

# U4 Helpdesk Answer

U4 Helpdesk Answer 2022

## Core principles for the development of anti-corruption strategies.

### Practices from around the world

There exist several international benchmarks to guide the development of anti-corruption strategies, as well as studies that provide additional guidance.

The responsibility for drafting the strategy should be clearly assigned to a small group, but strategy development also requires high-level commitment and broad consultation. The strategy should have a coherent theory of change, based on a robust problem analysis and set out clear interventions to address identified priorities. The formulation of an action plan requires detailing specific measures and activities, as well as sequencing and clearly distributing responsibilities for each activity; establishing relevant indicators with baselines, milestones and targets; and conducting costing and feasibility assessments. For the implementation phase, it is important to display consistent and coherent leadership, to secure proper coordination and to ensure that the strategy has adequate resources, both in terms of budget and personnel. Finally, the monitoring and evaluation stage should have clear monitoring mechanisms, rely on independent progress validation and leave space for making course corrections.

As Anti-Corruption strategies have become prominent in recent years, this paper draws on recent strategies to illustrate the principles mentioned above with practices from around the world.

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# Query

Please provide an overview of the core principles for developing, implementing and monitoring anti-corruption strategies. Please also provide real-world examples of good practice in regard to these principles.

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## Caveats

This paper attempts to distill good practices from a range of national anti-corruption strategies. This task would be easier for researchers if national authorities made more information from monitoring and evaluation publicly available. The cases included in this paper should be considered illustrative, as they have not necessarily been definitively proven to have yielded particularly impressive results. Finally, while the focus of this Helpdesk answer is on national strategies, much of the substance would also apply to sector-specific strategies.

## Introduction

There are several existing international benchmarks for the development of anti-corruption strategies, chief among which are:

- UNODC's 2015 *National Anti-Corruption Strategies: A Practical Guide for*

## MAIN POINTS

- The main principles for the development of anti-corruption strategies can be divided into five core phases of elaborating a strategy.
- Drafting process: overall responsibility for the strategy should be clearly assigned, political support of the highest level secured, and broad consultations led to collect inputs for the strategy.
- Theory of change: a robust problem analysis and a logical framework that clearly link the problem to the prioritised objectives.
- Formulation of an action plan: it should clearly outline the activities and measures, as well as how they will be prioritised and sequenced and who will be in charge of each one. Indicators with baselines, milestones and targets should identified and costs and budgeting taken into consideration.
- Implementation phase: good implementation comes with assigning the leadership of the strategy to one executive body and outlining the coordination mechanisms between all the relevant actors, including international networks.
- Monitoring for adaptive management and iterative programming.

*Development and Implementation* (UN, 2015),

- UNDP’s 2017 *Anti-Corruption Strategies: understanding what works, what doesn’t and why* (UNDP, 2017),
- the G20’s *High-Level Principles for the Development and Implementation of National Anti-Corruption Strategies* (G20, 2020),
- and the OECD’s 2020 *Public Integrity Handbook* (OECD, 2020).

Together, these materials cover the major considerations for anti-corruption strategies, from securing high-level political support, to an inclusive drafting process, an evidence and risk-based approach to prioritising objectives, ensuring adequate budget allocations and a robust monitoring strategy.

As such, there is by now fairly broad consensus around good practice. Generally speaking, the major principles can be sequenced into five phases.

1. Drafting process
  - a. Assigning clear overall responsibility
  - b. Securing political support
  - c. Conducting broad consultation
2. Coherent theory of change
  - a. Developing a robust problem analysis
  - b. Formulating clear interventions to address identified priorities, and setting out underlying assumptions
3. Formulation of an action plan
  - a. Detailing specific measures and activities, as well as sequencing and clearly distributing responsibilities for each activity
  - b. Establishing relevant indicators with baselines, milestones and targets
  - c. Conducting costing and feasibility assessments
4. Implementation phase

- a. Displaying consistent and coherent leadership
  - b. Pursuing (inter-institutional) coordination
  - c. Ensuring adequate resourcing
5. Monitoring for adaptive management and iterative programming
    - a. Monitoring mechanisms and commissioning independent progress validation
    - b. Making course corrections

## A clear and inclusive drafting process

The process of drafting a national anti-corruption strategy is widely seen to be equally important as the resulting content of the strategy itself. The OECD stresses that “an inclusive and rigorous strategy development process can help select relevant strategic objectives that are meaningful to citizens and businesses; prioritise and sequence actions in an open manner to address the most crucial integrity risks; and provide the necessary evidence for the interventions that are most cost-effective and likely to have the greatest impact” (OECD, 2020).

However, while the strategy drafting process is crucial and should not be rushed, the U4 Anti-Corruption Resource Centre recommends that the process be time-bound with clear deadlines for finalisation so that the absence of an approved strategy does not become a pretext for inaction (U4, no date).

### Box 1: A strategy for strategies: Colombia

Colombia has an overarching strategy that requires all public entities to design and implement their own anti-corruption and citizen service plans, that takes several core principles into account. Before drafting the plan, each entity should establish 1) the strategic context, which includes, among others, an assessment of the procedures and services of the entity, the information needs, and an overall view of corruption risks; 2) responsible areas, with leaders

appointment for each of the plan's actions; 3) a budget, clearly earmarking the resources the entity has to implement the plan; 4) goals; and 5) indicators (Presidencia de la República de Colombia, 2015:8).

## Overall responsibility

According to UNODC, responsibility for drafting an anti-corruption strategy should be assigned to a small, semi-autonomous group (UN, 2015: 5). The OECD Public Integrity Handbook (OECD, 2020) states that when drafting a strategy that involves several bodies, one option is to assign the primary responsibility for drafting the strategy document to a small committee and granting it a reasonable degree of autonomy in developing the draft; it is recommended that this committee is composed of representatives from the public bodies who will be accountable for the strategy's implementation.

### Box 2: Responsible entities

Most strategies clearly specify which entity or group will oversee the elaboration of the strategy. For example, in Kosovo, the current strategy appoints the Office of the Prime Minister to be responsible for drafting the next strategy<sup>1</sup> and the Anti-Corruption Agency as responsible for monitoring the activities of the action plan (Republic of Kosovo, 2020:4). In Lebanon, the Ministerial Anti-Corruption Committee with its supporting technical committee led the development of the strategy. In Peru, the High-Level Commission of Anti-Corruption was tasked with the elaboration of an Integrity and Fight Against Corruption Plan. In Indonesia, the Anti-Corruption Commission hosts the secretariat of the National Team responsible for the National Corruption Prevention Strategy with staff seconded from the Ministry of Home Affairs, the Ministry of Administrative and Bureaucratic Reform, the

President's Office, and the Ministry of National Development Planning (Stranas PK 2021).

## Political support

According to the UNODC, for any anti-corruption strategy it is vital to ensure the consistent support and involvement of senior political leaders (UN, 2015: 6). The G20 High level Principles (G20, 2020: 2) likewise stress that those drafting the strategy should be provided with "the necessary highest level of political support to be effectively autonomous from undue influence during the design process." The OECD Public Integrity Handbook (OECD, 2020) also states that "a strategic approach requires high-level commitment during the strategy design process, as well as ensuring that the approach avoids overly rigid compliance objectives and places emphasis on promoting cultural change within organisations."

