

An Integrated Approach to Anti-Corruption: Opportunities and Challenges

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1 Introduction

The COVID-19 pandemic has hit all human development dimensions hard and threatened to reverse gains in development over the past decades. In these turbulent times, both COVID-19 and corruption have a mutually reinforcing relationship – corruption undermines response and recovery efforts, while COVID-19 has increased the risks of corruption, fraud and abuse of authority. The COVID-19 pandemic has thus shown us that we need an integrated approach to anti-corruption, not only in crisis response and recovery, but also to build forward better for sustainable development.

Corruption, defined as ‘the abuse of entrusted power for private gain’², is not a new phenomenon, and is not just a challenge during the COVID-19 pandemic. Corruption undermines all development efforts and depletes valuable resources for development financing. Estimates show that businesses and individuals pay an estimated US\$1.5 trillion in bribes annually³. These lost resources could otherwise be used to ensure that everyone has the right to access basic services.

Therefore, ensuring that anti-corruption is integrated in all development efforts – including national, sectoral and local development plans and processes – is crucial in strengthening the enabling environment for effective, accountable and inclusive institutions, in and beyond recovery, to build greener economies, eradicate poverty in all its forms, provide universal and inclusive healthcare and education, and foster resilient institutions and societies.

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² UNDP (2008) Corruption and Development: A Primer
<https://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/corruption.html>

³ IMF (2016) Corruption: Costs and Mitigating Strategies
<https://www.imf.org/external/pubs/ft/sdn/2016/sdn1605.pdf>

This paper will discuss why integrating anti-corruption is important, and reflect on the progress and gaps in current anti-corruption efforts. Building on country examples and good practices from around the world, it will also discuss measures to address the identified gaps, in the following areas: political will and developing institutional capacities; strengthening the knowledge base; improving coordination; integrating anti-corruption in national, sectoral and local development plans and processes; and data collection.

2 Why integrating anti-corruption is important for sustainable development

2.1 Anti-corruption in the context of COVID-19

Corruption and its consequences significantly impact COVID-19 response and recovery. During the COVID-19 pandemic, the socio-economic impact of corruption and its implications for governance systems, including but not limited to the governance of the health sector, are significant. During the COVID-19 pandemic, the impact of corruption is being felt across healthcare service delivery, policymaking, procurement processes, and management of funds, including emergency health funds, social safety nets, and stimulus packages. Corruption exacerbates the socio-economic impact of COVID-19, as it can distort stimulus and economic recovery packages, divert subsidies for the poor, and fuel undue preferential treatment under emergency measures adopted by governments. It also undermines trust in government, reducing compliance with public health messaging, as well as fueling instability and conflict.⁴

Because of the lack of sufficient accountability and oversight mechanisms in crisis response and recovery, the risks of corruption and fraud significantly increase, and these have critical implications on society and the economy. Without addressing corruption risks in different areas, opaque decision-making, and oversight and accountability, the effectiveness of responses to recover from the socio-economic impacts of COVID-19 may be undermined or limited.

Just within the health sector, corruption causes losses of over US\$500 billion every year, even in ordinary times – this exceeds the amount of resources needed to provide global Universal Health Coverage⁵. The Global Corruption Barometer 2019 found that bribery rates in hospitals and health centres were up to 14%⁶. World Bank Surveys show that up to 80% of non-salary health funds never reach local facilities⁷. The consequences of corruption can be a matter of life and death. This is most evident for those deprived of healthcare, as corruption limits access to valuable, lifesaving resources, including medical equipment and facilities. The poor, vulnerable and marginalised will disproportionately be affected and left behind.

On the other hand, previous health crisis such as Ebola and SARS have shown that governments' commitment to transparency, accountability and anti-corruption significantly contributes to the effectiveness of crisis response by gaining public trust, including communicating information in a transparent and timely manner, and ensuring a clear role for audit and oversight institutions.

⁴ UNDP (2020) Transparency, Accountability and Anti-Corruption Service Offer for COVID-19 Response and Recovery <https://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/transparency-accountability-and-anti-corruption-service-offer-f.html>

⁵ Transparency International UK (2019) The Ignored Pandemic <http://ti-health.org/wp-content/uploads/2019/03/IgnoredPandemic-WEB-v3.pdf>

⁶ "Coronavirus: the perfect incubator for corruption in our health systems? 7 key COVID-19 points to consider" <https://ti-health.org/content/coronavirus-covid19-corruption-health-systems/>

⁷ "Efficiency of Public Expenditure Distribution and Beyond" <http://documents1.worldbank.org/curated/en/711501468774879785/pdf/multi0page.pdf>

An integrated approach on anti-corruption to respond to and recover from the COVID-19 pandemic calls for a whole-of-society approach, where citizens and civil society can constructively engage and monitor response and recovery measures. Socio-economic impact assessments and response plans should also address governance-related risks including corruption, fraud and embezzlement. Thus, transparency, accountability and anti-corruption are essential for socio-economic response and recovery from the COVID-19 pandemic.⁸

2.2 Anti-corruption for sustainable development

Corruption has devastating consequences on all areas of development, whether it is about governance, social protection, the economy, or environmental protection and climate action.

