

Financial institutions
Energy
Infrastructure, mining and commodities
Transport
Technology and innovation
Life sciences and healthcare

 **NORTON ROSE FULBRIGHT**

Research comparing 41 national anti-corruption strategies

Insights and guidance for leaders

Countries curbing corruption



Authors

Mark Pyman, Senior Fellow, Institute for Statecraft

Sam Eastwood, Jason Hungerford and Jasmine Elliott, Norton Rose Fulbright

Acknowledgments

We would like to thank Professor Michael Johnston, Professor Tina Søreide and Lt Col (Ret) Jodi Vittori PhD for their review and insightful feedback.

We would also like to gratefully acknowledge James Ford, Andrew Judkins, Maria Kennedy, Kate Langley, Stuart Neely and Andrew Sheftel from Norton Rose Fulbright for their help in reviewing national anti-corruption strategies and developing the methodology.

<http://www.nortonrosefulbright.com/knowledge/publications/147479/countries-curbing-corruption>

Executive Summary

We have analysed the substance of a broad range of national anti-corruption strategies. Our purpose in doing so has been to extract lessons and insights, as best we can, that can guide leaders responsible for developing their own national strategies into making better plans. The report illustrates its findings with multiple examples from the country strategies.

The case for combating corruption is that “it is a force which drives poverty, inequality, dysfunctional democracy and global insecurity”. These words, from one of the world’s foremost experts on countering corruption over the past thirty years, speak to all of us, in nations rich and poor, who wish to see a more prosperous and secure global future. National anti-corruption strategies and plans are a component of realising this desire.

We have taken a sample of 41 national anti-corruption strategies, from countries that rank between 21 and 130 in Transparency International’s Corruption Perception Index 2015. The intent was to look at countries that have not already succeeded in reducing corruption to a manageably sized problem (taken to be those countries ranking in the top 20), nor at those countries that are in the grip of deep, systemic corruption issues (countries in the bottom part of the CPI scale).

These 41 countries, despite having been chosen largely at random within that range, show a generally positive trend in controlling corruption over the past ten years based on data from the World Bank: 21 of them show an improving trend of control of corruption, 9 show no obvious trend, and 11 show a declining trend of control of corruption. This report thus starts from an optimistic perspective, that a surprising number of nations have made appreciable progress against corruption during the last decade.

Some of the national anti-corruption strategies are bold, innovative and thorough. Some reflect a superb diagnostic and situational analysis; some have a thoughtful and well-articulated spectrum of proposed measures. A few, but only a few, are first class in the way they approach implementation, monitoring and evaluation of the strategy.

21 countries show an improving trend on control of corruption based on data from the World Bank.

Less than 1/3 of the strategies note clear timelines or deadlines for each objective or activity.

Less than 1/2 of the strategies provide quantitative criteria for success, either overall for the strategy or per objective.

The main findings on the positive substance of the strategies were the following:

The desired beneficial impact of the strategy

The national strategies reviewed are rarely as explicit as they could be on what the desired impact of the strategy is beyond controlling corruption. Countries typically imply one or two desired beneficial impacts, which fall into the following broad categories

- To improve government and better public service delivery
- To improve national reputation, improving the CPI score
- To strengthen democracy, transparency, and/or integrity
- To improve economic prosperity, or to improve competitiveness
- To strengthen national security
- To be aligned with international anti-corruption standards
- To gain accession to the EU.

Sector emphasis

Some countries put special emphasis on particular sectors and reference certain sectors as key areas of focus or of risk. Out of the 41 strategies reviewed, 18 strategies made some sort of reference to specific sectors of priority or sectors that are highlighted for their corruption risks. The most common sectors noted were health, business, judiciary, education and procurement. However, none of the strategies appeared to extend to sector strategies.

Most strategies take a multi-pronged approach

Almost all of the countries share the current paradigm that an anti-corruption programme should comprise three broad elements – prevention, prosecution and education. This is sometimes alternatively expressed as a ‘comprehensive approach’ to fighting corruption.

Most of the strategies were developed with a broad scope, rather than a narrow one. Of the 41, 8 were narrow in scope and 33 were broad in scope. The breadth was commonly expressed as a balance between strengthening cultural values and implementing a range of preventive and punitive anti-corruption measures.

Both building integrity and reducing corruption are reflected

We looked at whether the principal emphasis of the strategy is positive – such as building integrity, developing a high integrity culture, or fostering ethical cultural values – or whether the strategy uses a more aggressive tone related to preventing corruption, fighting corruption, increasing controls, and reducing discretion.

Of the 41 strategies reviewed, only one has a tone that almost entirely focused on integrity. 11 countries refer in some significant capacity to both preventing corruption and building integrity as a dual-approach to anti-corruption. The majority have a stronger tone of corruption reduction.

11 strategies refer both to preventing corruption and building integrity as a dual approach to anti-corruption.

18 strategies reference specific sectors of priority noted for their corruption risk. The most common sectors noted include health, business, judiciary, education and procurement.

On the critical side, a significant number of country strategies were deficient in one or more serious respects:

Lack of diagnosis and situational analysis

While most strategies reflect on the risks of corruption that they hope to combat, overall the strategies reviewed did not provide sufficient analysis and detail to be considered a substantive risk or vulnerability assessment. Examples of these more structured approaches to risk assessment could be more widely used to ensure that the objectives proposed throughout the strategy are the most relevant and will make the most effective impact.

Poorly thought-through strategy and reform measures

This area of focus is where real anti-corruption knowledge, change management competence, and political skill are required. Knowing which sort of measure is suitable at which time is something that warrants serious consideration in a strategy and the expertise people who have such knowledge and experience. There are measures being proposed when there is evidence against their effectiveness: for example, too many hopes are generally being pinned on civil society. Overall, countries could have been much stronger in this area, with too many 'shopping lists' of generic measures or impossible-to-achieve generalities.

Little attention to leading and effecting change

The strategies are relatively weak on illustrating just how the proposed changes will be achieved. There is extensive literature from the corporate sector on how to change large organisations, covering both private sector organisations and, to a lesser extent, public and state-owned organisations. The anti-corruption world needs to embrace this literature and translate it to anti-corruption related initiatives.

Few strategies are explicit about political leadership

Few of the strategies are explicit about effective political leadership. Statements about the need for 'political will' seem to imply that the architects of the strategy do not believe that they have it. In a few strategies, there is a more explicit statement from an authoritative governmental figure, usually the Head of State, and more such ownership is needed. In this sample, the only notable examples were Bhutan, China and Rwanda.

Need to support committed individuals

The biggest surprise of the analysis was the complete absence of any focus on committed individuals or supporting groups of committed people against corruption. We could find not one reference to this in any of the 41 plans. Committed individuals – or 'human agency' as the academic literature calls it – are known to be one of the key drivers of positive change against corruption.

Unclear coordination and implementation

Only 19 country strategies made reference to or provide an outline of the implementing governance or coordinating structure for the strategy. Whilst 28 strategies comment to some extent on the overall implementation and monitoring of the strategy, less than a third note clear timelines or deadlines for each reform measure. Less than half provide quantitative criteria or indicators for success, either overall for the strategy or per objective/ reform measure.

Not one strategy contained explicit measures to support groups or networks of individuals committed to fighting corruption and building integrity in their government.

Few strategies are explicit about effective political leadership.

Contents

Introduction	09
1 Strategies, plans and time horizons	13
2 Overall framing – building integrity or reducing corruption	15
3 Consultation and drafting process	17
4 Continuity and learning from previous anti-corruption plans	19
5 Preliminary diagnosis and situational analysis	21
6 Desired beneficial impact	24
7 Principal Anti-Corruption measures proposed	26
8 Breadth and focus of the strategies	28
9 Theory of change	30
10 Governance structures and coordination arrangements	38
11 Implementation, monitoring and evaluation	42
12 Observations and lessons	47
Appendix 1 – Principal anti-corruption objectives and examples of objectives translated into detailed measures	51
Appendix 2 – Review questions by topic	67
Appendix 3 – Strategy document sources	71
Appendix 4 – References and related readings	74

Introduction

“The case for combating corruption relentlessly is that it is a force which drives poverty, inequality, dysfunctional democracy and global insecurity.” These words, from one of the world’s foremost experts on countering corruption over the past thirty years,¹ speak to all of us, in nations rich and poor, who want to see a more prosperous and secure global future.

This report starts from an optimistic perspective, that a surprising number of nations have made significant progress against corruption during the recent past. There is an increasing amount of evidence that the eternal pessimism, which usually accompanies discussion of corruption, is somewhat overdone.

Understanding why some countries have made progress in tackling corruption, whilst others have not, has been the subject of considerable recent research, notably the EU-funded ANTICORRP programme,² which has over the past four years examined countries across the world for factors that explain their success. The research especially identifies Chile, Uruguay, Botswana, Estonia, Georgia, Taiwan and South Korea as countries that have made real progress. All of them rank high on the 2015 Transparency International Corruption Perceptions Index (CPI) scale.³

Other countries too have made progress. Finland, which was seen as significantly corrupt after the First World War, was ranked 2 on the CPI scale and seen as a natural compatriot of the other Nordic countries. In the case of Singapore, ranked number 8 on the CPI scale, two key drivers of change were a relentless focus on building clean government, and developing a cadre of managers to carry the leaders’ vision forward. Improvement is not consigned only to peaceful countries. Countries that have emerged from conflict in the late 1990’s, like Georgia, Liberia and Serbia, have also been able to improve, demonstrating a major reduction in corruption over a period of just 5-10 years post conflict.

¹ Cockcroft, Laurence. *Global Corruption: money power and ethics in the modern world*. I.B Taurus, 2012, p 231.

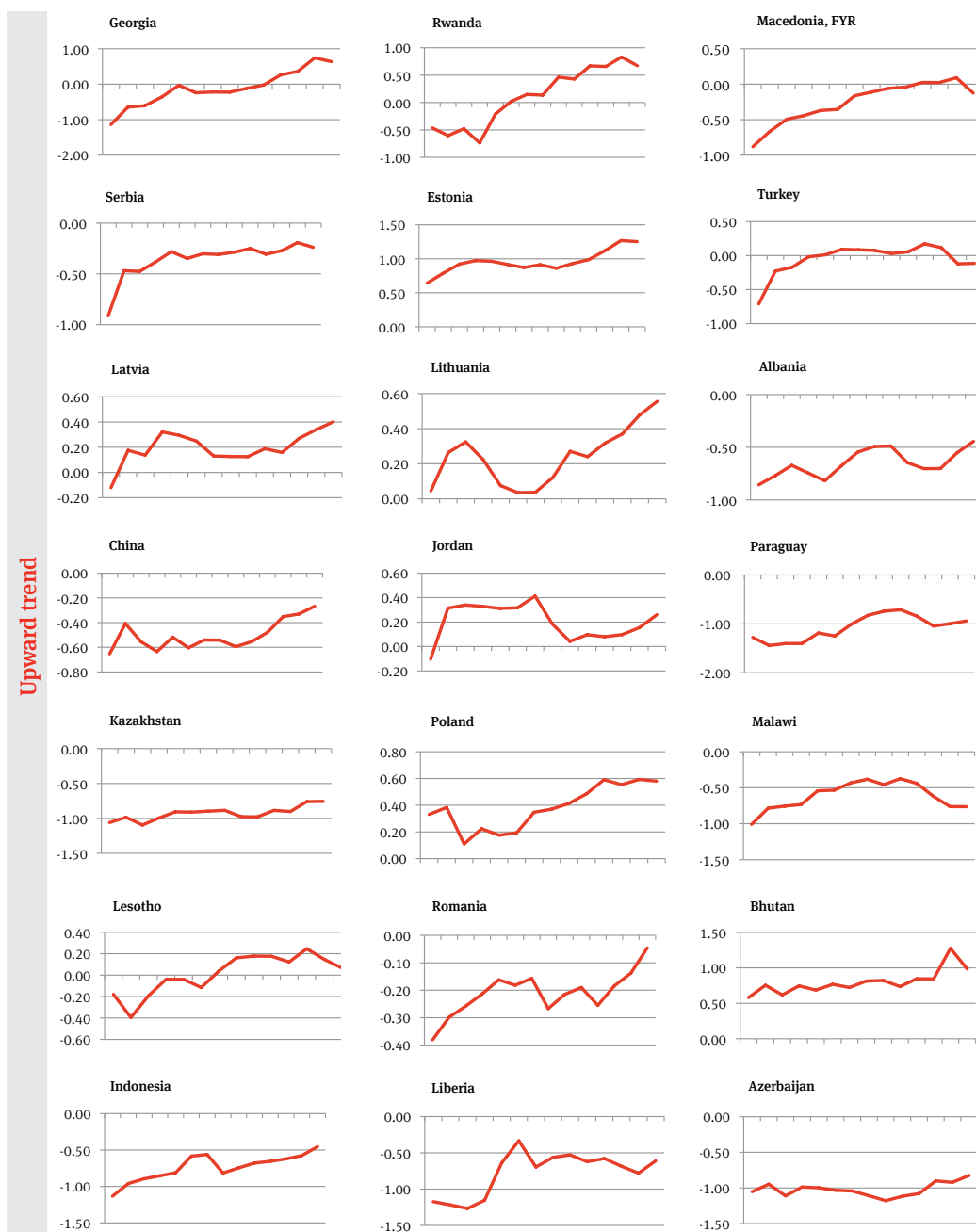
² ANTICORRP. *Anticorruption Policies Revisited: Global Trends and European Responses to the Challenge of Corruption*. 2012-2017. Accessible at <http://anticorpp.eu/>.

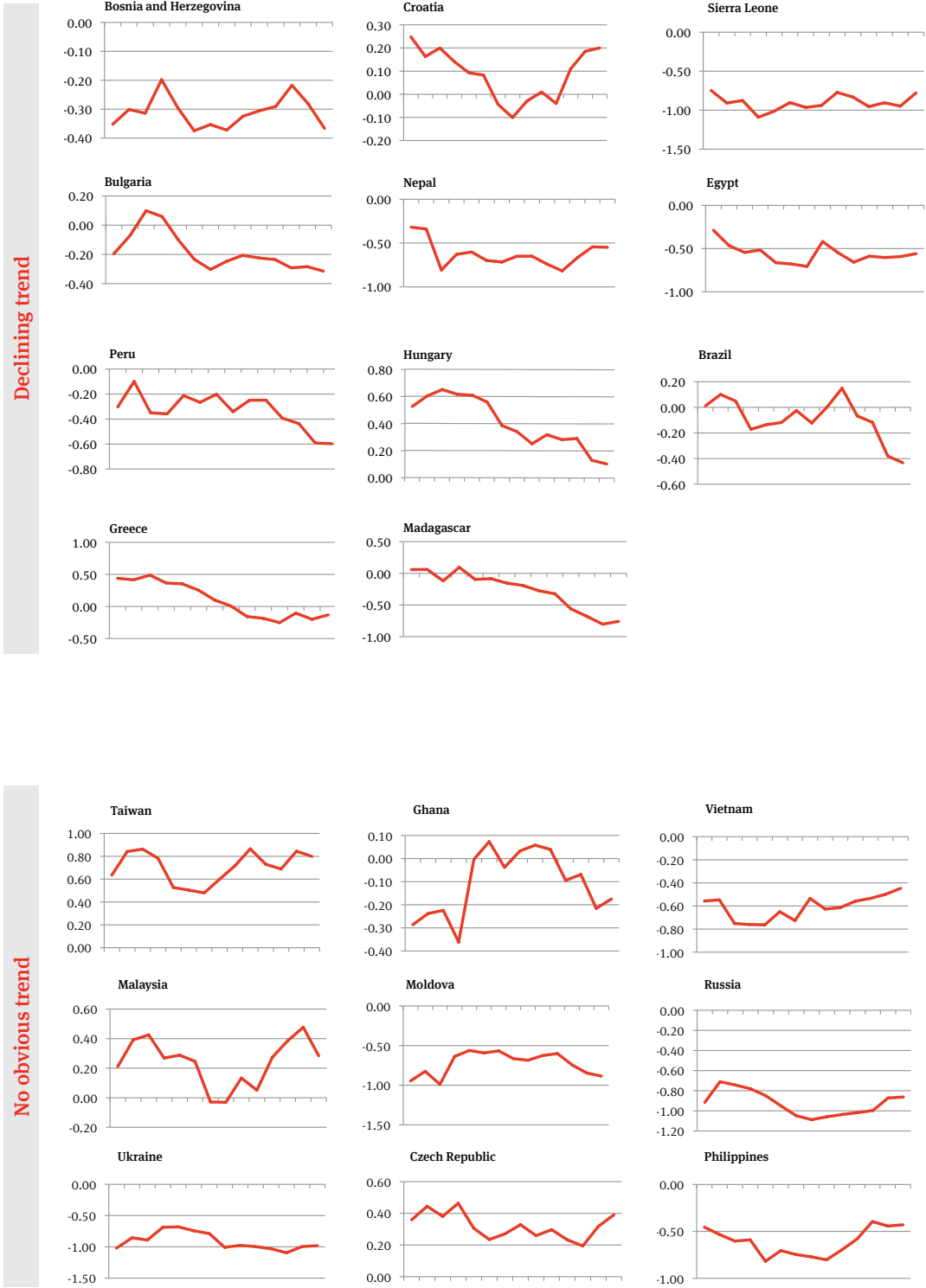
³ All references to current CPI scale are based on the 2015 CPI results.

Country trends – Control of corruption 2002-2015

The 41 countries analysed in this study, despite having been chosen largely at random, show a positive trend in controlling corruption. Using the World Bank Institute's 'Worldwide Governance Indicator' (WGI) for control of corruption,⁴ and plotting WGI scores from 2002-2015, we find that 21 of the countries have shown an improving trend of control of corruption, 9 have shown no obvious trend, and 11 have shown a declining trend of control of corruption.

⁴ Full data set of Worldwide Governance Indicators can be found at <http://info.worldbank.org/governance/wgi/index.aspx#home>.





Methodology

We have taken a sample of 41 national anti-corruption strategies that rank between 21 and 130 on the CPI scale. The intent was to look at countries that have not already succeeded in reducing corruption to a manageably sized problem, like those ranking in the top 20; nor at those countries that are in the grip of deep, systemic corruption issues that plague countries in the lower part of the CPI scale. The countries in the sample, ordered by their ranking in the 2015 CPI scale, are the following:

CPI decile	Countries
21st – 30th	Estonia, Bhutan, Poland, Taiwan
31st – 40th	Lithuania, Czech Republic, Latvia
41st – 50th	Rwanda, Jordan, Georgia, Croatia, Hungary
51st – 60th	Malaysia, Ghana, Greece, Romania
61st – 70th	Lesotho, Turkey, Macedonia, Bulgaria
71st – 80th	Serbia, Bosnia and Herzegovina, Brazil
81st – 90th	China, Liberia, Albania, Egypt, Indonesia, Peru
91st – 100th	Philippines
101st – 110th	Moldova
111th – 120th	Malawi, Vietnam, Russia, Sierra Leone, Azerbaijan
121st – 130th	Kazakhstan, Madagascar, Nepal, Paraguay, Ukraine

We interrogated each strategy through a structured questionnaire of 90 questions on ten topics. The topics were: 1) basic data; 2) the consultation and drafting process; 3) preliminary diagnosis and situational analysis; 4) realism, clarity and achievability of the proposed measures; 5) the desired overarching beneficial impact; 6) the focus of the strategy, the core content and principal measures; 7) the theory of change; 8) implementation; 9) monitoring, evaluating and reporting, and 10) the private sector. For example, we asked: Have countries been thorough in bringing multiple stakeholders on board? Do they have clear and effective governance and coordination arrangements? Have they done a diagnostic and situational analysis? The specific questions are listed in Appendix 2.

