’s urban areas, more than 9 million people do not have household facilities to wash their hands, whereas in Bolivia the number is almost 5 million out of a population of 11.5 million (CEPAL 2020).

The problem is likely to grow as Latin America is the fastest urbanising part in the world. The urban population will continue to swell, with some estimates predicting that, by 2050, around two-thirds of the global population will be living in urban areas (SIWI 2021). This will exacerbate competition between different water users, particularly between agriculturalists, industrialists, energy firms and urban dwellers (OECD 2016).

Perversely, the poor quality of water services means the poor end up paying more to access water, exacerbating underlying inequalities. In fact, the existence of informal providers in the most poor and vulnerable communities has led to the

imposition of high prices to access these services. In some cases, the prices of the services provided can be higher than in the formal provision of rich areas in the cities (WIN 2021).

In the Latin American and the Caribbean (LAC) region, averages from recent years show the poorest quintiles of the population spend twice as much on drinkable water services as the richest quintiles (CEPAL 2020). The COVID-19 pandemic has exacerbated this inequality as complying with quarantine measures was much harder for households with no or intermittent water access (CEPAL 2020).

This lack of reliable access to water means that a large part of the population has to look for alternative solutions, like illegal connections, water vendors, taking water directly from rivers or lakes, among others, many of which are expensive and/or do not guarantee the water is safe for drinking (UNESCO 2019).

Most countries in Latin America have private companies managing water and sanitation services under autonomous regulatory bodies that are in charge of ensuring quality standards and cost-efficiency (Adam et al. 2020). This is partly a consequence of the reforms of the 1990s when many LAC countries sought to attract private sector involvement, which led to extensive privatisation. In Chile, 86 per cent of total financing in the water sector came from the private sector by the end of the 1990s and, in 1999, the investment in public-private partnerships in water and sanitation in LAC reached a record US\$7 billion (Beroméu-Sánchez & Serebrisky 2018).

All around the world, private investment and the privatisation of water viewed in the 1990s as a means of securing better outcomes have, in practice, had mixed results (Transparency International 2017a). Today, LAC is the region with the highest rates of private sector involvement in the water sector. Most of this private participation is concentrated in some of the larger countries,

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including Argentina, Brazil, Chile and Mexico, but overall about 70 per cent of LAC countries have private participation in the water and sanitation sector (Beroméu-Sánchez & Serebrisky 2018).

Chile is one of the few countries in the world where both water sources and the distribution of water have been privatised (Tamayo & Carmona 2019; Universidad Católica de Chile 2021). The rights over this resource have left private actors with full control of the use of water, including selling access at often steep market rates (EFE 2019). By 2018, seven of the 10 Latin American cities with the highest water prices were in Chile (EFE 2019). Largely due to weak state oversight, private businessmen in Chile have abused water access, and audits have revealed numerous illegal water points (where water is captured without a proper licence) as well as extensive conflicts of interest in the sector (Tamayo & Carmona 2019). An example provided by the authors illustrates these abuses: in 2019, the Water General Direction fined a company that had installed an electric water pump 13 metres deep to extract a larger volume of water than they were legally authorised by the General Direction at a site that had usage restrictions due to water scarcity (Tamayo & Carmona 2019).

With water consumption demand estimated to rise by 55 per cent globally by 2050 (OECD 2016), the water sector will need to attract massive investment from both the public and private sector. As outlined in the next section, these investments are exposed to numerous corruption risks.

## The impact of corruption on the water sector

The definition of corruption provided by Transparency International is the “abuse of entrusted power for private gain”. The term private gain should be interpreted widely as it includes gains that can benefit family members, political parties or even an independent organisation or

charitable institution (WIN & Transparency International 2010). Similarly, corruption is a threat to every area where power, money and prestige are at stake (WIN 2016). As such, it does not only take place in the public sector; for example, falsifying water metre readings is a corrupt practice, whether it involves a private water company or a public utility (Gonzales de Asis et al. 2009).

Corruption is known to undermine effective water management around the world. Indeed scarcity problems are chiefly a result of poor governance rather than physical availability (UNDP/UNICEF 2015; Transparency International 2008). Additionally, corruption in the water sector can make water undrinkable, unaffordable and inaccessible (Transparency International 2008) and can cause overuse and contamination of water, which affects ecosystems and the human population (Ethos n.d.).

Water is an inelastic good; demand for it remains fairly constant despite changes in cost. As such, there are plentiful opportunities for market manipulation, such as artificially restricting the supply, as well as other corrupt practices designed to distort prices and extort service users (Ethos n.d.; Transparency International 2008). Indeed, corruption in the water sector can act as a barrier to public health that thwarts the realisation of the human right of access to safe drinking water that has been recognised and ratified by most Latin American countries (Adam et al. 2020). Corruption in the sector can also impose additional financial burdens that have a disproportionate effect on the most marginalised people (WIN 2016).

Specifically, corruption in the water sector can, among other things: inflate project costs; force citizens to pay bribes to access water; divert irrigation water from poor villages that would have used it for agriculture; cause safety features to be jeopardised; allow contamination of water bodies that harms the livelihoods of small farmers and fishers; and divert funding destined for water access (WIN & Transparency International 2010;

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WIN 2016). Corrupt actors in this sector can both divert funds earmarked for water projects and extract bribes from mostly poor households that are especially reliant on water access, squeezing investment in the sector from above and below (Jenkins 2017).

Water sector corruption also has an impact on food security as water conservation is crucial for agricultural production (Jenkins 2017; Transparency International 2017). If irrigation systems are captured by a few, or if corrupt water treatment leads to shortages or polluted water, food security is put in peril, particularly affecting the most vulnerable (Transparency International 2008). Corruption has the additional harmful effect of creating mistrust between water providers and water users, which aggravates tensions around large projects like dams and hydropower (WIN & Transparency International 2010).

It is generally agreed that corruption in the water sector hits the poor the hardest, and creates “water poverty” (Jenkins 2017). It affects the poor in many ways, including directly shrinking a household’s budget where water costs increase due to corruption, but it also leads to other negative externalities. When corruption affects access to drinking water, people living in poverty are more likely to suffer from water-borne diseases or have to spend hours going to fetch water. Both of these mean time away from work, which is especially significant in a subsistence economy (Transparency International 2008). As such, corruption in water and sanitation worsens the living conditions of the poor, particularly when socio-economic conditions intersect with other vulnerabilities, like gender or ethnicity, thwarting their ability to escape poverty (Jenkins 2017).

