



How can Technical Assistance support the Implementation of UNCAC?

U4 Background Paper for the International Cooperation Workshop
on Technical Assistance for the Implementation of UNCAC,
Montevideo, May 2007

Karen Hussmann and Miguel Peñailillo

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Executive Summary

At the first Conference of States Parties to the United Nations Convention against Corruption (UNCAC), held in Jordan in December 2006, participants agreed to establish a working group to promote the coordination of cooperation and technical assistance for UNCAC implementation. To facilitate the task of this group, it was also decided to organise a workshop with development and law enforcement experts to discuss good practices and potential avenues of coordination.¹ The main purpose of this paper is to provide inputs for discussion at this workshop to be held in Montevideo, Uruguay, at the end of May 2007. This paper highlights the perspective of development practitioners and is intended to complement the paper submitted by Finland to jointly contribute to well-informed workshop debates.

Part One of this paper describes key challenges for technical assistance in the field of anti-corruption, including the need to be responsive to political dynamics in receiving as well as giving countries. First, the fields of corruption prevention and combating corruption are interdependent, and the delivery of technical assistance for both of them needs to be more integrated. Further, despite a general consensus on the key elements and principles for anti-corruption work, it is important to recognise that donor organisations have differing approaches and priorities due to their specific mandates and *modus operandi*. The multiplicity of actors at the national level gives room for collaboration, complementarity and also competition in anti-corruption initiatives. Finally, support to certain public institutions in developing countries tends to be characterised by “silo vision”. All of these challenges need to be duly addressed if national anti-corruption policies are to be successful.

Part Two of the paper presents concrete suggestions to be considered for the provision of technical assistance in support of UNCAC implementation. The paper argues that anti-corruption activities support fundamental development goals and need to be linked to broader governance reforms in each country. In this effort, a gradual implementation approach should be developed focusing on both reform of the legal framework and sustainable change in practice and behaviours. Inter-institutional coordination mechanisms need to be created and/or strengthened at the national level. Further, long-term institutional capacity development is needed with a special focus on civil service career structures and continuity in administrative positions. Diagnostics and research on forms, types, manifestations and locations of corrupt practices need to be funded and made widely available for better policy making. In addition, local capacities to monitor and evaluate the effectiveness of policies need to be strengthened. Commitment and collective action by relevant actors who have had limited participation in anti-corruption activities (private sector, political parties, professional associations, trade unions and civil society) need to be further induced by identifying common interests, for example around sector concerns. Also, strategic visions can be implemented through sector approaches (natural resources, social services, etc.).

And finally, Part Three makes some proposals for how alignment of efforts can be realised on the ground through increased coordination, cooperation and coherence. The paper argues that donors in each country could channel their divergent interests and strengths into effective coordination structures. Joint diagnostics between development partners may be a good starting point. *Transparency Trust Funds* between development partners can be a useful tool to foster collaboration through joint programming and financing. Anti-corruption cooperation and technical assistance need to have a long-term commitment in order to overcome the challenge of relatively short-term government cycles. Donors need to ensure that their own ways of working reflect the highest standards in terms of transparency. The UNCAC secretariat requires support to catalyse the collection of country-level information and promote

¹ See Resolution 1/6, report of Conference of State Parties to UNCAC, CAC/COSP/2006/12.

the engagement of donors at the international level. And last but not least, UNCAC implementation at home should be advocated, in particular by involving the private sector in developed countries.

For the purpose of this paper *technical assistance* will be used broadly to refer to the provision of technical, material, financial and political support from donor countries to developing countries to help the latter prevent and prosecute corruption, as required by UNCAC implementation².

Although “technical assistance” may suggest standardised solutions for common problems, it is important to promote a broader understanding of the term in this context. Technical approaches may certainly be appropriate in some situations – for example the training of law enforcement agencies to conduct cross-border investigations – but they are inadequate when it comes to meaningful institutional reform, which demands a situation-specific response. It is critical that donors do not promote a one-size-fits-all approach to implementation, or support overambitious implementation agendas that quickly deflate after the first failures. Also, care is required not to convert UNCAC inadvertently into an end in itself but rather to use it as a vehicle for promoting public integrity, transparency and accountability as key ingredients for good governance and hence sustainable development.

² This broad use of the term will cover reference to both *technical assistance* and *cooperation* which denote discrete kinds of activity in different chapters of the Convention. As an illustration, in Chapter III Articles 37 onwards specify cooperation between different actors at national levels, while Chapters IV and V refer to international cooperation for law enforcement and asset recovery. Finally, Chapter VI on “Technical Assistance and Information Exchange” refers to specific types of cooperation (e.g. cooperation for development or financial cooperation) as well as to different forms of technical assistance (e.g. technical assistance and material assistance).

1 Challenges for technical assistance

1.1 Interdependence between cooperation for prevention and law enforcement

One of the biggest challenges to a coherent approach to technical assistance is the fact that traditionally, development and law enforcement actors have addressed the problem from two different perspectives. Technical assistance for the **prevention of corruption** focuses mainly on technical and financial support for the design and implementation of anti-corruption policies, institutional strengthening and capacity development, including that of anti-corruption bodies, the design and implementation of anti-corruption mechanisms (such as declarations of assets, codes of conduct, complaint mechanisms, and procurement), as well as the strengthening of civil society, media and the private sector. These measures are closely linked into broader governance reform, the modernisation of the public administration and democratic consolidation. The success of these anti-corruption measures depends on i) the extent to which they are linked with the above-mentioned broader reforms, ii) clearly established authority and accountability lines assigned to adequately equipped public agencies with the capacity for implementation, and finally, iii) the political will and resources to follow through. Cooperation for the prevention of corruption tends to be developed from a governance and institution building perspective. And this vision is usually deeply rooted in the specialised approaches pursued by professionals and experts working in this area.