We have also sought to understand what the underlying logic for the strategy was – and if there is any discussion of why the country might think that its chosen set of measures might succeed. For example, are the strategies broad, taking a ‘multi-pronged’ approach with a mix of preventative, punitive and educative measures? Do they place more emphasis on culture, transparency, firm enforcement, or external monitoring as the principal agents of change?

In this study, we have not attempted to correlate the anti-corruption strategies to the progress being made by the countries. It may be there is a clear connection. It may also be that other measures being taken by the country – for example in public financial management, or in introducing e-government – are actually the drivers of success against corruption. It may even be that the anti-corruption strategies play some entirely different sort of role – for example of signalling that the government cares about corruption, and stimulating other behaviours among civil servants, politicians and stakeholders – that yield the real beneficial effect.

1 | Strategies, plans and time horizons

Of the 41 countries reviewed, the norm is to have a strategy document supported by more detailed plans (21 countries out of 41). A further 17 countries had only a strategy document, as far as we could ascertain, whilst for 3 countries, we were only able to find an action plan.

The plans varied widely in the level of substance and detail. Some remained at high level throughout, with little detail on the proposed objectives and measures (though it may be that there were separately available action plans that we were unable to locate). Others were very clearly structured, going down to levels of activities or initiatives whose progress could be very specifically monitored. This level of detail is assessed further in section 7.

The time horizon adopted

The majority of the national strategies cover a time horizon of three, four or five years. Some of them also have an action plan that covers the first one or two years of that time period. Four of the national strategies cover a longer period: ten years in the cases of Ghana and Lithuania, and thirteen years in the cases of Indonesia and Vietnam. For countries with significantly longer time frames, we note discussion of why the time frame was chosen below.

The Ghanaian action plan is integrated directly into the broader national development plan, and this integration is perhaps the logic for the ten-year planning horizon. The commitment to make a plan is articulated in law, whereby Article 35(8) of the 4th Republic Constitution of 1992 states that ‘the State shall take steps to eradicate corrupt practices and the abuse of power’.⁵

The Lithuanian plan fits into a Parliamentary requirement to draft long-term State programmes for the strengthening of security, within which they consider corruption to be a threat to national security. The objective of the Lithuanian National Anti-Corruption programme is then to ensure a long-term, effective and targeted anti-corruption and control system in 2015-2025.

Both the Indonesian and Vietnamese strategies are intended to serve as a point of reference for the wider range of corruption prevention and eradication measures being developed both nationally and regionally (in the case of Indonesia). The Vietnamese long-term strategy 2008-2020 was developed because of the realisation that the anti-corruption approaches of the past were not succeeding, and the lack of a long term strategy was seen to be one of the institutional failings to be corrected.

Length of the document

The table below, besides giving the timeline covered by each plan, also notes the length of the document. They range from Turkey, at 7 pages a short, relatively non-detailed document, up to documents that are over 100 pages, such as Greece, Latvia and Peru.

⁵ National Anti-Corruption Plan (2012-2021), National Working Group (Ghana), Section 1.1.

Country	Timeline	Length of document
Albania	2015-2020	62 pages
Azerbaijan	2012-2015	14 pages
Bhutan	2014-2018	30 pages
Bosnia and Herzegovina	2014-2020 (updated 2016)	47 pages
Brazil	2015-2016	website
Bulgaria	2015-2020	19 pages
China	2013-2017	44 pages
Croatia	2015-2020	18 pages
Czech Republic	2015-2017	30 pages
Egypt	2014-2018	20 pages
Estonia	2013-2020	36 pages
Georgia	2010, 2014-2016	26 pages
Ghana	2012-2021	90 pages
Greece	2013-2017	130 pages
Hungary	2015-2018	48 pages
Indonesia	2012-2025	40 pages
Jordan	2013-2017	42 pages
Kazakhstan	2015-2025	23 pages
Latvia	2015-2020	127 pages
Lesotho	2014-2019	40 pages
Liberia	2014-2017	46 pages
Lithuania	2015-2025	38 pages
Macedonia	2016-2019	97 pages
Madagascar	2015-2020	24 pages
Malawi	2012-2017	52 pages
Malaysia	2013-2015	26 pages
Moldova	2014-2015	51 pages
Nepal	2014-2019	56 pages
Paraguay	2016	35 pages
Peru	2012-2016	117 pages
Philippines	2013-2016	41 pages
Poland	2014-2019	39 pages
Romania	2016-2020	93 pages
Russia	2016-2017	32 pages
Rwanda	2012	19 pages
Serbia	2013-2018	75 pages
Sierra Leone	2014-2018	48 pages
Taiwan	2012	29 pages
Turkey	2016-2019	7 pages
Ukraine	2014-2017	website
Vietnam	2008-2020	9 pages

2 | Overall framing – building integrity or reducing corruption

Anti-corruption strategies usually cover a broad spectrum of activities, as becomes apparent in subsequent chapters. In this chapter we are looking more broadly at whether the principal emphasis of the strategy is on the positive – such as building integrity, developing a high integrity culture, or fostering ethical cultural values – or whether the strategy uses a more aggressive tone related to fighting corruption, increasing controls, reducing discretion and so forth. To identify this framing, we looked at the strategy’s proposed mission or vision, the overall objectives, how the problems of corruption are phrased, and the tone of the introductory comments.

We also looked at whether there was a discernible trend towards the theme of integrity and using more positive messages of change to anchor anti-corruption initiatives. The reason for looking for this trend comes from the business world, where there is a growing approach on embedding ethical values into an organization, rather than fighting specific unethical behaviours. The expectation is that instilling a culture of ethics will naturally make it harder for people to commit unethical acts.

Out of the 41 strategies reviewed, more than half have only a tone of preventing corruption (Azerbaijan, Bosnia and Herzegovina, Brazil, Bulgaria, Croatia, Czech Republic, Georgia, Hungary, Indonesia, Jordan, Kazakhstan, Latvia, Lesotho, Madagascar, Malawi, Malaysia, Moldova, Nepal, Paraguay, Peru, Poland, Russia, Serbia, Ukraine, and Vietnam). Eleven plans referred in some significant capacity to both preventing corruption and building integrity as a dual-approach to anti-corruption. Depending on the objectives listed, this dual approach seemed either like a strong approach of changing both the culture and reinforcing institutional changes or like a muddled wish list of change. Only one country strategy, Taiwan, had a tone that almost entirely focused on integrity. The other theme of note was a combination of preventing corruption and ‘promoting transparency’ (as seen in three strategies: Estonia, Lithuania and Turkey).

Below we highlight examples of the different approaches or themes used in the strategies reviewed.

Taiwan

Taiwan’s approach, as reflected in the title of the plan (“National Integrity Building Action Plan”) and its policy direction, is one of the only strategies that focuses very little on corruption and almost exclusively on integrity building. It notes in its policy direction, “in order to realize the vision of the ‘Golden Decade’ for integrity reform, the government is to push forward the theme of policies for a clean, competent government”.⁶ The noted policy directions, which include shaping ethics, transparent government, and establishing networks of integrity systems, reaffirm this focus on integrity. Corruption is noted as a goal related to enhancing investigations capabilities and fulfilling international standards, like the UN Convention against Corruption (UNCaC).

Bhutan

Bhutan’s approach is a balance of promoting integrity and preventing corruption, as reflected in its title (“National Integrity and Anti-Corruption Strategy”). The introduction states that “the new strategy is built on the understanding that integrity is best strengthened and corruption best fought through a multi-pronged approach.”⁷ The objectives also focus both on fostering integrity (through political leadership and integrity education) as well as preventing corruption. The objectives (even the integrity-focused ones) still are described with the ultimate goal of fighting corruption, though, and the narrative in the introduction focuses more on the need to prevent corruption as well.

⁶ National Integrity Building Action Plan, Agency Against Corruption (Taiwan), p 1.

⁷ National Integrity and Anti-Corruption Strategy 2014-2018, Royal Government of Bhutan Anti-Corruption Commission, section I.2.

Rwanda

Rwanda's strategy is also a balance of promoting integrity and preventing corruption. The mission of the current strategy is clearly noted as two-fold: "promoting and inculcating awareness of a society founded on discipline, integrity and ethics" and "suppressing corruption through effective and culminating effects of its combating, controlling, and preventing efforts enumerated in this policy."⁸ Measures noted in the strategy reflect this dual approach, with goals specifically focused on enhancing political leadership and promoting national values.

Lithuania

Lithuania's approach is an example of the few strategies that highlight both anti-corruption and transparency. The primary strategic objective of the current strategy is "to reduce the scope of corruption, increase transparency and openness in the public and private sectors,"⁹ which is reflected in the narratives of the stated objectives and proposed measures. Through the description of the measures, it seems that the authors focus specifically on efficiency and transparency as a means to further reduce corruption.

Philippines

The approach taken by the strategy in the Philippines is unique when compared to the other strategies reviewed as it includes anti-corruption efforts within an umbrella of promoting good governance. The mission statement of what is called the "Good Governance and Anti-Corruption Cabinet Cluster" is:

- "Upholding transparency in government transactions and our commitment to combating graft and corruption
- Strengthening of the capacity of government institutions to link their respective budgets with performance outcomes and enabling citizens and civil society to monitor and evaluate these
- A professional, motivated, and energized bureaucracy with adequate means to perform their public service missions
- Improvement of public sector asset and resource management and revenue performance
- Establishing an improved policy and regulatory environment that will reduce the cost of doing business in the country and improve competition"¹⁰

The specific goals of the 2013-2016 strategy include improved transparency, improved public sector performance, improved anti-corruption measures, and improved good governance policy. While the measures noted in the strategy are similar to many of the other strategies, it is interesting to note that most of the measures do not centre on corruption, and the narrative of the strategy significantly focuses on good governance.

⁸ Rwanda Anti-Corruption Policy, Republic of Rwanda Office of the Ombudsman, section 3.2.

⁹ Resolution on the Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025, Seimas of the Republic of Lithuania, p 20.

¹⁰ Governance Cluster Action Plan 2013-2016, Good Governance and Anti-Corruption Cabinet Cluster (Philippines), p 5.

3 | Consultation and drafting process

Most of the strategy documents make no reference to how they were developed. This is a notable, because it could be useful for the reader to know whether they were done by a few people, or by a broad consultative process. Just five plans describe in some detail the process of developing the strategy – Albania, Ghana, Jordan, Latvia and Lesotho. These countries had been through extensive consultation, with up to 250 stakeholders (Lesotho) and 2 years of consultative effort (Ghana).

The United Nations Office on Drugs and Crime (UNODC) has a detailed report¹¹ proposing what a comprehensive drafting process would look like, including:

- Assigning responsibility for drafting the strategy to a small, semi-autonomous group
- Ensuring the continued support and involvement of senior political leaders
- Consulting regularly with all government agencies that will be affected by the strategy
- Soliciting the views of the political opposition whenever possible
- Engaging all sectors of society in the drafting process
- Emphasizing communication, transparency and outreach throughout the drafting process;
- Allocating sufficient time and resources to drafting the strategy
- Taking advantage of other countries' experience and expertise.

Below we highlight examples of how these five countries described their drafting process in the strategies reviewed.

Albania

The methodology and drafting process is summarised on page 5 of the plan. The strategy explicitly states that there was a consultation process with key stakeholders like public administration, independent institutions, international organisations and partners, civil society and the business community. The strategy also states that experiences from national institutions that were a part of the previous strategy were solicited during the drafting process.

The strategy notes the timeline for drafting the process, which started in December 2013 and ended in March 2015. Evaluation of the previous strategy started in December 2013, the first draft of the strategy and accompanying action plan was drafted from March 2014 – August 2014, and a final draft of both documents were circulated to institutions for review on December 2014.

Ghana

The methodology of the drafting process is summarised in section 1.2 of the plan, with members of the Working Group named in the acknowledgments and noted in section 1.0. The strategy development process aimed to be a “broad consultative approach” bringing together “state and non-state actors, both local and international, with the requisite mandate, experience, and interest to help in developing a well-considered” strategy.¹² The members of the working group included representatives of various government institutions, regional and international institutions and development partners, and civil society institutions. The strategy identifies three methods of consultation that were used in the drafting process, namely:

¹¹ For more information see pages 5-12 of “The United Nations Convention against Corruption National Anti-Corruption Strategies: A Practical Guide for Development and Implementation”.

¹² National Anti-Corruption Plan (2012-2021), National Working Group (Ghana), Section 1.2.

- Interviews with key representatives from government, members of Parliament, civil society organisations, and the private sector
- Focus group discussions with stakeholders
- Regional forums in the ten capitals to ensure input at the regional and district levels.

The public was also able to provide input into the process through a portal on the Ghana Anti-Corruption Coalition website.

While the start date of the drafting process is not noted, the strategy was finalised at a national conference in October 2011 with representatives from over 140 stakeholders representing public, private and civil society.

Jordan

The methodology of drafting the strategy is summarised in section 2.1 of the strategy. The strategy acknowledges various initiatives that formed the basis of this strategy, including a review of the previous strategy as well as other initiatives noted in sections 3.3. The strategy states that it was also developed based on information obtained through 240 meetings with and 320 online questionnaires from both public and private anti-corruption partners.

The strategy also outlines its methodology for its risk analysis and identification, where they cite Europol, ISO 31000 and ISO 31010 as methodological guidelines.

Latvia

As noted in the introduction to the strategy, the Corruption Prevention and Combating Bureau developed the strategy by holding four inter-institutional working meetings with state, municipal, and NGO institutions and a Public Consultative Council where ten NGOs discussed the draft strategy. The strategy was also informed by surveys, studies and reports related to corruption prevention in Latvia and a full assessment of the Latvian's framework and its compliance with UNCaC.

Lesotho

The national strategy summarises the drafting approach in sections 1.2 and 1.3. The strategy seems to note that its genesis was the National Dialogue on Corruption held in July 2013 with a theme focused on harnessing political will to fight corruption, where 250 national and international stakeholders agreed that Lesotho needed to take a more coordinated approach to fighting corruption. Stakeholder consultations were conducted in November 2013, and while the strategy does not list the various stakeholders, it does specifically note that district visits were used to engage with community-based organisations.

Political, Economic, Sociological, Technological, Ecological, Legislative, and Industry (PESTELI) and Strengths, Weaknesses, Opportunities and Threats (SWOT) exercises also were undertaken to facilitate a strategic planning workshop before the strategy was drafted. The strategy was finalised with a stakeholder workshop, where a final review was completed.

4 | Continuity and learning from previous anti-corruption plans

One of the initial questions we asked about each strategy was whether there is linkage or continuity with the previous anti-corruption strategy or initiative. While we recognize that failing to mention a previous strategy in the current strategy document does not necessarily mean that a country does not have an older strategy or has not been focusing on anti-corruption as an issue, we would expect that the current strategy would be strengthened by a reflection on initiatives that have been successful in the past and obstacles encountered. An acknowledgment of past anti-corruption strategies can also highlight a continuity of focus on key anti-corruption efforts, and it promotes transparency by including a frank discussion on the status of certain anti-corruption measures.

Out of the 41 country strategies reviewed, 30 strategies make at least a passing reference to a previous anti-corruption strategy, be it through a summary of the implementation of the plan or just noting that this current strategy has been informed by the progress of the old strategy. These strategies show that most countries are building off of a previous effort and show a continuity of focus towards anti-corruption as a priority.

Out of the 30 strategies that comment on the past anti-corruption strategy, only half of them (15) take it beyond a passing comment and provide some sort of reflection on the implementation or success of the previous strategy. This reflection is generally a half page to two pages in the introduction or preliminary diagnosis of the current state of the corruption in the country, noting key accomplishments and key challenges of the previous strategy. Stronger reflections tend to include specific actions taken under each objective of the previous strategy or statistics tied to each objective to show whether the country has improved or declined in an area. However, the majority of the 15 strategies that do provide a reflection do not provide this specific detail of analysis.

Overall, it is notable that most strategies do not give more than lip-service to the continuity from past strategies, or any lessons derived from them. It reinforces the oft-made observation that the anti-corruption world is woeful at self-reflection and learning.

Below we highlight strategies that provide substantive or unique commentary on their previous anti-corruption strategy in comparison to other strategies.

Ghana

Section 1.3 of the current strategy clearly highlights the limitations and shortcomings of past anti-corruption strategies as a part of an overall review of its recent anti-corruption initiatives in the introduction. As a part of a section giving an overview of corruption in Ghana, Section 2.2.3 also provides a summary in three pages of past anti-corruption developments. This review informs the current key issues.

Latvia

Section 2.2 of the current strategy, “Implementation of the Previous Policy,” provides a detailed analysis of the achievements and challenges found in implementing the previous strategy (2009-2013). This analysis goes into detail by sub-objective of the plan to identify what has been accomplished and what needs to be implemented or if there has been a significant affect in anti-corruption indicators based on the measures achieved.

Lithuania

Section 2 of the current strategy summarises the targets of the previous anti-corruption strategy (2011-2014) and the results achieved. The corresponding key performance indicators, which include national and international surveys on corruption experience and perception, are evaluated by target and explicitly compare statistics from the start of the plan to statistics from the end of the plan. The conclusion of this review notes that “the results of the implementation of the National Anti-corruption Programme of the Republic of Lithuania for 2011-2014 point to Lithuania’s improving situation in combating corruption.”¹³

Malawi

Section 4 of the current strategy reviews, in list form, key achievements, key challenges and lessons learnt from the implementation of the 2007-2011 strategy. The key achievements section of the review notes a number of statistics from perception surveys showing what has improved, and the key challenges note specific issues that the bureau implementing the policy faced during the process of implementation. While a “lessons learnt” section is unique, the conclusions noted are general issues regarding political commitment, resources and awareness.

Peru

The current strategy devotes almost 40 pages (one of three chapters) to reviewing the 2008-2011 national plan and past anti-corruption initiatives. The analysis is completed by objective and reviews what actions have been taken and observations on the implementation of these actions. The final section of this chapter provides overall conclusions by objective on the current status of its implementation.

Romania

The introduction of the current strategy provides a detailed summary on the strengths and weaknesses of the 2012-2015 strategy (Sections 1.1.1-1.1.2). Section 1.1.3 summarises the audit report on the implementation of the previous strategy and their recommendations for the current strategy.