Corruption significantly undermines development financing by diverting scarce resources away from development. The cost of corruption has been estimated to be US\$2.6 trillion annually⁹, and Global Financial Integrity has estimated that billions of dollars leave developing countries illicitly every year through government corruption, criminal activity, commercial tax evasion and mispriced commercial transactions. The High-Level Panel on Illicit Financial Flows from Africa estimated that Africa alone loses more than US\$50 billion annually to illicit financial flows¹⁰. Such amounts often represent hundreds of millions or billions of dollars in lost or foregone tax revenues that could have otherwise been collected and used for supporting development efforts, including investing in infrastructure, providing universal healthcare and education, creating jobs, and reducing poverty, amongst others¹¹.

Corruption acts as a major barrier to service delivery, both in terms of its access and quality. Corruption can discourage or prevent people from accessing basic services such as education, health, and clean water and sanitation. For example, the World Bank estimates that, globally, between 20% to 40% of public investment meant for the water sector is lost to corruption¹². These have wide-ranging ramifications on socio-economic outcomes. Moreover, women in particular are disproportionately affected by corruption in service delivery; they are shown to face increased risks of bribery and sextortion while accessing public services, including enrolling children at school¹³.

⁸ UNDP (2020) Integrating Transparency, Accountability and Anti-Corruption in Socio-Economic Impact Analyses <https://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/integrating-transparency--accountability-and-anti-corruption-in-.html>

⁹ http://reports.weforum.org/global-agenda-council-2012/councils/anti-corruption/?doing_wp_cron=1553840437.4626851081848144531250

¹⁰ UNECA 'Institutional architecture to address illicit financial flows from Africa' <https://www.uneca.org/institutional-architecture-address-illicit-financial-flows-africa>

¹¹ Global Financial Integrity 'Illicit Financial Flows' <https://gfintegrity.org/issue/illicit-financial-flows/>

¹² "The impact of corruption on access to safe water and sanitation for people living in poverty" <https://knowledgehub.transparency.org/assets/uploads/helpdesk/Impact-of-corruption-in-water-and-sanitation-on-poor-2017.pdf>

¹³ Transparency International (2020) Breaking the silence around sextortion: The links between power, sex and corruption <https://www.transparency.org/en/publications/breaking-the-silence-around-sextortion>

The indirect consequences of corruption could be even more devastating, by eroding public trust and social cohesion. Given the negative effects of corruption on state capacity, policymaking and other development outcomes, governments' ability to serve public interests is undermined. Impunity is also a significant factor which corrodes the rule of law and destroys public trust. Where systemic corruption exacerbates and affects all state functions, it becomes a serious threat to security and could result in disorder, civil strife or conflict, with significant and long-term destabilizing and debilitating effects.

Rooting out corruption is a major policy priority and is critical to the achievement of the SDGs. In the context of the 2030 Agenda for Sustainable Development, Goal 16 ("to promote peaceful, inclusive societies for sustainable development, to provide access to justice for all and to build effective, accountable and inclusive institutions at all levels") and its anti-corruption targets underpin the other SDGs, all of which rely on institutions to effectively meet the needs of all people. Corruption impacts all five pillars of sustainable development – people, prosperity, planet, peace and justice, and partnership; and is a major bottleneck to achieving sustainable development in all its three dimensions – economic, social, and environmental.

On the other hand, anti-corruption efforts are crucial not only for promoting transparency, accountability and integrity; they accelerate progress in meeting development goals. Domestic resource mobilization, Official Development Assistance, and quality private investment already play a huge role in many countries for development financing, but significant gains could also be made by strengthening efforts to curtail illicit financial flows, stolen assets, bribery and corruption.

3 Progress and gaps in anti-corruption efforts

Despite the challenging global, regional and country-level contexts for tackling corruption, the adoption of the 2030 Agenda for Sustainable Development by 193 Member States on 25 September 2015 was a major breakthrough for the anti-corruption movement as it made an explicit link between corruption and peaceful, just and inclusive societies.