The technical output that the drafting process produces will be meaningless if the resultant strategy proposes measures that are politically infeasible. The seminal 2017 World Development Report's examination of the role of political power in governance processes implies that anti-corruption strategies should adopt one of two broad approaches (World Bank, 2017). First, "working with the grain", by building on existing power structures and seeking alignment with prevailing social norms. Alternatively, propose means to reshape the policy arena to increase the range of anti-corruption interventions that can be realistically implemented. According to the World Bank (2017) the best way to do this is to try to shift elite preferences or actively attempt to enhance the contestability of policies by introducing new actors in decision-making.

Those charged with developing the strategy would be therefore well advised to develop a profound understanding of policy priorities of the major

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<sup>1</sup> The next strategy is to be designed after the approval of the Law on the Anti-Corruption Agency and the Law on Prevention of Corruption.

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political actors, as well as whether these are immutable or could be subject to change during the implementation period, for instance, due to elections. Where possible, this could entail discussions not only with the party in office, but also with representatives of the parliamentary opposition in relevant committees and other bodies (UN, 2015: 8). As well as ensuring that the proposed activities are ambitious but realistic, this exercise can also help inform contingency planning thereby helping to ensure that the strategy can capitalise on windows of opportunity that may emerge.

Those drafting the strategy could try to consolidate political support for reform by pointing to the tangible political and economic advantages that would result from lower levels of corruption, as well as underscoring policy commitments made at high-level summits (U4, no date). Such political will is often elusive, however, and where political support is lacking, anti-corruption strategies can seek to prioritise technocratic changes that are not likely to generate widespread political opposition. This could include bringing legislation into line with relevant standards, transposing directives into national law, or focussing on integrity and corruption issues in local or municipal administrations. Those drafting the strategy could also seek to devise measures that align with the interests of identified allies and potential anti-corruption champions, such as working with the business community to establish a level playing field and create conditions favourable to international investment, or empowering citizens to hold service providers to account for their performance (U4, no date).

#### **Box 3: Tone from the top depends on how anti-corruption is viewed by those in power**

The value of political commitment is no secret, just as the lack of it is a common lament among anti-corruption practitioners. The terms in which corruption is perceived by the government of the day is crucial; too often anti-corruption agendas are viewed by incumbents as an overseas development issue, an unwelcome foreign imposition on matters of national sovereignty or

merely an instrument of political rhetoric to castigate opponents. One of the first tasks of the drafting committee may therefore be to marshal evidence on the severity of the problem corruption poses to the government of the day and help frame the issue in terms the administration cares about – thereby shifting elite incentives, preferences and beliefs (World Bank, 2017).

The Biden administration's decision to classify corruption as a core national security interest seems to have been pivotal in bringing much-needed momentum to cross-governmental efforts to tackle the problem in the US. The recent *United States Strategy on Countering Corruption* emerged in response to these national security concerns and brings the impetus needed to get the wheels of government moving, from the US Treasury, to the State Department, the Department of Commerce, the Justice Department, USAID and even the Office of the Director of National Intelligence. The strategy makes it clear that the White House expects these agencies to prioritise anti-corruption efforts, dedicate the needed resources and coordinate amongst themselves (White House 2021).

#### **Box 4: Acknowledging the importance of political support**

Although political will cannot be conjured out of thin air, the strategy's responsible entity can capitalise on particular windows of opportunity (such as a change in public opinion, a new government) or leverage another agenda that is a high priority for the government (such as economic growth or national security) and relate it to anti-corruption activities. Certain policy agendas will already have anti-corruption as an important component, such as accession to the EU or the OECD.

In Kosovo, the Anti-Corruption Strategy considers political will necessary for the Strategy to work. Specifically, the government needs to set priorities and activities and then guarantee that they are budgeted and implemented. The document also

mentions the importance of having the support from both the government and the opposition and involving all political parties in the Assembly on anti-corruption policy debates. Accentuating the importance combating corruption has on Kosovo's image and highlighting relevant findings from the European Commission's Progress Report (Republic of Kosovo, 2020: 13, 23) can serve as a reminder of how combating corruption is a prerequisite to EU accession, which can help garner more political support.

In Lebanon, the strategy recognises that political will has not always abounded but underscores positive changes. In recent years, both the executive and the legislative have showed their commitment with the issue and political parties have proposed specific anti-corruption actions (Republic of Lebanon, 2020:22).

## Broad consultation

UNODC states that one of the key factors for a successful strategy is regular consultation with all government agencies that will be affected by the strategy (UN, 2015: 7). The OECD Public Integrity Handbook (OECD, 2020) outlines that strategy development process should ensure the appropriate participation of actors responsible for carrying out any part of the strategy. Furthermore, the G20 High Level, Principle 2 asks countries to "take steps to ensure an inclusive design and development process" (G20, 2020: 3).

During the drafting stage when the strategy is under development, regular consultations with all government agencies affected by the strategy are advisable. Participants should not only include representatives of executive branch agencies, like the ministries of justice and interior, the police, financial intelligence units, ombudsmen, anti-corruption agencies, procurement bodies and civil service commissions, but also agencies outside the formal control of the executive, such as judges, legislators, audit agencies and subnational governments (UN, 2015: 8).

These discussions should improve the quality of the strategy's design by soliciting input from a variety of agencies in terms of their analysis of integrity challenges, potential solutions and the kind of operational detail crucial to smooth implementation, such as budgetary implications (UN, 2015: 10). Broad participation is also likely to heighten the sense of "ownership" of the strategy's success. In addition, it is probable that the frequent exchanges between different institutions involved in the process of drafting the strategy will lead to greater informal collaboration. In turn, this should improve different agencies' ability to cooperate on integrity issues during the strategy's implementation and monitoring stages (UN, 2015: 9).

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

### Box 5: Intra-governmental consultations

In Ghana, those drafting the strategy drew input from parliamentarians and the judiciary, while in Estonia the public prosecutor and competition law agency contributed to the strategy, and in Peru there were consultations with the supreme audit institution and the ombudsman (UN, 2015: 7).

Likewise, consultation with external experts, academics, civil society groups and citizen representatives can further strengthen the legitimacy of the strategy's core objectives and means of implementation.

### Box 6: Broader consultation exercises

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Strategies have become more participatory in recent years. The Mexican National Anti-Corruption Policy was the product of the analysis and systematisation of data collected through a national public listening exercise. Perspectives from citizens, civil society experts, academics, businessmen among other actors were collected and complemented with the analysis of diverse evidence, including official data, academic research, and documents from international organisations.

In South Africa, national and provincial public participation workshops were conducted as part of the development of the strategy (Republic of South Africa, no date:16). In Jordan, 240 meetings and 320 online questionnaires were conducted as part of the methodology to draft the strategy (Pyman, 2017:18).

In Chile, a participative plan was envisioned to build the National Anti-Corruption Strategy, taking into account a regional approach; gender, diversity and inclusion perspectives; and transparency. As part of the participative process, 155 activities took place, 1,554 people participated in dialogue days, five thousand people took part in approving the measures, 16,809 people responded to a survey regarding their thoughts on corruption in Chile, and 77 civil society organisations contributed to the process (Contraloría General de la República de Chile 2021: 9-10).