Women and children are particularly affected. According to research by Transparency International in 2019, one in five women have been victims of (or know someone that has been victim of) sextortion in Latin America. Several studies carried out by UNICEF, Stockholm

International Water Institute (SIWI), the Kenya Water and Sanitation Civil Society Network have identified the existence of these practices specifically in the water sector (WIN 2021: 99). Given the effect of corruption to reduce the quality of water and sanitation services, it also has deadly consequences: around 90 per cent of mortality cases in children under five are related to diarrheal diseases linked to water, sanitation and hygiene (UNICEF 2013).

As such, corruption in the water sector reinforces existing power asymmetries. It hits the poor hardest while dominant players benefit from coercive forms (such as public officials extorting bribes) and collusive forms of corruption (including companies bending or even rewriting the rules for their private gain) (WIN 2016; UNESCO 2019).

## Scale of corruption in the water sector

Estimates show that in some places, up to 50 per cent of water sector investment could be lost to corruption and is thought to be at least 10 per cent (WIN 2020a). The estimated average in developing countries is that corruption increases the cost of a water and sewerage connections by 30 per cent (Adam et al. 2020).

Widespread corruption and cronyism in the water sector is particularly detrimental for developing economies as it can disincentivise much needed investment (UNESCO 2019; WIN 2016).

The evidence on water sector corruption is patchy and mostly about procurement. This suggests that more systematic research is needed (Transparency International 2017a) and that more needs to be done to collect data on corruption in this sector. Nonetheless, some information is available. For example, according to the Global Corruption Barometer, more than one in five people paid bribes to access public services, which includes water (Transparency International 2019a).

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Investigative journalism has also helped uncover some corruption scandals in the LAC region. Although Colombia is one of the countries with the most water resources of the world, large parts of its population remained unserved (Bustamente 2018), which can be in part attributed to corruption. A water plant that was supposed to supply the city of Yopal with water was embroiled in scandal after one of its water tanks collapsed, reportedly due to widespread corruption and neglect (Prensa Libre 2019).

In Mexico, a lack of supervision of water licences to private actors has allowed multiple abuses, like the exploitation of water for commercial use when the licence was granted for agricultural purposes or the creation of a water black market in Chihuahua (Contra la Corrupción n.d.). In Mexico, there is often opacity and excessive discretion in the awarding of water licences, which provides the perfect environment for corrupt practices like kickbacks that lead to inefficiencies and overexploitation. An investigation by Ethos comparing the licence registries in Mexico to information regarding water sources found that, between 2015 and 2018, 77 licences were granted for aquifers that did not have enough water availability and did not benefit public and domestic use (Ethos n.d.).

A recent Inter-American Development Bank report used a methodology for proxying corruption in the water and sanitation sectors in the Latin American and Caribbean region (Adam et al. 2020).

Although its results are not exactly comparable, since data from each of the studied countries differed, it allowed the authors to gain a more comprehensive look into the risks in the sector and, more importantly, to estimate the economic and social costs of corruption in the water and sanitation sector in a manner that can be replicable. Despite the differences making comparisons difficult, the study provides some insights into practices such as “single bidding”. The authors found that this contracting risk was lower in the water and sanitation sector in Colombia, Ecuador and Uruguay in comparison to the whole public procurement sector, but it was higher than the national average in Mexico and Peru (Adam et al. 2020).

## Key players in the sector

The responsibilities for managing water tend to be spread across multiple levels of governments and a range of stakeholders, including regulators and river basin organisations (OECD 2016). Although the state has the ultimate responsibility in the sector, there are a number of actors that usually take part in the provision of this service (UNDP/UNICEF 2015). Thus, a typical set-up in the public service provision has three major groups of stakeholders: communities/users; policymakers and service providers (UNDP/UNICEF 2015). In addition, regulators play a pivotal role in supervising the sector, acting as a kind of referee.



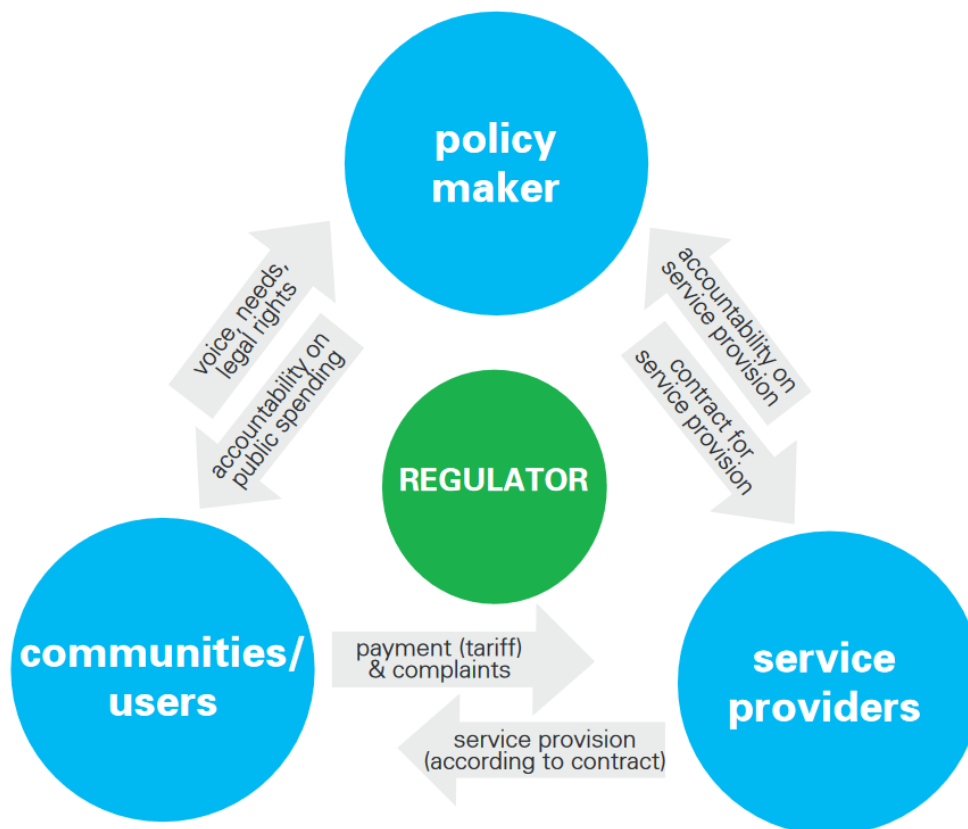


Figure 1: Water Service Provision Framework taken from UNDP/UNICEF 2015, p17

Large projects typically involve a number of other actors, from consulting firms to investment banks and supply companies, which also need to be taken into account (WIN & Transparency International 2010). Moreover, the responsibility for water management is often divided among agencies and ministries, with hydroelectric infrastructure, irrigation and urban water services under the jurisdiction of different entities (Transparency International 2017a). Finally, watercourses are not confined to national borders, involving more than one legal framework, which can be exploited for corrupt purposes (Transparency International 2008). This fragmentation of the sector can make it particularly hard to track funding (WIN 2016).

