

U4 Helpdesk Answer

Sudan: Overview of corruption and anti-corruption

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Sudan is a fragile state, emerging from the brutal dictatorship of Omar al-Bashir, which ended in April 2019 after he was ousted by a military coup following prolonged popular protests. The new administration has inherited a deplorable governance situation. Moulded by years of kleptocratic rule, the civil service is plagued by rampant graft, while the extractive industries sector and land management are similarly rife with corruption. In fact, much of the national economy is exposed to extensive rent-seeking by the security forces, which run large swaths of the country as personal fiefdoms.

The new regime will be forced to address corruption at all levels and sectors of the country and will need to reinforce a legal and institutional anti-corruption framework that is largely failing to prevent, investigate or sanction corruption.

Query

Please provide an overview the current situation regarding corruption and anti-corruption in Sudan

Contents

1. Overview of corruption in Sudan
2. Corruption by sector
3. Legal and institutional anti-corruption framework
4. References

Caveat

Pro-democracy uprisings in Sudan during the latter part of 2018 and early 2019 have generated serious changes to the political system of the country, and the political climate is evolving on a daily basis. Much of the available literature on Sudan refers to the period before 2018, and it is referenced to present the systemic and institutional challenges that new democratic leaders in Sudan will face.

Overview of corruption in Sudan

Background

The Republic of the Sudan (henceforth Sudan) straddles the Sahel and Sahara regions. The country gained independence from the United Kingdom in 1956, and experienced numerous attempts at parliamentary democracy interrupted on several occasions by military coups. Sharia law was implemented in 1983, a system which still provides the basis for Sudanese law, and which prompted the rise of insurgent military groups in the predominantly non-Muslim western Darfur region and the southern part of the country (De Waal 2019).

Main points

- After 30 years of authoritarian rule, Omar al-Bashir was deposed in 2019 and a new transitional government was established between civilians and the military.
- Sudan under al-Bashir was considered to be a kleptocracy, in which corrupt actors had effectively captured all aspects of policymaking and all areas of the public service as well as the judiciary. The military was a prime beneficiary of the regime and continues to act autonomously with minimal civilian oversight.
- The extractives industry presents a particular governance challenge in Sudan, as rent seeking reduces tax revenues and finances illicit activities.
- Anti-corruption efforts have historically been lax, with existing laws being inadequately implemented.

In 1989, a coup brought Omar al-Bashir to power with the stated intention of ensuring the implementation of sharia law. Through the Islamist-militarist National Congress Party (NCP),

al-Bashir ruled the country as an autocrat for the next 30 years (Morgan 2019).

Al-Bashir's rule was dominated by civil war as the insurgency in Darfur spilled over into outright war and resulted in massive human rights violations by government militia and paramilitaries (Reeves 2018). The armed conflict, which ended in 2005, left 2 million dead, and 6 million refugees and internally displaced people (Cockett 2016 cited in Kukutschka 2017). The peace process, initiated in 2010 has led to reduction in violence in Darfur, though human rights abuses continue to exist (Henry 2019). In Southern Sudan, insurgency groups signed a peace agreement with the government, which led to a referendum on South Sudanese independence. The referendum resulted in overwhelming support for independence, which was realised in 2011, when the country was partitioned into Sudan and South Sudan. However, violence erupted again in 2011 between the government and groups in regions bordering South Sudan (De Waal 2019).

Following South Sudan's independence, Sudan plunged into a deep economic crisis, as it lost nearly 75% of its oil reserves and 95% of its foreign currency reserves (The Enough Project 2017b). In December 2018, massive protests against rising food prices broke out against al-Bashir. The protests spread and came to include demands for democratisation. Repression of the protests resulted in more than 2,500 arrests and 65 deaths (Africa Centre for Peace and Justice Studies 2020).

In April 2019, al-Bashir was ousted by a coup, arrested and replaced by a transitional military council steered by former *janjaweed*¹ militia leader and current Rapid Support Forces (RSF) commander Mohamed Hamdan Daglo, most commonly known as Hemedti (Burke 2019b). The National Congress Party was dissolved shortly after the coup (BBC News 2019).

Pro-democracy protests continued, resulting in violence on 3 June 2019, in which 120 people were killed (Morgan 2019). A transition agreement was reached between pro-democracy groups and the transitional military council in August 2019, which would create a new constitution, a military-civilian sovereignty council of Sudan as head of state, and appoint new judicial justices and a new prime minister. A [constitutional charter](#) signed in August 2019 will act as a guideline for a transitional period to last until 2022. In December 2019, al-Bashir was sentenced to two years in prison for corruption, and several members of his family have likewise been arrested for corruption (Burke 2019a). In the trial, the judge identified that al-Bashir had embezzled US\$130 million and allegedly received an additional US\$90 million from Saudi Arabia for personal use (Burke 2019a).

The 2019 constitutional charter establishes Sudan as a parliamentary democracy, though until 2022 it will be headed by a military-civilian sovereignty council of Sudan as head of state and a prime minister who will lead a transitional cabinet and a transitional legislative council. The current political

¹ The *janjaweed* are paramilitary forces operating in Darfur as of 2003 that were supported by the al-Bashir government. They are accused of committing numerous

crimes against humanity including murder, torture and rape (Human Rights Watch 2006).

regime establishes 18 states (wilayah) and 133 local districts (CIA World Factbook 2020).

Major challenges remain, however. In the latest available assessment, conducted in early 2019, Freedom House judged Sudan to be “not free”, with a score of 7 out of a possible 100 (Freedom House 2019). Moreover, 69% of Sudanese respondents to the 2018 Afrobarometer survey believed that the country was not sufficiently democratic (Isbell and Elawad 2019).

Sudan is considered a lower-middle-income country, with a GDP per capita of only US\$977 (Svensson and Hamilton 2017; World Bank 2018b). Inequality is high in Sudan, which has a Gini coefficient of 35.4 and a Palma ratio of 1.4 (UNDP 2020). The average life expectancy for its 40 million inhabitants is 65.1 years, and the country has a human development index score of 0.507, among the lowest in the world (UNDP 2020). Approximately 52% of the population live under the poverty line, and 12.9% of the working-age population is unemployed (UNDP 2020). There are also 1.87 million people internally displaced people within Sudanese territory (OCHA 2020). The Sudanese economy is based primarily on its extractive sector, with oil and gold being its biggest exports (CIA World Factbook 2020).

Extent of corruption

Corruption is rampant within Sudan, a situation that simultaneously results from and exacerbates the country’s fragility (Elaim 2019). In fact, the World Bank’s 2018 Sudan Country Opinion Survey, which gauges the opinions of on-the-ground

international donor practitioners working in Sudan, revealed that 45% of international experts identified corruption as the prime cause of the country’s fragile status (World Bank 2018a).

International surveys on corruption show that corruption in Sudan is a widespread problem. Sudan ranks 172 out of 180 countries in the 2019 Corruption Perceptions Index, with a score of 16, well below the global average of 43, as well as lower than the average score for the sub-Saharan region of 32 (Transparency International 2019a).

Composite indicator	2015	2016	2017	2018	2019
Corruption Perceptions Index	12	14	16	16	16

The 2018 Mo Ibrahim Index of African Governance likewise places the country at 49 out of 54 African countries, with a score of 30.8 out of 100, below the African average of 49.9 (Mo Ibrahim Foundation 2018).