¹³ Resolution on the Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025, Seimas of the Republic of Lithuania, p 9.

5 | Preliminary diagnosis and situational analysis

Introduction

Every country is different, and most countries recognise the need to situate their approach to fighting corruption within a national diagnosis of the scale and nature of the corruption issues in their country. The UNODC recommends that countries conduct a preliminary diagnosis and situational analysis using a range of survey and analysis tools.¹⁴

Most of the national strategies recognise prevalent corruption risks in their country, but ten of the countries have notably more substantial analyses.¹⁵ For example, Lithuania uses a range of national sociological and factual surveys. The Lithuanian strategy references sector specific data, such as healthcare, judiciary, police and municipalities (which are the sectors judged still to be the most corrupt). Both Lithuania and Estonia actively track opinions and facts from the business community. Lithuania and Estonia also track different aspects of corruption, like reporting corruption, experiencing corruption, opinions on who to blame for the corruption, opinions on which are the most effective remedies, and whether corruption is increasing or decreasing.

While the majority of current strategies reflect to a certain extent on the risks of corruption that they hope to combat, overall the strategies reviewed did not provide sufficient analysis and detail for this reflection to be considered a comprehensive risk or vulnerability assessment. Examples of these more structured approaches to risk assessment, as noted above, with further incorporation of the various kind of data mentioned above could be more widely used to ensure that the objectives proposed throughout the strategy are the most relevant and will make the most effective impact.

Below we highlight examples of how strategies presented their preliminary diagnosis and situational analysis in the strategies reviewed.

Estonia

Estonia's situational analysis and objectives are clearly linked to statistical evidence.¹⁶ Estonia has used or commissioned national corruption surveys and analyses that report actual bribe giving and taking (rather than perceptions); that track the number of corruption cases; and that track the opinion of businessmen regarding the corruptibility of officials, both at local and at state government levels. They also plan to conduct sociological surveys that examine the possible impact of anti-corruption policy, measures and laws.

Ghana

Ghana uses both perception surveys, e.g. from TI and from the Ghana Centre for Democracy and Development, and World Bank Public Expenditure Tracking Surveys (PETS) as a base for its strategy (for example, the PETS on the healthcare sector shows that 80 per cent of health care funds 'leaked out' of the system).¹⁷

¹⁴ For more information, see pages 13-26 of the United Nations Office on Drugs and Crime's National Anti-Corruption Strategies: A Practical Guide for Development and Implementation.

¹⁵ These are Estonia, Ghana, Indonesia, Liberia, Lithuania, Malaysia, Moldova, Nepal, Poland and Romania.

¹⁶ Anti-Corruption Strategy 2013-2020, Criminal Policy Department of the Ministry of Justice (Estonia), p 1-3. Statistics and references to a variety of sources are also consistently noted throughout the strategy.

¹⁷ National Anti-Corruption Plan (2012-2021), National Working Group (Ghana), Section 2.2.

Indonesia

Indonesia's strategy weaves a sense of their preliminary diagnosis into the narrative of the overall objectives. The six objectives noted in Chapter II each have a section outlining the current issues that the strategy aims to tackle. Within these sections, they use, for example, surveys conducted by its own commission, Corruption Eradication Commission (KPK), and compare them with results from other neighbouring countries. They also use the CPI, the Corruption Law Enforcement index and percent compatibility to UNCaC ratification. On law enforcement, they use the percent settlement of corruption reports, percent of pre-investigations becoming investigations, percent conviction rate, and other similar statistics.

Liberia

Chapter 3, titled "The Anti-Corruption Context: Challenges Facing the LACC," provides a summary of how the Liberian Anti-Corruption Commission (LACC) sees the state of corruption in Liberia. In this chapter, they use the TI CPI and the World Bank Institute Governance Indicators to track progress, together with the Ibrahim Index of African Governance. Nonetheless, despite the good progress that these indicators signal, Liberia regards itself as still mired in endemic corruption, and uses this as the starting point for its plan.

Lithuania

Chapter II provides a preliminary diagnosis of Lithuania's anticorruption environment, including a review of sociological surveys, analysis of the past anti-corruption plan, summaries of proposed sectors with the highest risk of corruption, and a review of political and legal factors. Lithuania uses a range of national sociological and factual surveys. Their data goes into sector specific data, such as healthcare, judiciary, police and municipalities (which are the sectors judged still to be the most corrupt). They actively track opinions and data from the business community and different aspects of the corruption, like reporting corruption, experiencing corruption, opinions on whom to blame for the corruption, opinions on which are the most effective remedies, and whether corruption is increasing or decreasing.

Malaysia

In the introductory chapter, the plan opens with the evidence of a declining CPI score for the country. They use national surveys to identify where more effort needs to be placed. They find that the public regards grand corruption as the principal problem.¹⁸

Moldova

In Chapter 1 of the 2011-2015 strategy, the strategy provides a summary of Moldova's situation in relation to their anti-corruption initiatives. Moldova uses the TI data (CPI and the Global Corruption Barometer (GCB)) and several other international sources such as World Bank and Heritage Foundation, Index of Economic Freedom. They also use national data on sectoral corruption and corruption perceptions among professional groups (e.g. doctors, academic staff, police, etc).

¹⁸ Fight Corruption, Government Transformation Programme (Malaysia), p 84-85, 93.

Nepal

Part A of the strategy provides a situational assessment for the Commission for the Investigation of Abuse of Authority (CIAA), with the first section of this part highlighting a general assessment of corruption in Nepal. Nepal uses international indicators (CPI, Ease of Doing Business Index, Global Competitiveness Index, and Rule of Law Index) plus the World Happiness Index. They also use specific questions as success indicators from inside TI's GCB.

Poland

Section I of the strategy provides a preliminary diagnosis of corruption in Poland. In section I.3.1, the strategy tracks a number of data points related to corruption offences to show the scale of corruption in Poland, and section I.4.1 shows CPI data and several sources of national survey data to represent the public opinion on corruption.

Romania

The Introduction starts with a number of sections identifying the current state of corruption in Romania and reflecting on various sources of data. For example, Romania uses international indicators, e.g. Eurostat and World Bank, with sectoral comparisons of statistics across Eastern European countries.

6 | Desired beneficial impact

Reducing corruption is not usually an objective in itself; it is more a means to a better end result, such as reduced poverty, or improved economic development, or improving the attractiveness of the country to outside investors.

We have reviewed each of the national strategies to try to discern what the desired beneficial impact is; whether it is stated explicitly in the overall objective of the plan, or to whether it is implicit in the narrative of the strategy. For a small number of strategies, the overall beneficial impact (outside of reducing corruption) is unclear. Usually there are one or two such desired impacts.

Results

The national strategies typically each mention one or two desired beneficial impacts, and they fall into the following types:

- To gain accession to the EU
- To strengthen national security
- To be aligned with international anti-corruption standards
- To strengthen democracy, transparency, and / or integrity
- To improve economic prosperity, or to improve competitiveness
- To improve government and better public service delivery
- To improve national reputation (e.g. via improving the CPI score).

The two most common beneficial impacts we could ascertain were to improve government and public service delivery and to improve national reputation. 14 strategies noted improving public service delivery as an overall goal, either by modernising processes and making them more transparent or by building public confidence in these services through anti-corruption efforts. 13 strategies focused on broadly building their national reputation; these strategies would generally include references to their ranking on the CPI or to other perception surveys. Other desired noted beneficial impacts stem from building their reputation but explicitly note a more specific goal, like increasing economic competitiveness, aligning with international standards and gaining accession to the EU. Finally, some strategies clearly link anti-corruption efforts with overall state-building through a focus either on the ideals of transparency, integrity or democracy or recognizing a connection between anti-corruption and national security.

To gain accession to the EU

Albania

Bosnia and Herzegovina

Macedonia

Moldova

To strengthen national security

Estonia

Kazakhstan

Latvia

Lithuania

Russia

To align with international anti-corruption standards

Indonesia

Paraguay

Peru

Taiwan

Ukraine

To strengthen democracy, transparency and/or integrity

Bhutan

Czech Republic

Estonia

Ghana

Greece

Lithuania

Madagascar

Rwanda

Taiwan

To improve economic prosperity or increase competitiveness

Bulgaria

China

Hungary

Kazakhstan

Nepal

Philippines

Romania

Serbia

Vietnam

To improve government and public service delivery

Brazil

China

Georgia

Hungary

Latvia

Lesotho

Liberia

Madagascar

Malawi

Peru

Philippines

Rwanda

Serbia

Sierra Leone

To improve national reputation

Bhutan

Bosnia and Herzegovina

Bulgaria

Czech Republic

Greece

Indonesia

Liberia

Lithuania

Malaysia

Nepal

Poland

Romania

Russia

7 | Principal anti-corruption measures proposed

There is a significant amount of material in the strategies regarding proposed measures, too much to summarise in a section. What we have done is try to illustrate commonalities and differences by putting the strategies into a common structure using the terminology below. A breakdown of every country strategy reviewed based on this terminology can be found in Appendix 1.

Terminology

Everyone uses similar terms to have different meanings in relation to their measures and approaches – strategies, priorities, objectives, areas, themes, actions, etc. For the sake of ensuring a common definition, we use a simple terminology and have transposed each country’s themes into this terminology as best we can:

- Level 1 topics – the objectives at the highest level of conceptualisation of the strategy. Typically there would be two to three topics at Level 1, such as prevention, enforcement and capacity building.
- Level 2 topics – the next level down. They might cover 3-5 topics, for example, ‘increase the use of corruption prevention tools in public entities’ under the Level 1 topic of ‘prevention’.
- Level 3 topics – the lowest level, typically akin to ‘actions’ or ‘activities’. Thus, under ‘use of corruption prevention tools’ in Level 2, a Level 3 topic could be ‘undertake baseline research on corruption in the country’.¹⁹

Set out below by way of example is Albania’s anti-corruption measures using the terminology above. A similar breakdown of every country strategy reviewed can be found in Appendix 1.

Albania	
Level 1	1) Preventive approach; 2) Repressive approach; 3) Educational approach
Level 2 (for topic 1 at level 1)	1) Increased transparency in state activity and improved access to information; 2) Increased transparency in planning, elaborating, management and control of budgets; 3) Strengthening the electronic infrastructure of public institutions; 4) Improving the handling of denunciations against corruption; 5) Strengthen asset disclosures and control of conflict of interest cases; 6) Strengthen control of political party financing; 7) Improve internal audit; 8) Systematic identification of corruption risk areas; 9) Strengthening the integrity of public officials; 10) Systematic analysis of statistics; 11) Adoption of AC policies at local level
Level 3 (for topic 1 at level 2)	1) Implement ‘Open Government’ principles; 2) Strengthen the use of electronic means; 3) Equipping traffic police with observation cameras; 4) Publication of the results of inspections; 5) Transparent recruitment processes in education and in civil service; 6) Institutionalisation of engagement with business when drafting legislation

The purpose of noting the topics for all the plans is to provide insight into how they are structured, and to give insight into the substantive measures proposed. It is not to provide a complete listing. So, the reporting below, at levels 2 and 3, picks out just one topic at each level that seems the most related to direct anti-corruption measures. Not all the measures at each level will be listed here, again for the sake of limiting the length of this analysis.

¹⁹ The examples are taken from Liberia’s strategy – Strategic Plan (2014-2017), Liberia Anti-Corruption Commission, Chapter 4.

Sometimes a country has a structure of topics that does not lend itself easily to this three-tier structure. This happens most often when there are general statements in the strategy, which do not neatly match the categories in the accompanying action plan. In these cases we have adapted their structure as minimally as possible to fit the terminology.

Overall observations

Through these observations, we look to comment on broad similarities in the formatting and discussion of the proposed measures. We will not be making judgements on the effectiveness of the proposed measures themselves as information given in the plan is generally inadequate for us to make such comments without sufficient background of the country's environment. Still, the terminology noted above helps to provide a reference for comment as to detail of the measures noted and potential similar approaches amongst the strategies.

When analysing the Level 1 topics of the strategies, there tends to be between 2-8 overall objectives. These objectives tended to focus on broad concepts, like increasing transparency, promoting awareness, increasing enforcement, or increasing integrity. These topics set the overall tone of the strategy, but were generally vague and written in an inactive way (i.e. with phrases like “preventative approach” or “efficient and independent executive”).

Level 2 topics tended to be more active and provide a more narrow focus to the overall objectives, with 2-10 noted sub-objectives. These topics might be broken down by sector of focus if the level 1 topic was fairly generic, or these topics might highlight the reforms needed if the level 1 topic was more sector-specific. While more active in tone and generally more specific, level 2 topics were still too vague to be measured or completely answer how the level 1 topic will be promoted (i.e. “increase integrity in the public health system”²⁰ or “increase population’s access to corruption information and education”²¹). In a number of strategies, level 2 topics were the most detailed actions of the strategy, which then generally coincided with a much longer list of topics (upwards of 40 topics in one case).

Out of the 41 strategies reviewed, 20 strategies noted the level of detail expected at level 3. Overall, these topics were the most specific and measurable, like “provide technical equipment in accordance with recommendations from the needs analysis”²² or “carrying out scientific and practical research on the consistency of criminalisation of corruption in the public and private sectors with international and EU regulations”.²³ While these topics were generally written as concrete actions, it was unclear whether the action was feasible unless the strategy noted implementation factors like timing or budgetary considerations.

Overall, the strategies that provided detail down to level 3 seemed to have a clearer approach to the steps needed to progress the strategy in an effort to ultimately reduce corruption and promote integrity. Without this level of detail, strategies sometimes tended to look like a long list of vague goals. While these goals might be developed in further detail in departmental or sub-national strategies, the implementers of the national strategy would need to ensure clear coordination in order to ascertain the related progress of a measure.

²⁰ National Anti-Corruption Strategy for the period of 2016-2020, Ministry of Justice (Romania), objective 3.1.

²¹ Strategic Plan (2014-2017), Liberia Anti-Corruption Commission, objective 1.B.

²² Action Plan for the Implementation of the National Anti-Corruption Strategy in the Republic of Serbia for the Period 2013-2018, Ministry of Justice and Public Administration, objective 3.2.1.1.1.

²³ Resolution on the Approval of the National Anti-Corruption Programme of the Republic of Lithuania for 2015-2025, Seimas of the Republic of Lithuania, objective 29.3.1.

8 | Breadth and focus of the strategies

The national strategies cover a wide variety of topics, but there is inevitably a lot of commonality. In this section we review what the commonality is, and see if there are any lessons that we can draw from it. The focus topics come from the factors that are found to be important in the ANTICORRP research on countries that are succeeding against corruption.²⁴

The breadth and balance of the strategies

Most of the strategies were developed with a broad scope, rather than a narrow one. Of 41 strategies, 8 were narrow in scope and 33 were broad in scope. The breadth was expressed in several different ways.

- Perhaps the most common was to describe the strategy as a balance between preventive measures, punitive measures and educative measures.
- Also common was to frame the strategy as a balance between strengthening cultural values and implementing a range of preventive and punitive anti-corruption measures.
- Several countries expressed this sort of breadth, and then went on to put emphasis on one particular aspect. This might be transparency as the principal driver; for example, Estonia which has gone further than any other country down the open government route to efficiency and removing corruption and the Czech Republic and Taiwan who both also emphasise transparency as a driver of change.

Some strategies, such as those of the Czech Republic, Indonesia, Moldova and Nepal, have a more direct priority that corruption will be reduced because of enforcement of new laws and through more transparency in decision-making processes. Their strategies are then more narrowly focused on implementing such change levers. That same approach is also taken by Macedonia and Ukraine, but with the significant addition of actively harnessing the power of the people.

Sector emphasis

Some countries put special emphasis on particular sectors and referenced certain sectors as key areas of focus or of risk. Out of the 41 strategies reviewed, 18 strategies made some sort of reference to specific sectors of priority or sectors that are highlighted for their corruption risks.

The most common sectors noted include:

- Health – mentioned in 10 strategies
- Business – mentioned in 7 strategies
- Judiciary – mentioned in 6 strategies
- Education – mentioned in 6 strategies
- Procurement – mentioned in 5 strategies

²⁴ For an article presenting findings, see Mungiu-Pippidi, Alina et al. *The Quest for Good Governance*. *Journal of Democracy*, Vol 27(1), pp 95-109, January 2016.

Other sectors referenced include local government, law enforcement, infrastructure, sports, mining, tax, political parties, media, civil service, public finance, agriculture, customs, defence, and investment state loans.

While these 18 strategies highlighted in some way the need to focus on the sectors above, there was a discrepancy in the level of content and sector-specific focus from each strategy. Some strategies highlight certain sectors based on their risk assessment while some provide a generic narrative of risks related to each sector. Some strategies also have a sector-specific focus to their proposed measures while other strategies do not reflect noted sectors in their proposed measures even if they were recognised as areas of risk.

Political will and leadership

Surprisingly, only a few had a strong emphasis on effective political leadership as the key priority, notably Bhutan, China and Rwanda. Equally few had an emphasis on some of the political corruption areas, such as party financing, election campaigns and, more generally, money in politics.

Supporting committed individuals

We also examined all the strategies to see how many had an explicit or implicit focus on encouraging committed individuals or on supporting groups of committed people against corruption. Such groups are one of the key elements of countries having success against corruption, as identified in research from the Norwegian Agency for Development Cooperation.²⁵

The biggest surprise from this section was the complete absence of any focus on committed individuals, or on supporting groups of committed people against corruption. We could find not one reference to this in any of the 41 plans. Committed individuals – or ‘human agency’ as the academic literature calls it – are considered to be one of the key drivers of positive change against corruption.

Reduction of poverty

Few of the strategies talked about the reduction of poverty as one of the principal targets.

Just 5 of the 41 plans were explicit about this. This is a surprise, as for in many countries, there is a strong awareness that corruption hits the poorest hardest, and that it should therefore be expected to be explicit in the chosen priorities.

²⁵ Mungiu-Pippidi, Alina. Context Choices in Fighting Corruption: Lessons Learned. Norwegian Agency for Development Cooperation, 2011, p. 36.

9 | Theory of change

A major weakness of many anti-corruption strategies is that there is no commentary as to why a particular approach might be expected to reduce corruption. Corruption is not a straightforward topic, and there have been many examples where seemingly sensible approaches do not lead to the desired outcome, or indeed to entirely perverse outcomes.

A substantial part of the skill in tackling corruption lies in being able to understand how the political or governmental system might change in response to certain actions and to articulate how and why this might be so. A classic example comes from policing in New York in 1995, where the incoming mayor focused on tackling disrespectful police behaviour on the streets, instead of adopting the more conventional approach of focusing on changing the police control systems.²⁶ The theory of change was that both police and citizens would immediately start to notice improvement, and that this would generate both enthusiasm and resources for more fundamental changes. That was an unconventional strategy, one that flies in the face of the more usual ‘institutional strengthening’ approach, but it had a lot of success.