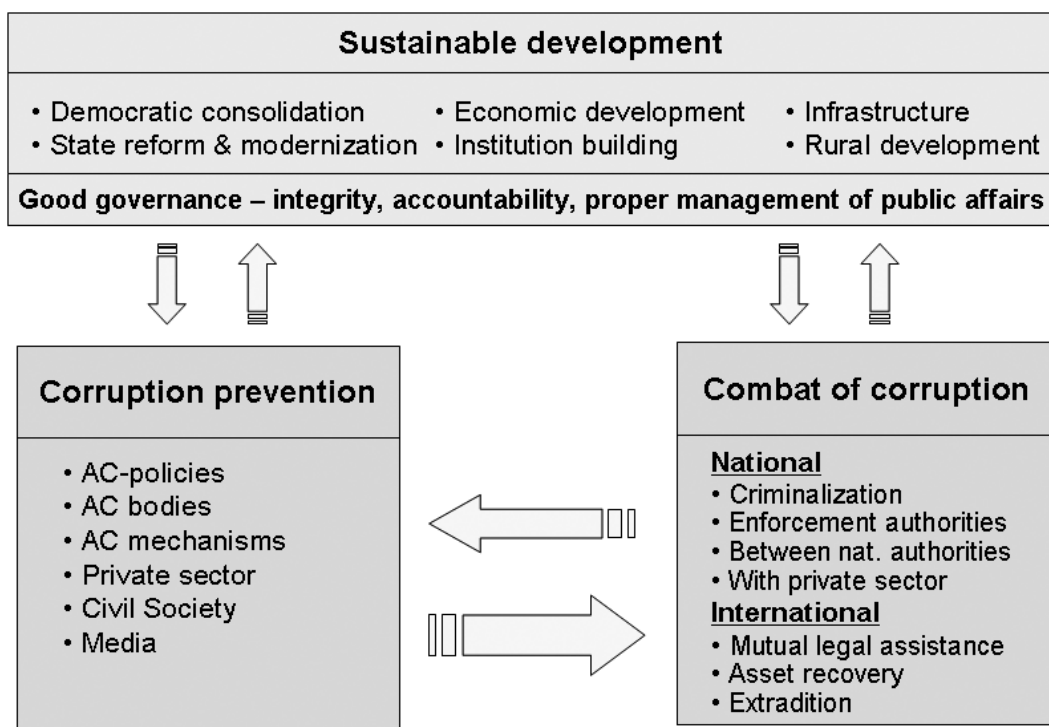
On the other hand, technical assistance for **combating corruption** mainly refers to the criminalisation of corrupt practices and law enforcement, both at the domestic level, and issues such as mutual legal assistance, extradition and asset recovery at the international level. Cooperation in this field is less about the design and implementation of policies or mechanisms. It is rather about i) capacity development of the national justice system, including the prosecution authorities, investigative police, and the judiciary, as well as about ii) the networks, capacities and compatibility of the legal frameworks that are needed if public agencies from different countries are to cooperate successfully with each other. Hence, cooperation in combating corrupt activities tends to be viewed from a law enforcement perspective where the focus lies on criminal aspects and the search for solutions concentrates on sanctions and repression. This vision tends to be also deeply rooted in the specific approaches of professionals and experts working in this area.

It is therefore hardly surprising to find on the ground of recipient countries important disconnections and, sometimes even, deep rifts between those who advocate mainly a preventive anti-corruption approach and those who believe that combating corruption needs to be privileged.³ The good news is that UNCAC provides an internationally agreed framework which balances preventive and punitive measures and creates an opportunity to bring cooperation and technical assistance approaches on these two fronts closer together. These different fields for anti-corruption technical assistance are intimately linked, reinforce each other and need to be understood as part and parcel of a systemic approach to address the multi-faceted and multi-layered problem of corruption. It is therefore useful briefly to illustrate their systemic interdependence.

³ In this context the often advocated approach of “frying big fish”, based on R. Klitgaard’s early and pioneering anti-corruption work, has caught a lot of attention and found followers around the world. Whether or not such an approach is feasible in countries with weak institutions and endemic levels of corruption has been questioned and unambiguous answers have not emerged as yet.

As indicated above the spirit of the Convention is not to prevent and combat corruption as an end in itself but “to promote integrity, accountability and proper management of public affairs and public property” as key ingredients for good governance which in turn is a crucial precondition for sustainable development.⁴ Hence, both fields of anti-corruption cooperation and technical assistance contribute to superior goals of national policies and international efforts: the creation of sustainable development, as illustrated in the following figure.

Figure 1 – Interdependence of cooperation to prevent and combat corruption



The interdependence between corruption prevention and the use of criminal law and sanctions against corrupt practices cannot be overemphasised. On the one hand, effective preventive measures require not only their formal existence, incentive systems, accountability, leadership, transparency and deep behavioural change, but also the necessary “sticks” for those who violate the rules and harm the public good. On the other hand, an effective criminal justice system depends to a large extent on a well-functioning state administration in order to gain access to evidence, information, data and assets related to the cases under investigation. As a general rule of thumb it should be noted that the cost of repression is high and for it to be effective it should be applied to the most severe violations of the rules in a society. Penal law is a last resort and it should not be the first or the only one.

Thus one of the main challenges for effective UNCAC implementation will consist in building bridges between technical assistance for corruption prevention with technical assistance for the combating of corruption.

⁴ The United Nations Millennium Declaration of 2000 states as one of its primary objectives to “create an environment - at the national and global levels alike - which is conducive to development and to the elimination of poverty” and further says that “success in meeting these objectives depends on good governance within each country ... and at the international level ...”. General Assembly resolution 55/2 of 8 September 2000, paragraphs 12 and 13 in particular.

1.2 The complex web of donor country agendas

Over the past ten years a certain international consensus has emerged among donor organisations about key issues to be addressed in the fight against corruption. But at the same time the different bi- and multilateral donor organisations have their own institutional mandates and objectives, which are determined by their home countries or management boards in line with national political interests, their respective visions about priorities in an interdependent world order, a concern for the good use of national taxpayers' money as well as varying approaches on how best to achieve development in poor countries.⁵

Hence, there are at times important differences between donor organisations regarding the motivations, focus, final goals and practical modalities of their anti-corruption cooperation (Hamm & Ludermann, 2006). Some donor organisations, for example, focus their anti-corruption cooperation on issues related to the fight against other forms of international crime that are considered a threat to national and international security. Others put great emphasis on national ownership of country-level anti-corruption policies. Some, in particular the larger donor organisations, try to exert strong political pressure on reform-resistant governments and may complement this with attractive financial incentives, while others privilege to hold dialogues with governments or support local actors to exert pressure on the ground (Anger, 2004; Hamm & Ludermann, 2006).

The attacks of 11 September 2001 in the USA have seemingly given a strong impetus to international cooperation, in particular in the areas of money laundering, freezing of assets and other forms of international crime as important means to combat corruption. However, caution is in order to avoid the risk that international anti-corruption initiatives inadvertently focus primarily on support to the above-mentioned issues at the expense of broader reforms of governance systems, national institution building to prevent corruption, and building strong integrity systems and transparency in recipient countries (ICPC, 2006). As illustrated above, prosecutorial and investigative approaches will be more successful if pursued in the context of a well-functioning state.

Harmonisation and alignment efforts for international cooperation as applied in the framework of the OECD draft DAC principles on anti-corruption cooperation are important initiatives to promote dialogue on the different interests and objectives and to find common ground. The challenges do not lie so much in having to deal with a variety of different approaches but rather in recognising them, making them explicit and strengthening transparency and coordination mechanisms in order to make best use of each donor organisation's interests and capacities.

1.3 Recipient country realities to consider

This section briefly presents some important aspects of the political and institutional realities in developing countries that receive technical assistance. By raising these issues, the authors want to draw the attention of donors to the need to increase further their focus on the local context and demand in recipient countries when they design and deliver their assistance programmes. Further, these aspects contribute to setting the stage for the recommendations for international cooperation laid out in Part 2.