Finally, the 2018 World Governance Indicators shows that Sudan is in the 5.77 percentile rank² for control of corruption, a small increase from the 1.42 percentile rank held in 2013 (Kaufmann and Kraay 2018).

² Percentile rank indicates the country's rank among all countries covered by the aggregate indicator, with 0

corresponding to lowest rank, and 100 to highest rank (World Bank 2019).

WGI indicator	2015	2016	2017	2018
Control of corruption	3.37	3.85	3.37	5.77
Government effectiveness	6.25	5.77	7.21	4.33
Political stability and absence of violence/terrorism	3.81	2.86	5.71	5.71
Regulatory quality	4.81	4.81	4.33	3.85
Rule of law	8.17	8.65	10.58	10.58
Voice and accountability	3.94	3.45	2.45	2.96

These findings tend to correlate with national opinion surveys on corruption. In the 2018 Afrobarometer survey, 75% of respondents from Sudan believed all or most government officials to be corrupt. Furthermore, 67% of those surveyed believed corruption had increased in the last year (Afrobarometer 2018), a result echoed by the 2019 Global Corruption Barometer (GCB), where 45% thought all or most public officials to be corrupt and 82% of respondents believed corruption to have increased in the last 12 months (Transparency International 2019b).

Bribery is present at all levels of the Sudanese state and business sector. In the 2019 GCB, 24% of respondents in Sudan stated that they had paid a bribe in some form, above the 20% average in the rest of the Middle East and North Africa region (Transparency International 2019b). In contrast, the results of the 2018 Afrobarometer show a lower rate of bribery, as just 6.9% of respondents claimed to have bribed officials to obtain documents they

needed, 2.9% bribed to access public education, and 5.4% paid a bribe or did a favour for a government official to access public services (Afrobarometer 2018). It is worth noting that in countries with particularly repressive regimes, citizens may underreport corruption, even in third-party surveys (UNODC 2018).

The World Bank's Country Policy and Institutional Assessment for 2018 scores Sudan a mere 1.5 out of a possible 10 in the area of transparency, accountability and corruption in the public sector (World Bank 2019).

The private sector is also affected by corruption. Private sector firms and foreign investors identify corruption as among the top constraints for doing business in Sudan (Elaim 2019). The latest (2015) Enterprise Survey reported that 64.7% of enterprises surveyed considered corruption to be a major constraint for their businesses. Meanwhile, 17.6% of firms were solicited for bribes, and 18.5% of the firms surveyed report being expected to give gifts to win government contracts (World Bank 2015).

It is difficult to quantify the cost of corruption to the Sudanese state during the al-Bashir regime. As mentioned, official court figures note that al-Bashir embezzled somewhere between US\$130 million to US\$470 million (Burke 2019a), yet in 2010, leaked cables from the former chief prosecutor of the International Criminal Court show that al-Bashir was estimated to have embezzled US\$9 billion (Sherwell 2010). Aggregate data taking into account embezzlement by the al-Bashir family and syphoned oil and gold as well as public sector funds by public officials (and from other sources) has yet to be calculated.

Forms of corruption

Corruption takes a variety of forms in Sudan, ranging from petty forms of corruption, such as bribery, to grand corruption, including embezzlement and theft of public funds involving high-level officials, as well as political corruption (Kukutschka 2017).

State capture

Most of the literature on governance in Sudan considers al-Bashir's regime to have been kleptocratic" (Warf 2017; De Waal 2019; The Enough Project 2017a). It is clear that under his leadership, the Sudanese state was captured by powerful interest groups, and the system was characterised by "crony capitalism associated with oil, construction contracts, import-export trade, and private security" (De Waal 2019; The Enough Project 2017a). To sustain his grip on power, al-Bashir's 30 year rule was marked by extensive neopatrimonialism, in which portions of the state apparatus were doled out to cronies, family and political supporters at the cost of the public interest. De Waal (2019) refers to the pre-revolution political system as a "collusive oligopoly masquerading as centralised authoritarianism".

Beginning in 1989, the National Congress Party and its Islamist allies pursued a policy of *tamkeen*, whereby political power was consolidated through the divvying up of official posts, public companies and public contracts between regime supporters and their clients (Baldo 2018). In particular, deep-rooted patronage networks ensured that NCP affiliates and various military groups were heavily favoured in the allocation of state contracts and civil service employment. Professor Verhoeven notes that during the regime's *tamkeen* campaign, "petty traders attending the right mosque suddenly

controlled parastatal" organisations, and "university graduates with Islamist credentials took over textile factories" (The Enough Project 2017a). Members of the NCP, particularly those from favoured ethnic groups, effectively controlled the economy and use the wealth they amass in banking and business to buy political support (Freedom House 2015 in Kukutschka 2017).

During the reign of al-Bashir, the quality of the civil service in Sudan was extremely poor as a result of widespread favouritism, nepotism, corruption and the abuse of office by low-level bureaucrats. This state of affairs was a structural problem, as under al-Bashir, NCP supporters and potential regime allies were supported financially by the state, either through public employment or "ghost employment" (The Enough Project 2017a).

Loyalty to the NCP and patronage became "pre-requisites for joining the civil service and advancing within the power structure". This corroded the civil service to the extent that "instead of expertise or ability, regime loyalty often [was] the only credential that matter[ed]" (The Enough Project 2017a). The disastrous results of this policy are apparent in the World Bank's Country Policy and Institutional Assessment for 2018, where Sudan scores 2 out of a possible 10 in the quality of public administration indicator (World Bank 2019). The new government will have to tackle these ingrained practices to improve capacity and efficiencies in public administration.

Nepotism is also common in Sudan at all levels of government. At the highest level, al-Bashir awarded contracts to his brothers' company, High Tech, a business group with shares in 23 companies working in sectors including petroleum, petrochemicals, engineering, cement, railways and

telecommunications (Kukutschka 2017; Hamoda 2017).

Sudan abounds with so-called grey companies, which are government-owned or semi-public entities capitalised with public funds but which were “entrusted” to individual Islamists to run them on behalf of the NCP (Baldo 2018). Under al-Bashir, most Sudanese businesses sub-contracted for major construction projects were linked to the Islamists’ companies, and at least 164 companies, operating in a range of services and industries were owned or controlled by military, police and National Intelligence and Security Services (NISS) officials (International Crisis Group 2011 cited in Kukutschka 2017). Control was so complete that in 2017, Sudanese economist Siddig Ombadda estimated that the NCP ran over 500 companies that effectively “controll[ed] all financial and economic fields in the country” (The Enough Project 2017a). In 2018, the finance minister admitted that 28% of the national budget accounts for funds and contracts had been awarded to these “grey companies” (Baldo 2018).

Parliamentary oversight within the al-Bashir kleptocracy was non-existent: laws in Sudan were approved as they were presented by the executive branch, including the national budget (Khalil 2018). Opposition within the legislature was uncommon as electoral tampering assured that the ruling NCP always enjoyed a super majority to approve laws.