Clarifying exactly who does what in a particular water market is therefore a key first step (OECD

2016) as effective governance strategies rely on constructive cooperation between actors to ensure the efficient use of water resources, the responsible use of power and an effective and sustainable service provision (UNDP/UNICEF 2015).

Similarly, it is important to differentiate between various water uses and purposes since they will entail different actors and thus different corruption risks. For example, the actors and corruption risks surrounding water for consumption for which the household is the final user will be different from the types of corruption related to the use of water for industry. Similarly, the rights associated with water use licences vary according to their aim and can include withdrawal rights to take or use water, usufructuary rights to profit from selling water and management rights to make rules and modify the resource (WIN 2016).

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Careful diagnosis of the players and structure of the water market under consideration is thus a prerequisite in efforts to curb corrupt practices.

## Overview of corruption risks in the water sector

Distinguishing the corruption risks at each stage of water sector value chain is important to fully grasp the different manifestations of corruption in the water sector.

The value chain in the water sector can be schematically outlined at the following levels: policymaking; organisational resources; procurement; and service delivery/client interface.

At the level of service delivery, there is a high risk of petty corruption in the sector, where low-level and mid-level officials abuse their power in their interactions with citizens (Root 2020). This can include: bribes to obtain a water connection or to expedite repair work; staff working at the point of service trying to gain some side income by providing services informally; or small bribes to falsify metre readings (Gonzales de Asis et al. 2009; Transparency International 2017a). Petty corruption at the user level has the most direct effect on people living in poverty (Jenkins 2017). Public officials can also be bribed by individuals trying to gain preferential treatment by, for example, gaining access to water during droughts (Transparency International 2017a).

Grand corruption usually involves politicians, senior officials and higher level engineering staff (Gonzales de Asis et al. 2009). This type of corruption can be common when awarding large contracts, and “water cartels” can also manipulate the service and impose water tariffs on a large scale (Gonzales de Asis et al. 2009). The allocation of resources, permits and licences also provides ample opportunity for cronyism and collusive corruption.

Water management and delivery represent great corruption risks because of their particular characteristics. The management and delivery of water lends itself to what has been called a “natural monopoly”, and monopolies are more susceptible to abuse of prices and conditions of service (Ethos n.d.).

The management and especially the delivery of drinkable water usually relies on large infrastructure systems that are technically complex (Transparency International 2017a), and thus requires big budgets, which can complicate the task of oversight and audit and thereby facilitate corruption (Ethos n.d.).

Estimates on the global amount of investment needed to provide water for drinking, irrigation, electricity and addressing climate change can rise to over US\$1 trillion a year (WIN 2016). As a result, more climate funds are being channelled through the water and sanitation sectors, which heightens corruption risks in the sector (Allakulov et al. 2020).

Much of the corruption in the water sector takes place during procurement processes since water infrastructure and treatment services usually involve lucrative contracts and important investments (Trapnell et al. 2017).

Before proceeding, it is worth noting that it can sometimes be difficult to differentiate between problems arising from corruption and problems that are the result of inefficiency, lack of capacity and incompetence (WIN & Transparency International 2010), though these conditions themselves can create an environment conducive to corruption and other abuses of power.

### Policymaking/regulatory level

At this level, actors in charge of developing policies for the water sector and then implementing and monitoring those policies (Sanchez Trancón et



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al. 2020). The process of policymaking usually involves the following groups of actors (WIN 2016):

- governments (at national and local levels)
- local communities (who can have little power but can be the most affected by water sector decisions)
- international donors and multilateral organisations (who can play an important role by ensuring governments adopt anti-corruption policies, but can also be investors)
- private companies and service providers
- and non-governmental and other CSOs

Water can be part of a ministry dedicated to the sector (either a water ministry or a water and sanitation ministry) or it can be part of a department or agency within a wider ministry, and the functions regarding its management are usually distributed among different levels and can also fall under various categories (Sanchez Trancón et al. 2020). Furthermore, if a country is unitarian or federative it will have different implications regarding who oversees water resource management.

Risks at this point include: political mismanagement of utilities to win votes; the political capture of big projects; giving subsidies to large-scale land users; the collusion of construction and rehabilitation during quality control (Trapnell et al. 2017; Transparency International 2017a); and policy capture (Gonzales de Asis et al. 2009). Risks at the policymaking level can emerge when there is no clear legal framework and the public sector lacks the necessary resources to operate accordingly, from human resources to material and financial ones (Sanchez Trancón et al. 2020).

Even before the start of any project, the planning and preparation phase can be quite controversial and politically charged as it can entail the acquisition of land, transfers or contracts with private companies (WIN 2016). The process needs

to be overseen to ensure that it is fair and transparent and governmental bodies are balancing different interests (WIN 2016). Decisions regarding water allocation can be captured, and undue influence of the policymaking process can be used to avoid the design or implementation of environmental regulations (Transparency International 2017a). Regulatory capture is also an important risk (Gonzales de Asis et al. 2009), where a regulatory body ends up furthering the commercial or political concerns of special interest groups (WIN 2016).

Both transparency and participation are key to avoid corruption but can be bypassed to fast-track policymaking or because confidentiality and security are given more importance than public accountability (WIN 2016).

## Organisational resources

Corruption at the organisational resources level can come from: rent-seeking behaviour which results in inappropriate projects or high investment in infrastructure when there are more efficient solutions; nepotism and patrimonialism in the appointment of positions and in assigning water user rights; the embezzlement or misuse of water management funds; bribery to gain water use rights, to informally extract water, to cover up environmental impacts or to gain provision licences (Trapnell et al. 2017; Transparency International 2017a).

The misappropriation of funds can happen at this point and be hidden through fraudulent reporting by, for example, creating ghost projects or double-counting, so it is always important to be able to match what is happening on the ground with what is being reported in the finance books (WIN 2016).

As previously mentioned, water infrastructure and treatment can involve complex projects. The highly lucrative contracts for storage, extraction, treatment and conveyance of water, which usually involve only a small number of service providers

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and public officials, create rent-seeking opportunities (Jenkins 2017).