We have looked at each of the anti-corruption strategies to see if they provide some answers to this most difficult of questions. In response to the question – “Is there any explicit, or even implicit, discussion about why the proposed objectives and measures might be successful?” – we found that 13 of the 41 strategies had some such discussion.²⁷

²⁶ See for example William J. Bratton, “Zero tolerance; policing a free society.” or George Kelling. “How New York became safe; the full story.”

²⁷ These are Bhutan, Bosnia and Herzegovina, Czech Republic, Ghana, Greece, Indonesia, Jordan, Kazakhstan, Macedonia, Moldova, Nepal, Paraguay and Ukraine.

Attributing ‘Theories of change’ – example countries

Bhutan

The King opens the national anti-corruption strategy with a strong statement: “Corruption – will we allow it, as in so many developing countries, to spread throughout society and destroy everything? Or will we meet the challenge and overcome it no matter how difficult it might be? In fighting corruption, will we remember to also fight waste, unnecessary expenditure and complacency?”²⁸ The strategy, which covers a ten-year period, then has a heavy focus on integrity building and values, involving religious organisations, education programmes and values-based professional training.

His government had a good appreciation of what they had achieved in the previous 5 year plan (stronger legal framework, building up a new Anti-Corruption Commission) and a nuanced assessment of the state of corruption: that cash based and petty corruption transactions were reducing, but that more sophisticated forms of corruption are likely to be on the rise.

Their theory of change is that a multi-pronged approach is required to reduce corruption. This approach comprises the following: Drive from the top; drive from the bottom (religious organisations, education programmes and values-based professional training); systems strengthening (civil service rules, public financial management); public sector alliances with civil society and the media; private sector engagement; and engagement with international organisations. They recognise that such changes will only be kept on track by a clear oversight and monitoring mechanism, and they put in place a two track monitoring system.

Bosnia and Herzegovina

The Bosnian strategy is a high level one, as it seeks to avoid overlap with the various levels of government at entity, district and canton level. It is oriented principally towards the public sector, which is where it identifies the most corruption occurring. Two theories of change are fairly explicitly stated. The first is ‘moral scorn’, which it sees as “the most powerful and efficient anti-corruption means, which requires at the same time the least institutional resources invested.”²⁹ The second is that criminal sanctions become more likely and will therefore deter corruption.

²⁸ National Integrity and Anti-Corruption Strategy 2014-2018, Royal Government of Bhutan Anti-Corruption Commission, p 1.

²⁹ BiH Anticorruption Strategy 2015-2019, Agency for Prevention of Corruption and Coordination of the Fight against Corruption (Bosnia and Herzegovina), p 6.

Czech Republic

The Czech theory of change is that corruption will be reduced because of new laws and through more transparency in decision-making processes³⁰, and that these two improvements will result in an overall decrease in corruption. In terms of focus, the 2015-2017 strategy is narrowly focused, with four priority areas:

- Independent civil service, the improvement expected to be effected by a new act on state prosecution
- Strengthening transparency through a project on ‘Electronic collection of laws and collection of international treaties and electronic legislative process’, through a new Conflict of Interest Act, a central electronic register of contracts Act, and a tightened up system of funding of political parties
- Efficient management of state property, through new laws requiring disclosure of beneficial ownership, new rules for public procurement awarding, electronic auctions and the strengthening of internal and external audit
- Development of civil society, including legislative whistleblower protection.

Ghana

Ghana carried out a very wide engagement in the development of its anti-corruption strategy, taking two years to develop the new strategy. They showed a good appreciation of why previous anti-corruption strategies had failed: inadequate appreciation of the complexity of corruption; lack of public participation; lack of local ownership; lack of coordination; and lack of government commitment).³¹ They had four strategic objectives: 1) Building public capacity; 2) Institutionalising efficiency accountability and transparency in the public sector; 3) Engaging individuals, media and civil society; and 4) Conducting effective investigations.³²

The strategy is, however, less compelling when it comes to the specific proposed actions. They resemble a very long wish list, without any obvious commitment to their implementation. For example, activity 14 of the action plan is to “enforce the public financial management legislation.”³³ Such a task will be hard change management, but the plan just states that the lead will be four agencies without further clarification or detail. Further, some of the activities seem to resemble those of earlier strategies.

As a result, it would seem that the implicit theory of change is to start many initiatives, in the expectation that some of them will be successful.

Greece

The Greek plan has five strategic objectives: 1) Efficient political leadership; 2) Increased public demand for accountability; 3) Efficient enforcement of anti-corruption measures; 4) Increased compliance with sound management regulations and increased accountability of public and private bodies; 5) Reinforced implementation of the anti-corruption plan.

³⁰ “A consistent enforcement of the government anti-corruption policy must lead to **improvement of the legal environment, increase of transparency and confidence in decision making processes**....and to overall decrease in corruption rate in Czech society.” (Government Anti-Corruption Conception for the Years 2015 to 2017, Minister for Human Rights, Equal Opportunities and Legislation, p 13).

³¹ National Anti-Corruption Plan (2012-2021), National Working Group (Ghana), Section 1.3.

³² National Anti-Corruption Plan (2012-2021), National Working Group (Ghana) , Section 3.0.

³³ National Anti-Corruption Plan (2012-2021), National Working Group (Ghana), Section 7.0 Annex 1.

The theory of change is not explicit, but it seems to be that a combination of political will and strong administrative action can eliminate the “intertwining of interests” between politics, media and organised economic interest, which it sees as the principal source of corruption.³⁴

Indonesia

Indonesia’s national anti-corruption strategy recognises that “corruption practices still occur massively and systematically at all levels”.³⁵ The strategy has six priorities: 1) An integrated system with capacity to prevent corruption; 2) Strategic law enforcement; 3) Harmonised laws and regulations; 4) International cooperation and asset recovery; 5) Anti-corruption education and culture; and 6) Mechanism of reporting corruption-eradication actions.

There is no explicit theory of change, but the principal implicit one is that corruption will reduce through stronger application of the law. This is direct in the case of priorities 2, 3, and 4; in the case of ‘Prevention’, there are still many law enforcement aspects included, such as asset statements by officials. This may be connected to the fact that the KPK is a law enforcement organisation.

Indonesia also encourages its regions to develop their own regional action plans, and some of them have done so. There is thus a second implicit theory of change that a sub-national, regional focus has more chance of success than an overarching national approach.

Jordan

Jordan has made a great effort to assemble a coherent anti-corruption strategy, involving many parties in its development. In its analysis of its anti-corruption system, it focused on legislative improvements, improved disclosure of information, a Code of Ethics for public sector employees, and more coordination among agencies when investigating corruption cases. Whilst important, none of this clearly spoke to what the theory of change might be.

The implicit theory of change becomes clearer when looking at the specific action plan outlined in section 5 of the strategy. This plan is organised under seven objectives (raising awareness, strengthening prevention, promote participation of society, more efficient investigations, enhanced international cooperation, and develop legislation). The specific actions tend to be capacity building actions – beginning with words like ‘preparing’, ‘organising’, ‘developing’, ‘conducting a study’, ‘activating corporate governance’ and ‘cooperating’.

Thus the implicit theory of change seems to be that Jordan will continue to build the capacity of its anti-corruption system, and that as a result of this increased capacity, corruption may decrease.

The strategy does outline priority sectors based on corruption risk as a part of its overall strategy in section 4.3 – notably mining, income and sales taxes, land sector, local councils sector and health sector – but the corresponding action plan in section 5 does not follow up this sectoral focus with specific actions, so it would seem not to be part of the theory of change.

³⁴ “Transparency” National Anti-Corruption Action Plan 2013, Hellenic Republic General Secretariat for Transparency and Human Rights, p 7.

³⁵ National Strategy of Corruption Prevention & Eradication Long Term (2012-2025) and Medium Term (2012-2014), Government of Indonesia, p 13.

Kazakhstan

The Kazakhstan strategy recognises that there is not a good fundamental understanding of corruption in the country: “the level and quality of sociological research on the problem of corruption and effectiveness of anti-corruption measures ... leaves much to be desired.”³⁶ As noted in section 3.2 of the strategy, there are six objectives:

- Fight against corruption in the sphere of the civil service
- Introduction of a public control institute
- Corruption control in quasi-public and private sector organisations
- Prevention of corruption in court and law enforcement agencies
- Building levels of an anti-corruption culture
- Development of international cooperation in fighting corruption.

Throughout the details of the six objectives above, the strategy notes in fairly explicit terms several theories of change:

- By “creating the conditions under which the use of official powers for personal gain will be unprofitable and impossible”³⁷, such as declaration of assets and ‘inevitability of punishment’, corruption will be reduced.³⁸
- By raising economic growth rates – through eliminating “administrative barriers that are hindering business activity and provision of high-quality and fast public services” – corruption will be reduced.
- Education of Kazakh youth will “allow for eradication of this social blemish”.³⁹

Macedonia

The Macedonian approach is broad in nature, applying an ‘integrated approach’ across five broad strategic objectives:

- Strengthened institutional system and legislation for prevention of corruption and conflict of interest. Topics include integrity and ethics in institutions, public procurement, electoral process and campaign funding, free access to information, property status, anti-corruption review of legislation, and lobbying.
- Strengthened repression of corruption with a focus on judicial bodies and cooperation of law enforcement bodies.
- Strengthening the institutions’ capacities and independence to implement the laws – topics include strengthening the capacity of law enforcement bodies.

³⁶ Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025, Law Enforcement Department of the Presidential Administration of the Republic of Kazakhstan, p 10.

³⁷ Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025, Law Enforcement Department of the Presidential Administration of the Republic of Kazakhstan, p13.

³⁸ Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025, Law Enforcement Department of the Presidential Administration of the Republic of Kazakhstan, p7.

³⁹ Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025, Law Enforcement Department of the Presidential Administration of the Republic of Kazakhstan, p18.

- Increased public participation – topics include awareness raising, media’s role, NGO sector’s role and the role of education.
- Efficient coordination of AC activities and evaluation of the implementation.

From the perspective of theory of change, we conclude that Macedonia is pursuing three theories of change that need to be followed through together: 1) Corruption will be reduced if there are clear, strong laws and effective bodies to implement it; 2) Building a culture of ethics and integrity in public institutions will lead to reduced corruption; and 3) Increased public participation is essential for corruption to reduce.

Moldova

The 2011-2015 Moldova Anti-Corruption strategy is rather open about the failure of previous efforts to control corruption; with indicators such as the Control of Corruption showing a declining trend. The reason was attributed to a wide range of factors, such as lack of a stable legal framework, lack of effective law enforcement, low levels of public confidence in law enforcement agencies and insufficient budgetary resources.⁴⁰

The main theory of change is that “anti-corruption activities needs to be guided by intolerance towards corruption and transforming it from low-risk and highly beneficial activity into high-risk activity with little benefits.”⁴¹ The detailed Anti-Corruption plan for 2014-15 is then quite specific in a range of actions to better understand the corruption in each sector and to strengthen all the relevant laws.

Nepal

The Nepalese strategy recognises that corruption has become deeply ingrained in national life and is increasing. The Commission on Abuses of Authority (the national Anti-Corruption Agency) overseeing the strategy recognises that previous attempts at reducing corruption have not been successful. The Commission is clear that Nepal has remained poor due to corruption and not the other way around.

The Commission’s core strategies are punitive, preventive and promotional, with emphasis on the punitive. The theory of change is less about reducing corruption and more about restoring public confidence in the national Anti-Corruption Agency. Hence a centrepiece of the theory of change is that by focusing on high profile cases, and not getting swamped by older cases, the commission will be able to “regain and restore public trust and confidence.”⁴²

Paraguay

As noted in the introduction to the anti-corruption strategy, there are nine proposed thematic priorities:

- Strengthening the National Anti-Corruption Secretariat (SENAC)
- Strengthening the inter-agency network of transparency and anti-corruption
- Consolidating the standard model of internal control (MECIP) in each of the public institutions
- Strengthening public ethics in state administration

⁴⁰ National Anti-Corruption Strategy (2011-2015), Parliament of Republic of Moldova, p 3.

⁴¹ National Anti-Corruption Strategy (2011-2015), Parliament of Republic of Moldova, p 4.

⁴² Strategic Plan 2014-2019, Commission for the Investigation of Abuse of Authority (Nepal), p33.

- Access to public information and transparency
- Promoting transparency and prevention of corruption in business
- Preventing corruption in contracts and public-private partnerships
- Citizen participation
- Asset recovery

There is no explicit theory of change in the national strategy. Yet, the implicit theory of change seems to be that a strong focus on making SENAC central to all the efforts will lead to positive results against corruption. In the text of the plan, SENAC is seen to be central to almost all the clauses of the strategy, to a much greater degree than any comparable body in other plans.

Ukraine

Ukraine's strategy is expressed in the law of October 26, 2014 "On the principles of State Anti-Corruption Policy in Ukraine (the Anti-Corruption strategy) for 2014 to 2017." It points to two fairly explicit theories of change. The first is that corruption will reduce through "creating a system of anti-corruption instruments that will enable efficient discovery and investigation of corruption related offences" which will bring corrupt people to liability.⁴³ The second is that there is high potential to involve the public in discovering and reporting corruption, and that creating such "special conditions... will facilitate a change of social views on reporting corruption", which will thereby reduce corruption.⁴⁴

Theories of change – discussion

As noted above, most of these countries share one high level feature in respect of theory of change: almost all of them share the current paradigm that an anti-corruption programme should share three broad elements – prevention, prosecution and education. Inasmuch as this can itself be considered a theory of change, then the theory can be stated as 'Having a comprehensive anti-corruption strategy that covers the three elements of prevention, prosecution and education will lead to a reduction in corruption.'

A more nuanced version of the same theory is that a comprehensive approach is required that tackles the corruption problem from multiple directions at the same time. One such example was Bhutan's – A multi-pronged approach is required to reduce corruption, comprising the following: Drive from the top; drive from the bottom (religious organisations, education programmes and values-based professional training); systems strengthening (civil service rules, public financial management); public sector alliances with civil society and the media; private sector engagement; and engagement with international organisations.

⁴³ On the principles of State Anti-Corruption Policy in Ukraine (the Anti-Corruption strategy) for 2014 to 2017, Verkhovna Rada of Ukraine; Law, Strategy on October 14, 2014 № 1699-VII.

⁴⁴ On the principles of State Anti-Corruption Policy in Ukraine (the Anti-Corruption strategy) for 2014 to 2017, Verkhovna Rada of Ukraine; Law, Strategy on October 14, 2014 № 1699-VII.

Again, this might be correct at a very high level, but it is not very useful as a theory, or as a source of focus. It is also a strategy that has been found to be unsuccessful in many countries. Whether this is because the theory is wrong, or because it was poorly implemented, can be argued over.

So it is perhaps more interesting and more useful to look at the 'lower' level theories of change, and to see if there are ideas here that have power.

One more focused version is the approaches of the Czech Republic, Indonesia, Moldova and Nepal, which all have a heavy focus on implementing the law and prosecution.

That same approach is also taken by Macedonia and Ukraine, but with the significant addition – in a way that seems very genuine – of actively harnessing the power of the people. This has been very visible in both these countries, where public protest is an integral part of the anti-corruption effort.

The Paraguayan approach, in our interpretation, takes a quite different tack, placing most emphasis not on the actual laws and measures, but on the body that is responsible for implementing them all, the National Anti-Corruption Secretariat. If that body is strong and successful, then the fight against corruption will be successful.

One country, Kazakhstan, creates a different approach by explicitly seeking to grow businesses as being the way out of corruption; although consciously removing administrative restrictions from them is arguably as likely to increase corruption as it is to increase growth.

Greece points to the intertwining of politics, media and organised economic interest as the core source of corruption. However, it does not seem to follow through with any theory of change that might disentangle this.

Finally, for countries at an early stage of fighting corruption, Jordan gives an example of realism, by focusing on capacity building as the main vehicle for longer-term improvement against corruption.

10 | Governance structures and coordination arrangements

There are a wide variety of governance structures established to oversee the implementation of the national strategies. However, the hierarchies involved are all rather similar, and typically look roughly as follows:

- The top-most authority is either the Council of Ministers or one of the Committees of Parliament, who review implementation of the strategy annually.
- The next level is usually a responsible Minister, often the Minister of Justice, usually chairing an inter-ministerial committee established to oversee the strategy implementation.
- The next level is some sort of implementation committee, often involving external stakeholders such as business and civil society.
- Then there is a secretariat who is the active coordinator of the strategy and its implementation across multiple ministries and agencies, and who generates all the reporting on progress.
- There then may be coordinators in each of the ministries, who are the designated working-level contact points for the committee.

These structures were very clear in only some of the strategies, and a total of 19 strategies made reference to a governance structure in some capacity. A surprising number made minimal reference to governance, and many were not explicit about who would be responsible or who the secretariat would be.

Below we highlight and summarise examples of strategies where the governance arrangements are described.

Albania

The national strategy will be implemented through the coordinated efforts of the Minister of State for local issues, the National Coordinator against Corruption (NCAC) and his reports to the government.⁴⁵

The institution of the NCAC was established as a coordination body, and it has played a key role in establishing the networks of points of contact across all the relevant institutions.

Bhutan

Section III provides an overview of their comprehensive, formal oversight and monitoring mechanism, including a diagram and subsequent narratives of relevant roles and responsibilities. The two houses of Parliament, through the relevant Committees, are responsible for reviewing and debating the key performance indicators of the strategy annually. The Cabinet of Ministers has oversight of the strategy for the Government, at least on an annual basis. A government body, the GNHC Secretariat (not defined) monitors the strategy implementation on a regular basis. Finally, all public bodies report on the implementation of the strategy at four levels: to the GNHC Secretariat, to the Anti-Corruption Commission (ACC), to the responsible Minister, and to the general public as part of their annual report. Armed Forces, and other bodies that do not report within the government structures, report through the ACC and to the general public.

⁴⁵ Albanian strategy pp10, 22-23.

Bulgaria

The Bulgarian strategy will be coordinated, monitored and controlled by the ‘National Council on Anti-corruption Policies’. As explained in section 2.2 of the strategy, this is a new inter-institutional body being established, though the composition is not specified in the strategy. In addition, a ‘Civic Council’, comprising NGOs and businesses, will also monitor the implementation of the strategy. Section 2.1 recognises the national coordinator for anti-corruption policies as the Deputy Prime Minister.

Czech Republic

Section 4 of the 2015-2017 strategy outlines key individuals and institutions that are involved in implementing the strategy. The Minister for Human Rights, equal opportunities and legislation is responsible for coordination of anti-corruption activities. The Minister is the Chairman of the Government Anti-Corruption Committee. In addition there is a Government Anti-Corruption Council, which includes prosecutors, NGOs, academics and the public, and an interdepartmental coordination group.

At the working level is the Anti-Corruption Unit of the Office of Government, under the Minister for Human Rights. The unit coordinates the implementation of action plans, follows the progress achieved, and communicates internally and externally about progress of the plan.