State capture extended to the judicial branch as well, with corruption, nepotism and cronyism being an important factor in any verdict that the courts handed down. While lower courts operate with a degree of autonomy, higher courts are generally under political control, while military courts are

directly under the control of each military force, with little to no respect for legal procedures (Freedom House 2019). Many times, lower-level corrupt officials settled their cases informally with their superiors if they returned assets they had stolen (US Department of State 2018a). The World Bank 2020 Doing Business Survey judicial quality indicator for Sudan gives the country a mere 4 points out of a possible 18, considerably lower than the sub-Saharan average score of 6.9 (World Bank 2020).

With the 2019 revolution, calls for public sector reform have been focused on dismantling the corrupt apparatus used by al-Bashir to stay in power. In November 2019, Sudan’s sovereign council seized NCP assets and restricted the use of party symbols in public offices (Al Jazeera 2020, Dabanga 2019c). Furthermore, in January 2020, the minister of religion began a graft probe into his ministry, which dealt specifically with endowments and haj pilgrimage subsidies, long considered to be an important source of embezzlement (Ljubas 2020). These efforts have been part of the General Framework for the Programme of the Transitional Government, released in December 2019, which aims to dismantle kleptocratic practices by revamping current oversight and anti-corruption mechanisms and creating new public and civilian oversight institutions (Transitional Cabinet 2019).

Private sector corruption and tax evasion

The private sector in Sudan suffers from many corruption risks due to the legacy of NCP rule. During the al-Bashir era, most investors in Sudanese companies were linked either to the government or to military groups operating in Sudan. These companies largely depended on fraud and bid-fixing to survive Sudan’s economic shocks during the

1990s. During the oil boom of the 2000s, some companies did manage to perform well enough to wean them off utter dependency on corrupt schemes, though many firms continued to resort to bribery to win public contracts (De Waal 2019).

The general opacity in Sudan extends to the private sector, in particular in relation to the sale, merger and dissolution of companies, which makes financial planning and market analysis difficult (US Department of State 2018a; Sudan Democracy First Group 2018). For example, when in March 2015 Sudan sold its stake in the Sudanese-Kuwaiti Hotels Company to Kuwait, the details of the sale were kept secret, including the financial transaction itself, the beneficiaries or even the rationale behind the sale of the profitable hotel chain (Reeves 2015).

The extensive system of crony capitalism ensured that state-owned companies and “grey companies” received preferential treatment in relation to access to hard currency, as well as lax regulation and oversight. In addition, this drove many of the companies *not* favoured by Khartoum’s leadership to resort to “any number of fraudulent procurement practices, such as substituting inferior and cheaper products; false invoicing for strategic goods allegedly procured; paying kickbacks to foreign suppliers and government officials awarding contracts; and collusion with other companies competing for government contracts” (Baldo 2018).

Moreover, the extremely secretive nature of Sudan’s banking system facilitates considerable corruption, which in turn “discourage[s] private sector investments and as such depriv[es] the banks from significant potential gains” (Sudan Democracy First Group 2018). The banking sector operates with very little transparency, with limited information available to investors, shareholders or the general

public (Sudan Democracy First Group 2017). In many instances, officials at the Central Bank of Sudan have overlooked or directly facilitated illicit financial flows, illegal mergers and other corrupt dealings as a result of undue influence or bribery (Sudan Democracy First Group 2018).

Many private businesses have resorted to buying hard currency allocations from banks and selling them on the black market to profit from the exchange (Baldo 2018; Reeves 2018). Between 2016 and 2017, a group of businesspeople and senior bank officials within the central bank and the Bank al-Shamal al-Islami allegedly embezzled US\$230 million in hard currency earmarked for the import of subsidised medicine (Baldo 2018). Reportedly, they then sold the currency on the black market for three times its face value and laundered the profits outside the country (Baldo 2018). Although their crimes were detected, the executive branch interfered in the case to delay their prosecution by changing the presiding judge three times (Baldo 2018).

Complicity and collusion in corrupt schemes is not uncommon between private companies and the government. For example, The Enough Project (2017a) notes that during the Sudanese oil boom, private companies managed to attain preferential rates to buy oil or to access land slated for oil production. In exchange, these companies acted as intermediaries to skirt international sanctions, to access foreign, hard currency or import arms for government officials, which were in turn used to protect the investments of those companies.

In another case, a December 2019 report by Global Witness showed that two companies based in Sudan and the UAE allegedly acted as front companies for the RSF to launder funds,

participate in military procurement procedures, and smuggle gold through RSF controlled mines (Global Witness 2019a). Leaked bank documents reveal that Hedmeti, his brothers, as well as various RSF authorities are the beneficial owners of these companies (Global Witness 2019a).

Unsurprisingly, the 2019 GCB shows that 32% of Sudanese respondents view business executives as the most corrupt group in the country (Transparency International 2019b), while in the 2018 Afrobarometer, 71.2% of Sudan respondents believe business executives to be corrupt (Afrobarometer 2018).

The World Bank's 2018 Sudan Country Opinion Survey, which gauges the opinions of on-the-ground international donor practitioners working in Sudan, found that 52.2% of respondents believe corruption in the private sector to be an important source of the country's fragility (World Bank 2018a).

The Sentry (2019) further notes that Sudan's systemic corruption and well-established kleptocratic network ensured that the Bashir government had little incentive to implement an effective anti-money laundering regime. While Sudan was released from ongoing Financial Action Task Force's monitoring process in 2015 (FATF 2015), a recent report by The Sentry notes that since 2015, the national financial intelligence unit has not been operational, and while the NISS and other semi-official paramilitary groups have benefited from state contracts and undue influence in the economy despite financing terrorism and other committing human rights violations (The Sentry 2019). Furthermore, although in 2018 in 2018 al-Bashir announced the use of Illegal Wealth Act to detect illicit money laundering related to gold smuggling and several high-level officials were

prosecuted, in most cases these cases were either thrown out or the accused were granted amnesty (The Sentry 2019).

According to Global Financial Integrity (2019), due to an estimated trade misinvoicing rate of 44%, Sudan loses an average of US\$871 million annually in the form of illicit financial outflows.

Public financial management

Extensive opacity in public financial management enables widespread discretion in the administration of public funds while making it difficult for anti-corruption watchdogs and other branches of government, such as the legislature or the auditor general, to scrutinise how money is spent. The 2017 Open Budget Survey gave Sudan a score of 2 out of 100 on its level of budget transparency (International Budget Partnership 2017).

The parliament does not have the power to amend executive budget proposals nor does it have sufficient time to discuss and approve the budget (Elaim 2019; International Budget Partnership 2017). A high proportion of the national budget is spent on unspecified national security priorities, and rather than using public money to provide public services, the state treasury was long used by al-Bashir as a tool to remain in power (Kukutschka 2017).

While decentralisation in Sudan in 1995 devolved some fiscal powers to the states through revenue-sharing agreements and administrative powers, which were further expanded in 2005, the central government maintains most fiscal and administrative powers in the country (De Waal 2019). Transfers from the central government to states represent 70% of revenue sources for states, despite the fact that constitutional limits are

capped at 30% (Fjeldstad 2016). Transfers differ widely by state: these transfers are never programmatic and tend to be mired in opacity. Most public spending (around 60%) has traditionally been used to pay relatively high wages to state-level bureaucrats to keep them loyal to the central government or transferred to local governments in urban areas where al-Bashir's regime needed the most support (Cockett 2016 cited in Kukutschka 2017; Fjeldstad 2016).