The Anti-Corruption and Citizen Service Plan of Bogota was also built in a participatory manner, summoning citizens, public servants and contractors to participate in the direction of transparent management. It included a survey conducted inside the entity asking the public servants what they thought were the biggest corruption risks in the processes they were involved in (Alcaldía de Bogota 2022).

In Malawi, an extensive consultative process was led involving stakeholders from the three branches of government, civil society, the private sector, faith-based organisations as well as the sectors of media, youth, academia and women (Republic of Malawi, no date:3-4).

The Argentinian National Integrity Strategy aspired to broad citizenship participation. To achieve this, it was decided to involve society in the design and implementation of integrity and transparency policies, through the expansion of the Advisory Council. The composition of the Advisory Council for the design of this strategy sought to ensure a plural and balanced representation, with actors from across the country, from different social sectors and backgrounds and with a gender perspective (Oficina Anticorrupción 2021a).

The U4 (no date) has argued that gathering the views of local communities and ensuring that the anti-corruption strategy addresses their concerns is more important than tick box compliance exercises to appease international observers. Placing the preferences expressed by local citizens and businesses at the heart of the strategy can also help avoid a scenario in which policymakers attempt to simply transpose other countries' anti-corruption strategies that likely have limited relevance to the experience of local people.

#### **Box 7: The public consultation procedure in Latvia**

Anti-corruption strategies that are developed with a high degree of transparency and public participation are able to benefit from the input of a wide range of stakeholders. A good example is that of Latvia, which in 2009 established a mandatory minimum 30-day public consultation period for draft government policies, including anti-corruption strategies.

Regulation No. 970/2009 stipulates that no later than 14 days before any draft strategy is officially submitted to the State Secretary or other decision-making body, notifications regarding opportunities for public participation must be published on the website of the relevant government body (such as the Corruption Prevention and Combating Bureau in the case of anti-corruption strategies). Once the strategy has been submitted to the State Secretary, an inter-governmental consultation commences to allow for further comments to be submitted. If there

are objections, further meetings are organised, and inter-governmental consultation continues until there are no objections or until the strategy goes to the Cabinet of Ministers with some objections left (Likumi, 2013).

#### Box 8: Consultation in two phases in Lebanon

In Lebanon, the anti-corruption strategy was developed in consultation with a wide variety of actors, that represented all three branches of government, as well as public sector officials, the civil society and the private sector. Over the course of ten months, 22 meetings were sustained, and a draft strategy was developed. This strategy was then evaluated and revised. The main recommendation was to develop an implementation framework. With support from UNDP, a second round of consultations began. After the second round of consultations, an implementation framework with detailed, targeted and achievable results was drafted (Republic of Lebanon, 2020:6, 12-13).

#### Box 9: Human Rights and Gender Perspectives

Gender considerations and human rights should be taken into consideration at every step of the process, from the stages of strategy conception to its implementation (Merkle, 2018). The Argentinian National Integrity Strategy emphasised the importance of incorporating a human rights perspective and of considering the differentiated impacts corruption has on women, as well as discriminated and vulnerable groups. The strategy thus takes into consideration the different forms of inequality corruption (re)produces.

## Towards a coherent theory of change

A coherent overarching theory of change is increasingly recognised as pivotal to anti-corruption interventions. For instance, the G20 High Level Principle 5 (G20, 2020: 4) recommends that strategies “articulate a clear vision, explaining why action against corruption is needed and how

planned activities will contribute to the achievement of that vision.”

A good theory of change requires an explicit mission statement, a strong problem identification, and clarity in terms of the interventions and the outcomes that are needed to effect change, as well as the underlying assumptions for these outcomes to materialise (UNDG, 2017). Moreover, the implied links between these various elements need to be clearly spelled out, to provide a coherent connection across the results chain, from the foreseen activities right the way through to desired high-level results.

#### Box 10: A system approach

In Mexico, the extensive information collection and analysis was the basis to identify the characteristics of corruption in the country. The [Mexican National Anti-Corruption Policy](#) identified high levels of impunity regarding corruption, from detection to sanction; high levels of discretion; the distortion of points of contact between government and society which cause corruption; and the weak involvement of different sectors of society in controlling corruption (Secretaría Ejecutiva del Sistema Nacional Anticorrupción 2020: 12). Identifying these issues allowed for a systemic diagnosis of the problem, which was, in turn, the basis for the elaboration of the policy.

Since the problem was seen to be systemic, the main objective of the policy is to ensure the coordination of all public entities and involve different sectors of society to guarantee an effective control of corruption. In turn, four policy axes arose from this objective: 1) to fight corruption and impunity; 2) to fight arbitrariness and the abuse of power; 3) to improve public management and the points of contact between government and society; and 4) to involve society and the private sector (Secretaría Ejecutiva del Sistema Nacional Anticorrupción 2020: 13). The objectives of the policy are directly related to the identification of the problems, addressing each one of the causes identified. A diagnosis on each of those axes was also conducted as part of the strategy, which

allowed the identification of the conditions that increase corruption risks in different areas.

## Robust problem analysis

The G20 High Level Principle 1 emphasises the centrality of a “preliminary diagnostic [assessment] of the strengths and gaps of the existing framework”, while Principle 3 states that countries should “undertake a corruption risk analysis and, if needed, strengthen systems for the collection and use of data” (G20, 2020: 2-3). UNODC’s Guide recommends that governments drafting anti-corruption strategies “conduct a preliminary diagnosis of corruption challenges” (UN, 2015: 13).

This robust diagnostic stage is key to the success of any anti-corruption strategy. It can involve political economy analysis, stakeholder mapping, corruption risk assessments and other forms of evidence gathering, including commissioning further background studies and research.

### Box 11: Background sociological and criminological studies

In Romania, for example, to inform for the development of the next National Anti-Corruption Strategy, the Ministry of Justice commissioned a special study in 2020, entitled *Causes and Determining Factors of Corruption: Criminological Research Report: Qualitative and Quantitative*. As well as surveying a nationally representative sample of 1,365 public officials to gauge views about corruption and its drivers from “insiders”, the authors of the study also conducted in-depth interviews with a range of people convicted of corruption to gather information on potential motives and red flags.

### Box 12: Combing several sources to build a strong analysis in Malawi

In Malawi, the situational analysis of the anti-corruption strategy drew on indicators such as the World Bank’s Country Policy and Institutional Assessment and public opinion polls, which

included a Governance and Corruption Survey that showed Malawians perceived corruption as worsening (Republic of Malawi, no date:7-8). A national corruption perception survey was undertaken in 2019, and extensive research was conducted, including political economy analysis and interviews and focus group discussions with staff of the Anti-Corruption Bureau (Republic of Malawi, no date:4). The authors also delved into the outcomes and lessons learned from the previous strategy (2008-2013) to consider the gaps the new strategy would need to overcome.

Based on the evidence collected and a consultative process with multiple stakeholders, three concrete goals were identified: “1) to improve the quality and accessibility of public services for the benefit of all Malawians; 2) to strengthen the rule of law to ensure that crimes of corruption are effectively detected, investigated and ultimately punished; and 3) to promote a culture of integrity where corruption is widely repudiated and denounced in the interest of the common good” (Republic of Malawi, no date:4-5). Beyond the specific corruption-related goals, the Malawian strategy acknowledges the role corruption plays in thwarting access to quality public services and prioritises that issue as an overarching goal of the strategy. The goal of improving public service delivery was a strategic decision that seeks to bring visible change for users, who, it is hoped, therefore become engaged in the fight against corruption (Republic of Malawi, no date:21).