Estonia

Estonia’s strategy highlights relevant roles in managing the strategy in a section titled “Implementation and Assessment,” specifically with a diagram highlighting the roles of the Ministry of Justice, domain specific anti-corruption networks and corruption prevention ministry coordinators.⁴⁶ The Ministry of Justice coordinates the Estonian Strategy. They manage the anti-corruption policy, coordinate the strategy’s implementation, conduct relevant surveys, assess the progress of implementation, and report on progress to the Government.

They in turn have two groups reporting to them. The first group comprises a person in every Ministry who is assigned to act as the contact person for the strategy, ensure the implementation of the strategy in his or her ministry, implement the anti-corruption policy and also propose new measures and activities. The second group comprises domain-specific anti-corruption networks, for example in healthcare, law enforcement and local government. These networks will meet once or twice a year, summoned by the Ministry of Justice, to discuss the developments in their area.

Georgia

The preamble to the 2010 Georgian National Anticorruption Strategy recognises that the strategy is under the leadership of the Minister of Justice, who chairs the Anti-Corruption Inter-agency Coordination Council. The members of this council are the representatives of the executive plus legislative and judicial bodies, plus NGOs and international organisations. The council is responsible for the elaboration of the anti-corruption strategy and the action plan, amending the plans as required, and monitoring the implementation.

⁴⁶ Anti-Corruption Strategy 2013-2020, Criminal Policy Department of the Ministry of Justice (Estonia), p 8.

Ghana

Section 5 of the strategy outlines the monitoring and evaluation structure, including the team responsible for monitoring and implementation. The strategy is under the leadership of the Commission for Human Rights (CHRAJ), who will appoint a Monitoring Committee (Monicom) comprising 10 representatives (From the CHRAJ Commission, Planning Commission, Public Services Commission, State Enterprises Commission, Private Sector, and NGO). Monicom will meet at least twice a year. Monicom will track progress, review data, produce periodic reports and organise participatory stakeholder sessions quarterly.

Lesotho

Lesotho's oversight structure is headed by the 'National Coalition against Corruption' (NCAC), which is recognized in section 3.1.2 of the strategy. This body comprises representatives from the public sector (Prime Minister and Minister of Public Service), legislature (Speaker), Judiciary (Chief Justice), private sector (Head of Chamber of Business), civil society (President of council of NGOs), faith based communities, Vice Chancellor of the National University of Lesotho, traditional leadership (Head of college of chiefs), media (President of media institute), women, youth and people with disabilities. This group will coordinate the anti-corruption efforts, monitor implementation, evaluate the results, and make recommendations for continuous review.

Lithuania

Chapter IV of the strategy summarises the implementation of the programme and outlines who is responsible for implementation. The government will approve an inter-institutional action plan, chaired by the ministry of Justice with the participation of the Special Investigation Service. The plan will be approved by the Parliamentary Committee on National Security and Defence.

Moldova

Chapter VI of the 2011-2015 strategy presents the institutional framework for implementing the strategy. The responsibility for the implementation of Moldova's strategy is divided between 1) the Heads of Institutions, who have the responsibility for realizing their action plans; 2) the Parliamentary Commission responsible for defence, national security and the rule of law, which includes anti-corruption, who will coordinate at the highest level both the strategy implementation and the overall parliamentary control; 3) The Monitoring Group, who will follow up progress quarterly and consists of an inter-ministry group, largely at Deputy Minister level plus outside representatives from NGOs, business and local authorities; and the Secretariat of the Monitoring Group which will provide all the working support for elaboration of the plans, organising the meetings, presenting progress, and other related activities.

Poland

Section III.1 outlines the implementation structure for the strategy. Poland's implementing structure is headed by the Council of Ministers (Level IV), beneath whom is the Implementing Authority (Level III), which will be an inter-ministerial group chaired by the Minister of Internal Affairs. The administrative services team is led by the Interior Ministry who, in turn, supervises working groups for implementation of individual tasks (Level II). Within each ministry there are Coordinators (Level I).

Romania

Section 9.1 of the strategy highlights responsible roles for implementation and monitoring of the strategy. Romania's strategy is under the leadership of the Ministry of Justice. Monitoring representatives from independent authorities, anti-corruption institutions, central government, local government, business, and civil society will support him, meeting about every six months.

Serbia

As noted in Sections 5.2-5.4 of the 2013-2018 Serbian Anti-Corruption Strategy, the Justice Ministry is responsible for coordination of the strategy; they will establish a unit to coordinate implementation of the strategy. They will be supported by an Anti-Corruption Council, an advisory body that will overview the implementation of the strategy. The formal monitoring of the strategy and action plan is under the authority of the Ant-Corruption Agency, who will receive annual and semi-annual reports on the progress of implementation.

11 | Implementation, monitoring and evaluation

The implementation process is a common section that is included in the majority of anti-corruption strategies. 28 strategies that we have reviewed comment to some extent on the overall coordination of implementing and monitoring the strategy.

Yet, beyond overall coordination, more specific details are not outlined. It is common for strategies to note that monitoring and evaluation results will be presented in some capacity on at least a yearly basis, but few acknowledge what sort of resources will be dedicated to evaluation. Furthermore, there is little acknowledgment of specific expectations as to how a plan will be evaluated and what they are hoping to capture with the results beyond the status of implementation.

For example, less than a third of strategies note clear timelines or deadlines for each reform measure. It is common for strategies to highlight the overall objectives and reform measures with relevant responsible entities and then to leave the responsible entity to define how to implement the measure in their own subsequent plans. These more detailed entity plans, from our review, are not readily accessible, and therefore it is difficult to ascertain the overall implementation process. Furthermore, most strategies either do not assess or only note as assumptions key aspects to a strategy's success, like funding or full-time resources.

Less than half of the strategies provide quantitative criteria or indicators for success, either overall for the strategy or per objective/ reform measure. Sometimes, strategies will also leave this definition of success with the relevant responsible entities and then leave the responsible entity to define how to implement the measure in their own subsequent plans; yet this makes it difficult to ascertain and track the standard of success of the overall strategy. Strategies that do note quantitative criteria for evaluation include indicators such as:

- Improvement on various perception indexes (which is generally not a recommended indicator, as indexes like the CPI should not be compared yearly or changes cannot be explicitly attributed to the progress of the strategy).
- Percentage of implementation achieved (e.g. number of meetings held in relation to an initiative or if a policy is enacted or not).
- To a lesser extent tracking of data collected by the government (e.g. an increase in court cases).

Below we highlight examples of how strategies presented their plans for implementation, monitoring and evaluation in the strategies reviewed.

Albania

Implementation, monitoring and evaluation are summarized in chapters 4-5 of the strategy. These sections include a breakdown of the allocation of funds and financial sources for each objective and a description of overall indicators for success of the plan. The indicators noted are the TI CPI, measures from the World Bank, GRECO recommendations and the Nations in Transit Report. The strategy notes that it will be reviewed for potential revisions on an annual basis, and the responsible coordinating entity will call quarterly, biannual, and annual meetings to evaluate the monitoring of the strategy. There will be quarterly draft monitoring reports which will be published annually.

Bhutan

The national anti-corruption strategy of Bhutan provides a diagram of the oversight and monitoring mechanism, which includes a range of stakeholders noted in the governance of the strategy in section III. The diagram notes annual reports on the implementation of the plan by various organisations in the monitoring mechanism.

Bulgaria

Section 4 of the strategy outlines the approach to monitoring and evaluation of the strategy. The National Council on anti-corruption will present annual and semi-annual reports to the Council of Ministers. The strategy notes that it will primarily be monitored through a bi-annual review of the level of administrative corruption, a yearly review on the implementation of specific policies, and a yearly review of related policies in key institutions. Overall implementation of the strategy will be evaluated by an external evaluator that will be based on the summary of progress reports, sociological research and statistical and economic analyses.

Estonia

In the section titled “Implementation and Assessment,” the strategy notes that non-governmental organisations, organisations like the Chambers of Commerce and the Responsible Business Forum, local governments and various sector-related organisations will be involved in the implementation process. It states that the authorities related to the implementation of the strategy will present progress of the strategy to the Ministry of Justice and a report will be presented to the Government annually. A summary report with a full assessment of the strategy will also be presented to the Government at the end of the strategy’s timeframe. The strategy states that the overall expected budget for the first five years of the strategy will be 6.1 million euros, but doesn’t provide a clear breakdown of where these funds will be allocated.

Ghana

Section 5 of the strategy outlines the monitoring and evaluation structure, and the first annex of the strategy (the action plan) notes various implementation measures by activity. The implementation of the strategy is noted into three time frames- short term, medium term and long term, which is noted by activity. An indicative budget is also noted per objective, but the strategy notes that individual responsible parties need to secure the proper resources to execute the strategy. The Monitoring Committee is expected to meet twice a year to coordinate various activities, including: developing a monitoring and evaluation plan, holding quarterly participatory sessions, collecting quantitative and qualitative data towards the progress of the plan, and producing annual progress reports that will form part of reports on the overall state of corruption in Ghana. The strategy also notes that there will be commissioned evaluations at the end of year 3, 5 and 10 as well as ad hoc evaluations and thematic studies.

Indonesia

The national strategy is described as a guide to provide more coordination for the development of regional and sectoral anti-corruption plans and clearly states its decentralized approach to implementation.⁴⁷ Chapter III of the strategy categorises the objectives of the plan into short, medium and long term focuses. Overall and specific indicators for success are noted within each objective and include the TI CPI, the Anti-Corruption Law Enforcement Index, incorporation of UNCaC review results, percentage of assets of corruption recovered, success rate of international cooperation, Anti-Corruption Behavioural Index and Corruption Prevention and Eradication reports.

Jordan

Section 4.2 of the strategy presents the plan for implementing the strategy and the process of monitoring and reporting the strategy's progress. The strategy notes that ministries and institutions responsible for the implementation of the strategy will report quarterly to the Higher Committee (responsible for the coordination of implementation) on the progress of implementation. The Higher Committee will then prepare quarterly reports for the Government on the implementation progress of the strategy. The Government will ultimately evaluate the achievements and results of the strategy.

Kazakhstan

Section 5 of the strategy outlines the plan for monitoring and evaluation of the strategy's implementation. An annual national report on the strategy's implementation will be published through the media which will also be provided in a draft form to the public for external assessment and feedback.

Latvia

Section 11 of the strategy provides a short note on the reporting and assessment procedures of the plan. The Bureau responsible for coordinating the implementation of the strategy will submit interim evaluations of the strategy to the Cabinet of Ministers in 2018 and a final evaluation in 2021.

Indicators by objective are noted and include international and national perception surveys as well as quantitative indicators related to number of people trained or proportion of institutions implementing the specific objective.

Liberia

Chapter 5 of the strategy outlines the implementation plan and Chapter 6 sets out the expected budget and financing of the plan. The Strategic Plan Implementation Committee is expected to collate relevant reports on implementation, including quarterly progress reports; annual reports highlighting key achievements, constraining factors and recommendations; mid-term evaluation reports; and a final evaluation report. An estimated budget is also noted by objective (with the total budget estimated at 14,882,000 US\$).

⁴⁷ "The implementation of these national documents on corruption eradication obviously presented a number of challenges. One of these, the implementation by the Ministry/Agency and the regions felt like they were all going their own separate ways, there was no synergy, and thus the achievements were not maximal in encouraging corruption eradication. It is for this reason that a comprehensive Long Term National Strategy on Corruption Prevention and Eradication 2012-2025 and the Mid-Term 2012-2014 (Nastra CPE) is urgently required, especially as a source of reference or a compass for all the stakeholders in determining their steps." National Strategy of Corruption Prevention & Eradication Long Term (2012-2025) and Medium Term (2012-2014), Government of Indonesia, p 11.

Lithuania

Chapter IV of the strategy summarises the implementation of the programme and process of monitoring the implementation. The actions of the strategy will be financed through general appropriations of the institutions responsible for implementation. The responsible institutions will also provide reports to the coordinating agency on an annual basis.

The coordinating agency will then summarise this information into an annual assessment which will be fed into the annual Report on the Status and Development of National Security and presented to the Government. The coordinating agency will also conduct annual analysis of corruption-related problems with a view to propose recommendations to the strategy, and the agency will submit a final assessment of the strategy at the end of the timeframe. Upon approval of the Interdepartmental Commission for the Coordination of Fight against Corruption, information related to the implementation of the strategy will be published on the coordinating agency's website.

Malawi

Section 7 of the Anti-Corruption Bureau (ACB) Strategic Plan elaborates on the implementation, monitoring and evaluation framework for the strategy.

To assess implementation of the strategy, quarterly reports will be presented to the Director of the ACB, oversight bodies, Parliament, development partners and the National Integrity Committee. Quarterly monitoring visits will also be used to assess progress made.

There will be mid-term and annual assessments completed by an external firm, and the annual assessment will be presented at an Annual Meeting with the Director of the ACB, the oversight body, funding agencies and key stakeholders. Indicators for success are noted by goal and include perception surveys, status updates of implementation, and conviction rates and statistics.

Malaysia

While the strategy does not specifically note a process of evaluation, the strategy itself was pulled from a website that clearly displays annual reports.

Moldova

The strategy notes a fairly detailed structure of governance in Chapter VI and that there will be quarterly and annual reports. Indicators for success are noted by objective in the 2014-2015 Action Plan and include quantitative indicators, like number of reports published or submitted, feedback in reports, and perceptions and experience surveys. The strategy provides a methodology for monitoring and evaluating the implementation of the plan as Annex 2, and notes that it will use a combination of meetings, site-visits and various reports from the implementing agencies.

Philippines

Annex B provides a monitoring plan for the action plan and summarises how the plan will be reviewed. The strategy notes that quarterly assessment workshops will be held for the implementation agencies and civil society organisations to report on the status of implementation, identify solutions for challenges and share information. A year-end assessment will also be conducted. These reports and outputs will be uploaded onto the Governance Cluster website, which includes a feedback mechanism for the public.

Romania

In section 8, the strategy notes that funding for implementation will be provided by institutions responsible for the implementation of the strategy. Section 9.2 provides the process of monitoring the plan, which states that the Ministry of Justice will report annually to the Romanian parliament on the status of implementation. Monitoring reports on the implementation, obstacles and recommendations for progressing the strategy will be issued by the Technical Secretariat. These reports will also be presented at an annual conference.

Serbia

The implementation structure of the strategy is noted as an objective within the strategy, and the process of monitoring the strategy's progress is elaborated in section 5. The Ministry of justice will be coordinating the implementation of the strategy and will hold quarterly meetings with state and public authorities to exchange experiences about the implementation of activities under their responsibilities. Responsible authorities will provide status updates on a semi-annual and annual basis to the Anti-Corruption Agency, which is in charge of monitoring the implementation of the plan. The Agency will then provide a stand-alone report to the National Assembly. The strategy notes that the Agency has the power to question any reports or evidence that a responsible authority gives or fine an authority that does not provide a status update.

Vietnam

The national strategy is divided into three phases (2008-2011, 2011-2016, and 2016-2020) and it is noted that the activities in each phase should build off of each other. While a monitoring agency is not clearly noted, the strategy sets the expectation that there will be quarterly and annual reports on the progress of the strategy based on periodical statistics.

12 | Observations and lessons

The positive message

These strategies provide cause for optimism. Some are bold, innovative and thorough. Some countries have been extraordinarily diligent in bringing multiple stakeholders on board; some have very clear and effective-seeming governance and coordination arrangements; some have done a superb diagnostic and situational analysis; many have a thoughtful and well-articulated spectrum of proposed measures; a few are first class in the way they approach monitoring and evaluation of the strategy.

Such good examples, as noted in the previous sections, will help others to see how they can improve their own countries' approach.

The disappointments

On the critical side, many of the countries recognise that the strategies of the previous years have not been successful. The honesty is commendable, but some of the current strategies also tend to look remarkably like the previous ones.

Risk and vulnerability assessments

While the majority of current strategies reflect on the risks of corruption that they hope to combat, overall the strategies reviewed did not provide sufficient analysis and detail for this reflection to be considered a comprehensive risk or vulnerability assessment. A more structured risk assessment with further incorporation of various kinds of data could be more widely used to ensure that the objectives proposed throughout the strategy are the most relevant and will make the most effective impact.

Lists of measures

Allied to this, there is a temptation to write up a long list of measures, with multiple initiatives across each of the themes of the strategy. These can be almost impossible-to-achieve activities, like 'Implement a meritocratic civil service', just as one item among 100, with no further detail nor recognition that this task has taken many countries a century or more to do. Such shopping lists can dissipate any sense of priority.

Theory of change

A major weakness of many anti-corruption strategies is that there is no commentary as to why a particular approach might be expected to reduce corruption. Corruption is not a straightforward topic, and there have been many examples where seemingly sensible approaches do not lead to the desired outcome, or indeed to entirely perverse outcomes.

It is easy to make assumptions that a change will be beneficial, without checking whether the past evidence supports the assumption. For example, many hopes are pinned on civil society, but a large research programme in eastern Europe showed that the bulk of civil society efforts have had little or no impact.⁴⁸ So how will these ones be different?

⁴⁸ Mungiu-Pippidi, Alina. *The Quest for Good Governance*. Cambridge University Press, 2015, p 172-175.

Inasmuch as this can itself be considered a theory of change, countries that are fairly explicit about the underlying logic of the strategy share the current paradigm that an anti-corruption programme should share three broad elements – prevention, prosecution and education. Yet, if a number of these plans share the same paradigm, then it could be questioned whether the strategy itself has been truly tailored to the risks and underlying issues the country needs to address.

Sector focus

Another disappointment is in respect to sector strategies. Whilst 18 of the strategies reference priority sectors, none of them indicate that there are substantive sector anti-corruption strategies in place.

Supporting committed individuals

The strategies contain no clear reference to supporting and growing the groups of committed individuals who dedicate their career to building integrity in their government. Recent research shows how central such groups (usually senior civil servants) and their networks have been in making the necessary change happen in country after country. The strategies are still more focused on laws, institutions and projects than on building such leadership cadres.

Thoughtful choices of strategy and tactics

There is a real need for more thoughtfulness in just how a specific change might lead to reducing corruption. This is where real anti-corruption skill, change management skill, and political skill are required. To illustrate this, we note an example from Colombia, where the head of the Defence Ministry needed to reduce rampant corruption in the military.⁴⁹ One of the measures was a ‘nudge’ measure, and one was a brute-force organisational change. Both had major transformational impact:

- The ‘nudge’ measure was to change the culture of procurement from closed to open. All procurement had always been secret, as much from habit as anything else. Everything down to boots was procured in secret, with single-sourcing and corruption inevitably creeping in. The Secretary General signed an administrative order requiring that all procurements would henceforth be by public competition, unless she herself signed that it should be secret. This order changed the dynamics of the organisation, so that suddenly a mid-level official would have to take his requirement for boots to the top official if he wanted to argue that the procurement should remain secret. The culture shifted substantially within the space of 2-3 years towards open procurement.
- The wrenching organisational change was to strip the individual military services (army, navy, air) of their right to procure their own larger requirements and to centralise all such large procurements in one civilian-led unit in the MOD. This was a major political fight, was fiercely resisted and led to Ministerial resignations and to some retirements as it was argued.