Revenue collection is characterised by a general lack of transparency in the enforcement of regulations, which provides many opportunities for corruption and bribery. Undue tax exemptions granted as a result of corrupt relationships between local officials and companies are very common, resulting in substantial revenue loss. For example, unmerited exemptions cost the state of North Kordofan up to 7% of its projected revenue in 2010 (Fjeldstad 2016). In relation to tax collection by all levels of state, procedures to manage taxes paid in cash are weak and there is no systematic reporting, providing many opportunities for corruption among tax collectors (Fjeldstad 2016). Nineteen per cent of Sudanese respondents of the 2013 GCB reported having paid bribes to tax collectors (Transparency International 2013).

A common practice in relation to budget execution is *tagneeb*, meaning to “set funds aside.” It refers to a practice that allows ministers at the federal level to divert discretionary funds away from public coffers without reporting those amounts to the Ministry of Finance (Baldo 2018). The practice allows for percentages of public funds to be used without any transparency and poses a serious risk of corruption (Reeves 2015). Sudan Democracy First Group has written in detail about how one tax form, Form 15, is a common vector for tax evasion

and embezzlement, including through *tanjeeb*, petty corruption by law enforcement and, notoriously, by port and border authorities (Sudan Democracy First Group 2015).

The Ministry of Finance, the body responsible for distributing funds to the rest of the ministries is considered to be a war-chest for corrupt interests. In 2014, Sudan's inspector general alleged that the Ministry of Finance diverted or embezzled at least 16 billion Sudanese pounds (approximately US\$350 million) intended for other ministries and had falsified reports to oversight bodies (Dabanga 2014c).

While, there is an auditor general who prepares annual reports about government expenditure execution, this position had very little capacity under al-Bashir to provide detailed data about mismanagement of funds. The general figures compiled by the auditor general nonetheless provide a conservative estimate for the scale of the misappropriation of funds. For example, the auditor general reported that between 2014 and 2015, in 107 of 237 public institutions, upwards of 3.5 million Sudanese pounds were unaccounted for, due to reporting malpractice (incomplete or fraudulent reporting) (Elbushari 2017).

Furthermore, the auditor general has generally lacked sufficient resources or political leeway to investigate shady public procurement, with local economists noting that very little attention has been paid to NCP owned companies and their near-monopoly on public procurement (The Enough Project 2017a). The Open Budget Survey of 2017 gives the auditor general a score of 50 out of 100 due to its low capacity to effectively monitor and sanctions irregularities.

In 2014, the auditor general expressed a concern regarding the audit procedure, as ad hoc laws to prohibit auditing of certain institutions or outright disappearance of institutions due for audit makes it difficult to properly identify the sources and true extent of embezzlement (Elbushari 2017; Dabanga 2014b)

Corruption by sector

While various sectors suffer from corruption in Sudan, the available literature on corruption in Sudan stresses that corruption is particularly prevalent in the extractives and land sectors, as well as in terms of security and law enforcement.

Extractive industries

Although agriculture employs around 80% of the country's workforce, mineral, hydrocarbon and ore extraction continue make up a large percentage of Sudan's economy (CIA 2019). In fact, even after losing around two-thirds of its known oil reserves and three-quarters of its oil revenues following the secession of South Sudan in 2011, oil extraction remains one of the dominant industries in the country (Kukutschka 2017, SUD004).

Historically, oil helped to maintain a "payroll peace", whereby oil revenues were distributed to cronies and supporters of the government, particularly in areas where oil extraction was the dominant industry (Deshayes and Chevrillon-Guibert 2019; Dabanga 2014b; De Waal 2019). This arrangement led many analysts to describe the country as a rentier state plagued by the "resource curse" (Obi 2007), not least because most of Sudan's conflicts with internal rebel groups and neighbouring countries centred on contested control of mineral resources (Patey 2010).

In 2014, following a series of conflicts with South Sudan, a deal was reached to allow for pumping of South Sudanese oil through Sudan; this deal was done "directly between Khartoum and Juba without intermediaries and the details were not made public, indicating a likelihood of off-the-books payments" (De Waal 2019).

The structural feature of rent-seeking that became embedded in Sudan's political economy during the oil boom after 1999 also drove ever-larger transfers from oil revenues to states and local government to maintain their allegiance (Patey 2010), a practice that drove up the country's debt burden. The abrupt loss of oilfields and a period of US sanctions battered the Sudanese economy for several years after 2012, contributing to the economic crisis, high inflation and the introduction of unpopular austerity measures that contributed to the unrest of 2018 and 2019 (CIA 2019).

The continued lack of transparency and accountability in the extractive sector generates a very high risk of corruption and political interference (The Enough Project 2017a). Rent-seeking affects the whole production chain, from extraction to the processing and transport of minerals, metal and hydrocarbon wealth. As such, the reporting of volumes and estimated reserves, as well as the administration of foreign companies' entitlements and allocations to producing state governments, are all exposed to high levels of corruption (Kukutschka 2017).

International investors are reportedly complicit in widespread corruption as the almost total lack of transparency enables them to not only arrange payments and bribes to local authorities without reporting these transactions but also allows them to commit large-scale tax evasion (Deshayes and

Chevillon-Guibert 2019). For example, a 2014 report by the auditor general found that 61% of Sudan's 196 oil companies evaded taxes (Dabanga 2014b), while the national Sudanese Petroleum Company ranked 48 of 52 state-owned companies in the Resource Governance Index (Natural Resource Governance Institute 2017). While the company discloses "sufficient information about joint ventures and subsidiaries, it is opaque in its commodity sales, production and government transfers" (Natural Resource Governance Institute 2017).

The overall state of Sudan's extractives industry is reflected in the 2017 Resource Governance Index, where Sudan ranks 86 out of 89 countries with a score of 21 out of 100 (Natural Resource Governance Institute 2017).

In 2012, large gold reserves were discovered in Darfur and became Sudan's primary source of hard currency, constituting 40% of the country's exports and worth approximately US\$2.5 billion annually (De Waal 2019). Al-Bashir's government promoted gold mining as a way to make up for lost oil revenue, yet problems arose as 90% of the gold was extracted in 800 artisanal mines in areas largely controlled by paramilitary groups (De Waal 2019). These groups employ violence to control gold revenues, using murder, rape and torture unscrupulously. During a raid on the Jubel mine in North Darfur in 2013, 839 people were reportedly killed (The Enough Project 2017a). A UN Expert Panel found that 99% of gold originated from Sudan was "tainted", referring to the human rights abuses associated with mining it (The Enough Project 2017a).

Profits from artisanal gold mining have not only contributed to funding paramilitary groups but also

led to detrimental effects on local populations and the environment (Tubiana 2014; Sudan Democracy First Group 2017). An estimated 1 million people work in Darfuri artisanal gold mines, many of whom have emigrated from neighbouring countries or from oil producing states, an influx that has displaced more than 150,000 Darfuris and increased stresses on existing urban systems (The Enough Project 2017a; Sudan Democracy First Group 2017).