At the monitoring level, powerful companies may avoid environmental regulations through undue influence, bribery to get rights and permits and colluding to cover up environmental and social impacts (Chêne 2009) when, for example, the environmental impact assessments normally required for large-scale projects, such as dams, are obtained through corruption (Transparency International 2017). The complexity of the projects can hamper the ability of civil society to monitor them, but additionally, governments can perceive water security – particularly related to large infrastructure projects – to be central to national security, limiting civil society space to participate (Jenkins 2017).

In Mexico, Ethos (n.d.) has identified certain areas in the water sector as especially prone to corruption regarding water licensing:

- licences and licence transmission (giving a licence to another private entity without the regular public channel)
- licences with incomplete, untimely and incorrect information (concessions are given even if the authority in charge does not have all the pertinent information)
- licences in water sources with deficits (providing water licences in places where its availability is not enough)
- licences that do not observe priorities (which are public and domestic use)
- black market of water licences
- lack of government monitoring capacity

Large farming businesses can also abuse their position through patronage networks, rotating doors or even conflicts of interest. The effects can be nefarious. Irrigation systems in Mexico are reportedly captured by the largest 20 per cent of farmers, who receive more than 70 per cent of irrigation subsidies (WIN & Transparency

International 2010). In Chile, big farming receives economic support from the National Irrigation Commission through subsidies to expand irrigation surfaces and improve areas where irrigation is poor, and the links between the public and the private sector run deep. For example, the 2019 agriculture minister was the owner of an investment fund (Asesorías e Inversiones Antonio Walker Prieto) through which he and his family participated in a farming company that was among the 20 companies that benefitted most from the National Irrigation Commission (Tamayo & Carmona 2019). Although the minister modified his role in other societies in the sector, although his wife was the administrator and subsidies to those companies were received before his term in office, it illustrates the conflict of interests that can occur.

The tensions between farming and water use will be higher in countries where large-scale farming is an important part of the gross domestic product. For example, in Chile, where farming represents 11 per cent of the GDP, the National Agriculture Society published a letter in 2019, supported by the agriculture minister and the government, urging representatives not to approve an end to perpetual water rights (Tamayo & Carmona 2019).

## Procurement

Water and sanitation are more than twice as capital intensive as other utilities, which makes it prone to corruption as it attracts large flows of public money (Adam et al. 2020). In general, large and complex projects can be difficult to monitor for manipulation, and large water resource management, irrigation, hydropower and dam projects can be prone to bribery and collusion (Transparency International 2008; WIN 2016). In particular, hydropower projects have huge environmental impacts and require massive investment volumes. As they are very technically complex projects that require customised engineering, they pose serious corruption risks at every stage of the project (WIN & Transparency International 2010).

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Procurement and other forms of public contract activities, such as licensing and privatisation, usually entail large sums of public funds. At this level, there are possibilities of: collusion and extortion; contract variations with no justification; the capture of profitable contracts and negotiations of water concessions; inflation of public procurement prices; and it can contribute to delayed and low-quality provision or even non-completion of a project (Adam et al. 2020; Trapnell et al. 2017; Transparency International 2017).

Furthermore, corrupt prices can appear at the contracting, permit and licensing processes (WIN 2016). When designing the terms of reference for a project, both under-specification and over-specification are risks (WIN 2016). In the first scenario, bidders under-specify materials and/or time with the objective to win the contract by being the lowest bid and then amend it accordingly afterwards. Over-specification can be used to generate extra work for either contractors or suppliers or to favour one supplier over the other (WIN 2016).

The risks are particularly higher when it involves lucrative contracts with few service providers (Transparency International 2017), which can usually be the case in a sector like water. Additionally, large water projects can entail a series of other smaller contracts, and it is important to also pay attention to each of them and not only the final large one (WIN & Transparency International 2010).

In concrete terms, corruption can present itself in: administrative corruption (falsifying documents, for example); collusion in the public sector; bribery to influence the tender result; falsification of documentation by private bidders; collusion; bid-rigging; and inflation of prices (Gonzales de Asis et al. 2009; Transparency International 2017a; Transparency International 2008). Corruption can also happen after the tendering process as construction companies involved in costly infrastructure projects can seek to lobby, bribe or

influence government officials to amend the terms of the contract, or they can cut costs by using sub-standard material and equipment (Jenkins 2017).

It is important to take into account that the early and late stages of the procurement process are usually more exposed to corruption due to: limited access to information; a budget phase with deficiencies and no transparency; a planning stage without information and participation; the abuse of exception to open public bidding; and during the contract execution phase, a lack of effective control and supervision (WIN & Transparency International 2010). One way to gauge corruption risks in procurement is to collect information on the proportion of contracts that have been awarded where there was a single bidder or just the minimum number of bidders for the bid to be legal (Trapnell et al. 2017).

Although large-scale projects can involve large sums of money, and thus be more attractive for corruption, smaller-scale projects can be more complex as their proximity with communities entails a larger constellation of stakeholders (WIN & Transparency International 2010). Additionally, at the local government level, external advisers will usually be required but harder to find, and smaller projects will tend to be less organised than large-scale projects, which usually are implemented in contexts where control institutions are relatively strong (WIN & Transparency International 2010).

Once the project construction starts, several new corruption risks arise, which include: not following the specifications of the project; failure to complete it; underpaying workers; and fraudulent invoicing (Gonzales de Asis et al. 2009).

## Operational level

Conducting an integrity assessment can help detect risks at this level (WIN 2016). At this stage, corruption risks include: theft; overbilling by suppliers; installing illegal connections; non-compliance of regulations; and falsification of

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accounts (Gonzales de Asis et al. 2009). The corruption of monitors and inspectors can also happen at this level. Regulatory officials can also receive bribes to overlook water overuse or discharge and in treatment facilities, inspectors can be corrupted to provide false documentation on the quality of water (Jenkins 2017).

Similarly, when irrigation systems are difficult to monitor and rely heavily on expert maintenance, they pose serious risks of corruption, which can lead to uncertain irrigation for small-scale farmers (WIN & Transparency International 2010). Other risks include embezzlement and fraud at water treatment facilities that might divert resources from treatment or from hiring the necessary experts to analyse water quality (Trapnell et al. 2017) and bribing officials to overlook the excessive extraction of water from fragile ecosystems (Jenkins 2017).

## Point of service delivery

At this level the most important risks are likely to directly affect the final user and impact marginalised communities particularly hard. Although compared to other sectors, like health or education, there are fewer agents that interact with ordinary citizens and households at this point, bribes can still be demanded by service providers (Transparency International 2017a). In some places, especially informal settings, private providers can also be in charge of delivering water via trucks, which are sometimes subsidised by the state, making the interaction between service providers and citizens as direct as in health or education services. Given that in these settings cash changes hands in face-to-face interactions, petty bribery risks are especially high (Transparency International 2017a).