These measures, utterly different in concept and manner of execution, are good examples of the diversity of the possible measures. Knowing which sort of measure is suitable at which time is something to take much thought over in a strategy, and to seek out people who have such knowledge and experience.

⁴⁹ Transparency International Defense and Security Programme. A review of anti-corruption reform measures in the defence sector in Colombia. Plus personal; experience of the authors.

Leading change in large organisations

There is extensive literature from the corporate sector on how to change large organisations, covering both private sector organisations and, to a lesser extent, public and state-owned organisations. The anti-corruption world needs to embrace this literature and translate it to anti-corruption related initiatives.

For example, ‘toolkit’ approaches to change, which are common in anti-corruption strategies, do not have a good record of success in changing large organisations. Research from the corporate world,⁵⁰ where there is intense focus on how to update and reshape large organisations to meet new business challenges, suggest that such ‘toolkit’ approaches work only in cases of rather simple change – exactly the circumstances that we do not have with anti-corruption.

Political leadership

Few of the strategies are explicit about effective political leadership. Statements about the need for ‘political will’ seem to imply that the architects of the strategy do not believe that they have it. In a few strategies, there is a more explicit statement from an authoritative governmental figure, usually the Head of State, and more such ownership is needed. In this sample, the only notable examples were Bhutan, China and Rwanda.

⁵⁰ For example, see Rowland, Deborah and Malcolm Higgs. **Sustaining Change: Leadership that Works**. Jossey Bass, 2008.

Appendix 1 – Principal anti-corruption objectives and examples of objectives translated into detailed measures

For the sake of ensuring a common definition, we use a simple terminology and have transposed each country's themes into this terminology as best we can

- Level 1 topics – the objectives at the highest level of conceptualisation of the strategy. Typically there would be two to three topics at Level 1, such as prevention, enforcement and capacity building.
- Level 2 topics – the next level down. They might cover 3-5 topics, for example, 'Increase the use of corruption prevention tools in public entities' under the Level 1 topic of 'prevention'.
- Level 3 topics – the lowest level, typically akin to 'actions' or 'activities'. Thus, under 'use of corruption prevention tools' in Level 2, a Level 3 topic could be 'undertake baseline research on corruption in the country'⁵¹.

See Section 7 for overall analysis.

Albania	
Level 1	1) Preventive approach; 2) Repressive approach; 3) Educational approach.
Level 2 (for topic 1 at level 1)	1) Increased transparency in state activity and improved access to information; 2) Increased transparency in planning, elaborating, management and control of budgets; 3) Strengthening the electronic infrastructure of public institutions; 4) Improving the handling of denunciations against corruption; 5) Strengthen asset disclosures and control of conflict of interest cases; 6) Strengthen control of political party financing; 7) Improve internal audit; 8) Systematic identification of corruption risk areas; 9) Strengthening the integrity of public officials; 10) Systematic analysis of statistics; 11) Adoption of AC policies at local level.
Level 3 (for topic 1 at level 2)	1) Implement 'Open Government' principles; 2) Strengthen the use of electronic means; 3) Equipping traffic police with observation cameras; 4) Publication of the results of inspections; 5) Transparent recruitment processes in education and in civil service; 6) Institutionalisation of engagement with business when drafting legislation.

⁵¹ The examples are taken from Liberia's strategy.

Azerbaijan	
Level 1	1) Improvement of the Anticorruption Legislation; 2) Improvement of Petitions and Complaints Review; 3) Improvement of Legislation on Criminal Prosecution; 4) Improvement of the Activity of the Commission on Combating Corruption; 5) Improvement of the Operation of the Anticorruption Department with the Prosecutor General; 6) Prevention of the Legalization of Crime Proceeds and Enhancement of the Relevant Institutional Mechanisms; 7) Improvement of the Civil Service Legislation and Institutional Mechanisms; 8) Improvement of Civil Servants' Activity and Promotion of their Professionalism; 9) Prevention of Conflict Of Interests and Financial Declaration; 10) Improvement of Ethical Conduct Rules; 11) Improvement of Municipalities' Operation; 12) Further Development of the Entrepreneurship-Friendly Environment; 13) Improvement of Audit Services; 14) Improvement and Promotion of Transparency in Public Procurement; 15) Promotion of Transparency in the State Real Estate Registration; ... (28 measures).
Level 2 (for topic 10 at level 1)	1) Arrangement of regular ethical conduct trainings and study courses for civil servants; 2) Preparation, submission to the Commission on Combating Corruption and publication of the annual reports on ethical conduct, which shall include information on awareness raising, instances of violation and disciplinary punishment measures applied; 3) Elaboration of an effective mechanism for investigation of complaints on violation of the ethical behavior conduct; 4) Allocation of the ethic conduct section on the web-pages of the state institutions, which shall contain mechanism of electronic submission of complaints on unethical behavior, ethic rules, reports, etc.; 5) Development of the ethical conduct training and study module and definition of the minimum requirements thereof.
Level 3	Not applicable.
Brazil	
Level 1	1) Assess the transparency of legislative powers of Judiciary, Public Ministries and Audit Courts; 2) Promote social participation through active transparency tools for monitoring the forms of transfer of federal funds; 3) Create guidelines for the implementation and effective functioning of the state and municipal systems of internal control; 4) Develop diagnosis and improvement proposals for the Brazilian whistleblower protection system; 5) Propose the creation of mechanisms that encourage the adoption of integrity programs in public procurement; 6) Provide a diagnosis of role models in public law; 7) Develop studies on the effectiveness of criminal prosecution; 8) Map information systems and databases useful for combating corruption and money laundering; 9) Propose format for institutional risk assessment related to money laundering; 10) Perform self-assessment for FATF compliance; 11) Improve the rules of banking and tax secrecy; 12) Monitor the new framework for civil society organisations.
Level 2	Not applicable.
Level 3	Not applicable.

Bhutan

Level 1	1) Ensure political will, promote leadership and integrity; 2) Promote cooperation and partnerships; 3) Raise awareness and foster integrity education; 4) Mitigate corruption risks; 5) Strengthen systems capacity to combat corruption; 6) Strengthen legal and regulatory framework.
Level 2 (for topic 5 at level 1)	1) Human resource capacity of key institutions is reviewed and strengthened; 2) Conduct regular audits; 3) Public sector institutions report on compliance annually; 4) The capacity of the ACC to verify assets is increased; 5) Systematic induction and in-service training for all civil servants; 6) Introduce an integrity-focused spiritual development programme for civil servants; 7) Introduce integrity pacts systematically; 8) Establish a centralised structure to provide expertise on procurement, including in relation to integrity and AC.
Level 3	Not applicable.

Bosnia and Herzegovina

Level 1	1) Establishment and strengthening of institutional capacities and improvement of the regulatory framework for the fight against corruption; 2) develop, promote and implement preventative anti-corruptive activities in public and private sector; 3) improvement of organisational activities of judicial authorities and law enforcement agencies in combating corruption; 4) raising public awareness and promoting the need for the participation of the whole society in combating corruption; 5) establish effective mechanisms for coordination of the fight against corruption, and monitoring and evaluation of the implementation of the strategy.
Level 2 (for topic 3 at level 1)	1) reporting corruption; 2) detection of corruption; 3) coordination and cooperation between the institutions in discovering and proving corruption; 4) collecting evidence for criminal offences of corruption; 5) prosecution of criminal offenses of corruption; 6) the development and enhancement of penal policy for corruption criminal offences; 7) strengthening mechanisms for monitoring the work of judicial authorities.
Level 3 (for topic 1 at level 2)	1) ensuring appropriate mechanisms for reporting corruption of employees in public institutions, as well as monitoring procedures upon requests; 2) promote reporting of corruption and encourage active participation of the citizens in the fight against corruption.

Bulgaria

Level 1	1) development of an effective system of anti-corruption organs and units; 2) combating corruption in the high echelons of power; 3) countering political corruption with emphasis on electoral corruption; 4) preventing and countering corruption in the judiciary system of power, the Ministry of Interior and supervisory bodies; 5) release of citizens of petty corruption; 6) create an environment of public intolerance towards corruption.
Level 2 (for topic 2 at level 1)	1) reform of asset statements and conflict of interest by extending the scope of the declared circumstances; 2) establishing a system of penalties with deterrent effect; 3) adoption of a modern penal policy and corresponding amendments of criminal law focused on legislation processes; 4) further vocational training and specialisation of investigating authorities and magistrates; 5) protection of whistleblowers on corruption.
Level 3 (for topic 1 at level 2)	Not applicable.

Croatia	
Level 1	1) Strengthening integrity, accountability and transparency in public authorities; 2) strengthening integrity, responsibility and transparency of bodies of local and regional governments; 3) Strengthening integrity, accountability and transparency in state owned companies; 4) effective conflict of interest; 5) achieving transparency by public authorities through access to information; 6) strengthening transparency in the judiciary; 7) improving the transparency and effectiveness of anti-corruption mechanisms in the economy; 8) strengthening integrity, accountability and transparency within public finance; 9) strengthening the transparency and efficiency of the implementation of agricultural policy; 10) strengthening the transparency and efficiency in the health sector; 11) strengthening the transparency and efficiency in the field of education, science and sport; 12) building integrity and transparency at all levels in the system of environmental protection, transport and infrastructure.
Level 2 (for topic 4 at level 1)	1) Strengthening the administrative and technical capacity of the Commission to decide on Conflict of interest the development of the necessary legal, technical and IT tools and establishing international and bilateral training programs; 2) Extension of the circle of officials in terms of the Law on Prevention of Conflict of Interest the holders of public office by public authorities or with which it is due to content their powers naturally involve a high risk of corruption; 3) Integration of the provisions on conflict of interest in the internal rules of legal entities in broader sense can be considered part of the public administration; 4) Strengthening the mechanisms of means testing of public officials; 5) Raising awareness of the conflict of interests of all categories and levels of officials covered by the provisions of the Conflict of Interest, in order to awareness on the issue of ethics and integrity.
Level 3	Not applicable.
Czech Republic	
Level 1	1) Efficient and independent executive; 2) Transparency and free access to information; 3) Efficient management of state property; 4) Development of civil society.
Level 2 (for topic 1 at level 1)	1) Implementation of the new civil service act); 2) Decree stipulating the content, extent and other requirements of the civil service examination; 3) Rules for education of employees in state administration offices; 4) Creating unified rules for preparation of service regulations regulating ethics rules for a state employee; 5) New legislation concerning the state prosecution office; 6) Monitoring the RIPP (undefined) level of individual departments; 7) Publishing consolidated lists of advisers and advisory bodies on websites.
Level 3	Not applicable.
Egypt	
Level 1	1) Raising the governmental and administrative performance of the state, improving the public services; 2) sending the transparency and integrity principles to the employees in the administrative office of the state; 3) stipulating and updating the legislations supporting corruption combating; 4) improving the judicial proceedings to achieve prompt justice; 5) supporting the authorities concerned with anti-corruption; 6) raising living standard of citizens and achieving social justice; 7) raising the public awareness of corruption danger and the importance of combating it, building the citizen's confidence in the state institutions; 8) reinforcing the local cooperation in the field of anti-corruption; 9) reinforcing the regional and international cooperation in the field of anti-cooperation; 10) participating with the civil society organisations in anti-corruption.
Level 2	Not applicable.
Level 3	Not applicable.

Estonia	
Level 1	1) Promotion of corruption awareness; 2) Improvement of transparency of decisions and actions; 3) Development of investigative capabilities of investigative bodies and prevention of corruption that could jeopardise national security.
Level 2 (for topic 2 at level 1)	1) Increase the transparency of legislative and political decision-making process; 2) Increase the transparency of financial transactions and work procedures of local governments; 3) Increase the transparency of state agencies' activities and supporting a culture of preventing corruption; 4) Preventing corruption and increasing transparency of public procurements; 5) Increasing the transparency of decisions to grant aid; 6) Prevention of influencing and corruption in law enforcement authorities and courts; 7) Increasing the transparency of healthcare.
Level 3 (for topic 2 at level 2)	1) Activities for preventing conflicts of interest in local government; 2) Activities for establishing internal audit systems for local government; 3) Stage by stage launching of the information system 'Transparent Estonian Local Government'; 4) Preparing an electronic interface enabling parents to electronically register their children into kindergarten and to monitor their position in the queue; 5) Enabling electronic processing and publishing of local governments' detailed plans; 6) Making the State Construction register electronic, so building permits can all be online and electronic.
Georgia	
Level 1	1) efficient inter-agency coordination in the fight against corruption; 2) prevention of corruption in public sector; 3) openness, access to public information and civic engagement in anti-corruption activities; 4) anti-corruption education and public awareness raising; 5) prevention of corruption in law-enforcement bodies, effective detection and prosecution of corruption-related crimes; 6) prevention of corruption in judiciary; 7) transparency and reduction of corruption-related risks in public finance and public procurement; 8) prevention of corruption in customs and tax systems; 9) prevention of corruption in relation to private sector; 10) prevention of corruption in health and social sector; 11) prevention of political corruption; 12) prevention of corruption in defense sector.
Level 2 (for topic 6 at level 1)	1) Increase judicial independence and strengthen the role of individual judge; 2) Enhance mechanism for selection and promotion of judges; 3) Ensure transparency of judicial reform with active participation of civil society; 4) Enhance remuneration system of judges; 5) Ensure enforcement of ethical norms in judiciary; 6) Involve individual judges in the administration of judiciary; 7) Enhance system of disciplinary proceedings; 8) Ensure training of judges in the issues related to the ethics; 9) Increase transparency of the activities of the High Council of Justice; 10) Increase access to information in the judiciary.
Level 3	Not applicable

Ghana	
Level 1	1) Build public capacity to condemn and fight corruption and to make corruption a high-risk, low-gain activity; 2) institutionalise efficiency, accountability, and transparency in the public, private and not-for-profit sectors; 3) engage individuals, media and civil society organisations in reporting and combating corruption; 4) conduct effective investigations and prosecution of corrupt conduct.
Level 2 (for topic 2 at level 1)	1) conduct system examination of corruption-prone MDAs and public institutions to identify and plug loopholes; 2) monitor implementation of system examination reports and recommendations; 3) rotate roles and schedules of revenue staff and accountants; 4) introduce computerised and net-based system in revenue collection/generation agencies; 5) simplify procedures of tax assessment, collection and payment verification; 6) develop and implement user friendly, efficient and effective tax administration systems; 7) enact a budget law; 8) build capacity of MDAs for transparent use of public resources; 9) extend EITI principles to oil and gas sector; 10) develop and implement customer service charters in all MDAs, public and private sector institutions; 11) ensure that MDAs and MMDAs prepare financial statements on time for audit; 12) establish and strengthen audit report implementation committees in all MDAs and MMDAs; 13) enforce legislation regulating the operations of political parties; 14) enact law setting ceiling on political party financing and election expenditures; 15) establish a parliamentary committee to follow up on PAC recommendations on the AuG's report; ... (45 measures in total).
Level 3	Not applicable.
Greece	
Level 1	1) tasks and duties of the alternate Minister of Justice, General Secretariat against corruption; 2) implementation of transparency; 3) detection of risk areas of corruption; 4) educational actions; 5) monitor controlling of corruption; 6) maintaining and management of corruption; 7) improvement of legislation; 8) integrity codes of conduct; 9) accountability and compliance reporting; 10) public-private partnership; 11) increased public engagement.
Level 2 (for topic 9 at level 1)	1) Obligation of Municipal District Area and Local Government to comply with legal Anti-Corruption requirements and with objectives of the strategic plan; 2) evaluate the reasons for the lack of implementation of necessary anti-corruption activities and make proposals for remediating those lacks; 3) Establishment of a central place or unit where reports on corruption could be received and analysed. For suspicious transactions reports related to money laundering linked to corruption from financial institutions this is Financial Intelligence Unit. For reporting between (inspecting and investigating) authorities it might be helpful to consider bundling of information; 4) Explore on the possibilities to give access to the tax audit platform Elenxis to the organisations involved in the anti-corruption network; 5) use of inducement prizes to identify innovative solutions to reduce corruption.
Level 3	Not applicable.
Hungary	
Level 1	1) increasing organisational resilience; 2) public procurement; 3) transparency in government agencies and publically owned companies; 4) questions surrounding the assets of the civil servants; 5) developments of official procedures; 6) promoting cleanliness and control in the private sector; 7) education and training for public services and human resources; 8) raising awareness through campaigns and surveys and education and training in primary and secondary schools; 9) creation of mechanisms for policing corruption.
Level 2	Not applicable.
Level 3	Not applicable.

Indonesia	
Level 1	1) prevention; 2) law enforcement; 3) harmonising legislation; 4) international cooperation and asset rescue of corruption cases; 5) education and anti-corruption culture; 6) reporting mechanisms of implementation of corruption eradication.
Level 2 (for topic 3 at level 1)	1) formulate and revise laws and regulations in the field of corruption and in other strategic fields that have potential opportunities for corruption, in order to establish a harmonious and adequate regulatory structure for CPE; 2) achieving compliance between the provisions of the UNCAC with the applicable laws of Indonesia.
Level 3	Not applicable.
Jordan	
Level 1	1) Raise awareness and education on corruption and anti-corruption efforts; 2) strengthen the prevention of corruption; 3) strengthen the capacity building of Jordan Anti-Corruption Commission; 4) promote integrity and active participation of society in anti-corruption activities; 5) strengthen the efficiency of investigations and court proceedings of corruption cases; 6) enhance international cooperation in anti-corruption field; 7) develop national anti-corruption legislation in accordance with International standards to ensure efficiency of implementation.
Level 2 (for topic 3 at level 1)	1) establish a standardised process for the preparation of JACC's budget and performance plan; 2) ensure qualified personnel and technical capacity for the JACC through human resource planning; 3) develop JACC's organisational structure; 4) establish a separate witness protection unit at the JACC and adopt regulations to protect informants, and experts in corruption cases witnesses and whistleblowers; 5) establish a separate asset recovery unit at the JACC to enhance tracing in the proceeds of corruption crimes and experts in corruption cases; 6) establish standard operating procedures for handling complaints and planning of investigations; 7) establish IT based case management system for the JACC; 8) develop an intelligence information guide for the JACC.
Level 3 (for topic 3 at level 1)	Not applicable.
Kazakhstan	
Level 1	1) combating corruption in the Civil Service; 2) introduction of a public control institute; 3) combating corruption in quasi- public and private sectors; 4) prevention of corruption in the Courts and law enforcement; 5) creating an anti-corruption culture; 6) international cooperation development on anti-corruption issues.
Level 2	Unclear.
Level 3	Not applicable.