The industry has also engendered additional sources of corruption, as smuggling of artisanal gold has become widespread and resulted in massive losses in taxes. Between 2010 and 2014, more than US\$4.5 billion worth of gold was smuggled from Sudan to the United Arab Emirates alone (Sudan Democracy First Group 2017). From 2013 onwards, most of Sudan's gold production does not appear in official statistics for exports or national gold reserves (Baldo 2018). De Waal (2019) concludes that the "most credible explanation for this is officially-sanctioned off-the-books exports by companies associated with the regime". Baldo (2018) points to the lack of hard currency and the low foreign exchange rate offered by the central bank, noting that this means that businesses are likely to sell gold to state-sponsored companies engaged in smuggling.

Since the August 2019 constitutional charter, there have been some encouraging signs in relation to extractive industries. In December 2019, the RSF under "Hemedti" Daglo announced the transfer of RSF controlled gold mines to the central government (Global Witness 2019b). Furthermore, the transitional government has reportedly taken a more proactive stance towards investigating fraud and embezzlement related to extractive mining: in early 2020, for instance, a religious organisation

was found guilty of using state funds from the country's *zakat* (Islamic alms) court to finance land acquisition and gold prospecting (Dabanga 2020a).

Land governance

Despite the critical contribution of the extractives sector to Sudan's economy, the majority of people employed in the country are in agriculture, which occupies more than 80% of the workforce (The Enough Project 2017a). Access to land, therefore, is crucial for the subsistence of most Sudanese citizens, while also increasingly becoming a focal point of foreign investment.

In recent years, corruption in land management in the country has come under greater scrutiny due to the increased commercial value of agricultural and urban land (Kukutschka 2017). Corrupt behaviour in the sector is driven by a combination of discretionary power within land administration bodies, overlapping and parallel institutions for land management institutions and regulations, as well as extensive powers granted to government ministries to expropriate or privatise land (Sudan Democracy First Group 2016). According to the 2013 GCB, 14% of Sudanese respondents reported paying bribes to land registry bodies (Transparency International 2013).

Corruption has been found to be extensive in processes developing urban land for commercial and residential purposes, acquiring land from customary authorities, the use of land revenues by customary authorities, as well as in the capture of land registry programmes by national and local elites (Kukutschka 2017; Dabanga 2014a).

Corruption plays a role in facilitating large-scale land acquisition by investors. Approximately US\$9 billion of investments in land projects was made

during the oil boom, a number which is touted by the government but figures much lower when revenues are presented in the budget (Reeves 2015; Sudan Democracy First Group 2016). In 2014, allegations of illegal land sales triggered an investigation to determine whether public land was sold at a comparatively cheap price to ineligible owners with government connections. However, Sudan Democracy First Group accused the investigative committee of being biased and of failing to suggest legal recourse to hold those responsible in the illegal sales (Kukutschka 2017). In conflict zones such as Darfur, Kordofan and the southern states, violent land expropriation by security forces is common, and government reparations for these seizures are almost never granted to those displaced, who currently number around 1.87 million people (OCHA 2020).

Law enforcement

Corruption is widespread among the police and security forces in the country. In 29 years of al-Bashir's reign, more than 75% of published budgetary resources were allocated to defence and security spending (Callaway 2018).

The police in Sudan do not need a warrant to make arrests and can easily manipulate the powers they are entrusted with for private gain or political purposes (Martini 2012). Abuse of power and unlawful and arbitrary arrests are therefore not uncommon. Petty bribery is a frequent form of corruption, particularly among traffic police, who compensate for their low wages by abusing their power to issue on-the-spot fines. As officers can issue fines ranging from US\$8 to US\$16, they are able to manipulate documentation to pocket part of the fine, extort innocent drivers for bribes, or

colluding with drivers to lower fines in exchange for bribes (Kukutschka 2017).

Sudan Democracy First Group notes that corruption in traffic enforcement has led to systematic collusion between police officers and transport companies (Elhaj 2015a). Police at bus and ferry terminals falsify departure time stamps to allow buses and trucks to go over the speed limit. This practice not only endangers drivers in general but also negates the right to legal compensation for the passengers if they were to be victims of an accident (Elhaj 2015a). Systematic collusion also extends to smuggling and contraband: extortion and collusion between police and bootleggers of alcohol, for example, creates a system where bootleggers bribe police to operate, usually a much lower price than the fines associated with the crimes they commit (Elhaj 2015b).

According to Transparency International's 2019 GCB, 34% of surveyed citizens perceive the police to be corrupt, and one in three respondents (33%) who had contact with the police had to pay a bribe (Transparency International 2019b). In the 2018 Afrobarometer survey, 34.1% of respondents believed most or all police to be corrupt, while 8% reported having paid a bribe to avoid problems with the police (Afrobarometer 2018).

Corruption also plagues the security and armed forces. In 2010, the National Security Act empowered NISS forces to seize property, conduct surveillance, search premises, and detain suspects for up to four and a half months without judicial review. These powers have been abused to detain and torture political opponents (Kukutschka 2017). Bribery and other forms of petty corruption are also widely committed by military personnel (Transparency International UK 2015).

There is a notorious lack of transparency and accountability in the armed forces. In Transparency International UK's Defence Governance Index, Sudan has the lowest grade of F (on a scale of A to F), with major problems across the board related to accountability and oversight of the armed forces, as well as in relation to procurement and use of resources (Transparency International UK 2015). There is no transparency in the defence budget in Sudan, and reliable aggregate figures have not been published since 2006, with no details available on military R&D, training, construction, personnel expenditures, acquisitions, disposal of assets and maintenance expenditures (Transparency International UK 2015).

The operation of Sudan's security sector during al-Bashir's rule relied on a mix of state funding straight from the national budget, funds derived from the military's control of key industries, financial support from foreign actors, and financial flows from corrupt or illicit activities (Reeves 2018). Indeed, the Sudan Armed Forces' budget is partly derived from operations producing and selling arms to the state as well as neighbouring countries, while the RSF partly depended on financing from mercenary activities, control of gold mines and smuggling, and the NISS derives some of its budget from commercial operations and from foreign donors (De Waal 2019).

These diverse sources of financing ensures that the various armed forces can operate with a degree of autarky and as such are able to flout national laws and regulations (Reeves 2015).

Legal and institutional framework

Overview and background

The popular uprising in 2018 and 2019 was partly motivated by anger against perceived corruption and the “rule of thieves”, and protestors included coalitions of professionals, opposition groups, labour unions, journalists and subaltern military officers who resented al-Bashir’s rule (De Waal 2019). The August 2019 agreements centred on establishing a framework for democratisation that focuses on restoring civil liberties and preparing the public sector for civilian rule. In December 2019, al-Bashir was tried and sentenced on corruption charges, with the court demanding repatriation of embezzled funds, which according to some media estimates amounted to US\$9 billion, chiefly from misappropriated oil revenues (Baldo 2018).

Only 8% of Sudanese respondents to the GCB believe that corruption has decreased in the past year, and 80% believe the government is doing a bad job at curbing corruption (Transparency International 2019b). This could change in the coming year as the transitional cabinet released its General Framework for the Programme of the Transitional Government in December 2019. It outlines 10 commitments to be implemented during the transition to full democracy, including commitment 3: “Combatting corruption and commitment to transparency and accountability”. The framework outlines several vague commitments to revamp current oversight and anti-corruption mechanisms, creating new public and civilian oversight institutions and revising laws and procedures at all levels of state to ensure compliance to national laws (Transitional Cabinet 2019).