When there are few agents responsible for delivering water, this creates a bottleneck problem that service providers can use to their advantage to extort bribes (Trapnell et al. 2017). Forms of corruption here can include overcharging the users

or the state and fraudulent metre reading (Gonzales de Asis et al. 2009). Similarly, consumers might need to resort to paying bribes to have services restored or problems with the service solved (WIN 2016). Bribes can also be used to: gain access to illegal connections; evade fee payments; and the capture of water provision services and committees (Trapnell et al. 2017; Transparency International 2017a). Manipulation of metre readings and non-revenue water – illegal connections and leaks – are also risks at this point and can cost water authorities large sums of money (WIN 2016).

A lack of official access to water can lead to citizens seeking other solutions, which might include resorting to illegal connections and/or paying bribes (WIN 2016). Informal providers operating outside the law can charge much more for water access than standard public utility rates (Jenkins 2017). These groups usually operate outside any accountability mechanism and are unlikely to reinvest their revenue in water delivery infrastructure, which means the fees paid by the poor are lost to the sector (WIN 2016). Petty corruption can also amount to major fraud, as theft and leakages can result in huge losses, as in the case of the Nairobi City Water and Sewerage Company that lost 40 per cent of its supply, forcing poor residents to buy water from vendors at 10 to 25 times the price; or in South Africa where the losses from water to illegal connections and vandalism cost the Thekwini Metropolitan Municipality US\$44 million (WIN 2016).

Rural communities can be particularly affected since they have more challenges accessing safe water supply. The poor in those communities can end up paying more for lower quality water provided by informal service providers and water cartels (WIN 2016). Those out-of-pocket payments are revenue lost to the sector since they are not subject to accountability (WIN 2016). Rural communities may also be less aware of who is responsible for maintaining different assets for allocating water (WIN 2016). Even when rural areas are properly

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serviced, it can be a challenge for regulators to perform their tasks in the same way as for urban providers (Sanchez Trancón et al. 2020).

In this unequal context, it is important to take into account how rural communities are organised in order to manage water supply (WIN 2020b). In Latin America, several water management organisms coexist with water community management, but several contradictions remain. In Mexico, these community based organisations do not have enough legal standing, which prevents them from properly fulfilling their functions while their staff usually works for free facing many challenges (WIN 2020b). These conditions do not only affect their ability to provide adequate services but also impact transparency, accountability and norm abiding (WIN 2020b).

Citizens and businesses could also bribe officials to gain private benefits, like diverting water from one area to another (Trapnell et al. 2017) or securing water access during droughts or dry seasons (Jenkins 2017). Risks at the point of service delivery can be related to the abuse of water rationing decisions (WIN 2016). Water smuggling takes different forms, such as officials using public networks to connect users that have not met the required paperwork or extracting water from public networks to sell it to other users (Ethos n.d.).

Finally, corruption at this level has been found to affect women differently since the corruption they face can take different forms, including sextortion (UNESCO 2019). Collecting water tends to fall on women and girls in most households without a water connection, which puts them in direct contact with the petty corruption that happens at this level (Jenkins 2017). Women are particularly vulnerable to sextortion, which is a form of sexual exploitation where an unwanted sexual activity is extorted in exchange for something (IBA 2019), in this case, access to water. Although women tend to be the managers of household water, they are rarely consulted in how water services are provided (WIN 2016).

## Anti-corruption approaches

“The water sector cannot be made more transparent, accountable and participative unless there is a change in power relations and accountability mechanisms.” (WIN 2016: 157).

The Delft Statement on Water Integrity asserts that the main problem regarding access to water is not resource scarcity but rather governance failures. Accountability is hindered by fragmented institutions in a sector that is already susceptible to corruption, and most countries do not have a comprehensive system to track funding to water and sanitation (WIN 2016).

Water integrity goes beyond addressing only corruption and includes the integrity of water resources, people and institutions. It relies on three distinct frameworks: water sector regulations, the human right to water and sanitation, and anti-corruption legislation (WIN 2016). Good water governance implies integrity, transparency and stakeholder engagement (WRI n.d.) as well as assessing political, institutional and administrative rules, formal and informal practices for decision-making, and, particularly important, holding decision-makers accountable for water management (OECD 2016).

A key framework to strengthen integrity in the water sector is the TAP-A approach: transparency, accountability, participation and anti-corruption, developed by the Water Integrity Network (WIN 2016). These key principles should help accomplish integrity in the sector. Transparency should allow the flow of accurate and open information by bolstering information access laws and investigating the extent of corruption and socio-economic damage. For decision-makers and implementers to be held accountable, it is important to have clarity regarding responsibility in governance and funding systems, and to have a strong sector capacity that can deliver on human rights and sustainable



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development goals targets. For increased participation, all relevant stakeholders need to be included in decision-making while balancing stakeholder interests and ensuring a seat at the table for civil society, the private sector and excluded groups. Finally, anti-corruption relies on robust laws and regulations, with strong regulators and justice systems, and accompanying legislation that requires participation and transparency in the sector (WIN 2016).

Since water is a vital resource for human life and a human right, it is important that any anti-corruption measures consider and actively seek to avoid negative externalities. For example, cracking down on illicit water vendors without a plan to provide water to their customers in informal settlements will restrict access to water for the most vulnerable or have them turn to another informal and likely expensive alternative (Jenkins 2017). Without first establishing official, efficient and affordable water services for people living in informal settlements, it is likely that local officials will oppose efforts to suppress illicit vendors and tackle corruption in the sector (see Holland 2016).

## Enhancing accountability in the water sector

Accountability is a key deterrent for corruption, and observers estimate that between 20 per cent to 70 per cent of resources could be saved in the water sector if corruption was eliminated (UNDP/UNICEF 2015). To achieve integrity in the water sector, it is important to hold accountable those who have the power over knowledge, resources and decision-making (WIN 2016). Accountability is truly effective when both horizontal accountability mechanisms (government control over public service providers) and vertical accountability mechanisms (citizens access to effective channels to express concern with their political representatives) work in unison (UNDP/UNICEF 2015).

Horizontal accountability can be improved through capacity building, improving access to information, and ensuring the independence of monitor and regulation agencies from the government (UNDP/UNICEF 2015). In rural areas, it is also important to give technical assistance to the decentralised levels of government (UNDP/UNICEF 2015).