### Box 13: Previous strategies

The evaluation of previous plans and strategies is also a good starting point to identify lessons learned and possible obstacles. In Burundi, the Revenue Office evaluated its previous strategy and built its current strategy from the lessons learned from that experience. Among other things, this evaluation allowed them to recognise the importance of a participative approach that would help the employees of the Revenue Office implement the strategy (OBR, 2017).

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The Namibian strategy also starts with a review of its previous strategy and builds on the recommendations that arose from the evaluation (Anti-Corruption Commission of Namibia, 2021:10). In Peru, the evaluation of the previous strategy led to an emphasis on the importance of improving coordination mechanisms (Presidencia de la República del Perú, 2018:8). In fact, the Peruvian strategy has an entire chapter dedicated to reviewing the past plan and past anti-corruption initiatives (Pyman 2017:20).

#### Box 14: Household surveys and business surveys

The second chapter of Lithuania's 2015-2025 National Anti-Corruption Programme, which comes immediately after the introduction, assesses in considerable depth the findings of various sociological surveys relevant to corruption in the country, before moving on to reflect on the results of the previous strategy and sectoral analysis (Seimas of the Republic of Lithuania, 2015). The Programme considers four distinct surveys.

These include two surveys commissioned by external actors, namely the European Commission ([Eurobarometer](#)) and Transparency International ([Global Corruption Barometer](#)). The third survey is called the Lithuanian Map of Corruption, and is published periodically (see Data Europa, 2020; Transparency International 2021). The objectives of the Lithuanian Map of Corruption are to assess attitudes towards corruption among these groups, ascertain the reported incidence of corruption across government, identify corrupt practices and evaluate the willingness of different stakeholders to contribute to reform. Results from the 2014 edition were used to inform the development of the 2015-2025 Programme, and more recent iterations have been used to track progress (see Special Investigation Service of the Republic of Lithuania, 2020). The 2021 edition, for instance, surveyed 1,005 citizens, 503 business executives, and 697 civil servants (Special Investigation Service of the Republic of Lithuania, 2021 and 2022).

Finally, the 2015-2025 Programme also considered dedicated business surveys, such as the 2014

*Corruption in the Private Sector* survey carried out by the Law Institute of Lithuania (2014).

Using results from these surveys as baseline data, the Lithuanian Anti-Corruption Programme then included target values related to questions asked in these surveys as results level indicators for the Programme. For instance, while in 2014 31% of respondents to the Lithuanian Map of Corruption reported paying a bribe in the previous five years, the Programme set a target of 10% for 2025 as a means of assessing its impact (Seimas of the Republic of Lithuania, 2015: 34). Thus survey data can be especially useful when collected as part of ongoing longitudinal studies. At the outset of strategy development, it can point to corruption hotspots, during implementation it can serve as a useful progress indicator and at the end of the strategy it can give a high-level impression of impact.

Whatever source material is drawn on, establishing a solid understanding of corruption's drivers and enabling factors, as well as core vulnerabilities, is indispensable.

There is an ongoing debate within the anti-corruption field about whether whole-of-government approaches are preferable to sector-specific strategies (see UNDP, 2017; OECD, 2017; Hobbs and Williams 2017; OECD, 2018).

While some like Pyman arguing forcefully in favour of sectoral approaches (Curbing Corruption, 2022), UNDP (2017: 38) recommends that during the diagnostic phase, the analysis of shortcomings in the anti-corruption framework should be "overarching and holistic"; it is this broad analysis that can help the strategy's authors to identify critical sectors with a high risk of corruption. In Finland, for instance, once a "large spectrum risk mapping" had been conducted across all areas of government, a decision was taken to prioritise anti-corruption measures in certain high-risk sectors, including public contracting, urban planning, political finance, the construction industry, sport and trade (OECD, 2020).

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Once a clear evidence base has been marshalled, this should serve to inform the development of the proposed interventions, by pointing to existing loopholes in the anti-corruption framework, key weaknesses and vulnerable sectors or processes, potentially hostile actors and corrupt networks, as well as opponents of reform within the government and state institutions.

#### **Box 15: Recognising transnational dimension of corruption during problem analysis**

Rudolph (2022: 16) argues that “if kleptocracies are going to seamlessly cross borders with coordinated networks of actors and tools”, anti-corruption strategies should adopt a “whole-of-government approach that places particular emphasis on better understanding and responding to the threat’s transnational dimensions.”

It is therefore encouraging that some recent strategies have begun to comprehensively consider the transnational dimensions of corruption during the diagnostic phase. The formulation of each of the UK’s three primary outcomes for its [2017-2022 Anti-Corruption Strategy](#), for instance, made it clear each area had both a domestic and an international aspect:

- 1. Reduced threat to UK national security, including from instability caused by corruption overseas.*
- 2. Increased prosperity at home and abroad, including for UK businesses.*
- 3. Enhanced public confidence in our domestic and international institutions.*

Likewise, the new US [Strategy on Countering Corruption](#) includes measures for “home and abroad” in each of its strategic pillars, ranging from matters relating to enforcement, offshore finance, digital assets, anti-money laundering, beneficial ownership transparency, real estate and “enablers” such as lawyers, investment advisors and escrow agents who bridge domestic and foreign jurisdictions (White House, 2021).

The South-African strategy gives transnational corruption a prominent role, and the strategy’s fifth pillar is to “strengthen the resources, coordination, transnational cooperation, performance, accountability and independence of dedicated anti-corruption agencies” (Republic of South Africa, no date:10).

In Senegal, the strategy’s evaluation revealed that the efforts in police international cooperation, especially in the area of extradition, were insufficient. The strategy also mentioned that the country had difficulties pursuing crimes committed abroad and, particularly, identifying beneficial owners. The strategy’s specific objective 2.3 is thus to reinforce international cooperation (République du Senegal, no date:38,55).

In Indonesia, a strategy on international cooperation and asset recovery was presented as part of the broader Corruption Prevention and Eradication strategy. One of the objectives was to increase cooperation with foreign law enforcement agencies (Ministry of National Development Planning of Indonesia, 2013).

The diagnostic phase should thus consider the role of foreign institutions, actors and networks in corruption, as such analysis is naturally a pre-condition to targeted activities such as financial investigations, sanctions, entry bans, prosecutions or asset seizures (Rudolph, 2022: 13).

#### **Box 16: International initiatives**

Countries can choose to involve themselves in transnational initiatives, and several strategies are framed in this broader international context.

According to Pyman (2018:29), there are three kinds of transnational initiatives:

*“those that need transnational collaboration to address transnational problems (e.g. money laundering, beneficial ownership);*

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*those that benefit from transnational approaches to national level issues (e.g. public procurement, standards for public officials);*

*those involving transnational collaboration on corruption in specific sectors (e.g. extractives 8UK Summit, G20), and Fisheries, Forestry, and Construction (G20))”.*

The French Anti-Corruption Strategy mentions several international texts and initiatives to fight against corruption, like the UN’s 2030 Agenda, the European Consensus on Development, the United Nations Convention against Corruption (Merida Convention) and the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD) (République Française, 2021:9-10). It commits to raising France’s anti-corruption actions to the highest international and European standards and provides a framework to ensure French actions abroad do not fuel corruption (République Française, 2021:11).