International conventions

Sudan has been party to the United Nations Convention against Corruption (UNCAC) since 2014 and to the African Union Convention on Preventing and Combating Corruption since 2018. It is difficult to assess Sudan’s compliance with these conventions, given that the country has yet to publish even the executive summary of its UNCAC peer review, the fieldwork for which took place in October 2016 (UNODC 2020).

Domestic legal framework

Criminalisation of corruption

Chapter 13 of the Sudanese 2003 penal code criminalises a number of corruption-related offences related to public servants, such as active and passive bribery, extortion and embezzlement and other wrongdoings for personal enrichment regarding any public property (Secretariat for Legal Affairs and Constitutional Development 2003).

Punishments for embezzlement include imprisonment or execution for public service workers and confiscation of property, although these sanctions are almost never carried out (US Department of State 2018a, Muzila et al. 2012). The country adopted the Money Laundering and Terrorism Financing Act (MLFTA), which criminalises money laundering and the facilitation of financing of terrorist organisations (Kukutschka 2017).

The 2010 Public Procurement, Contracting and Disposal of Public Assets Act 2010 provides for the state to punish corrupt practices by disbarring bidders and suppliers from future tenders for up to 10 years, the possible loss of any existing contract and possible criminal penalties of up to three

months imprisonment and/or a fine of up to 10,000 Sudanese pounds (Transparency International UK 2015).

As per Article 5 (3) of the constitutional charter, the statute of limitation generally applicable to crimes is not applicable to corruption crimes committed after 30 June 1989.

Political party and campaign financing

Sudan does not have a system to provide public funding to political parties, though Electoral Law 2008 stipulates that parties and candidates should have equal access to print and broadcast media during electoral periods (International IDEA 2018).

Political parties and candidates must report their finances, including their revenues, expenses and donor information on an annual basis, as well as 30 days after the results of an electoral campaign as per the Political Parties Act of 2007 and the Electoral Act of 2008 (International IDEA 2018). In theory, all financial reports must be made public by the National Elections Commission, yet in practice there are currently no reports publicly available on any government website.

Sudan permits political donations from domestic corporate sources or from other organised groups, but bans all foreign donations, anonymous donations and the use of public funds for electoral purposes (International IDEA 2018).

Vote buying is illegal under the current penal code (International IDEA 2018). This and other electoral crimes, including non-compliance with financial reporting, face penalties in the form of disqualification, fines or imprisonment (International IDEA 2018).

Article 57 (3)(c) of the 2019 constitutional charter establishes that no organisation shall have to right to work as a political party unless it has “transparent and open sources of funding.”

Access to public information

Article 39 (1) of the 2005 Sudan Interim Constitution enshrined the right to receive and disseminate information, which was complemented by a freedom of information law passed in January 2015 (Suliman 2019a). The law states that “every person shall have the right to access and obtain information from its original sources from governmental departments and units at all levels of government, public sector institutions, public companies, companies in which the government holds any percentage of shares and any public body the competent minister considers as doing work akin to that of public sector and civil society organisations”, all within 21 days and in either written or oral form. The law is not clear if the legislative and judicial branches, the head of state, or oversight bodies are subject to provide access to public information (Access Info Europe and Centre for Law and Democracy 2019).

According to Access Info Europe and Centre for Law and Democracy (2019), Sudan’s access to information law scores 64 out of 150 in the Global Right to Information Rating.

In practice, however, there are constraints to access to information. Upon its approval, Sudanese legal scholar Ali A Khalil called it “a mere cosmetic process intended to whitewash the unpleasant record of the Sudanese government on issues of transparency and accountability” (Suliman 2019a).

First, the format of the law implies that it only becomes operative once a commission on access to

information has been established, which at the time of writing has yet to happen (Khalil 2018).

Moreover, the law has 12 exceptions under which information will remain classified (Bertelsmann Stiftung 2018). These include personal records and information on national security, foreign policy and criminal procedures, and it remains unclear how the information will be categorised (Suliman 2019a; Access Info Europe and Centre for Law and Democracy 2019). Moreover, the executive branch of government would be able to control access to information as the president will have the right to appoint a minister to oversee access to information requests (Baitarian 2015).

Furthermore, the government would also be allowed to impose fees for each inquiry and individuals will be subject to penalties under other laws if they request certain types of classified information, such as information that the government could decide is a threat to national security (Global Integrity 2016 in Kukutschka 2017). The law also omits protections for those who request information from being tracked or attacked by any governmental body or any other person or organisation that could benefit from concealing the requested piece of information. Overall, in the 2019 All Africa Indicators, Sudan scores 0 out of 100 in all indicators having to do with de jure and de facto provision of public information (Global Integrity 2019)

With the August 2019 constitutional charter, the right to access information was enshrined in Article 56 which states that “every citizen shall have the unrestricted right to freedom of expression, to receive and publish information and publications, and to access the press, without prejudice to public order, safety and morals, as defined by law” (TMC and FFC 2019). It remains to be seen whether this

legislation will provide for more effective transparency than its predecessor.

Conflicts of interest and asset declaration

There is currently no law that explicitly regulates conflicts of interests in Sudan. Article 75 of the 2005 interim national constitution prohibits the president, vice-presidents, ministers and other constitutional office holders to “practice any private profession, transact commercial business, receive compensation or accept employment of any kind other than ... the government”. In practice, however, many high-level officials own stakes in private enterprises, contributing to widespread cronyism and facilitating the continued proliferation of patronage networks (Freedom House 2019).

Article 75 of the 2005 interim national constitution asserts that all executive and legislative constitutional office holders, justices, and senior civil service officials are also required by the constitution to present declarations of their “assets and liabilities including those of their spouses and children.” This obligation is also incorporated in Article 9 of the 1989 Sudanese Anti-unlawful Enrichment and Suspect Act which also defines the crime of “suspicious enrichment” as “every such property, as may vest into any person, and he cannot explain any lawful aspect for acquiring the same” (Muzila et al. 2012). As per the Electoral Act of 2008, all candidates to public office must also present asset declarations, including those of their spouses or children (International IDEA 2018). Asset disclosures, however, are not public and there are no regulations to enforce compliance with this obligation (Kukutschka 2017; US Department of State 2018a).

The anti-corruption commission, the Financial Disclosure and Inspection Committee and the Unlawful and Suspicious Enrichment Administration at the Justice Ministry monitor compliance of asset declaration submission. Despite the existence of these bodies, there is no evidence of effective enforcement or prosecution of offenders (US Department of State 2018a).

Sudan does not have any restrictions on lobbyists or special interest group representatives from becoming public officials, nor does it restrict public employees from joining lobby firms or interest groups following their time as a public sector employee (Global Integrity 2019). To illustrate this opacity, in June 2019, the leader of the transitional military council hired a Canadian lobbying firm for US\$6 million of government funds to try to secure US support following the 3 June crackdown on protests; the Sudanese public only became aware of the situation following publication of the transfer of funds by the US government (Lynch and Gramer 2019).