⁵ As the Sida report on Anti-Corruption Strategies in Development Cooperation (2004) summarises concisely: "Donor organisations are partly political organisations with the assignment of implementing their nation's political agenda, partly supervisory agencies with the assignment of ensuring the tax-payers' funds are administered well, and partly knowledge organisations with the assignment of transferring know-how to recipient countries and acquiring know-how from recipient countries".

1.3.1 Multiplicity of actors as potential recipients of cooperation

The implementation of UNCAC will undoubtedly require a variety of different national actors, each of which may potentially be recipients of international cooperation and technical assistance. For example, to enable a criminal prosecution, a chain of administrative and criminal procedures needs to be carried out satisfactorily by a variety of public agencies. Hence, anti-corruption efforts focused on increasing the capacity of the attorney general's office would have limited chances of success if the other institutions involved, such as internal and external control organs, the police and the courts, were not strengthened, too.

First and foremost, targets of technical assistance include the different state agents (executive, judiciary and parliament). In addition, the private sector, civil society and media are critical. None of these groups forms a monolithic block as each individual player, such as the different ministries, control organs, anti-corruption bodies, professional associations or different civil society organisations, tends to have its particular political agenda, institutional objectives and interests. Thus, the majority of anti-corruption measures require the confluence of multiple interests in a common direction over several years.⁶ Those who initiate reform need the support of allies. The identification of such allies, in addition to potential opponents, and the understanding of their respective interests can help donors to design or adjust their cooperation projects.

Civil society coalitions present a unique set of challenges. In developing countries civil society organisations (CSOs) tend to be institutionally weak, fragmented and dispersed. They compete for resources and may have weak or temporary incentives to collaborate.⁷ In addition, CSOs are often identified with certain political visions that may be irreconcilable. In such conditions, the creation of effective coalitions constitutes a true challenge, which does not seem to be resolvable through mere technical or financial support.

Finally, it is important to highlight that public players may be open to cooperation in their work towards national anti-corruption goals. However, they compete at the same time for economic resources and space on the political agenda. Thus it is not rare that some projects are replaced by others on the priority. In this complex context, international cooperation and political support from donors can be a relevant incentive to provide viability to specific initiatives. However, caution is required not to generate inadvertently adverse effects by distorting or misbalancing a country's policy framework. For example, donor support to temporary anti-corruption organs depending on the executive may be an effective approach to creating momentum for anti-corruption policies in one country, but in others may only result in short-term effects because these organs may disappear with the government which set them up. Or technical assistance to carry out "zero tolerance" policies to crack down on corruption through repression may diminish the effects of other programmes designed to promote transparency or public integrity.

Diagnostics, information and assessments that are shared between donors can facilitate the effectiveness of their decisions in view of the above factors. Coordination of efforts is important for taking advantage of the dynamics of natural competition and collaboration between national players who are potential recipients of anti-corruption support.

⁶ For example, uniting public agencies and companies has been crucial for the success of procurement reform, while the association between civil society, media and academia has been an important factor in improving access to information in several developing countries.

⁷ For example, in only 10 out of the 21 countries examined in the first round of the follow up mechanism to the Interamerican Convention against Corruption, civil society organizations provided an independent evaluation report of which only 4 were developed by a coalition of CSOs. See www.oas.org.

1.3.2 Politics of anti-corruption policy making

Article 5 of UNCAC stipulates that State Parties should have an effective and coordinated anti-corruption policy framework.⁸ This article is crucial as it reflects the conviction of State Parties that anti-corruption work cannot be confined only to technocratic solutions aimed at fixing certain problems in the systems. It puts emphasis on the realm of public policy and thus acknowledges the inherently political nature of anti-corruption work.

Anti-corruption initiatives cut across different sectors of a country's governance system and its multiple institutions, and can be promoted by a variety of public and private players with multiple, often conflicting and at times changing political objectives. As said before, these policies and measures may complement, strengthen or even compete with each other and their dynamics and strengths depend on the broader governance context, an often changing political agenda and the capacities, will and power of the players involved.⁹ A good illustration of this is given in the following figure, which depicts the development of anti-corruption policies in Chile over a period of 10 years:

To date, considerable efforts have been made to develop practical advice and methodological guidance on what anti-corruption strategies, programmes or policies should consist of. However, these orientations have been largely prescriptive and some of the underlying assumptions have more recently come to be questioned.¹⁰ Also, much attention has been centred on the design stage of anti-corruption policies and mechanisms. Given the importance of implementation, not enough attention seems to be paid to this phase. Often inter-institutional coordination is difficult, political incentives for implementing partners change, and institutional capacities require considerable financial and technical resources.¹¹ It is important not to lose sight of the dynamics of the multiplicity of players, the influence of the political environment, and the identification of new needs for capacity development.

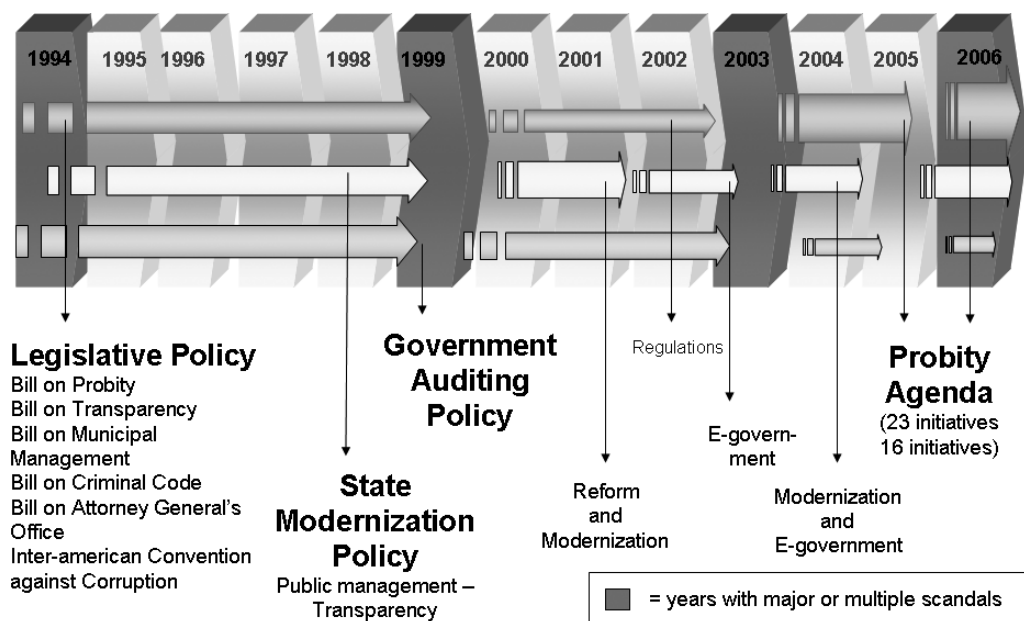
⁸ “Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability”, Article 5, paragraph 1, UNCAC.

⁹ “Few political leaders have been able to bind themselves to anti-corruption reforms over an extended period of time.” Quoted from Heilbrunn (2002).