For many countries, international commitments play an important role, and the UNCAC features prominently in numerous strategies. For example, the objectives of the Anti-Corruption Strategy of Kosovo took into account international requirements as well as reports published by international organisations. Although “*Kosovo is not a party to most international anti-corruption conventions, including the United Nations Convention against Corruption, due to issues related to its status*” it is making considerable efforts to harmonise its legislation with them (Republic of Kosovo, 2020:9).

Lebanon took ratification of the United Nations Convention Against Corruption as an opportunity to re-evaluate the country’s anti-corruption system and special committees were tasked with assessing different UNCAC chapters, as part of the preparatory work to develop the anti-corruption strategy (Republic of Lebanon, 2020: 11). The Namibian Anti-Corruption Strategy states that State Parties of the convention are required to develop and implement anti-corruption strategies

(Anti-Corruption Commission of Namibia, 2021:14) while the Senegalese strategy mentions the application of article 5 of the UNCAC (République du Senegal, no date:27). Paraguay takes as a starting point the Kuala Lumpur Statement on Anti-Corruption Agencies and its recommendations to develop its Integrity and Anti-Corruption Plan (Gobierno Nacional de Paraguay, 2020:10). In Peru, the Integrity Strategy of the OECD has a prominent role in the elaboration of the Integrity and Anti-Corruption Plan (Presidencia de la República del Perú, 2021:11).

## Formulation of objectives

To articulate how change is expected to happen, it is crucial to clearly link the problem analysis to a set of prioritised objectives, assumptions and risks in a logical framework that forms the core of the overarching theory of change.

Most countries that have published anti-corruption strategies have adopted a hierarchical architecture of objectives, with one well-defined general objective for each strategic priority or major deficit and more specific objectives grouped under these high-level objectives (Pyman, 2017). Regardless of the number of tiers of objectives a strategy proposes, solid rationale should underpin the selection of objectives and a summary should explain how they were devised based on the available evidence. Moreover, it is important to explicitly describe how the objectives will contribute to the accomplishment of the envisioned results.

It is recommended to clearly link the proposed interventions to a set of underlying assumptions and a monitoring framework. This can help account for any attribution problems and policy lag. It also allows for the foreseen approach to be adapted if circumstances change during implementation. Ideally, contingency planning would be built in at early stage of drafting. One way to do this is to list a menu of various policy options (“pathways”) that would likely contribute to the achievement of the desired objective and could be considered in different circumstances.

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## Development of an action plan

The G20 High Level Principle 6 (G20, 2020: 4) proposes that governments should “develop an action plan to address identified priorities of these anti-corruption strategies.” Similarly, the OECD Public Integrity Handbook (OECD, 2020) states that after conducting problem analysis and establishing objectives, the next step is “plan the specific activities needed so the objectives can realistically be met.”

The development of an action plan, as the last major step in the drafting process, should be time-bound with clear deadlines, so as not to delay implementation or drag on and become a pretext for inaction.

### Fine tuning of measures and activities, prioritisation, sequencing and distribution of responsibilities

Once broad objectives have been set, it is crucial to disaggregate these into more specific measures, policies, and reform initiatives.

Various sources could be considered when identifying potential activities for inclusion in the strategy. First, outstanding international commitments, such as those from GRECO evaluations, UNCAC review mechanisms or OGP action plans, can be identified and included. Second, the existing work plans of key integrity agencies, such as anti-corruption agencies or audit institutions can be reviewed for relevant activities and potential synergies. Third, input gathered through consultations with academics, think tanks, civil society, the business sector and citizens can and should inform the development of the action plan.

**Box 17: A cross-governmental approach to developing an action plan in Finland**

A multi-stakeholder approach involving law enforcement, civil society and municipal governments was adopted in Finland to develop specific measures to meet the national anti-corruption strategy. Building on the strategy’s six objectives, the multistakeholder group drew up more detailed action planning, encompassing twenty-three specific reform measures, and prioritising these on the basis of data analysis, statistics and risk mapping conducted by the police, the Office of the Parliamentary Ombudsman, the Finnish Competition and Consumer Authority, and the Tax Administration as well as from Transparency International Finland (Pyman, 2018: 13).

It is important, however, that an anti-corruption strategy does not merely become the sum of its constituent parts. An agglomeration of existing commitments and work plans submitted by different bodies will add little overall value. As discussed above in the section on problem analysis, it will be more productive to first begin with a wide-ranging diagnostic assessment to identify critical systemic shortcomings and determine how to address these vulnerabilities, rather than starting with a review of relevant agencies’ existing operational level activities and working “upwards” to define overarching priorities.

Responsibility for the achievement of each foreseen activity should be clearly assigned to one lead body which is accountable for the success of that part of the strategy. Activities may be broken down further into specific tasks, each with an approximate timeline for implementation. Clear deadlines for discrete phases of implementation can help track progress later to identify leaders and laggards. The resulting action plan should provide a logical roadmap to accomplish stated objectives, rather than a shopping list of diverse pledges from relevant bodies.

### Box 18: Clear deadlines and responsibilities

The Mexican National Anti-Corruption policy established 40 policy priorities with clear implementation leaders and different time frames:

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short-term (3 years or less), medium-term (between 3 and 6 years) and long-term (more than 6 years). The actions and projects for each of those 40 priorities are linked to the anti-corruption cycle (prevention, detection, investigation and sanction) and need to consider each of the four strategic axes of the policy (Secretaría Ejecutiva del Sistema Nacional Anticorrupción 2018: 15).

In Namibia, the strategy is divided into strategic objectives that have specific objectives, actions and responsible parties for their implementation (Anti-Corruption Commission of Namibia, 2021:21).

The Anti-Corruption Strategy of Lebanon develops a detailed range of activities to accomplish each of its outputs, with clear responsible parties and expected timelines.

Another key aspect relates to the prioritisation and sequencing of activities. Prioritisation can be especially useful, as not all elements of the strategy are equally important. Developing an anti-corruption curriculum for secondary schools, for instance, may be less pivotal than establishing a functioning beneficial ownership registry. During turbulent times, a documented set of core priorities can help focus efforts on the most pressing and promising activities and objectives. At the same time, sequencing of the action plan can ensure that those activities that have positive multiplier effects are implemented first.

#### **Box 19: The importance of prioritisation and sequencing**

Experience from other countries such as Romania indicates that during periods of political turbulence, a national anti-corruption strategy can serve as a kind of anchor. During the tumultuous years of 2016-2019, observers noted that the Romanian National Anti-Corruption was able to serve as a key reference point for anti-corruption work, by providing some continuity and allowing work to proceed in less controversial areas that did not rely on high level political support (OECD, 2022: 7).

#### **Box 20: Linking problems with expected results and activities**

The Ukrainian strategy links the problems and risks found with specific strategic results. One of the identified problems is the “*low effectiveness of tracing and recovery of assets derived from corruption and corruption related offences, and prevention and countering money laundering*” (National Agency on Corruption Prevention of Ukraine, 2020:36). Recognising the clear transnational dimension of this problem, the strategy prioritises a series of actions linked to the “*management of assets arrested within criminal proceedings, tracing illegally obtained assets outside the borders of Ukraine and repatriation thereof*” (National Agency on Corruption Prevention of Ukraine, 2020:36).