Latvia

Level 1	1) Ensure public administration's policy of human resource management that excludes motivation for corruptive activities; 2) Create and improve an independent internal control system to limit cases of corruption in the public, municipal or private sector; 3) Reduce the public tolerance towards corruption; 4) Ensure the inevitability of penalties for offences related to the abuse of official power and for unlawful use of power; 5) Limit the power of money in politics.
Level 2 (for topic 4 at level 1)	1) Setting of effective, proportionate and dissuasive administrative or criminal penalties for offences committed; 2) Prevention and combating of bribery of officials related to foreign and international organisations; 3) Determination of responsibility for the squandering or misappropriation of property; 4) Prevention of the laundering of the proceeds of crime; 5) Efficient operation of the preventive AC organisations and ensuring their independence.
Level 3 (for topic 1 at level 2)	1) Draw up amendments to the law on Corruption prevention to extend the rights to investigate; 2) Draw up a draft law to set criminal liability for requesting a bribe; 3) Education of employees on reporting violations of law; 4) Evaluate the possibility of stipulating in law that those participating in organised crime cannot hold public office; 5) Develop and implement better methods of criminal investigation by carrying out strategic analysis; 6) Ensure accountability of statistical data required by OECD anti-bribery convention; etc.

Lesotho

Level 1	1) transparent and accountable systems; 2) improved awareness and knowledge of the scourge of corruption and its implications; 3) improved legislation and prosecution to deter corrupt practices; 4) fully capacitated anti-corruption oversight bodies.
Level 2 (for topic 1 at level 1)	1) strengthen recruitment procurement and tendering processes and procedures by April 2016; 2) improve regulations if business registration process and practices by April 2016; 3) establish service standards regime for all sectors of society by 2017; 4) institutionalise declaration of assets and interests regime in Lesotho by 2017.
Level 3 (for topic 4 at level 2)	Strengthen the declaration of assets and interests by all in the Public Sector and Parastatals (1) review the declaration of assets and interests regime; 2) sensitise stakeholders on declaration of assets and interests regime; 3) implement the declaration of assets and interests regime).

Liberia

Level 1	1) Prevention of corruption; 2) Enforcement of laws against corruption; 3) Institutional management and capacity building.
Level 2 (for topic 1 at level 1)	1) Increase the use of corruption prevention systems and tools in public entities; 2) Increase population's access to corruption information and education; 3) Effective asset disclosure and verification regime; 4) Effective partnership between ACC and other stakeholders.
Level 3 (for topic 1 at level 2)	1) Undertake nationwide baseline research; 2) Evaluate performance of anti-graft institutions; 3) Conduct risk reviews of institutions; 4) Develop risk-reduction implementation plans; 5) Promote AC tools.

Lithuania

Level 1	1) striving for greater management efficiency in the public sector, transparency and openness of decision making and procedures, accountability to the public and higher resilience to corruption in the civil service; 2) ensuring the application of the principle of unavoidable liability; 3) reducing the supervisory and administrative burden on economic entities by transforming the system of institutions carrying out the supervision of economic entities; 4) ensuring fair competition and transparent and rational purchase of supplies, works or services in public procurement; 5) increasing transparency, reducing and eliminating possibilities of manifestations of corruption in the field of healthcare; 6) promoting zero tolerance for corruption and encouraging the involvement of the public in anti-corruption activities.
Level 2 (for topic 1 at level 1)	1) expanding and shaping zero tolerance for corruption and promoting active citizenship; 2) strengthening law enforcement capacity to detect criminal acts of a corruptive nature; 3) ensuring adequate criminalisation of criminal acts of a corruptive nature.
Level 3 (for topic 3 at level 2)	1) carrying out scientific and practical research on the consistency of criminalisation of corruption in the public and private sectors with the international and EU obligations assumed by Lithuania regarding corruption in the public and private sectors; 2) by drawing up draft legal acts on criminalisation of corruption in the public and private sectors and recommendations on the practical application of the norms.

Macedonia

Level 1	1) strengthened institutional system and legislation for prevention of corruption and conflict of interest; 2) strengthened repression of corruption; 3) strengthen capacity and independence of law enforcement institutions; 4) increased public participation in the fight against corruption and conflict of interests; 5) efficient coordination of anti-corruption activities, monitoring an evaluation of the implementation
Level 2 (for topic 1 at level 1)	1) integrity and ethics in institutions at all levels; 2) public procurement, concessions and public-private partnerships; 3) electoral process, political party funding and electoral campaigns; 4) free access to information of public charter; 5) property status and conflict of interests; 6) anticorruption assessment of legislation; 7) lobbying.
Level 3 (for topic 2 at level 2)	1) developing and establishing the integrity concept; 2) adoption of guidelines on the integrity system; 3) developing the methodology to monitor the integrity system; 4) drawing up a review of regulations that contain the grounds for the adoption of discretionary decisions; 5) analysis of discretionary powers in all segments of the government system.

Madagascar

Level 1	1) Strengthening the rule of law so as to have a state capable of responding to aspirations of justice for citizens; 2) create the conditions for the emergence of an economic development; 3) encourage the emergence of a strong national leadership.
Level 2 (for topic 2 at level 1)	1) control mechanisms to protect the financial and natural predation; 2) educate, inform and engage citizens; 3) coordinate and harmonise international support for the LCC; 4) place adequate mechanisms to the one share, mobilize optimally tax and customs policies and make a transparent credible expenditure chain; 5) protect national resources and reduce natural resources trafficking; 6) ensure local development and participation; 7) reduce corruption to facilitate access to healthcare; 8) reduce corrupt practices to facilitate access to education; 9) fight against corruption in the private sector.
Level 3 (for topic 4 at level 2)	1) make the chain of income and expenditure transparent and credible in order to streamline management of public property; 2) make the functional citizen budget.

Malawi	
Level 1	1) increased understanding of the nature and procedures for reporting corruption; 2) increased public confidence in the fight against corruption; 3) enhanced integrity, transparency and accountability; 4) enhanced efficiency and effectiveness of investigations of corruption cases; 5) enhanced and effectiveness of prosecution of corruption cases; 6) strengthened administrative and financial capacity of the Bureau; 7) improved measures of results.
Level 2 (for topic 5 at level 1)	1) to strengthen the prosecutorial capacity; 2) to enhance quality of prosecution of corruption cases; 3) to improve management of seized assets.
Level 3 (for topic 1 at level 2)	1) Develop and implement capacity building strategy for prosecutors; 2) develop prosecution procedures; 3) develop policy and procedure for outsourcing private lawyers.
Malaysia	
Level 1	1) enforcement agency; 2) grand corruption; 3) government procurement; 4) education and public support.
Level 2 (for topic 1 at level 1)	1) special committee on corruption; 2) executive review committee in MACC; 3) project management office on prevention; 4) monitor compliance unit activities; 5) monitor 'Name and Shame'; 6) corporate integrity system Malaysia; 7) streamline oversight committees.
Level 3	Not applicable.
Moldova	
Level 1	1) Research component; 2) Legislative component; 3) Institutional component; 4) Education and public communication component.
Level 2 (for topic 1 at level 1)	1) Implementation of institutional integrity plans according to approved methodology; 2) Organising training for public authority managers; 3) Implementing an efficient system for risk management and internal control within central authorities; 4) Corruption risk assessments in healthcare; 5) Corruption risk assessment within penitentiary system; border police; national army; customs service; diplomatic missions; 6) Draft strategy for National Integrity Commission; 7) Improve quality of public authority web-pages; 8) Implement AC actions during recruitment, selection and promotion of civil servants; 9) Create independent national body for examining procurement contracts; 10) Implement electronic procurement process.
Level 3	Not applicable.
Nepal	
Level 1	1) Punitive; 2) corruption prevention; 3) public education and awareness; 4) capacity development of the CIAA; 5) coordination and collaboration; 6) building international linkages.
Level 2 (for topic 3 at level 1)	1) cultivating political will and commitment to fight corruption; 2) spreading anti-corruption awareness programs among top-level civil servants, local body representatives and public enterprise management; 3) help support civil society based organisations in their effort to promote anti-corruption education and publicity works.
Level 3	Not applicable.

Paraguay

- Level 1** 1) strengthening SENAC; 2) strengthen the Inter-agency Transparency and Anti-corruption Network; 3) consolidation of the standard model of internal control Paraguay in each of the public institutions of the executive board; 4) strengthen public ethics in state administration; 5) tightening policies of access to public information and active transparency; 6) promote transparency and prevention of corruption in business; 7) transparency and prevention of corruption under contracts public-private partnerships; 8) citizen participation in the prevention and control of corruption; 9) policy to recover assets of illicit origin.
-
- Level 2**
(for topic 1 at level 1) 1) adequacy regulations; 2) process design, internal operating protocols and work plans to fulfill the goals under the plan; 3) implementation of internal processes; 4) design methodology for assessing compliance with the goals of the strategy as well as obligations of transparency, integrity and public ethics by each of the institutions of the executive branch; 5) monitoring the implementation of those good practices that have been awarded, or those policies whose implementation would lead to public recognition.
-
- Level 3**
(for topic 3 at level 2) 1) definition of profiles suitable for Secretariat human resources; 2) personnel selection; 3) training staff in different roles; 4) testing and alignment of internal processes.
-

People's Republic of China

- Level 1** 1) Making unremitting efforts to improve party conduct; 2) Combating corruption resolutely; 3) Preventing corruption scientifically and effectively; 4) Strengthening the Party's unified leadership over the work of improving party conduct, upholding integrity and combating corruption.
-
- Level 2**
(for topic 3 at level 1) 1) Deepening education in Party conduct; 2) Improving the laws and regulations; 3) Strengthening checks and monitoring concerning the exercise of power; 4) Deepening reform and transforming government functions and eliminating defects in our system that give rise to corruption.
-
- Level 3**
(for topic 3 at level 2) 1) Enhance intra-Party supervision and reinforce inspection; 2) Strengthen and improve monitoring of the exercise of power by leading officials; 3) people in charge must file annual reports on how they have upheld integrity while in office; 4) Fortify administrative supervision of functional government departments; 5) Strengthen democratic supervisions and listen to the criticisms of the people; 6) Bring into full play the supervision role of peoples' organisations such as trade unions, Communist youth league and women's' federations; 7) Introduce a list of the powers of local governments and make this known to the public; 8) We will strengthen the supervision of state-owned enterprises concerning their implementation of the 'three keys and one large' system.
-

Peru	
Level 1	1) articulation and coordination to fight corruption; 2) effective prevention of corruption; 3) timely and effective investigation and punishment of corruption in the administrative and judicial sphere; 4) promotion and joint participation active citizenship, civil society and industry in the fight against corruption; 5) Peru positioning in international anti-corruption space.
Level 2 (for topic 3 at level 1)	1) propitiate mechanisms coordination and exchange of information between entities exercise functions of prevention, investigation and punishment of the corruption; 2) strengthen public entities fighting corruption.
Level 3 (for topic 3 at level 2)	1) strengthen fiscal and judicial anti-corruption system effectively; 2) effectively address the corruption cases; 3) ensuring institutional conditions (operational, regulatory and financial) to the Attorney Specialised Crimes Corruption at the national level; 3) Increase the capacity of data processing and analysis in the agencies responsible for fighting corruption.
Philippines	
Level 1	1) Improved transparency and citizen's empowerment; 2) Improved public sector performance; 3) Improved AC measures; 4) Improved policy environment for good governance.
Level 2 (for topic 2 at level 1)	1) Strengthened public financial management and accountability; 2) Improved performance management and monitoring systems; 3) Enhanced delivery of frontline services; 4) Enhanced delivery of justice.
Level 3 (for topic 1 at level 2)	1) Implement Government Integrated Financial management System; 2) Implement comprehensive human resource information system; 3) Implement local government units public financial management.
Poland	
Level 1	1) Strengthen prevention and education; 2) strengthening the fight against corruption.
Level 2 (for topic 2 at level 1)	1) monitor risk of corruption and improve legislation; 2) develop systems solutions in the exchange of knowledge between authorities and law enforcement; 3) strengthen international work in fight against corruption.
Level 3 (for topic 1 at level 2)	1) develop a mechanism for coordination between enforcement agencies and state bodies; 2) develop a periodic report on corruption related crimes and recommendations; 3) improve exchange of information.

Romania

Level 1	1) Develop a culture of transparency for open government at central and local level; 2) Increase institutional integrity by including AC measures as mandatory elements of management plans; 3) Strengthen integrity, reduce corruption risks in priority sectors and fields; 4) Increase knowledge and understanding of standards of integrity by employees and beneficiaries of public services; 5) Enhance performance to combat corruption through criminal means and administrative measures; 6) Increase implementation of AC measures by approving integrity plans in all central and local institutions, including subordinate institutions.
Level 2 (for topic 3 at level 1)	1) Increase integrity in the public health system; 2) Increase integrity in the national education system; 3) Increase integrity in the work of MPs; 4) Increase integrity in the judiciary; 5) Increase integrity in the financing of political parties and in election campaigns; 6) Increase integrity in public procurement; 7) Increase integrity in business; 8) Increase integrity in local government.
Level 3 (for topic 1 at level 2)	1) Establish a mechanism for prioritising budget allocations at the Ministry of Health (MOH) based on clear evaluation criteria; 2) More transparent use of public resources by aggregating MOH data online; 3) Assess the performance of the MOH procurement system; 4) Establish a mechanism for tracing drugs on the Romanian market; 5) Strengthen the control structures at MLH and expand their powers; 6) Improve accountability for MOH managers; 7) Develop a new mechanism for financial support of medical education, to eliminate pharmaceutical industry sponsorship; 8) Identify Conflict of Interest situations among clinical staff; 9) Review patient feedback to get independent knowledge of their experience.

Russia

Level 1	1) Ensuring the involvement of civil society institutions in countering corruption; 2) Enhancing AC activities of federal executive authorities; 3) Introducing innovative technologies raising transparency in the adoption of legislation; 4) Improving the system of public property accounting; 5) Elimination corruption generating factors that hamper inward investment; 6) Promoting the practice of open electronic auctions; 7) Expand the system of legal awareness raising; 8) Updating civil legislation; 9) Further development of the legal counter-corruption framework; ... 21 measures in total.
Level 2	Not applicable.
Level 3	Not applicable.

Rwanda

Level 1	1) Effective political leadership in the fight against corruption; 2) Increased public demand for accountability and rejection of corruption; 3) Effective enforcement of anti-corruption measures.
Level 2 (for topic 3 at level 1)	1) Strengthen the legislative and judicial framework; 2) Strengthen public financial management; 3) Strengthen compliance with international standards and obligations; 4) Enhance professional standards in public service organisations; 5) Enhance public confidence in the operation of AC agencies; 6) Carry out surveys and analyses of corruption; 7) Set up and agree on mechanisms for M&E.
Level 3 (for topic 4 at level 2)	1) Address performance and accountability in the public service; 2) Monitor public attitudes to accountability issues and service delivery; 3) Regular training on AC and integrity; 4) Set up clear administrative sanctions violations of the Code of Conduct and criminal action to be initiated when appropriate.

Serbia	
Level 1	1) Eliminate deficiencies in the legal framework and control the financing of political activities and political entities; 2) eliminate deficiencies in the legal framework and build capacities in the field of conflict of interest, control of property and incomes of public officials; 3) adopt and implement an effective legal framework which shall regulate lobbying and participation of the public in the process of adoption of regulations; 4) determine clear criteria for nomination, selection and dismissal as well as for evaluation of results of work directors of public enterprises; 5) adopt provincial and local anti-corruption action plans whose implementation shall be supervised by standing working bodies of the assemblies of local self-government units and autonomous province; 6) fully develop the e-Tax system and regularly update the data; 7) establish a legal and institutional framework for the implementation of a system for a unique tax identification number for natural persons and legal entities; 8) identify and eliminate any deficiencies in the legal framework for the customs system conducive to corruption; 9) establish efficient control of application of customs regulations; 10) enhance participation of the public in monitoring budget expenditures; 11) consistent application of the Law on Public Procurements and keeping on the actions of competent authorities related to the irregularities found in the reports;...(53 objectives).
Level 2 (for topic 8 at level 1)	1) adopting the law which in a comprehensive manner governs the customs services; 2) adopting and amending by-laws to harmonise them with the law governing the customs service; 3) amending the legal framework to eliminate detected deficiencies that support corruption; 4) adopting and amending by-laws in accordance with the analysis and ensuring their consistent application; 5) educating employees about new provisions of the by-laws; 6) improving the customs administration information system.
Level 3 (for topic 6 at level 2)	1) employ new personnel in accordance with recommendations from the needs analysis; 2) provide technical equipment in accordance with recommendations from the needs analysis; 3) improve the system for the exchange of information with customs services in other countries.
Sierra Leone	
Level 1	1) Prevention – reforms, education, awareness raising; 2) Enforcement – improvement in the legal and institutional arrangements for the detection, investigation and prosecution of corruption; 3) Measurement – the regular and systematic measuring of the nature, causes and extent of corruption.
Level 2 (for topic 1 at level 1)	1) Linking the control of corruption with the agenda for prosperity; 2) Economic policy reform; 3) Strengthening institutions; 4) Public sector reforms.
Level 3 (for topic 4 at level 2)	1) Prudent public financial management; 2) Reform of public sector pay; 3) Reform of recruitment and selection; 4) Reform of performance management; 5) Human Resource management reform in the public sector; 6) Records management improvement.