In particular, SDG 16 and its targets on reducing corruption, bribery and illicit financial flows (16.4 & 16.5) ; developing effective, accountable and transparent institutions (16.6) ; ensuring responsive, inclusive, participatory and representative decision-making (16.7); and strengthening access to information (16.10), all directly and indirectly represent anti-corruption, and are important enabling conditions for the successful achievement of the entire 2030 Agenda.

All of the global indicators related to the five key targets above now are classified as Tier I (data for more than 50% of countries globally) or Tier II (data for less than 50% of countries)¹⁴ and have an established methodology and guidance for countries to measure and report on. More countries have also integrated anti-corruption and measures of transparency,

¹⁴ Tier Classification for Global SDG Indicators.

https://unstats.un.org/sdgs/files/Tier%20Classification%20of%20SDG%20Indicators%2028%20Dec%202020_web.pdf

accountability, integrity, participation and inclusion in their national development plans and processes, in addition to the Voluntary National Review (VNR) processes for SDG monitoring. Out of the 45 countries that reported progress on the SDGs at the High Level Political Forum in July 2020, 30 countries provided information on progress on 16.4; 44 countries on 16.5; 41 countries on 16.6; 27 countries on 16.7 and 34 countries on 16.10.¹⁵

Despite progress in the last decade, there are four key challenges in integrating anti-corruption in national, sectoral and local development plans and processes::

- There is a **lack of political will and weak institutional capacity** to integrate and implement anti-corruption measures.
- There is a **lack of knowledge** on how to integrate anti-corruption in national, sectoral and local development plans and processes. Anti-corruption is not just about reducing corruption and bribery; it is also about ensuring transparency, accountability, integrity, openness, access to information, and participation.
- There is a **lack of coordination** between the anti-corruption community (including anti-corruption agencies and audit and oversight institutions) and the development community (including line ministries, planning and budget ministries).
- There is a **lack of data** to monitor progress on corruption and anti-corruption. While there is now established methodology for anti-corruption-related SDG targets, many are classified under Tier II, meaning that data is not regularly produced by countries.

4 Addressing the gaps

4.1 Political will and developing institutional capacities to integrate and implement anti-corruption measures

Although there has been tremendous progress on anti-corruption efforts in the past two decades, the lack of political will to implement anti-corruption measures, as well as the lack of institutional capacity to do so, has led to limited progress in reducing the prevalence of corruption in many countries.

While the issue of institutional capacity to integrate and implement anti-corruption measures could be addressed by governments, donor and programme partners through providing resources and support for institutional arrangements, legal framework, data collection, and overall technical expertise to prevent and address corruption, the issue of securing ‘genuine political will’ for anti-corruption is contextual and linked to many socio-economic, political and societal factors. Securing political will requires identifying the right entry points and champions, strengthening a multi-stakeholder approach, building a bottom-up approach

¹⁵ Global Alliance for Reporting Progress on Peaceful, Just and Inclusive Societies and White & Case ‘Analysis of the 2020 Voluntary National Reviews and SDG 16 <https://www.sdg16hub.org/content/analysis-2020-voluntary-national-reviews-and-sdg-16>

through social accountability and empowering people and civil society, and adopting a common anti-corruption approach by all major donors and development partners to create an enabling environment for constructive engagement.

Entry points to help secure political will and strengthen institutional capacity to integrate anti-corruption include the following:

- **Anti-corruption instruments and international norms and standards can act as an important entry point** to secure political will. These include the Implementation Review Mechanism of the United Nations Convention against Corruption (UNCAC), the global legally binding instrument to prevent and combat corruption. Regional conventions and sub-regional mechanisms such as the OECD Istanbul Anti-Corruption Action Plan are also important. However, there is also a need to **build synergies between these mechanisms and the SDG implementation and monitoring processes**.
- **Identifying champions through a sectoral and local governance approach** can help drive efforts to integrate anti-corruption. Similarly, **strengthening coalitions with multiple stakeholders** including the private sector, youth, universities and local government actors can help create an enabling environment to exert pressure for political will to implement reforms.
- **Adopting a bottom-up approach can help create an enabling environment to demand for anti-corruption reforms**. Working at a grassroots level with communities, civil society and non-state actors to engage in anti-corruption activities, including whistleblowing, advocacy, social accountability and gathering data, is an important means to generate and exert pressure on leaders and governments to initiate or sustain reform.
- **Strengthening the localisation of the SDGs** and integrating anti-corruption measures are important to ensure that cities, communities, households and individuals engage meaningfully in the SDG implementation processes, exercise accountability and enhance the monitoring process.
- **Enhancing the role of audit and oversight institutions and anti-corruption bodies** is important in enabling anti-corruption actors to link their work on the prevention of corruption, such as corruption surveys and integrity building, with SDG implementation and monitoring processes. Involving anti-corruption actors in development plans and processes can help integrate anti-corruption measures in other SDGs.
- **There is a need to strengthen the role of parliamentarians in ensuring accountability** for the effective implementation of commitments, monitoring of SDG implementation, enactment of legislation and adoption of budgets. Parliamentarians