¹⁰ Shah and Schachter (2004) point out that support for anti-corruption agencies or awareness raising campaigns will have limited effects in a context with rampant corruption rather efforts should focus on broad underlying features of the governance environment. The focus on awareness raising has been criticized as it may mainly help to create an atmosphere of public cynicism and the creation of broad coalitions has been put in question due to their limited success of sustainability (Tisné & Smilov; 2004).

¹¹ For example, the political pressure often withers away with the passage of a new law or a legal amendment. However, the practical implementation of such measures requires administrative rules and regulations, procedures as well as capacity building to the wider public service and sometimes citizens or economic players.

Figure 2 – Chile: Ten years of differing anti-corruption policies



Source: Miguel Peñailillo (2004) – Capacity building course for Chilean executives

Anti-corruption initiatives should not be viewed as highly rational processes with static goals in which expert technocrats are in control of the instruments for achieving predicted or stated outcomes. Rather they need to be considered as “fuzzy betting attempting to influence the probability towards future situations”, in particular in the developing world (Turner & Hulme, 1997).

A considerable challenge for international cooperation therefore lies in recognising and understanding the politics of anti-corruption policy making and implementation. This is crucial for i) the detection of opportunities for cooperation, ii) the alignment of international and national efforts, and iii) the provision of technical, material and political support to help ensure the sustainability of anti-corruption initiatives.

1.3.3 Silo visions affect the effectiveness of anti-corruption work

The prevention, detection, investigation and sanctioning of corrupt acts require institutional actors that are coordinated among each other and have access to shared information flows. However, in developing countries anti-corruption work is often deeply rooted in a “silo vision” – an approach that focuses on institutional capacity building at the expense of inter-institutional cooperation and coordination.

Important anti-corruption organs such as specialised anti-corruption bodies, the comptroller or auditor general, as well as the attorney general, are usually characterised by an important level of political and functional autonomy. This autonomy is necessary, among others, to fend off political pressures in the course of investigations for example, but it also creates a certain degree of political and operational isolation which may negatively affect their institutional work (JSCA, 2005).

The institutional autonomy and particular organisational culture typical of investigative and control institutions, such as secrecy or reservation, compartmentalisation of information, and vertical control of decisions, contribute to the development of these “silo visions”. For that reason, public agencies with a prime role to play in the fight against corruption may act in a limited way influenced by their specific

intra- and inter-institutional relations and the lack of process vision regarding the country's overall objectives in fighting corruption. This situation is mirrored in the fact, for example, that one of the most common recommendations of the follow-up mechanism to the Inter-American Convention against Corruption was that Latin American states needed to strengthen their supreme control institutions by establishing inter-institutional coordination mechanisms.¹²

In this context, the potential role of donor cooperation and technical assistance is important not only for strengthening institutions through training programmes, financial support and the transfer of technologies, but also through financial and technical support for inter-institutional coordination mechanisms as well as a regular exchange of information between the key public actors.

2 Issues to consider with respect to technical assistance

UNCAC reinforces existing donor initiatives in the field of anti-corruption. The OECD DAC Principles on Anti-Corruption, for example, echo UNCAC's holistic approach, calling for attention to both the supply and demand sides of the problem. The Paris Agenda is in line with UNCAC, as the latter provides an agreed framework for support, based on common international standards. The preventive measures of the Convention reflect generally accepted principles of the good governance agenda. On the other hand, punitive measures and international legal assistance reinforce international agreements in areas such as money laundering, transnational bribery, and fraud, and add the criminalisation of such crucial practices as the bribery of officials of public international organizations, bribery in the private sector and the liability of legal persons.

The Convention obliges States Parties to “enhance their cooperation at various levels with developing countries, with a view to strengthening the capacity of the latter to prevent and combat corruption” (see section II). The UNCAC itself provides an internationally agreed framework for organising such efforts. As emphasised above, however, a framework should not be confused with a blueprint. There is no single model of reform; instead, the leadership in each country must determine priorities and the appropriate sequencing of steps towards implementation (U4, 2007). This section will propose a series of issues for consideration by States Parties when discussing the orientation of development cooperation and technical assistance for a gradual implementation of UNCAC.

2.1 Ensure that anti-corruption initiatives are in line with broader governance reforms

As briefly illustrated in section 1.1, anti-corruption initiatives are crucial contributions to the achievement of superior development objectives, such as functioning political systems, economic development, access to justice, the rule of law, health and education. Hence, it is critical to ensure that anti-corruption efforts are in line with broader governance reform for at least the following main reasons.

First, opportunities for corruption are often one important risk factor in achieving the desired results of broader governance reform. It is therefore crucial to identify which types and forms of corrupt practices may threaten to jeopardise particular central reform efforts in a given country and take appropriate corruption risk management measures.

¹² Committee of Experts of the OAS Convention Follow-up Mechanism (2006), “Hemispheric Report of the First Round of Analysis”. See www.oas.org.

Second, anti-corruption initiatives are only one, often secondary, priority on the political agendas of governments and compete with numerous other reforms or policies for attention, resources and skills. Hence, linking anti-corruption efforts tightly into broader governance reforms may not only increase the effectiveness of the latter but also augment the chances of success of the former.

Third, responsibility and accountability for the implementation of anti-corruption efforts need to lie necessarily with the competent agency or agencies that have political-administrative authority over the reform in question and many of the corruption prevention measures cut across the state administration. This requires that, for example, the implementation of codes of conduct needs to be part not only of civil service reform in general but of each public agency in particular.

Fourth, resources and skills for anti-corruption work are limited; thus the development of anti-corruption strategies should take into consideration how best to create synergies, use the strength of existing priority policies and avoid having anti-corruption efforts, as a fashionable topic, divert attention and resources from the superior objectives of state activity.

2.2 Develop a gradual implementation approach based on a strategic vision

Given that UNCAC contains a wide variety of preventive and punitive anti-corruption provisions, full compliance by states parties will be a challenge for the vast majority of countries around the globe. The scope and depth of this challenge will vary widely from country to country depending on the extent to which its normative system is already in line with UNCAC provisions and to what degree these norms are really being implemented. Two issues are of particular relevance in this context for international cooperation.

First, technical assistance should be provided to states parties with a view to helping them to develop a strategic vision on how to address country-specific corruption problems over time. Taking into account that quick fixes for corruption at the systemic and behavioural levels are virtually non-existent, the time horizon for such a strategic vision could extend over one to two decades. Developed countries have taken decades to establish and consolidate adequate integrity and ethical infrastructures. This does not mean that important changes and reforms are impossible in the short term; it is rather meant to call for realism when addressing entrenched problems.

Second, taking into account that state capacities, as well as financial and technical resources are limited in developing countries, technical assistance should be geared towards assisting developing countries taking into account other key policy and reform areas (see point 2.1), to translate gradually this strategic vision into concrete implementation of the UNCAC.¹³ Such a gradual approach needs to pay particular attention to focusing not only on legal reform but also on achieving sustainable change in practice. The latter is far more challenging than the former and will require sustained levels of cooperation and technical assistance for institutional reform and behavioural change.