Vertical accountability can be enhanced through: developing CSOs' political analysis skills; building NGO capacities to better understand the water sector; and encouraging citizen participation in all water related policy processes and monitoring systems (UNDP/UNICEF 2015).

Hybrid accountability describes the participation of citizens and civil society actors in horizontal processes of accountability. Examples include participatory budgeting, citizen audits and the participation of civil society in the supervision of water providers (UNDP/UNICEF 2015).

The improvement of accountability in the water sector entails action in three dimensions: political, administrative and social (UNDP/UNICEF 2015).

Political accountability refers to governments being accountable to their citizens and not abusing power, as well as following transparent criteria to appoint individuals for public posts and report on their activities and spending. It is important to have specific mechanisms for the water sector that ensure decision-makers and the government are responsible to citizens, such as including civil society in planning, budgeting, monitoring and evaluation of projects and mechanisms for complaints and redress in water projects and operations (UNDP/UNICEF 2015).

Administrative accountability rests within administrative structures and standards and includes ensuring all employees comply with professional codes of conduct. Water providers such as utilities should be required to report on their planning, performance and spending



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(UNDP/UNICEF 2015). It is thus linked to financial accountability, which relies on oversight bodies like audit institutions and parliaments scrutinising accuracy and efficiency in the water sector (WIN 2016).

As such, transparency is important and can be reinforced through the publication of utility budgets and contracts, public meetings involving citizens, regulators and water sector officials, among others (Jenkins 2017). This can improve answerability in the sector by allowing citizens to understand decision-making processes, what information to demand from officials and how to lodge complaints (OGP 2021).

Similarly, to curb corruption, it is important to ensure information and data regarding corruption is made available, including case files that can be used in prosecutions (OGP 2021).

Social accountability refers to the actions people undertake, whether individual citizens, journalists or CSOs. They perform a watchdog role and can ensure service providers adhere to quality standards. This type of accountability is particularly important in a near-monopolistic sector like the water market (UNDP/UNICEF 2015). It is important to take into account the local context. For example, in rural areas, community radios are likely to be a more important ally than internet outlets.

The remainder of this paper considers how to enhance political, administrative and social accountability in the water sector with reference to the three stakeholder groups primarily responsible for each respectively: the public sector, water service providers and utilities, and finally civil society groups and citizens.

The final section of the paper then reflects on holistic, multi-stakeholder approaches to curbing corruption in the water sector.

## Public sector

The main state functions regarding water allocation and provision fall into six categories: policy and law making; building capacity; planning and budgeting; financing; organising service delivery arrangements; and regulating water services (UNDP/UNICEF 2015). Where these functions and responsibilities are split across different entities, a coordination mechanism can help to address coordination problems, like a dedicated water technical working group with representatives from different agencies that meet on a regular basis (Sanchez Trancón et al. 2020).

Integrity in the water sector at this level needs to have the following characteristics: policy coherence, clear responsibilities, coordination mechanisms with other actors and bodies, data availability, access to information, participatory involvement of relevant stakeholders, regulation, accountability, autonomy, leadership and adequate resources (Sanchez Trancón et al. 2020). The rest of this section will outline recommendations to curb corruption in the water sector at the state level.

### Customary laws

It is important to consider the interplay between customary and state laws since, in many countries, it is customary law which governs water rights in local communities (WIN 2016). Special attention needs to be paid to communities with informal water rights to ensure they are not dispossessed (WIN 2016). Lower levels of government, like municipalities and river basin authorities are usually more aware of existing user rights, but in developing countries they also often lack the enforcement capacity to deal with conflicting rights and demands (WIN 2016).

### Procurement data

The improvement of public procurement data in the water sector is important for data analysis to be used for guiding policy (Adam et al. 2020). This does not only entail ensuring the quality of information and decreasing data errors and

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missing fields, but public procurement datasets could be extended to include: indicators of prices, relative contract values and unit prices; project completion delays and overruns; and risk assessment indicators, like linked sanction lists and the name and bid prices of the losing bidder (Adam et al. 2020). Transparency on bidding processes can be facilitated by access to information on procurement, and e-procurement can help minimise interactions between bidding companies and public officials, preventing the formation of corrupt networks (Transparency International 2017).

### **Regulators**

Regulators need certain conditions to be able to fulfil their mandates, which include: “(i) autonomy from policymakers (and politicians) regardless of the institutional frameworks within which it sits; and (ii) capacity, in terms of human, material and financial capacity” (Sanchez Trancón et al. 2020, 4). These conditions should help avoid regulatory capture or undue influence over regulatory bodies from actors that could have a conflict of interest or close ties with the water entities that the regulators are supposed to monitor.

Regulators could follow the example of the economic regulator of the water and sewerage industry (Ofwat) in England and Wales, that offers a special guide for those who feel they need to make an accusation regarding water and sewerage companies (WIN 2016). In Honduras, service providers are required to register and report monthly on key indicators to the Regulatory Information System on Drinking Water and Sanitation for Service Providers. The regulator then uses the system to identify issues and put in place monitoring systems (Sanchez Trancón et al. 2020).

### **Audit institutions and anti-corruption agencies**

Audit institutions and anti-corruption agencies can use cost monitoring mechanisms to track actual public spending in the water sector and compare this to the forecasted estimates, potentially

identifying red flags that indicate corruption (Adam et al. 2020). INFObras, in Peru, is an information system in the comptroller’s agency for public works which seeks to increase the transparency of public works through aligning information systems, particularly matching information on public works with information about their physical progress (WIN 2016). Similarly, supreme audit institutions play a role in holding public institutions accountable (WIN 2016). It thus important to ensure that they are not ignored, are well staffed and are independent. Furthermore, for their assessment to bear results, prosecution should follow if a report finds flagrant offences (WIN 2016).

### **Open government approaches**

Open government approaches can help strengthen institutional capacity as well as improve communication between different stakeholders, which can lead to improvements in the provision of water services. A detailed document to create a water and open government commitment and action plan can be found [here](#). Open government has the potential to improve the governance and performance of water services by helping to create a proper environment for it to work in (Avello et al. 2021). Specifically, the [Open Government Partnership](#) (OGP) enables city governments to bolster the links between water and open government through a local strategy and the Community of Practice on Water and Open Government, which its explained in more detail in the CSO section (Avello et al. 2021).