In Colombia, each public entity has to elaborate an annual anti-corruption and citizen service strategy and is then responsible for its implementation. By working with annual anti-corruption plans, the city of Bogota prioritises specific activities for each year. For example, instead of simplifying all procedures and services of their Public Space Ombudsman Office, the plan prioritises three institutional procedures. It also disaggregates its guidelines into specific goals that have a clear responsible area and a concrete delivery date. For instance, the objective of simplifying procedures is broken down into 1) a specific activity to assess existing regulations and 2) the development of guidelines on the transfer of land. The objective is assigned to the Vice-direction of Property Registry and the expected date of delivery is November 30<sup>th</sup>, 2022.

#### **Developing monitoring frameworks with robust indicators**

Linked to the activity plan is a comprehensive monitoring framework, which should include a set of indicators for each objective. Ideally, these indicators should fulfil the SMART criteria. As well as being Specific and Measurable, it is important to ensure they are Achievable by identifying targets

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and baseline values. The indicators should be clearly Relevant to the objectives and be Timebound.

#### Box 21: Transparency in monitoring

The Argentinian National Integrity System relies on the National Integrity Survey to build a baseline for developing specific actions. The strategy presented 1,016 indicators to measure the implementation of the proposed activities. A matrix with information on the organisation in charge, the guideline, the action, the type of action and the indicators was then developed. The aim is to build a dataset that will be available for all citizens on an online platform called “Mapa de la acción estatal”, on which the public can track implementation (Oficina Anticorrupción de Argentina, 2021).

An important lesson is that establishing a range of outcome or results level indicators for the strategy’s objectives may be more useful than tick-box activity indicators. In any case, developing “baskets” that include different types of indicators (framework, progress, impact) will help triangulate progress during implementation (Transparency International 2017). By the same token, it is also advisable to include a range of different sources of data, including perception-based measures, experiential survey data from businesses and citizens, expert assessments and – crucially – robust administrative sources of data, which are often neglected (Jenkins 2020).

#### Box 22: The value of administrative and statistical data

Administrative data, such as the number of investigations or convictions, has its limitations. Its utility depends on the impartiality of law enforcement agencies and the courts, the record-keeping and monitoring capacities of public bodies, and consistency in the use of statistical definitions across subnational units (different police forces, regional administrations and so on).

Administrative data is nonetheless a vital complement to other types of data. It has the

advantage of being relatively straightforward to track over time and can be useful to identify areas of concern in institutional setups and procedures, thereby helping to prioritise reforms or other anti-corruption measures (Jenkins, 2020).

Finally, associated risks and sources of verification should be mentioned in the monitoring framework. Rather than listing generic risks, it will be more useful to evaluate various risks in terms of impact and probability, as well as set out clear mitigation measures for high risks.

### Costing and budget allocations

The G20 High Level Principle 7 (G20, 2020: 5) recommends that countries “dedicate sufficient resources to ensure successful implementation” of anti-corruption strategies. Equally, UNODC advises governments to consider the costs, benefits, burdens, opposition and support for each element (UN, 2015: 30).

A national anti-corruption strategy can serve as an overarching programmatic framework to direct funding from various sources (including national budgets, external donors, even the proceeds of asset recovery) towards strategic anti-corruption objectives and areas of limited capacity. This is most useful when the strategy’s budget allocations are linked to medium-term expenditure planning and specify an annual breakdown of expected disbursement. Importantly, costing should be done at the most granular level possible. Objectives may be compromised of multiple distinct actions that are the responsibility of different agencies, so disaggregating activity costing by organisation can support transparency and accountability during implementation (UN 2015).

The lack of financial resources is frequently identified as a key barrier to the successful implementation of anti-corruption strategies (see OECD, 2022: 33). As such, the planned activities should be determined in line with realistic assessments of the resources required to implement them. As alluded to above, prioritising and

sequencing activities is helpful to ensure that budgetary resources are allocated to the most critical activities.

Another common issue seems to be that the central agency responsible for coordinating the anti-corruption strategy is allocated a lump sum to oversee implementation, but other public bodies are often expected to fund the prescribed anti-corruption measures from existing operational budgets. Establishing a ring-fenced overarching budget for the execution of the strategy, and then dividing this pot up between agencies could help ensure that all bodies have access to sufficient resources and that anti-corruption measures do not have to compete with other institutional priorities (UNDP 2017). Finally, it is important not to neglect monitoring and evaluation costs; setting aside funds at the beginning to track the progress of the strategy can help ensure it performs as expected.

## Principles for effective implementation

### Leadership by a central coordination body

Once the national strategy has been approved, one executive body should be charged with overseeing, coordinating and monitoring the implementation of the strategy.<sup>2</sup> In many cases, a dedicated team is established to act as a technical secretariat to fulfil these functions and is embedded into a line ministry such as the Ministry of Justice or the Ministry of Interior. Whichever model is adopted, it would be advisable to appoint leadership responsibilities to a body that was heavily involved in drafting the strategy.

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<sup>2</sup> There may be cases whereby an anti-corruption strategy is developed for a body from the non-executive branch of government, such as a judicial council or parliament. To maintain the appropriate

In most countries this body is responsible for managing the day-to-day implementation of the strategy and liaising with anti-corruption focal points based in other organisations. More specifically, this can include assigning tasks to other institutions, producing regular monitoring reports, conducting on-site evaluation missions, providing integrity training for public officials, soliciting input from external stakeholders, providing methodological support for corruption risk assessments and integrity plans, as well as commissioning surveys and background research.

#### Box 23: Central coordination bodies

In Mexico, a constitutional reform created a body in charge of coordinating anti-corruption efforts at all three levels of government as well as responsible for tracking the country's progress in this area: the National Anti-Corruption System. One of its first major projects was creating a standardised assets and interests declaration form for all public officials and launching an internet platform to centralise the submissions (Hinojosa 2019). This action follows directly from the Mexican Anti-Corruption Plan, which tasked this body with establishing a platform that would allow relevant authorities access to pertinent information like interest declarations, corruption reports and information on public bids, among others. Although the system has made important progress, it appears to lack the political support it needs to flourish (Hinojosa & Meyer 2020). Critical seats in the body have been left vacant and state legislatures give the systems at the state level little to none funding (Hinojosa & Meyer 2020).

In its strategy, Lebanon established the Ministerial Anti-Corruption Committee with a supporting technical committee. The committees' main task is to oversee the development of the national anti-corruption strategy and its implementation plan

*division of powers, the executive branch should not be granted oversight or coordination powers for such strategies.*

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(Republic of Lebanon, 2020:44). The strategy also amends the dual-committee mechanism for the implementation phase. It improves representation at the political and institutional levels for both committees and modifies their tasks to put the Ministerial Anti-Corruption Committee in charge of supervising the implementation of the strategy. The Technical Committee is made responsible for establishing task forces to develop the implementation plan and action plans for each of the main outcomes of the strategy, which should include budgets and measurement indicators (Republic of Lebanon, 2020:45). The Technical Committee is composed by representatives from the Ministry of State for Administrative Reform, the Presidency of the Council of Ministers, the Ministry of Justice, the Ministry of Finance, the Ministry of Interior and Municipalities, the Higher Judicial Council, the Public Prosecution at the Court of Cassation, the Court of Accounts, the Central Inspection, the Higher Disciplinary Board, the Central Bank, and the Council of State, giving it a broad reach.