Donors should assist dialogue between governments, civil society and donors themselves on what actions are required to meet the standards set out in UNCAC and assist in the development of firm plans for who should be responsible for the implementation and monitoring of anti-corruption programmes. National Anticorruption Plans or Strategies can give both direction to government departments and a

¹³ Specific attention needs to be paid to those countries which are most afflicted by corruption. They will likely need the most comprehensive set of anti-corruption reforms, but at the same time weak institutional capacities and immature political systems may preclude quick fixes. In this context, the combination of a long-term strategic vision into which a gradual UNCAC implementation approach is inserted would be most desirable.

common standard and strategy for donors to align their activities with (Green et al., 2005). A built-in review mechanism to monitor priorities and sequencing in light of changing public policy agendas is necessary to make corrections and detect new opportunities. However, caution is advisable to avoid a situation where state parties and donors rush to adopt broad-based “formal compliance” plans while the capacity and will to implement them may be lacking.

2.3 Support national coordination mechanisms

Anti-corruption initiatives usually cut across a wide range of government activities, such as general governance, financial management, public sector reform, justice sector reform, and other general sector work, such as health and education. To ensure the success of such a wide range of efforts with different institutional homes, inter-institutional coordination is indispensable. In many countries with a clearly identified governmental anti-corruption body, this task tends to be assigned to this institution. In other cases ministerial committees or other inter-institutional coordination mechanisms may exist. No matter which model is chosen, the vast majority of countries suffer from serious weaknesses in their coordination capacities. Some of them stem from the design of the coordination approach while others are due to a lack of human and financial resources.

International development partners should take these shortcomings seriously and look for creative ways to support existing national coordination mechanisms. The concrete form will vary widely from country to country, but donors need to start to think about this area and set some resources aside.

Finally, in a variety of countries, in particular those with large development cooperation budgets, donor-government consultative groups have been established to foster policy dialogue and coordination, and to facilitate joint funding initiatives. There does not seem to be a fixed model as yet with regard to the location of anti-corruption coordination in such frameworks. But there are some important questions that need to be raised at the country level, taking into consideration the local political culture as well as existing institutions. Such questions include whether to form a separate anti-corruption group or to mainstream anti-corruption into other sector consultative groups such as governance; how to make the group work; who should lead it; and whether there is scope for a division of labour among its members (Green et al., 2005). Considering the enormous breadth of activities and issues that an anti-corruption consultative group has to follow, donors should ensure that sufficient and competent human resources are available.

2.4 Profile existing projects and conduct gap analyses

Anti-corruption initiatives can be embedded in many development programmes, often implicitly. As a first step, donors could consider mapping the relevance of existing aid-funded programmes for UNCAC implementation. By profiling the interface of current activities with the Convention, donors may strengthen the position of all reform advocates – not just themselves – in discussions vis-à-vis the state (GTZ, 2006). Such a mapping would also provide an invaluable contribution to the coordination of efforts and avoidance of duplication¹⁴.

¹⁴ Data bases for the systematic sharing of basic information concerning past, ongoing and future technical cooperation projects and programmes which focus on the prevention and control of corruption or, more broadly, work towards enhancing good governance could be used as a tool for this. The efforts undertaken in this area by the UNODC on behalf of the International Group Against Corruption members (IGAC) and the U4 can serve as an example.

Further, every country contains in its legal framework and administrative rules certain anti-corruption provisions. However, in most countries it is not known to what extent their national laws, rules and regulations are in line with UNCAC. To overcome this lack of knowledge, it would be useful if donors supported national gap analyses in order to compare the national legislation with UNCAC, not only in terms of whether or not legal provisions exist and comply with the international standards but going an important step further to assess to what extent these standards are applied in practice. The experience of Indonesia and Colombia can be drawn upon for such gap analysis exercises.¹⁵ The “Report Card” experience of Transparency International in Latin America and OECD countries may serve as an example for efforts to assess the degree of implementation of integrity norms.¹⁶

2.5 Build long-term institutional and human capacity

The biggest challenges for anti-corruption efforts are usually not related to amending laws or passing new ones but rather to the state’s capacity to implement and enforce them effectively. A number of countries have cutting-edge legislation on anti-corruption, often thanks to technical assistance from abroad and sometimes due to a strong formal legal culture, but their institutions have not been adapted accordingly, a multiplicity of norms from different times may be in conflict with each other, and above all the organisational culture and individual behaviour within public institutions has not changed. Further, technical assistance has so far privileged training, policy advice and technical inputs into the design of specific anti-corruption measures, but support for the implementation phase, including the indispensable capacity development of public agencies, has been relatively minor.

For the prevention and control of corruption to be effective, the international community must convince itself that long-term institutional capacity development is one of the most crucial ingredients for success. Such an approach may not be as appealing as providing support for the design of anti-corruption measures or the training of relevant stakeholders as outputs there are clearly visible. However, the focus needs to shift towards creating outcomes and impacts and for that well-functioning institutions and a civil service culture of probity and integrity are indispensable. An important condition for achieving this lies in the need to strengthen the civil service career system, to reduce the discretion of incoming governments to replace large numbers of career public officials, and to improve continuity in those positions which require specialised knowledge.

Further, such capacity development must go beyond financial and technical support for anti-corruption bodies. More importance needs to be given to strengthening the integrity and institutional capacities of other key institutions in preventing, controlling and combating corruption in line with the national priority reform agenda. For example, if public financial management and justice sector reform are central policy pillars of a country, the institutional development approach for the Ministry of Finance, Supreme Audit Organisations, Ministry of Justice, Attorney General’s Office and court system need to have a strong integrity, transparency and accountability component with specific focus on eliminating opportunities for corruption.

Support measures can include long-term advisors or mentors to provide hands-on technical support to governmental institutions, link institutional development efforts more explicitly with internal integrity and accountability initiatives¹⁷, dedicate more resources to the implementation and monitoring of codes of conduct and integrity standards. The latter could be done in conjunction with civil society monitoring.

¹⁵ The German Technical Cooperation (GTZ), for example, conducted a study comparing Germany, Colombia, Indonesia and Cameroon. Information can be obtained from Dedo Geinitz Dedo.Geinitz@gtz.de.

¹⁶ See www.transparency.org

¹⁷ These include the development of internal accountability and oversight structures, codes of conduct, ethics training, service user charters, complaints reporting mechanisms, disciplinary actions, and complaints analysis.

Finally, the establishment or strengthening of national training institutions, in particular to train and prepare career officials for the public administration, should be considered.

2.6 Conduct diagnostics and research for better policy making

Research and analysis of corruption provides the foundation for sound policy making, as well as a benchmark for implementing reforms. This is widely acknowledged among development partners and has been reflected in practical advice published by them to guide the development of anti-corruption strategies. However, realities on the ground are still often characterised by the lack of a sound knowledge base.