Taiwan	
Level 1	1) Shaping ethics; 2) Transparent government; 3) Consolidating official admonitions; 4) Establishing networks; 5) Public participation; 6) Diversified governance; 7) Social justice; 8) Bringing Taiwan in line with international standards.
Level 2 (no clear connection to level 1)	1) Strengthening the elimination and prevention of corruption; 2) Implementing public service ethics; 3) Promoting corporate integrity; 4) Expanding education and dissemination; 5) Improving efficiency and transparency; 6) Carrying out procurement openly; 7) Practicing fair participation in politics; 8) Participating in international and cross-straits collaborations.
Level 3 (for topic 2 at level 2)	1) Push forward the enactment of laws and regulations relating to public service ethics; 2) Reasonably adjust salary and welfare of civil servants; 3) Activate the education of civil servants on integrity and rule of law; 4) Incorporate disciplinary measures against senior civil servants; 5) Take disciplinary actions against heads of authorities; 6) Implement the mechanism for morality evaluation of civil servants; Amend government regulations regarding 'revolving door' to avoid conflicts of interest.
Turkey	
Level 1	1) On-line requirement towards measures; 2) Preventive measures for the implementation of sanctions; 3) Increasing public awareness of the measures directed.
Level 2 (for topic 3 at level 1)	1) Boosting the weight of ethical behaviour in the national education; 2) Increased activity towards new principles of ethical behaviour by the religious affairs authorities; 3) Including ethical behaviour in television and radio broadcasts
Level 3	Not applicable
Ukraine	
Level 1	1) corruption prevention in representative government bodies; 2) creating a trustworthy public service; 3) corruption prevention in the operation of executive authorities; 4) corruption prevention in the sphere of government procurement; 5) corruption prevention in the judicial system and bodies of criminal justice; 6) corruption prevention in the private sector; 7) access to information.
Level 2	Not applicable
Level 3	Not applicable

Vietnam	
Level 1	1) To strengthen openness and transparency in the performance of official functions and duties, to minimize conditions and opportunities that give rise to corruption in policy-making, development and enforcement of laws; 2) To control the exercise of State powers; to perfect the civil service, and to improve the quality of the execution of official functions and duties; 3) To perfect the economic management mechanism, to build an equal fair and transparent environment for business; 4) To improve and enhance effectiveness and efficiency in the performance of inspections, examinations, supervisions, audits, investigations, prosecutions, and court trials with regard to detecting and dealing with corruption; 5) To enhance awareness and to promote the role of the entire society in preventing and combating corruption.
Level 2 (for topic 2 at level 1)	1) To implement well-defined/clarified delegation and decentralization; to define clearly functions, duties, powers of each level of administration, and to correct and to overcome overlapping and a situation of “no man’s land” in managerial operations. To clarify responsibilities and duties for each post/position, especially the responsibility of the heads of agencies, organizations and units, and based on the performance of such responsibilities and duties to evaluate public officials and civil servants. To strengthen inspections and examinations of the implementation of rules and regulations of civil service, especially the performance of public functions and duties in those positions and posts that directly handle requests from citizens, organizations and enterprises; 2) To perfect and to control closely the implementation of rules and regulations on recruitment, instatement, appointment, reappointment and transfer in order to improve the quality of the personnel of public officials and civil servants; 3) To incorporate the content of preventing and combating corruption into the training programs for public officials and civil servants with a view to educate and to inculcate integrity, to enhance awareness and a sense of responsibility for the personnel of public officials and civil servants with regard to preventing, detecting and dealing with corruption; 4) To reform fundamentally the system of salaries and allowances to ensure that public officials and civil servants have their income levels equivalent to moderately good levels of income of the society; to implement appropriate salary policies in some particular areas.
Level 3	Not applicable

Appendix 2 – Review questions by topic

Consulting and drafting process⁵² – questions reviewed:

1. Was responsibility for drafting the strategy assigned to a small semi-autonomous group?
2. Was there a process for ensuring continued support and involvement of senior political leaders?
3. Was there regular consultation with all government agencies that will be affected by the strategy?
4. Were the views of the political opposition solicited (where possible)?
5. Were multiple sectors of society engaged in the drafting process? If so, what sectors?
6. Are there multiple bodies with anti-corruption responsibilities noted in the plan? If so, is this viewed positively or negatively?
7. To what extent are any, some, or all of these bodies with anti-corruption responsibilities actually involved in the drafting process?
8. Were communication, transparency and outreach involved throughout the drafting process?
9. Does the plan mention how long it took to draft the plan or what resources were allocated to drafting? If so, what is noted?
10. Was advantage taken of other countries' experience and expertise?
11. Does the plan fit easily into applicable laws or does it require significant change?
12. Does the country openly acknowledge that they have a corruption problem?
13. Does the plan connect into the cultural, moral and religious components of society?
14. Does the plan follow any particular recognised model structure?

⁵² Questions inspired by recommendations of the UNODC's The United Nations Convention against Corruption National Anti-Corruption Strategies: A Practical Guide for Development and Implementation, p 5-12.

Preliminary diagnosis and situational analysis⁵³ – questions reviewed:

1. Are they using self-assessments, peer reviews, or other assessments?
2. Are they using cross country comparisons of corruption and governance?
3. Are they using country specific surveys of corruption perceptions?
4. Are they using surveys of actual experience of corruption?
5. Are they using internet platforms and social media (e.g. for anonymous reporting of bribes)?
6. Are they using information collected by government agencies (e.g. corruption complaints, court cases, asset disclosure by public servants)?
7. Are they comparing different sources of quantitative data, e.g. value of exports and imports, to identify discrepancies that may be due to corruption?
8. Are they doing detailed risk/vulnerability assessments?
9. Have they assessed obstacles for reform or implementation?
10. Is there any explicit consideration of how the plan will change if major obstacles are encountered (refers both to high level objectives and principal reform measures)?
11. Have resource constraints been properly evaluated?
12. Has the potential for additional support to the plan from other groups (e.g. political parties, NGOs, international community, etc.) been addressed? If so, who? Has the potential for coalitions been explored?

Breadth and focus of strategies – questions reviewed:

1. Is the plan focused on punitive measures?
2. Does the plan promote human agency?
3. Does the plan mention human agency at all?
4. Is the plan focused on modernising government processes?
5. Is the plan focused on internal controls?
6. Is the plan focused on training?
7. Is the plan focused on seriously engaging civil society?

⁵³ Questions inspired by recommendations of the UNODC's The United Nations Convention against Corruption National Anti-Corruption Strategies: A Practical Guide for Development and Implementation, p 13-26.

8. Is the plan focused on particular topics/sectors? If so, which, and why?
9. Is the plan focused on the reduction of inequality?
10. Is the plan written from the perspective of the anti-corruption agency?

Theory of change – questions reviewed:

1. Is there any explicit, or even implicit, discussion about why the proposed objectives and measures might be successful?
2. Is the plan composed entirely of administrative and technical measures or does it also contain measures that are more explicitly political (e.g. removing people in certain positions)?
3. If the plan contains a significant number of measures that would require strong political fighting to make happen, is there any recognition of achieving this within the timescale of the government?
4. Is it explicit or implicit that the production or implementation of the plan is a part of an election campaign, a political manifesto or a political commitment? If so, does this appear to make the plan stronger or weaker?
5. If there does appear to be a significant political angle to this plan, are there signs that the authors have sought to make this a cross-party plan?
6. Does the plan mention “political will” to a significant degree? If yes, what seems to be meant by this? Is there any discussion of what such will compromises and what will enhance “political will”?
7. Is the plan strongly focused or does it cover a very wide range of activities?
8. If it is strongly focused, what on and why? In particular, what is the logic for focusing on these issues and why should the authors believe that success in implementing particular measures will actually lead to reduced corruption?
9. Is it clear what the main intended change mechanisms are?
10. If the change mechanisms are clear, is there any discussion as to why these mechanisms might be successful?

Implementation of the strategy⁵⁴ – questions reviewed:

1. Is a single, high-level entity in charge of coordination and implementation?
2. Is there a steering committee for the strategy? How often does it meet? Who heads it?
3. Is there a nominated lead senior person? Is that person full-time?
4. Are there full-time implementing resources?
5. Are timelines/deadlines clearly noted per reform measure?
6. Has significant preparatory work been done, so that the plan will be easier to implement?
7. Does the coordination and implementation body have sufficient authority?
8. Is cooperation fostered in some way between the coordination body and implementing agencies?
9. Does the coordination body plan to regularly report on progress of the implementing agencies?
10. Has each agency agreed to an implementation, monitoring and evaluation schedule?
11. Have potential challenges regarding coordinating implementation been thought through?

Monitoring and evaluation of the strategy⁵⁵ – questions reviewed:

1. Are there quantitative criteria or indicators for success? If so, give some indication of what the principal ones are?
2. Does the plan clearly allocate resources for evaluation?
3. Does the plan use year-to-year changes in corruption index scores to measure strategic impact?
4. Does the plan intend to involve external organisations in monitoring and evaluation (e.g. civil society organisations, scholars, research organisations and citizens)?
5. Is it clear that monitoring and evaluation results will be published on a regular basis?
6. Is it clear that monitoring and evaluation results will be presented to the relevant supreme national body (e.g. president, parliament) on at least an annual basis?

⁵⁴ Questions inspired by recommendations of the UNODC's The United Nations Convention against Corruption National Anti-Corruption Strategies: A Practical Guide for Development and Implementation, p 33-38.

⁵⁵ Questions inspired by recommendations of the UNODC's The United Nations Convention against Corruption National Anti-Corruption Strategies: A Practical Guide for Development and Implementation, p 39-50.

Appendix 3 – Strategy document sources

Links to document sources

Country	Link to National Anti-Corruption Documents ⁶⁰
Albania	http://www.ceshtjetvendore.gov.al/files/pages_files/15-05-04-05-52-24Inter-sectoral_Strategy_against_Corruption_2015-2020.pdf
Azerbaijan	http://www.commission-anticorruption.gov.az/upload/file/NACAP%20Azerbaijan%202012-2015%20Eng.pdf http://commission-anticorruption.gov.az/view.php?lang=en&menu=0
Bhutan	http://www.acc.org.bt/sites/default/files/NIACS%202014-2018%20(Final).pdf
Bosnia and Herzegovina	http://rai-see.org/wp-content/uploads/2015/08/Final-ACS-sent-to-the-CoM.pdf
Brazil	http://www.justica.gov.br/sua-protecao/lavagem-de-dinheiro/enccla/acoes-enccla
Bulgaria	http://rai-see.org/wp-content/uploads/2015/08/Bulgaria_Anti-corruption_strategy_-2015.pdf
China	https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/workinggroup4/2014-September-8-10/Responses_NV/China_EN.pdf
Croatia	http://narodne-novine.nn.hr/clanci/sluzbeni/2015_03_26_545.html
Czech Republic	http://www.korupce.cz/assets/protikorupcni-dokumenty-vlady/na-leta-2015-2017/Government-Anti-Corruption-Conception-for-the-Years-2015-to-2017.pdf
Egypt	http://www.undp-aciac.org/resources/ac/newsDetails.aspx?nid=1198
Estonia	http://www.korruptsioon.ee/et/korruptsioonivastane-tegevus-eestis/korruptsioonivastane-strateegia-2013-2020
Georgia	http://www.transparency.ge/en/node/911 (update- http://www.coe.int/t/DGHL/cooperation/economiccrime/corruption/Projects/EaP-CoE%20Facility/RT%20Tbilissi%2020May%202014/Logframe%20AC%20Strategy%20Draft%20-%20Eng%20(02%2005%202014).pdf)
Ghana	http://www.chrajghana.com/wp-content/uploads/2012/08/nacap.pdf
Greece	http://www.gsac.gov.gr/index.php/ethniko-sxedio
Hungary	http://korruptciomegelozes.kormany.hu/strategiai-dokumentumok1
Indonesia	https://www.unodc.org/documents/indonesia/publication/2012/Attachment_to_Perpres_55-2012_National_Strategy_Corruption_Prevention_and_Eradication_translation_by_UNODC.pdf
Jordan	http://www.jacc.gov.jo/Portals/0/strategy/Strategy_en.pdf

⁵⁶ Please note that these documents may include the anti-corruption strategies of anti-corruption organisations if national anti-corruption plans could not be publically found and may have been translated from their original language for review when needed.

Country	Link to National Anti-Corruption Documents
Kazakhstan	http://www.mid.gov.kz/en/pages/anticorruption-strategy-republic-kazakhstan-2015-2025-years http://www.kstu.kz/antikorrupsionnaya-strategiya-respubliki-kazakhstan-na-2015-2025-gody-2/?lang=en
Latvia	https://www.knab.gov.lv/en/legislation/policy/
Lesotho	http://www.ls.undp.org/content/lesotho/en/home/library/democratic_governance/nacsa-finalbook.html
Liberia	http://www.lacc.gov.lr/public/images/stories/ANNUAL%20REPORTS/LACC%20STRATEGIC%20PLAN%202014-2017%20%20FINAL%20APPROVED%20VERSION%20OCTOBER%2010%202014.pdf
Lithuania	http://www.stt.lt/documents/eng/Kovos_su_korupcija_programa_EN_2015-2025.docx
Macedonia	http://www.dksk.org.mk/en/images/stories/PDF/stateprograme-eng-final.pdf
Madagascar	http://www.bianco-mg.org/wp-content/uploads/2016/04/SNLCC-BOOKLET-A5.compressed.pdf
Malawi	http://www.acbmw.com/wp-content/downloads/Strategic_Plan_140813.pdf
Malaysia	http://gtp.pemandu.gov.my/gtp/resources_reports.aspx
Moldova	http://cna.md/en/strategia-nationala-anticoruptie
Nepal	http://ciaa.gov.np/images/publications/1422355036ciaa_institutional_strategy_english2014_2019.pdf
Paraguay	http://www.presidencia.gov.py/archivos/documentos/DECRETO4900_c7x2g8ok.pdf
Peru	http://spij.minjus.gob.pe/Graficos/Peru/2012/Diciembre/09/DS-119-2012-PCM.pdf
Philippines	http://www.gov.ph/governance/resources/
Poland	https://cba.gov.pl/pl/newsy-serwisu-antykorum/3062,Uchwala-RM-ws-Rzadowego-programu-przeciwdzialania-korupcji-na-lata-2014-2019.html

Romania	http://www.just.ro/publicarea-formei-revizuite-a-proiectului-strategiei-nationale-anticoruptie-2016-2020/
Country	Link to National Anti-Corruption Documents
Russia	http://kremlin.ru/acts/bank/40657 http://en.kremlin.ru/supplement/565
Rwanda	http://ombudsman.gov.rw/IMG/pdf/rwanda_anti_corruption_policy.pdf
Serbia	http://polis.osce.org/library/details?doc_id=4118&lang_tag=&qs= http://rai-see.org/wp-content/uploads/2015/08/Serbia_-_ACTION_PLAN_2013-2018.pdf
Sierra Leone	http://www.psru.gov.sl/sites/default/files/STRATEGY.pdf
Taiwan	http://www.aac.moj.gov.tw/ct.asp?xItem=435195&ctNode=40726&mp=290
Turkey	http://www.bcct.org.tr/news/turkey-announces-action-plan-to-improve-transparency-and-fight-corruption-during-2016-2019/16259
Ukraine	http://zakon4.rada.gov.ua/laws/anot/en/1699-18
Vietnam	http://www.ngocentre.org.vn/webfm_send/20

Appendix 4 – References and related readings

- ANTICORRP. **Anticorruption Policies Revisited: Global Trends and European Responses to the Challenge of Corruption**. 2012-2017. Accessible at <http://anticorr.eu/>
- Bratton, Willam and William Griffiths and Ray Mellon. **Zero Tolerance: Policing a Free Society** (2nd ed). The IEA Health and Welfare Unit, 1998. Accessible at <http://www.civitas.org.uk/pdf/cw35.pdf>
- Cockcroft, Laurence. **Global Corruption: money power and ethics in the modern world**. I.B Taurus, 2012.
- Hussman, Karen. **What can we learn for the implementation of Article 5 of UNCAC?- Synthesis report of six country case studies: Georgia, Indonesia, Nicaragua, Pakistan, Tanzania and Zambia**. 2007, U4 Anti-Corruption Resource Centre. Accessible at <http://www.u4.no/publications/anti-corruption-policy-making-in-practice-what-can-be-learned-for-implementing-article-5-of-uncac/>
- Kelling, George. “How New York Became Safe: The Full Story”. City Journal. 2009. Accessible at <http://www.city-journal.org/html/how-new-york-became-safe-full-story-13197.html>
- Khaghaghordyan, Aram. **International Anti-corruption Normative Framework: the State of the Art**. ANTICORRP, 2014. Accessible at http://anticorr.eu/wp-content/uploads/2014/12/D1.1_Part3_International-Anti-corruption-Normative-Framework.pdf
- Mungiu-Pippidi, Alina. **Context Choices in Fighting Corruption: Lessons Learned**. Norwegian Agency for Development Cooperation, 2011. Accessible at <https://www.oecd.org/countries/zambia/48912957.pdf>
- Mungiu-Pippidi, Alina. **The Quest for Good Governance**. Cambridge University Press, 2015.
- Mungiu-Pippidi, Alina et al. **The Quest for Good Governance**. *Journal of Democracy*. Vol 27(1), pp 95-109, January 2016. Accessible at <http://www.journalofdemocracy.org/sites/default/files/Mungiu-pippidi-27-1.pdf>
- Rose-Ackerman, Susan and Bonnie Palifka. **Corruption and Governance: Causes, Consequences and Reform**. Cambridge University Press, 2016.
- Rowland, Deborah and Malcolm Higgs. **Sustaining Change: Leadership that Works**. Jossey Bass, 2008.
- Tana Copenhagen. **Guidance note on Theory of Change**. 2014. Accessible at <http://tanacopenhagen.com/uploads/Other%20documents/Tana%20Guidance%20note%20on%20ToC.pdf>
- Transparency International. **2015 Corruption Perceptions Index**. Accessible at <https://www.transparency.org/cpi2015/>
- Transparency International. **2016 Corruption Perceptions Index**. Accessible at http://www.transparency.org/news/feature/corruption_perceptions_index_2016

Transparency International Defense and Security Programme. **A review of anti-corruption reform measures in the defence sector in Colombia.** 2011. Accessible at http://ti-defence.org/wp-content/uploads/2016/03/2011-08_Colombia_Report.pdf

United Nations Office on Drugs and Crime. **The United Nations Convention against Corruption.** 2004. Accessible at <https://www.unodc.org/unodc/en/treaties/CAC/>.

United Nations Office on Drugs and Crime. **The United Nations Convention against Corruption National Anti-Corruption Strategies: A Practical Guide for Development and Implementation.** 2015. Accessible at https://www.unodc.org/documents/corruption/Publications/2015/National_Anti-Corruption_Strategies_-_A_Practical_Guide_for_Development_and_Implementation_E.pdf

United Nations Office on Drugs and Crime. **Technical Guide to the United Nations Convention against Corruption.** 2009. Accessible at <https://www.unodc.org/unodc/en/treaties/CAC/technical-guide.html>

Norton Rose Fulbright

Norton Rose Fulbright is a global law firm. We provide the world’s preeminent corporations and financial institutions with a full business law service. We have more than 3500 lawyers and other legal staff based in more than 50 cities across Europe, the United States, Canada, Latin America, Asia, Australia, Africa, the Middle East and Central Asia.

Norton Rose Fulbright will combine with Chadbourne & Parke, a leading international law firm, during the second quarter of 2017. Norton Rose Fulbright’s expanded practice will have more than 1000 lawyers in the US and 4000 lawyers worldwide.

Recognized for our industry focus, we are strong across all the key industry sectors: financial institutions; energy; infrastructure, mining and commodities; transport; technology and innovation; and life sciences and healthcare.

Wherever we are, we operate in accordance with our global business principles of quality, unity and integrity. We aim to provide the highest possible standard of legal service in each of our offices and to maintain that level of quality at every point of contact.

Norton Rose Fulbright Verein, a Swiss verein, helps coordinate the activities of Norton Rose Fulbright members but does not itself provide legal services to clients. Norton Rose Fulbright has offices in more than 50 cities worldwide, including London, Houston, Toronto, Sydney and Johannesburg. For more information, see nortonrosefulbright.com/legal-notices.

The purpose of this communication is to provide information as to developments in the law. It does not contain a full analysis of the law nor does it constitute an opinion of any Norton Rose Fulbright entity on the points of law discussed. You must take specific legal advice on any particular matter which concerns you. If you require any advice or further information, please speak to your usual contact at Norton Rose Fulbright.