play a crucial role in ensuring political buy-in, financing and accountability of the SDGs, including monitoring resource usage and budget transparency.

- **Corruption measurement** can also be an important instrument for generating political momentum and securing political will. Data and evidence are powerful tools for securing political will for combatting corruption and serving as entry points for implementing anti-corruption measures and their integration in various sectors.
- **Adopting a corruption risk management approach** is an important entry point to integrate anti-corruption in sectors, institutions, programmes and other operations and functions. Through integrity assessments or corruption risk assessments, risks can be mapped, identified and prioritized. Based on the assessment of these risks, mitigating plans and strategies can then be designed and implemented, followed by monitoring and evaluation. In addition, this can help trigger dialogue and enhance cooperation between anti-corruption institutions and line ministries, to strengthen the integration of anti-corruption in development plans and processes.
- As highlighted by studies and evaluations of anti-corruption efforts, effective donor coordination for multi-donor technical assistance, including a common donors' position for integrating anti-corruption in key development sectors (including health, education, water and sanitation, climate change, extractive industries, and more) could significantly help to secure political will and build much-needed institutional capacity for an integrated approach to anti-corruption.

4.2 Strengthening the knowledge base on integrating anti-corruption across development areas

In theory, it is clear how corruption undermines development efforts and how anti-corruption can accelerate achievement on all the SDGs. Yet, in practice, there is a huge gap in the knowledge and tools needed to integrate anti-corruption in national development plans and strategies to achieve the SDGs. For example, there is often a misconception that anti-corruption relates only to Target 16.5 'Substantially reducing corruption and bribery'; rather than the targets that encompass issues of transparency, accountability, participation, inclusion, and access to information. Anti-corruption is represented by five key targets in SDG 16 and many other targets related to peaceful, just and inclusive societies, and is a cross-cutting area of work in the 2030 Agenda.

Given the knowledge gap, a flagship online training course 'Anti-Corruption in the Context of the 2030 Agenda for Sustainable Development'¹⁶ was jointly developed by UNDP and UNSSC. The course promotes an integrated approach to the SDGs, from an anti-corruption and SDG 16 perspective. The five-week interactive and facilitated online course includes five comprehensive modules, concrete examples and practical guidance from around the world.

¹⁶ For more information, see: <http://unssc.org/courses/anti-corruption-context-2030-agenda-november-december-2020/>

- Week 1: Introduction to anti-corruption and sustainable development
- Week 2: SDG 16 and anti-corruption: Human rights and gender perspectives
- Week 3: Fighting corruption across sectors
- Week 4: Integrating anti-corruption in national sustainable development strategies
- Week 5: Measuring and monitoring anti-corruption for sustainable development

It features more than 20 experts from the field through video presentations and live webinars. The latest edition includes a dedicated lesson on ‘Anti-Corruption in COVID-19 Response and Recovery’, in line with UN/UNDP Socio-Economic Framework for COVID-19 Response¹⁷. More than 500 practitioners have been trained in 4 editions rolled out so far in 2019-2020, representing over 80 countries, and working in international organisations, governments, civil society, academia and the private sector.

To promote knowledge and advocacy, UNDP has developed more than 30 knowledge products on anti-corruption¹⁸, including corruption risk mitigation methodologies across thematic areas. These include service delivery sectors such as health, education and water; gender equality; human rights; illicit financial flows; procurement; extractive industries; climate change; and more. UNDP has also developed methodologies to measure corruption and anti-corruption, as well as guidance to strengthen national anti-corruption strategies and national anti-corruption institutions. An online web-portal¹⁹ also provides open-access online courses free-of-charge, for all development and anti-corruption practitioners and activists to build their knowledge.