Development partners should provide technical assistance and financial support to broaden this knowledge and to make it widely accessible. Specific attention should be given to the following areas:

- Research on types, forms, locations and manifestations of corruption. This should include but not be limited to corruption perception surveys which can provide a baseline on which to design appropriate interventions, respond to the demands of the population and monitor change. Further, assessments of sector vulnerability to corruption should be considered that would provide the basis for specific corruption risk management plans.
- Research on local values, beliefs, traditions, principles and local accountability mechanisms is crucial for the design of interventions that are to meet with local expectations and behavioural standards. This is particularly important in countries where traditional societal values stand in stark conflict with the principles of a modern Weberian state bureaucracy.
- Assessments of the quality of the legal-judicial-penal sector, since this tends to fall outside existing diagnostic reviews (Green et al., 2005). Such assessments are an important complement to the above, in particular in view of the need to bring the fields of corruption prevention and corruption repression closer to each other¹⁸.
- Ensuring that research results are made available in relevant local languages, widely disseminated and made easily accessible, in particular where information technology can be used.

Demand for research may easily go beyond available and reasonable means or be turned into an end in itself. A pragmatic approach to avoiding these potential pitfalls might consist of development partners supporting the government, civil society organisations, media, professional organisations and the private sector in creating broad agreement on a research agenda for the country.

2.7 Strengthen national monitoring and evaluation capacities

The lack of solid monitoring and evaluation capacities is a common problem for developing countries. Data collection systems tend to be unreliable and erratic, national statistic offices are weak and public agencies do not attribute great value to processing, systematizing, preserving and disseminating the information they produce. This lack of institutional capacity negatively impacts on the quality and efficiency of public policies, which is particularly true for anti-corruption policies. For example, the OAS has recommended to all countries in Latin America to develop information and indicator systems

¹⁸Assessments undertaken in this area by UNODC (for example the assessment of judicial integrity in three Nigerian states) may provide insight and some lessons learnt on how to do this. See www.unodc.org/unodc/corruption_publications.html.

on anti-corruption to evaluate the implementation of the Inter-American Convention against Corruption.¹⁹

On the other hand, development partners usually do apply monitoring and evaluation mechanisms to the anti-corruption projects they support, but these are often based on indicators and criteria more relevant to headquarters than for the actors on the ground involved in the implementation of broader policies into which these projects are supposed to feed. Further, despite the efforts of donors to make their monitoring and evaluation information more transparent, problems with accessing the information remain – especially for civil society organisations and the media.

Within this context, technical assistance for UNCAC implementation should provide specific support to the strengthening of national monitoring and evaluation capacities. First and foremost, this will require capacity development of state institutions in this area, in particular with regard to the creation of monitorable indicators, data collection and processing of information. “In-house” capacity is crucial for the government to review its policies and programmes periodically and take corrective action where needed. Secondly, there also needs to be financial and technical support for the capacity development of independent monitoring and evaluation, for example through policy research institutes, civil society organisations or the media.

2.8 Induce commitment and action by a broader range of relevant actors

The opportunities for corruption in every country are manifold, widely scattered through the mechanics of the political system, the decision-making process within the state administration and service delivery, and hence, involve a wide variety of different actors. The first wave of anti-corruption work has largely concentrated efforts on rather technocratic approaches to reforming the public administration and strengthening civil society in its watchdog and advocacy functions. The private sector was recognised later as a key partner, and recently the political nature of corruption has been acknowledged through increased work with parliaments and other political actors. There is no doubt that in different countries and regions other stakeholders have participated or been encouraged to participate in anti-corruption work as well.

However, as illustrated in point 1.3.1, there seems to be a need to strengthen and induce anti-corruption action amongst a broader range of relevant actors:

- Taking into account the weaknesses and fragmentation of civil society actors, development cooperation should emphasise the generation of collective action capacities, including organisational, managerial and technical capacities to form associations and sustain them over time, which is particularly important for those organisations that participate in anti-corruption coalitions.
- The private sector in many countries has not yet been sufficiently involved in anti-corruption work.²⁰ Different strategies for involving large or small and medium sized companies may be needed, taking into account their specific needs and potential interest in anti-corruption work. In any event, the involvement of the private sector is essential if a comprehensive clampdown on corruption is to be successful.
- Political corruption has been addressed in recent years through an increased focus on political finance reform, including election campaign financing. However, broader issues of

¹⁹ See www.oas.org

²⁰ A GTZ review on UNCAC relevant projects from 2006 found that “except in the projects in South Africa and Indonesia, the private sector is largely excluded”.

accountability and integrity for political parties as organisations and for their members should be addressed, including internal governance, codes of conduct, and the like.

- Professional organisations, such as those of lawyers, journalists, brokers and auditors, are promising anti-corruption constituencies for specific sectors and can exert strong influence on policies and practices. In addition, professional organisations contribute to shaping professional standards and ethics, an area that should be much more exploited to create behavioural change.
- Trade unions may be important anti-corruption partners in areas involving the control of public companies and civil service ethics.
- Finally, civil society has been an important recipient of anti-corruption cooperation over the past decade. However, development partners should be careful not to concentrate their support on a few central-level organisations but look creatively for ways to reach out to provincial or local organisations in order to support anti-corruption from the ground up.

To date, anti-corruption cooperation has put strong emphasis on the creation of coalitions in order to aggregate otherwise dispersed interest groups and stakeholders so that they have more “political weight”. While this approach is in general commendable, it should be noted that for coalitions to be effective they need to have a true common interest and concrete objective. A complementary approach to broad all-encompassing anti-corruption coalitions would be to bundle interests and energies around more concrete, possibly sector-related anti-corruption goals (see next point).

2.9 Educate about UNCAC, its usefulness and implications

Prospects for effective and coherent implementation of UNCAC will largely depend on the commitment of the multiple actors in a given country to turn this legal obligation into meaningful reality. Therefore, UNCAC needs to be known by a far wider range of people. By way of example, it is worth noting that the majority of staff in the Latin American projects surveyed by GTZ were not familiar with UNCAC, and that out of 160 judges trained in El Salvador, 159 were not aware with UNCAC and its implications for their work.²¹

Hence, international support for the development of user-friendly, practical and case-oriented UNCAC training modules would be useful. These modules need to be tailored to different target audiences, such as the staff of government agencies, justice institutions, supreme audit organisations, parliament, civil society, media and the private sector, but also in particular to the staff of international development partners. The training should not only aim at raising awareness but also at generating demand and commitment for reform.

Awareness raising and education is particularly important when it comes to mainstreaming UNCAC provisions into general development cooperation projects. Well-informed and experienced anti-corruption professionals are relatively rare and most development cooperation projects will not enjoy the participation of such specialists. Hence, in order to ensure that a reasonably sound mainstreaming of UNCAC can take place, education and training about UNCAC within the donor organisations themselves is crucial.

²¹ Personal experience of the authors gained from USAID financed anti-corruption training of judges in El Salvador (2007).