For the leadership of anti-corruption efforts, the South African strategy proposed the establishment of a state entity that will report directly to parliament. The strategy also includes guidelines for this new entity, including what should its mandate be, its institutional placement (an autonomous agency), its powers and responsibilities, and its functions (Republic of South Africa, no date:84-87).

The coordination unit typically has a systemic incentive to ensure the success of the strategy, because ensuring effective cooperation between the various bodies is its *raison d'être*. This can lend useful impetus to the strategy and such momentum can compel other institutions to cooperate (UN, 2015: 37). As such, the political standing of the coordination unit matters. Razzano (2016), for instance, argues that there is a need for strong political leadership to drive cooperation across government and provide the necessary authority to drive decision making in coordination structures.

Where a central coordination body is staffed solely by mid-level public officials, it can lack the political clout to make headway on difficult reforms, as experience from South Africa shows (Razzano 2016). Therefore, political endorsement of inter-institutional coordination can become an objective in itself to overcome bureaucratic recalcitrance and inertia. One approach is to make the central coordination body the chair of an inter-ministerial steering committee that brings together senior officials accountable for various aspects of the strategy. This provides the opportunity to escalate obstacles and political roadblocks to the ministerial level (see, for instance, Seimas of the Republic of Lithuania 2015).

#### Box 24: Lithuanian Governmental Commission

In Lithuania, the Special Investigations Service (a kind of anti-corruption agency) is responsible for monitoring the implementation of the national anti-corruption programme and presents an annual assessment of the implementation of the action plan to the Governmental Commission for the Coordination of the Fight Against Corruption, an inter-institutional body bringing together representatives from all ministries and headed by the Prime Minister (Seimas of the Republic of Lithuania 2015).

## Coordination and cooperation mechanisms

Anti-corruption strategies provide a comprehensive policy framework that cuts across different sectors and involves different government institutions (Martini 2013). As such, successful anti-corruption strategies must go beyond simply laying out a set of substantive policy reforms and also provide channels to ensure coordinated implementation of these reforms. Indeed, the Kuala Lumpur Statement on Anti-Corruption Strategies stresses that such strategies themselves provide a valuable opportunity for coordination among accountability and supervisory bodies (UNODC 2013).

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The problem of coordination is particularly acute in the anti-corruption field, as sophisticated forms of corruption demand a combination of law enforcement, regulatory, civil and administrative responses (Jenkins 2019). Unfortunately, coordination among integrity agencies is often plagued by structural and resourcing constraints, bureaucratic pathologies and political interference. There is also an underlying tension in that, while integrity systems rely on close cooperation between different agencies to function effectively, there is also a need for these same agencies to act as checks and balances on each other. As such, according to Doig, Williams and Ashour (2012) coordination is “one of the most challenging aspects of anti-corruption work” due to the wide diversity of mandates, overlapping remits, competing agendas or differing levels of autonomy from political meddling, all of which contributes to a general absence of systemic clarity.

Thus, in addition to the oversight role of high-level steering committees that meet periodically, there is also a need for other more routine coordination mechanisms that provide a venue for representatives of various institutions to exchange information, agree commitments and coordinate their efforts to ensure policy coherence.

#### **Box 25: Malawi’s National Integrity Committee**

Multistakeholder initiatives convened during the drafting process can be equally useful during the implementation phase. In Malawi, a National Integrity Committee oversees governance of the National Anti-Corruption Strategy. The committee involves a wide range of actors, with representatives of the executive, the legislative, the judicial, local governments, the private sector, civil society, faith-based organisations, the media, traditional leaders, youth, academia and women. It also has an Activities Implementation Project Team and an Anti-Corruption Bureau. The committee is in charge of providing policy and strategic guidance, developing the annual action plan, monitoring and evaluating activities, and providing quarterly reports (Republic of Malawi, no date:30).

The literature suggests that there are several prerequisites for effective coordination. First among these is dedicated resourcing. Where a coordination mechanism has been established, sustaining this “common good” entails negotiating collective action problems. Meaningful coordination requires the allocation of dedicated staff, as well as the commitment of a lead agency to manage the process and win over other bodies.

Second, clear mandates and lines of responsibility are essential to enable interagency cooperation. This can be encouraged both formally, by setting out legal obligations to cooperate with requests for assistance or information, and informally, such as by establishing steering groups of various agencies to build the interpersonal trust essential for coherent and coordinate action (Bardach 1998). Different countries have adopted various coordination mechanisms that are formalised to different degrees, from interagency fora to task forces, from secondments to trouble-shooting sessions, and from memoranda of understanding to decision-making protocols (OECD, 2013; Davis, Machado and Jorge, 2014).

While different institutional frameworks have been proposed as more or less conducive to fostering coordination among integrity agencies, it appears that solid working relationships are critical if different agencies are to overcome the barriers presented by specialisation, turf wars, group think, party politics and information hoarding (Peters 2018).

Regardless of the coordination arrangements selected, it is important to specify how such mechanisms are expected to support implementation of the strategy in practice, including the mandate of coordination bodies and the division of labour between implementing agencies. Unfortunately, as yet few national strategies explicitly set out on how coordination mechanisms are intended to operate in practice (UN, 2015; Pyman, 2018).

Beyond considering how to strengthen coordination between government bodies within the same polity,

those drafting anti-corruption strategies would do well to reflect on how to enhance coordination with:

- non-governmental actors in a given country
  - notably civil society and the private sector
  - in support of preventive and educative measures.
- government agencies situated in different countries for the purpose of pursuing corruption cases involving multiple jurisdictions.
- broader international networks and fora, such as the Open Government Partnership, the Extractive Industries Transparency Initiative, the UNCAC Review Mechanism, the Global Forum on Transparency and Exchange of Information for Tax Purposes, the OECD Working Group on Bribery, the G20 Anti-Corruption Working Group and so on.

#### Box 26: Coordinating with other international and multilateral actors

The new US Anti-Corruption Strategy actively commits the country to redouble its anti-corruption coordination mechanisms in multilateral fora, such as NATO, the G20 and G7, the OGP, EITI, the OECD, OAS and UNCAC.

Of particular importance to the US strategy are efforts “to work with partners in multilateral fora to push for ending offshore financial secrecy” (White House, 2021: 28). Importantly, such initiatives require policy coherence between diplomatic, aid, trade and security agendas. For instance, cracking down on secrecy jurisdictions will require convincing governments in these countries to relinquish lucrative opportunities, and observers have noted that substantial development assistance could help sweeten the pill (Rudolph, 2022: 17).

Similarly, international cooperation can serve to improve other countries’ actions to battle corruption. One of the pillars of the US Strategy is to improve diplomatic engagement and leverage foreign assistance resources to advance policy

objectives. The US strategy contends that United States’ assistance can serve to bolster partner governments’ anti-corruption efforts (White House, 2021:14).

The French Anti-Corruption Strategy highlights the work advanced in international forums, like the Open Government Partnership and the Extractive Industries Transparency Initiative, and aims to promote them. For its part, the French Cooperation Agency launched a support program for the implementation of open government commitments in three francophone developing countries (République Française, 2021:15). The strategy also seeks to promote and improve an international tool for examining contract award procedures, as part of the Methodology for Assessing Procurement Systems (MAPS) initiative (République Française, 2021:16).