Whistleblowing

Whistleblower protection in Sudan has a legal basis in Sudan insofar as some experts hold that Article 39 of the 2005 interim constitution (which guarantees freedom of speech) provides a constitutional basis for protecting whistleblowing (Blueprint for Free Speech 2014). The 2016 Anti-Corruption Act further guarantees the privacy rights of whistleblowers, punishing anyone who reveals their personal data with two years in prison, a fine or both (Suliman 2019b).

In practice, there is no culture of actively encouraging corruption reporting, and there are no practical safeguards in place to protect

whistleblowers. In one case in 2013, a whistleblower who attempted to report corruption in the police service was tried and convicted of damaging the reputation of the police, and sentenced to prison (Transparency International UK 2015).

There are channels available to the general public to denounce corruption. The Public Grievances Chamber has various channels through which to denounce corruption, including ways to do so anonymously (Public Grievances Chamber 2018). After the toppling of al-Bashir in 2019, public prosecutors have reportedly started gathering corruption complaints on a more proactive basis, working with citizen groups to formulate these complaints and encouraging whistleblowers to come forward (Dabanga 2019a).

Despite this, there is currently no legal system to report on police corruption or abuse, and Sudanese citizens remain very reticent about reporting wrongdoing for fear of reprisal (GAN Integrity 2016). When asked in the 2018 Afrobarometer survey, 60% of respondents said that they would not report corruption if they witnessed it (Afrobarometer 2018).

Institutional framework

Sudan has several institutions responsible for investigating corruption and providing oversight for government institutions and processes.

Auditor general

The office of auditor general is confirmed as an independent body by Article 33 of the 2019 constitutional charter, though its structure and functions are those prescribed in Article 205 of the 2005 interim constitution (National Audit

Chamber 2020). The auditor general is the top authority of the National Audit Chamber, and independent audit institution [with wide jurisdiction over all branches of government](#). As per the charter, the auditor general is selected by the cabinet and formally appointed by the sovereignty council (TMC and FFC 2019).

The auditor general reviews “the accounts of the national executive bodies, the national legislature and the national judiciary, as well as the accounts of the northern states, institutions, bodies, public companies and any other institution determined by law” (National Audit Chamber 2020). The auditor general presents annual reports relating to public expenditures in regards public budgets (Elbushari 2017). While the auditor general is expected to make reports publicly available, the government usually does not act on its findings and recommendations. The auditor general is also responsible for undertaking legal action to retrieve embezzled money, though this is generally a slow process (Elbushari 2017).

Although the auditor general chamber’s independence is guaranteed by law, in practice it is subject to political interference and lacks the resources to fulfil its mandate. There is also a notable lack of transparency in most internal reports presented to the auditor general, with many allegedly suffering from fraudulent data or forgery (Elbushari 2017).

Anti-corruption commission (ACC)/Anti-Corruption and Public Funds Recovery Commission

The ACC has its roots in a series of recommendations made by international financial institutions to al-Bashir’s government in 2010. In January 2012, al-Bashir ordered the establishment of the ACC to “monitor and follow what is being published in the media about corruption and to

coordinate with the presidency of the republic and other competent authorities in the Ministry of Justice and the national assembly to complete information on what is being raised about corruption at the state level” (Sudan Tribune 2014).

In 2013, the head of the agency was removed by the president only a year after his appointment for not finding evidence of corruption and no replacement was appointed (Kukutschka 2017). Until 2016, the commission remained non-functional and, as a result, there was no official, independent body to counter corruption. In 2016, Law No. 8 on the National Commission for Transparency, Integrity and Combating Corruption was passed which established the “the National Commission for Transparency, Integrity and Combating Corruption”. This law sets out the functions of the anti-corruption commission to receive complaints from citizens and reports from civil servants about alleged corruption and prepare reports for the Ministry of Justice to present to the judiciary (US Department of State 2018b). The ACC also nominally possesses discretionary powers to punish violators of the asset declaration provisions of the Constitution (US Department of State 2018a) though there is no evidence that would indicate that the commission has ever become fully operational.

As per the constitutional charter, the anti-corruption commission is due to be restructured as the Anti-Corruption and Public Funds Recovery Commission and put to work immediately (Arab Centre for Research and Policy Studies 2019).

Anti-Corruption Investigation Unit (ACIU)

Created in July 2018, the ACIU operates under NISS authority. The ACIU is mandated with countering corruption in government to safeguard

public funds (US Department of State 2018a). The ACIU is intended to act in coordination with the anti-corruption commission to investigate corruption the public service, with the glaring exception of the armed forces.

It is uncertain whether the ACIU will continue operating within the new regime as the NISS was largely supportive of the al-Bashir regime and opposed to military leaders within the sovereignty council.

National Elections Commission (NEC)

The NEC was established by Article 141 of the 2005 interim constitution, and its functions, structure and composition were laid out in the 2008 National Elections Act (EISA 2011). The NEC manages elections and referenda, acts as a liaison between the government and political parties, is in charge of mapping electoral districts, and is entrusted to take legal action against “people or officials who engage in corrupt or illegal actions” in relation to elections (EISA 2011).

The nine members of the NEC are proposed by the president and approved by parliament to hold six-year terms. Although members of the NEC have judicial immunity, the presidency has the power to dismiss these members on moral and ethical grounds and in relation to their physical and mental health (EISA 2011). The budget of the NEC is also proposed by the president and presented as part of the annual budget. Until 2019, the National Election Commission chairman had always been a NCP official (Freedom House 2019).

The NEC’s performance in the 2015 election was considered widely skewed towards the NCP. Deliberate confusion regarding voter registration, the discriminatory media access for independent

candidates and opposition parties, and the opaque management of the elections failed to ensure effective participation in the elections (Bertelsmann Stiftung 2018).

Public Grievances Chamber

The Public Grievances Chamber is the country’s equivalent of an ombudsman. This office was set up in 1995 (and modified in 1998 and by the Public Grievances Office Act of 2015) as an independent body mandated to consider complaints related to grievances suffered by citizens in relation to state institutions after all other means of litigation had been exhausted (International Monetary Fund 2013 cited in Kukutschka 2017). The Public Grievances Chamber is composed of independent judges and subordinate to the presidency of the republic (Isalam 2018). It allows complaints to be filed anonymously, though accompanied with sufficient evidence to warrant an investigation (Public Grievances Chamber 2018). Reports by Global Integrity and other sources, however, point out that the chamber office is poorly staffed and underfunded and that its reports are often outdated or unavailable to the public (Kukutschka 2017).

In February 2019, during the escalation of protests, al-Bashir announced the dissolution of the body in favour a “federal centre for the fight against corruption” without providing details about its functions or structure (Isalam 2018). The destiny of this chamber is unknown following the August 2019 constitutional charter as chapter 8 of the declaration replaces previous existing judicial bodies with a new supreme judicial council and a constitutional court.

Public prosecutor’s office

The public prosecutor represents the highest attorney in the country. The office is independent as per the 2019 constitutional charter, which also states that the prosecutor is appointed by the sovereignty council after being nominated by the Supreme Council of the Public Prosecution. The public prosecutor is responsible for representing the state and its people and bring forward cases, including corruption, to the judiciary. A special anti-corruption attorney within the public prosecutor's office investigates and prosecutes corruption cases involving officials, their spouses, and their children (US Department of State 2018a).