2.10 Promote sector approaches – converge supply and demand for reform

To date, anti-corruption cooperation has largely concentrated on support to the much needed strategic anti-corruption frameworks or plans, anti-corruption bodies, specific anti-corruption measures and the strengthening of external actors such as civil society, parliament and the media. More recently, a complementary approach has started to emerge which starts to look at corruption vulnerabilities in specific sectors, such as health, construction and justice.²²

Addressing corruption vulnerabilities in specific sectors has the potential to generate new or additional benefits for anti-corruption work. On the one hand, responsibility and accountability for sector anti-corruption initiatives would be more concentrated in the hands of sector-relevant public agencies. Those sectors which carry forward national priority reforms with committed leadership should be identified as pilots. On the other hand, sector specific approaches provide an opportunity to match better the supply and demand side for anti-corruption work with a view to strengthening internal and external demand and commitment for real change. This means that cooperation and technical assistance should be focussed both on public agencies of the sector in question as well as on interest groups, clients and civil society organisations with a stake in that particular sector. They could include the following:

Risk assessments of sector vulnerability to corruption and ensuing risk management plans for whose implementation public agencies would be accountable.

- Agency-level internal integrity initiatives, including implementation and monitoring of codes of conduct, internal and external communication strategies, internal control framework, development of a hierarchy of accountability from the top to the lowest supervising grade, among others.
- Encouragement of private sector involvement relevant for a particular sector, e.g. the pharmaceutical industry in health, or construction companies in public works.
- Support to professional organisations with a stake in the sector as well as to civil society organisations and client groups (e.g. parent-teacher associations in education) for them to develop or strengthen advocacy, education and monitoring capacities.

3 Cooperation and coordination of development partners

As stated above, UNCAC provides for a comprehensive framework within which international cooperation and technical assistance for anti-corruption initiatives can be organised more effectively, in particular if different underlying political agendas are made explicit and are fully considered.

DAC alignment and harmonisation principles set a common agenda for governments and development partners. They focus on increasing government capacity by using government systems and reducing donor congestion around government. This involves coordination among donors. Implementation of these principles depends on the effective coordination of technical assistance by governments as well as

²² For examples from Africa, see Green et al. (2005), “A review of in-country donor coordination in Africa against corruption” – DFID. The issue-focused Global Anti-Corruption Reports from Transparency International also contribute to heightened awareness and insights into corruption problems specific to particular sectors.

on donor leadership. The draft DAC “Principles for Donor Action in Anticorruption”²³ reflect international agreement regarding the collaboration needed in anti-corruption work.

Although these principles are a symbol of joint political will, the dynamics at donor headquarters can be quite complicated and determine to a large extent whether and how donors really work together on anti-corruption. Coordinated donor activities are hindered when there are no significant government-led initiatives for donors to support collectively. But also, where collaboration is not a high priority for donor HQs there is less motivation for in-country collaboration (Green et al., 2005).

A starting point for increased cooperation could be to identify a small group of donors with shared priorities and good relations. Such groups can provide an opportunity for joint programming, sharing information, resources and training, developing joint strategies and common procedures, and taking common action.

3.1 Develop a shared, country-focused anti-corruption approach

It is widely acknowledged that isolated or piecemeal anti-corruption activities will not bear fruit. Rather, country-specific anti-corruption strategies are needed, tailored to the particular problems of corruption as well as to the political culture and integrated into the overall national development plan. There is no doubt that technical assistance needs to be aligned with such national strategies or plans. There are also countries where no anti-corruption strategy or national plan has been developed as yet, where their credibility and legitimacy may be in question, or where they may leave out support for important non-governmental actors.

No matter what the circumstances, as the DAC draft principles for donor action on anti-corruption state, development partners should create a shared anti-corruption approach, in agreement with the government and based on a commitment to implement UNCAC. As illustrated in point 1.2, due to the fact that each development partner has not only to respond to the demands of its national counterparts but also to implement headquarters policies and instructions, caution must be exercised to avoid sending mixed signals to national stakeholders through divergence in interests, focus and approach.

An anti-corruption approach largely agreed upon by the international community would increase both the efficiency and effectiveness of its cooperation. It would help to avoid duplication, to divide responsibilities for support, focus interventions and convey a unified message to counterparts. It would also reduce often wasteful competition for funds. As a start towards such shared country visions on the ground, development partners should engage in joint diagnostic tools or analytical work specific to anti-corruption.²⁴

3.2 Transparency of cooperation – promoting donor accountability

Transparency of donor cooperation and technical assistance for anti-corruption initiatives is crucial for several reasons. Effective access to information about donor-funded anti-corruption projects, their objectives and available funds facilitates i) coordination between donors and partners, ii) equitable

²³ Principle 1: We will collectively foster, follow and fit into the local vision. Principle 2: We will acknowledge and respond to the supply side of corruption. Principle 3: Policy should be based on evidence. See www.oecd.org.

²⁴ For example, a 2005 report of DFID governance advisors in Africa states that “there are few openly available examples of donors’ joint use of anti-corruption related diagnostic tools or analytic work. This is either because such activities are relatively new, there is little analytic work being undertaken, or because donors have not given sharing experiences and good practice a high enough priority.”

conditions for positive competition for funds, iii) monitoring of implementation and iv) evaluation of impact. Donor practice should reflect the standards that they try to instil in partner countries and lead by clear example.

Hence, donors should ensure that their agency practices are consistent with the standards of UNCAC, in particular when it comes to the transparency of information. Further, information on the decision-making processes and on decisions that concern members of the public should be published (Article 10).

Other relevant provisions for improving the integrity and accountability of donor agencies address the need for a code of conduct, a transparent, merit-based hiring and promotion process, transparency in the administration and auditing of funds, whistleblower protection for people who report cases of corruption, and the encouragement of civil society participation in their policy making.

During recent years, several organisations have chosen to integrate the corruption perspective into programme and project support in all sectors of development cooperation. Experience gained by NORAD, DFID, the World Bank and IaDB shows that the organisation must allocate considerable resources to make it possible to integrate these issues in practice. There should, for example, be an autonomous group in the organisation that has the specific mandate and political support to pursue the issues, both inside and outside the donor organisation. The group should have a strategy that covers several years and contains a work plan with specific and measurable goals, as well as its own budget (Anger, 2004).

Finally, the modalities of international cooperation and technical assistance should reflect principles of integrity. It is recommended, therefore, that codes of practice and appropriate operating standards be introduced or strengthened in areas such as finance, procurement and human resources, as well as in reporting on those projects that contribute to good governance. The political will accompanying the process would increase political legitimacy at home and earn approval abroad (GTZ, 2006).

3.3 Transparency trust funds – collaborative financing

Despite the increasing harmonisation efforts of donors, international cooperation and technical assistance for anti-corruption is still often uncoordinated, fragmented and scattered and many organisations still work on a bilateral level and in relative isolation from each other. The reasons for this are manifold and certainly include different orientations from headquarters and varying financing mechanisms ranging from budget and sector support to off-budget support, but also a lack of coordination capacity or will from the government side.