One of the strategy’s action areas is “supporting the work of international organisations, non-state actors and local institutions” (République Française, 2021:17). As part of it, France will reinforce collaborations with international organisations by signing agreements that will “facilitate joint investigations and the sharing of information on corruption risk” (République Française, 2021:17). The strategy also aims to reinforce collaboration with non-state actors, including public officials in partner countries, civil society representatives and the private sector (République Française, 2021:17).

Finally, one of the objectives of the South African strategy is that “*South Africa and its anti-corruption agencies can effectively collaborate with other countries and international bodies to prevent corruption, money laundering and related offences, bring corrupt persons to book and secure convictions and asset recovery*” (Republic of South Africa, no date:38).

## Resourcing

Once the budget has been allocated at the outset of the strategy, the central coordination body should

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ensure that each actor actually uses these resources to implement the agreed activities. Each body tasked with performing a given task under the strategy should publicly report annual data on spending aligned with the strategy. The coordination body should maintain centralised records of spending to allow tracking of and accountability for implementation by the various institutions responsible for elements of the strategy, as spending data can be a useful proxy of implementation. This would also allow for more evidence-based budgeting in future that ties individual activities to specific funding commitments.

Resources are not only financial, dedicated focal points for the anti-corruption strategy should be appointed at each relevant public body, with a mandate to liaise with the central coordinators and ensure that necessary staff positions to implement the foreseen activities to which their organisation has committed are filled (see for instance the evaluation of Romania's national anti-corruption strategy in OECD 2022).

#### **Box 27: Tracking institutional resourcing in Lithuania**

The efficacy of any anti-corruption strategy against corruption depends on the allocation of resources to fulfil the set plan. As an example, Lithuania has developed Inter-Institutional Action Plans that:

- Include estimates for capital and operational expenditures,
- Identify additional costs and costs estimates for specific activities,
- Set out a multi-annual financial plan linked with a medium-term expenditure framework.

As such, the Action Plan's activities are financed from the general appropriations approved for the respective institutions implementing the Lithuania Anti-Corruption Programme, and these agencies can thus be held accountable for financial planning and reporting. This permits the central coordinating body in Lithuania, the STT, to ensure that resourcing remains sufficient throughout the implementation phase (Government of the Republic of Lithuania, 2020).

## **Improving monitoring and institutional support**

### **Monitoring mechanisms and independent progress validation**

The G20 High Level Principle 8 (G20, 2020: 5) states that strategies should “establish processes or mechanisms to monitor and evaluate implementation” of their anti-corruption strategy. Furthermore, the OECD standard (OECD, 2020) requires indicators and establishment of baselines, milestones and targets. Finally, UNODC asks countries to select progress indicators, establish baselines and set realistic targets for each implementation indicator (UN, 2015: 39-43).

A good monitoring strategy should encompass self-assessment reports from public institutions, on-site evaluations, background surveys and studies, systematic evaluation of administrative data, and periodic reports issued by international observers such as the OGP, GRECO or the UNCAC review mechanism. Opening up monitoring to public participation from citizens, civil society and academics can help strengthen the legitimacy of the report results. Possible approaches range from including dedicated indicators that draw on data provided by the public to encouraging civil society groups to produce parallel progress reports. Taken together, all sources of monitoring data should be compiled and reported in annual monitoring reports that identify successes and the rate of implementation as well as challenges that have been encountered.

### Box 28: Romania's monitoring platforms

An approach that has received some international attention is the Romanian model of so-called cooperation platforms. The Technical Secretariat responsible for implementing the national anti-corruption strategy regularly convenes five platforms: one each for integrity agencies, central government officials, local government officials, civil society and the business community. These sessions provide stakeholder groups with an opportunity to receive updates on progress made and shape the work of the Technical Secretariat.

One lesson from Romania is that such platforms should not merely serve as a communication tool for the central coordination body to disseminate updates. Rather, coordination and cooperation platforms should be empowered to take ownership of the strategy and adapt plans to account for changing circumstances (OECD, 2022).

Romania also monitors public bodies' implementation of the strategy via the use of "thematic missions". These are multistakeholder on-site evaluation visits organised by the central coordination body to verify how public institutions identify and mitigate corruption risks. The findings of these thematic missions are discussed by the multistakeholder cooperation platforms and published online, and the information is used to identify capacity deficits and knowledge gaps. On this basis, the technical secretariat then develops additional guidance materials, including on topics such as conflict of interest, revolving doors, and access to information requirements (Ministry of Justice of Romania, 2016).

### Box 29: The utility of using indicator baskets to monitor progress

For its [annual updates to the 2017-2022 Anti-Corruption Strategy](#), the UK adopted a two-tiered basket system of indicators. First, two baskets of indicators were employed to provide a picture of the UK's situation at a high level of abstraction, by drawing on comparative global datasets. One of

these focused on the robustness of anti-corruption safeguards such as transparency and stakeholder engagement, while the other looked at global composite corruption indices. In other words, the former was about the risk of corruption, the latter about the (perceived) incidence of corruption. While the scores for such indicators are unlikely to change dramatically during the lifecycle of an anti-corruption strategy, these indices nonetheless provide a useful illustrative impression of how a country is performing relative to other countries in terms of controlling corruption.

The second tier of indicator baskets took a more tailored approach, by including data that related specifically to the three desired result areas of the 2017-2022 Strategy: security, prosperity and trust. These three baskets are primarily composed of specific, disaggregated indicators drawn from a wide range of governance datasets, which bear a clear conceptual link to the given outcome area and are thus at least somewhat sensitive to targeted policy interventions.

The basket approach is a pragmatic response to the fact that governance and corruption are complex, multi-dimensional phenomena. All indicators have weaknesses, and a single indicator is not sufficient to obtain a comprehensive understanding of the state of affairs and to identify possible points of intervention. The basket approach has the advantage that it can include a number of complementary indicators that draw on a variety of both objective and subjective types of data, including experiential and perceptions-based datasets, expert assessments, administrative data and where available citizen-generated data. This approach generates a more comprehensive picture based on the views and experiences of experts and citizens, while mitigating the risks of making decisions based on misleading data. For further details, see (UK Government 2020: 34-44).

In line with the latest thinking around problem-driven iterative adaptation, information gleaned from monitoring activities should also be used to adapt to changing circumstances. This can involve revising, updating or reformulating objectives and

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indicators to achieve results that are more realistic, lowering risk and seizing on windows of opportunity.

#### **Box 30: Lessons learned and adjusting the strategy**

In Burundi, the Revenues Office evaluated its previous anti-corruption strategy (2015-2017) to design the current one (2018-2023). This allowed them to identify the monitoring shortcomings of the previous strategy in concrete terms, like the fact that the relevant data had not been uploaded to the website, or that the indicators to evaluate the strategy had not been duly developed. One of the lessons they learned from this experience was the importance to implement a monitoring system that allows for a dynamic, periodic and participative evaluation to adjust the strategy during implementation (OBR 2017).

The Argentinian National Integrity Strategy is set up as a dynamic and flexible initiative. It allows participating bodies to provide information during implementation and to incorporate new actions after the strategy has launched. The strategy entrenches flexibility in planning as a guiding principle.

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