Similar to the TAP-A approach, the OGP’s core principles to improve water, sanitation and hygiene (WASH) governance are: effective participation; transparency and open data; accountability; and inclusion, diversity and gender equality (Avello et al. 2021). To achieve effective participation, local governments should engage and coordinate directly with all water stakeholders (Avello et al. 2021). Transparency and open data in the WASH sector will help improve performance and make evidence-based decision-making possible at national and local levels while enhancing accountability between

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service providers and water users (Avello et al. 2021). The accountability principle requires access to information in a timely manner to ensure that citizens can influence water sector projects (both in their designs and implementation (Avello et al. 2021). These principles help curb corruption in the water sector, but inclusion, diversity and gender equality are the key to reaching the most vulnerable (Avello et al. 2021).

Several countries in the LAC region have made progress in the water sector through OGP.

- In Paraguay, the government adopted a digital platform overseen by the civil society, municipalities and donor groups on rural water and sanitation information – SAISAR – (OGP n.d.).
- In Brazil, a data platform allowed the public to monitor the Water for All water resource management programme (OGP n.d.).
- Mexico is committed to implementing the recommendations from the [Natural Resources Transparency Index](#), a civil society project that seeks to ensure natural resource sustainability through the participation of all interested citizens. To comply with this, Mexico is committed to, among others, promoting monitoring groups (government and civil society) and improving the quality of public information regarding water sources management by 50 per cent (OGP n.d.).
- Honduras is committed to improve drinkable water services by enhancing the basin management and expanding the monitoring and social contract model (OGP n.d.). The commitment included the development and strengthening of monitoring and control local units, composed of community members (OGP n.d.).

### **Open contracting and integrity pacts**

Similarly, governments can use the [Open Contracting Global Principles](#) to advance open contracting, which fosters transparency and

accountability by making relevant information on public contracts easily available. According to [Open Contracting](#), several public agencies in countries in the region are already using the [Open Contracting Data Standard](#). This is a standard for the publication of information related to public contracts, from the planning stage until the implementation phase. Another useful tool is the [Methodology for Assessing Procurement Systems](#) (MAPS) developed by the OECD, which assesses procurement systems in their entirety.

Integrity pacts can also be a useful anti-corruption tool in public contracting (WIN & Transparency International 2010). An integrity pact includes an agreement between a government or public agency and all bidders for a public sector contract, by which they all commit to not paying, offering, demanding or accepting bribes. Additionally, bidders commit to not colluding with competitors or bribing public officials while carrying out the contract. The implementation of the pact is overseen by an independent monitor, who ensures everyone is upholding their commitments (WIN & Transparency International 2010).

For an integrity pact to work properly, the following conditions are important: political will of the authority; maximum transparency at each step; external independent monitoring system; and multi-stakeholder involvement. It is especially important to choose a good independent monitor, since this entity is in charge of ensuring the pact is implemented and thus is the source of credibility and reassurance for all parties and the source of information for the public (WIN & Transparency International 2010). For more detailed information as to how to implement an integrity pact in the water sector, see [WIN and Transparency International's 2010 manual](#).

In Mexico, two water projects, El Cajon and La Yesca, used elements of the integrity pacts for their implementation (WIN & Transparency International 2010).

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In El Salvador, the National Water and Sewerage Administration signed three integrity pacts with the bidding companies for tenders for pipe replacement. In these agreements, they commit to refrain from corrupt practices and a monitor, typically from civil society, oversees the whole process (UNESCO 2019). In this case, the overseer was the Foundation for Studies on the Application of Law (FESPAD), and the UNDP-SIWI Water Governance Facility also signed the pact as an international witness (UNESCO 2019). The Spanish Agency for International Cooperation and Development (AECID) further supported the work.

## Service providers and utilities

A lack of integrity directly threatens public utilities' and service providers' performance, efficiency and long-term sustainability by increasing financial costs, reputational and legal risks, and ultimately reducing the quality and availability of services of water and sanitation, especially for the most vulnerable and marginalised. To manage the challenges presented by these failures, public utilities can implement tools to assess, prioritise and address integrity risks.

Available tools for water utilities include the [integrity assessment tool for water utilities](#) and the Water Integrity Network's [Integrity Management Toolbox](#).

The main objective of the assessment tool is to evaluate how prepared an organisation is to prevent corruption risks from materialising, and consists of principles, indicators and components. This in turn is used as a starting point to improve the organisation's performance (Allakulov et al. 2020). The assessment tool is currently being piloted by the Water Integrity Network in Latin America.

The Integrity Management Toolbox is a participatory approach that helps raise workplace ethics awareness and implement integrity management practices (WIN 2018). It is a key

element of business management, and it helps communicate the organisation's values to the staff while providing tools that help detect risks and prevent and sanction rule violations (Hermann-Fried et al. 2014b). The toolbox aims to increase awareness that integrity management can bring benefits to the business and focuses on how to manage an integrity change process (Hermann-Fried et al. 2014b).

The Integrity Management Toolbox has already been used in several countries in Latin America, including in Costa Rica (WIN 2015), Honduras (WIN 2018), Ecuador (WIN, SIWI, cewas, 2016–2018), Paraguay and Argentina (WIN, SIWI, cewas, 2019–2021).

Utilities providers should seek transparency in three key dimensions: outreach and openness; dialogue with users and participation of relevant stakeholders; and controls for integrity (Barreti-Dilon et al. 2018). A study conducted in four water utilities in Latin America found that transparency had a positive relationship with efficiency, which can be a point of entrance to convince utility providers to implement transparency reforms (Barreti-Dilon et al. 2018).

Water companies could therefore be encouraged to join the [CEO Water Mandate](#) from the UN Global Compact, which helps companies to implement and disclose water sustainability policies and practices.

## CSOs and citizen initiatives

Incorporating transparent and participatory mechanisms to enable civil society groups, citizens and affected communities to provide inputs into the decision-making process can help prevent undue influence of powerful – often corporate – players (UNESCO 2019). Bottom-up approaches help build a base of support for change (WIN 2016), and citizen oversight can be a barrier to corruption (WIN 2020a). Furthermore, the involvement of more vulnerable user groups and community

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based organisations can lead to greater accountability and thus better performance (UNESCO 2019).

Citizens and CSOs can use the accountability mapping guide to assess accountability within the water and sanitation sector and produce graphical representation of accountability relationships between actors (Avello et al. 2021). The [facilitator's guide](#) provides methods to understand accountability in the sector and plan improvements.

The [AVINA Foundation](#) promotes the democratic governance of water resources, seeking multi-sector participation in water planning and its related public policies. The foundation formed a Community of Practice on Water and Open Government that includes the Open Government Partnership (OGP), the Stockholm International Water Institute (SIWI), the Water Integrity Network (WIN), and the World Resources Institute (WRI).