One way to help overcome these difficulties could lie in the creation of jointly financed “*Transparency Trust Funds*”, which would be put at the service of nationally determined anti-corruption work, be it anti-corruption strategies or action plans, specific anti-corruption policies, strengthening of non-governmental actors, research or a combination of all of this. There is arguably a greater incentive for donors to collaborate when they are spending money on the same activity.

Such *Transparency Trust Funds* could be governed by an independent structure consisting of government and donor representatives and with civil society participation. Financial commitments to these trust funds should be at least medium term in order to help ensure the sustainability of anti-corruption activities (see also point below). However, particular care is needed in terms of achieving a government co-financing scheme with an increasing share of funds provided by the national government as a sign of its political commitment to anti-corruption reform. The Joint Transparency Fund of Nicaragua and the Partnership for Governance Reform in Indonesia, for example, provide some experience to draw upon.

3.4 Long-term commitments to overcome the challenge of short government cycles

As illustrated in point 1.3.2, new governments can legitimately take up a new government programme and a specific agenda of priorities, which may or may not include an important focus on anti-corruption work and which may or may not build on prior anti-corruption programmes. Hence, the political cycle naturally affects the continuity and orientation of anti-corruption policies in the country. For example, efforts by one government may focus on increasing public ethics, probity and integrity aiming at behavioural and cultural change, but the next government may shift the focus to internal control and auditing. Since anti-corruption efforts require a long term approach if they are to generate lasting change, progress made during the first government may be left abandoned half way down the road. The result is not only a waste of money and human resources, but also increasing disillusionment on the part of those involved as they adapt to changing priorities, learn to assume that reforms will not be carried through and that thus no change from them is really required, and hence lose commitment or willingness to change.

International cooperation should identify creative ways of breaking this dilemma of the political cycle, striking a balance between recognising the legitimacy of varying government programmes and the need for sustained support to already initiated anti-corruption efforts. The above-mentioned Trust Funds for Transparency may be one vehicle for achieving this if designed appropriately. Another way would be to put a greater focus on ensuring continuity of career civil servants in their positions, in which they acquire over time relevant technical and political management capacities.

3.5 Support to the UNCAC Secretariat

UNCAC foresees that secretariat services be provided to the Conference of States Parties in order to assist them to improve their capacity and cooperation, to support the sessions of the Conference of States Parties, to provide information and to facilitate coordination with relevant international and regional organisations (Article 64). UNODC has been assigned to perform those functions.

As illustrated throughout the document, international cooperation and technical assistance are key factors for the successful implementation of the Convention at country level and at the same time cooperation and coordination between the providers of technical assistance need to be improved. Hence, the Secretariat of the Conference of the State Parties should consider providing the following services:

- Disseminate information with a particular focus on bringing the supply and demand side of anti-corruption efforts closer together. This could include the establishment of a central “clearing house of information” with data on, as a minimum, donor strategies on anti-corruption (headquarters-level strategies); donor-supported anti-corruption programmes and projects at country level (including those governance projects with anti-corruption components relevant for UNCAC); national anti-corruption strategies, plans or programmes; as well as specific national anti-corruption policies and measures. Not all of these need to be researched from scratch as relevant links to existing material can often be easily established. UNODC has already started collecting information about concrete projects as part of the IGAC database (www.igac.net).
- Facilitate coordination between the different international and regional players involved in UNCAC implementation in order to detect opportunities for synergy or partnership and to avoid duplication. The provision of relevant information, as noted earlier, is a prerequisite. However, the secretariat should also identify gaps in the cooperation and technical assistance, create bridges between the two fields of anti-corruption cooperation, as pointed out above, and organise

fora where donor organisations can discuss, align and harmonise their efforts, such as in the working group on technical assistance.

3.6 Advocate for UNCAC implementation at home

Donor organisations also need to advocate for UNCAC ratification and implementation at home, as it is impossible for them to engage in a credible dialogue with partners on corruption when their own governments are complicit in the problem. Hence, UNCAC should be used to catalyse more coherent anti-corruption policies among development aid, law enforcement and foreign policy branches of government. Development actors should liaise with colleagues from relevant ministries within their own countries to ensure that Convention compliance is pursued in all branches. It is particularly important that donor countries address international drivers of corruption, which implies engaging proactively with the private sector both at home and in partner countries.

Hence international initiatives, such as the Extractive Industry Transparency Initiative, the Water Integrity Network or the United Nations Global Compact Initiative, merit particular support from donor agencies, both at the international coordination level and at the implementing country level.

Questions to consider for discussion

Strategic vision, gradual approach and linkage to governance reforms

- In what ways can international donors improve their ability to identify and encourage the participation of key actors/sectors in anti-corruption initiatives? Which kinds of mechanism, programme and coaching approach can donors provide in order to support national actors in developing the necessary capacities to reach and sustain political agreements (including the development of a long-term strategic vision and gradual implementation approach)? Which mechanisms/support programmes exist to help ensure that these actors follow through with their commitment in the phase of implementation?
- How can donors improve their assessments of national capacities to implement anti-corruption measures? How can donors strengthen their advice or guidance to national counterparts with regard to greater realism and more achievable results?
- In which way can international donors help “seduce” the key players in broader governance reforms to participate actively in the design and implementation of anti-corruption initiatives? Which incentives can be used to convince these key governance reform players that anti-corruption initiatives could help strengthen their own institutional and political objectives?

Inter-institutional coordination and capacity building

- How can donors support the creation and functioning of inter-institutional coordination mechanisms for anti-corruption initiatives? How can they provide support to less institutionalised coordination mechanisms such as inter-ministerial committees, for example?
- In what ways can international technical assistance and cooperation ensure that local capacity is effectively established? How can they move beyond training and short-term capacity building activities? How is institutional capacity development to be achieved? How can output-focused

activities (e.g. number of people trained, number of workshops held) be made compatible with impact-focused projects (e.g. improving institutional integrity)?

- What is needed to strengthen national monitoring and evaluation capacities, both within the government as prime actor but also in independent institutions such as policy research institutes, civil society organisations, universities, etc.?
- How can donor organisations more creatively identify and support relevant national non-government actors, in particular private sector and professional organisations, trade unions, religious organisations and non-mainstream civil society organisations?
- How can anti-corruption initiatives be better integrated into sector reform approaches (e.g. health, education, public works)? How can specialised knowledge, expertise and skills be created on sector-specific anti-corruption issues?

International cooperation and coordination

- Which coordination modalities between donor organisations on the ground can be used as good practice? Which joint programming and funding modalities between donors at the country level can be considered as good practice?
- What programming and financing mechanisms would allow donor organisations to enter into long-term funding commitments so as to break the dynamics of short-term government cycles?
- In what ways can the UNCAC secretariat facilitate the work of donors to make information on their anti-corruption strategies, programmes, funding, evaluations, etc. easily available? What is needed to increase knowledge and access to information about opportunities where bi- and multi-lateral donor organisations could join forces regarding the design and delivery of cooperation and technical assistance?
- What mechanisms should be used to determine whether international donors themselves comply with UNCAC standards? How can the degree of effective implementation, both at headquarters and in country/field offices, be evaluated?

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