The public prosecutor has recently undergone various changes: the al-Bashir government appointee for the office was fired after the April coup, replaced by Alwaleed Sayed Ahmed. In June 2019, after launching an investigation into the 3 June crackdown, Ahmed was in turn fired by the transitional military council to be replaced by Abdullah Ahmed (Al Jazeera 2019). In October 2019, as per the constitutional charter, a new public prosecutor was assigned.

Financial inquiries unit (FIU)

Established in 2010 to meet with FATF standards, the FIU was established “to analyse the information which relates to the money suspected to be the proceeds of an offence or from terrorism financing, and send such information to the competent prosecution attorneys bureau” (Central Bank of Sudan 2020). Between 2013 and 2015, the FIU sent 75 anti-money laundering cases to the Ministry of Justice's office of public prosecution and worked with several public and private actors in the financial sector in order to strengthen detection of illicit financial flows. In 2015, it published an analysis of

trends in suspicious activity reports filed by banks over a three year period (The Sentry 2019).

The FIU lacks operational and legal autonomy to perform its duties well, according to MENAFATF evaluators (The Sentry 2019). Also, despite efforts to improve it, banking supervision remains weak, and neither the FIU nor the Central Bank of Sudan wields sufficient power to enforce compliance among private sector financial institutions (The Sentry 2019).

Other stakeholders

The explosion of political activity by Sudanese citizens in 2018 and 2019 was supported by journalists and civil society organisations whose activities had been heavily restricted during the al-Bashir regime. After the coup in April 2019, civil society and media organisations took a dominant role in negotiations with the transitional military council to ensure a stable transition to democracy and meet popular demands. As such, the constitutional charter of 2019 is a compromise shaped by civil society organisations seeking to guarantee a transition to democracy by 2022 (Bolatito 2019).

Media

In Sudan, Article 56 of the constitutional charter establishes freedom of expression and freedom of the press. Prior to the 2018-2019 uprising, freedom of the press was heavily restricted by the Press and Publications Act 2009, the 1999 penal code, and the 2009 national law of 2010. These allowed the government to impose “severe restrictions on press freedom, including a ban on media content that ignites ethnic and religious sentiments that may

incite violence” (Hamid et al. 2018; US Department of State 2018a).

Technically, these laws are still in place, though in practice restrictions have not been applied since August 2019, with the government hoping to reform these restrictions through participatory processes before 2022 (AllAfrica 2020)

The National Council for Press and Publications (NCP) monitors the press in Sudan and is entitled to issue licences to newspapers and magazines. It also controls a registry for journalists and conducts exams on journalists looking to qualify for licences (Hamid et al. 2018). The NCP can also order the closing of a media outlet for three days without a court order.

During the al-Bashir regime, restrictive laws set out by the central government restricted journalism in Sudan (Hamid et al. 2018). The government could effectively silence corruption denunciations by censoring or revoking media licences or by criminally prosecuting journalists for libel. Due to the entrenched corruption in the judiciary, libel trials generally went against journalists (US Department of State 2018a). Journalists were forbidden to publish stories about 15 “red line issues”, including articles about corruption, university protests, the weak economy and declining value of the Sudanese pound, deaths of persons in detention, the fuel crisis, government security services, and government action in conflict areas (Freedom House 2019; US Department of State 2018a).

Furthermore, due to the nature of media ownership in Sudan, where the government has a stake in broadcast and privately owned media (Hamid et al. 2017), journalists may be subject to pressures from

inside their media outlet, or economic pressures may be exerted on the organisation to professionally sanction the journalist in question (Hamid et al. 2018). The 2013 GCB reflects this, as 68% of respondents believed media organisations to be corrupt (Transparency International 2013).

During the tumult of the recent revolution in Sudan, around 100 journalists were arrested and there were numerous raids on media organisations. The NISS was also responsible for “shutting down independent and opposition newspapers such as Al-Tayar, Al-Jareeda, Al-Midan and Al-Watan, or confiscating entire issues as they c[a]me off the press” (Reporters Without Borders 2019).

According to Reporters Without Border's 2019 World Press Freedom Index, Sudan is ranked 175 out of 180 countries, with a score of 72.45 (Reporters Without Borders 2019). It scores 0 out of a possible 4 in the 2019 Freedom in the Media Index (Repucci 2019).

There are signs of improvement following the 2019 uprising and ousting of al-Bashir. Recently, workers of the state-run Sudan News Agency demanded a restructuring of journalistic practices to promote media freedom and ethics to reflect the “new reality” or “healthy reality” following the 2019 revolution (Dabanga 2019b). Similarly, the Sudanese government has allowed foreign journalists into the country as of 2019 (Dabanga 2019d).

However, in January 2020, the anti-corruption committee closed four newspapers to investigate allegations of corruption and abuse of state funds. The Journalist Association for Human Rights protested against these actions, which prompted the government to guarantee employment to the

workforce of both newspapers (Dabanga 2020b; Al Jazeera 2020; Dabanga 2020c).

Civil society

Freedom of assembly and association have been guaranteed by Article 57 of the 2019 constitutional charter, though similar constitutional protections were granted in the 2005 interim constitution. Despite these provisions, al-Bashir's regime cracked down harshly on civil society organisations, trade unions and public demonstrations in general.

Public protests have frequently been violently repressed with deadly force, including during the 2011 Arab Spring, 2013 student protests, as well as the 2018 and 2019 uprising (Freedom House 2019; Kukutschka 2017; Africa Centre for Peace and Justice Studies 2020).

Under al-Bashir, civil society organisations (CSOs) were frequently harassed if they were not openly "Islamic" and approved by the government (Kukutschka 2017). The national NGO law under the previous regime heavily regulated civil society activities, requiring CSOs to re-register annually, as well as advanced approval before receiving any foreign funding and establishing penalties and fines if their actions were judged to be in opposition to the government (US Department of State 2018a). Furthermore, CSOs have been forced to work through local government organisations when providing similar public services: for example, humanitarian aid was withheld from the Blue Nile state until a state-sponsored organisation was put in charge of distribution (Kukutschka 2017).

State violence has also been meted out to outspoken civil society groups and academics. In

2018, human rights activist Hisham Ali Mohamed Ali, who has advocated against torture and official corruption, was detained upon arrival at Khartoum International Airport and remained in detention until 2019 (Front Line Defenders 2018).

In August 2019, the transitional military council made a formal agreement with the Forces for Freedom and Change, a conglomeration of pro-democracy groups formed in January 2019 to end the violence and establish a baseline for civil and political rights (Sudanese Professionals Association 2019). The Forces for Freedom and Change include a wide variety of civil society and human rights groups, the most important among these the Sudanese Professionals Association, a group made up of various professional associations, largely made up university educated urbanites (Sudanese Professionals Association 2018). Although not a member of this grouping, the Sudan Democracy First Group, made up of academics and researchers focusing on countering corruption, extremism and poverty in Sudan, is among the most important groups researching corruption in the country (Sudan Democracy First Group 2020).

During the al-Bashir regime, there were no independent trade unions and the Sudan Workers' Trade Unions Federation was co-opted by the government, and any strikes not authorised by the federation was met with government repression (Freedom House 2019). Due to the pro-al-Bashir leadership in the unions some pro-democracy groups have asked the government to disband the leadership of the unions (Dabanga 2019e).

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