The community is intended to facilitate the development of approaches that can foster transparency, inclusive participation and accountable decision-making to improve water services (WIN 2019a). Its recent [declaration](#) emphasised the need for greater transparency in areas including the financing of the water sector and emergency responses (OGP 2021).

Relevant experiences from the LAC region that have emerged out of the community of practice include the creation of a mobile app to report disturbances in the water pipes in the Dominican Republic; the strengthening of supervision and control units in Honduras to monitor water service delivery providers; and the co-creation of a national water plan by the government and civil society in Uruguay (WRI n.d.).

Several cases have demonstrated the impact of ensuring public participation in policy decisions for higher transparency and legitimacy of water and sanitation services (OGP n.d.). Uruguay launched

a successful dialogue in 2016 that gathered nearly 2,000 government representatives, citizens and academics to discuss the development of Uruguay's national water plan over the course of six months, after which the government approved the plan (OGP 2018). Additionally, the Uruguayan government committed to strengthening participatory spaces by incorporating digital tools and promoting the topic of water in education spaces to formulate integrated water resource management plans (OGP n.d.). Mexico committed to promoting inter-institutional coordination and active citizen participation to establish a [system with updated information](#) on water licences and extraction (OGP n.d.).

In Chile, as part of the OGP process, the Water Directorate developed a web app to access information on water use licences and to make it easier to file damage complaints (OGP 2019).

CSOs can also help bolster transparency. For example, in Argentina, a collective of water organisations helped monitor the quality of water service provision, and the data then informed policies at the province and municipality levels (Avello et al. 2021).

Other multi-stakeholder approaches can be directed at the international aspect of water management. For example, the Global Water Partnership (GWP) organised a roundtable between six Central American countries, Mexico and the Dominican Republic to facilitate the coordination of the 25 international watercourses and 18 transboundary aquifers present in Central America (GWP 2020).

Initiatives like the 2030 Water Resources Group ([2030 WRG](#)) is a public, private, civil society partnership hosted by the World Bank that seeks to help countries close the gap between water demand and supply by 2030. Their work is based on four principles: inclusivity, transparency, accountability and integrity. Their work in Peru has helped build a transparent and high-level dialogue



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between the government, the private sector and civil society (2030 WRG n.d.).

It is important to collect input from affected communities and under-represented organisations, particularly women and indigenous communities when relevant (OGP n.d.). In Mexico, Cántaro Azul, which seeks to ensure access to safe water in rural communities, realised it was important to develop a social component to the technological services (Gutiérrez Vizcaino 2019). They identified that one major challenge was that people did not know their rights nor the water quality criteria, which made it harder for them to demand quality services (Gutiérrez Vizcaino 2019). The Integrity Management Toolbox for Small Water System Supplies helped Cántaro Azul greatly to build their own community solutions (Gutiérrez Vizcaino 2019). According to one of the key leaders involved in the process, the toolbox helped them identify what they wanted to do and build a working plan while using a self-management approach (Gutiérrez Vizcaino 2019).

There are water management organisations that provide access to online information, like the [Water Management Transparency Index](#) from Transparency International Spain, that assesses how much relevant information has been made available by a water agency (Trapnell et al. 2017).

Finally, independent media can be an important ally in identifying corruption in the water sector. However, ensuring freedom of the press and the security of journalists is not a given anywhere, much less so in Latin America. In 2014, a Mexican journalist was detained and spent 10 months in jail after filming a demonstration outside the Water Commission in the state of Quintana Roo (WIN 2016).

## Holistic sectoral approaches

The OECD has developed a water governance framework that can be applied at the different governance levels (local, basin, national and so

on) and to different water uses (resource management, water services, reduction of water disasters, for example) (OECD 2018). The framework is based on a bottom-up and multi-stakeholder approach, considering that both the challenges and responses regarding water governance are highly dependent on location and context (OECD 2018). It evaluates, with a traffic light system, the water governance system conditions, the planned changes and how much support the evaluation gains from the relevant parties (OECD 2018).

The main goal is to promote a transparent, inclusive, open and future-looking dialogue between all relevant parties. It is a tool for voluntary self-evaluation to assess the policy frameworks, the institutions and the tools regarding water governance to improve them over time and to move from a report preparation to a more hands-on approach (OECD 2018). It is easy to replicate, and CSOs can use it to evaluate the sector.

It is important to strengthen multi-stakeholder efforts to curb systemic corruption by adopting cooperative approaches at different levels; developing risk assessments; connecting different actors working on anti-corruption initiatives in the sector; and using the role of international cooperation and funding to promote integrity and anti-corruption mechanisms (OGP 2021).

Stakeholder mapping is the first step in holistic approaches and entails identifying who is (and who should be) involved in the decision-making processes in the sector (WIN 2016) as well as the roles and responsibilities of different actors in the sector. It is also important to know their priorities, as well as the risks and strengths of the constellation of relevant actors.

Open government and water reforms can also be initiated by any stakeholder in a city in a four-step approach (Avello et al. 2021). The first step is to understand the water service delivery and engage



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with key stakeholders. Then the governance gaps in the water sector are identified, followed by an outline of the factors to be considered to achieve a higher impact. A useful framework to identify the water governance gaps can be summarised in analysing the “what” (core functions), the “how” (how the principles are implemented), and the “what for” (what are the outcomes) (Avello et al. 2021). The final step is to establish a mechanism to track progress and to follow-up (Avello et al. 2021). The commitments need to fulfil a minimum SMART criterion: they have to be specific, measurable, answerable, relevant and time-bounded (Avello et al. 2021).

All relevant stakeholders need to be involved in anti-corruption and integrity processes, but it is important to balance their interests fairly, with particular attention to the poor and marginalised (WIN 2016). The Delft Statement recommends that multi-sector approaches consider the links between water, food production and energy supply (WIN 2016).

In addition, it is important to think about inclusion, diversity and gender equality to ensure that the most vulnerable communities – including those in informal settlements – are reached (Avello et al. 2021). Thus, the intersection between poverty and other sources of discrimination should be taken into account at all times. The [Gender and Water Alliance](#) and [Women for Water Partnership](#) have been working on water and gender for some time. The Women for Water Partnership seeks to empower women in decision-making processes to achieve the Sustainable Development Goal of access to safe water for all.

Specific, gender-sensitive actions that can be taken in this regard include (WIN 2016):

- promoting gender budgeting in the sector
- ensuring all programmes start with a gender analysis and involve women in planning
- providing gender-targeted programmes

- raising awareness as to the particular impacts water corruption has on women
- recognising sextortion as a specific form of corruption
- supporting women’s grassroots organisations

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