Knowledge exchange is a crucial dimension of the implementation of the 2030 Agenda. In this regard, UNDP’s focus on knowledge management and accumulation of lessons learned at country, regional and global levels through its vibrant Community of Practice has significantly contributed to consistent and coherent policy direction and programme support on anti-corruption. UNDP has also leveraged South-South and Triangular Cooperation to facilitate knowledge exchange in various forms of innovative and tested policy solutions on anti-corruption.

For example, the UNDP Seoul Policy Centre²⁰ has shared the experiences of the Republic of Korea in implementing their Anti-Corruption Initiative Assessment and Corruption Risk Assessment with Viet Nam, Myanmar and Kosovo. It also applied Seoul Metropolitan Government’s Clean Construction System in countries including Philippines and Tunisia, to promote efficiency, accountability and transparency in public construction management to accelerate achievement on the SDGs.²¹

¹⁷ <https://www.undp.org/content/undp/en/home/coronavirus/socio-economic-impact-of-covid-19.html>

¹⁸ Available for download here: <https://anti-corruption.org/wp-content/uploads/2020/12/UNDPs-Key-Publications-on-Anti-Corruption-Updated-Nov-2020.pdf>

¹⁹ <https://anti-corruption.org/courses/>

²⁰ www.undp.org/content/seoul_policy_center/en/home

²¹ https://www.undp.org/content/seoul_policy_center/en/home/development-solutions-partnerships/Governance.html

As SDG partnerships remain fundamental to the implementation of the 2030 Agenda, knowledge exchange and sharing across development partners and stakeholders, which also contribute toward strengthening the knowledge base, are an important means of integrating anti-corruption in development plans and processes.

4.3 Improving coordination between AC institutions and other line ministries and agencies

Corruption is rarely an isolated phenomenon found only within a specific institution, sector or group of actors. To address and prevent corruption and to promote transparency, accountability and integrity across society, a coordinated and whole-of-government and a whole-of-society approach is needed. Governments play a lead role in putting in place plans and strategies that advance anti-corruption within their national development plans and strategies. They can also stimulate legislative reform that will establish legislative and institutional frameworks against corruption with robust enforcement and punitive measures. At the same time, civil society and communities play an important role in the monitoring and oversight of these measures.

Progress in anti-corruption efforts for sustainable development strongly relies on effective cooperation between and within institutions, as well as engagement with a wide range of actors, sectors, departments, implementing agencies and institutions that may have very different priorities, competing agendas, and conflicting interests. Relevant government actors include budget and planning ministries for SDG implementation, line ministries, statistical offices, anti-corruption agencies including commissions and audit institutions, and local governments.

Yet, in most countries, cross-agency coordination remains weak or inexistent. The implementation of the SDGs is typically led by budget and planning ministries, while anti-corruption efforts are led by anti-corruption agencies, justice ministries or the prosecutor's office. In many countries, the anti-corruption community and the development community are often not well connected and integrated.

Therefore, several approaches may be taken to bridge this coordination gap:

- In the thematic groups, working groups and task forces that are responsible for the implementation and monitoring of the SDGs, **development actors should actively involve anti-corruption actors** to provide an anti-corruption perspective to each of the SDGs.
- In the validation processes of national and local development plans and strategies, **a broad range of stakeholders** should be involved, to increase transparency and accountability. Anti-corruption actors should **ensure that development plans incorporate anti-corruption measures**, including internal and external oversight mechanisms, as well as strategies to control corruption.
- **Anti-corruption actors need to be involved in the monitoring process of the SDGs**, including its budgeting and implementation plan, to ensure that transparency, oversight and accountability measures are integrated. Moreover, given that anti-corruption

agencies (ACAs) have the experience and mandate to monitor corruption and can be an important source of data, National Statistical Offices should work closely with ACAs in the SDG monitoring process.

- **Auditing the SDGs** are an important component of national efforts to track progress, monitor implementation and identify opportunities for improvement across the SDGs. On anti-corruption, many audit institutions have also developed fraud audits and procurement audits to assess the gaps and loopholes in SDG-related investments. In formulating methodologies and identifying areas which would be useful to audit, **Supreme Audit Institutions (SAIs) should consult SDG committees** and engage a wide range of stakeholders, including various levels of government. Civil society organizations, such as Transparency International, have also been engaged in auditing the SDGs.
- In formulating sectoral plans and strategies, **sectoral development practitioners should engage anti-corruption actors** to understand the sector-specific corruption risks and mitigation strategies. Integrating anti-corruption measures are essential for the achievement of development outcomes in all sectors, by removing governance bottlenecks, preventing leakages of resources, and strengthening integrity and accountability of institutions to deliver their functions and meet development goals.

Coordination is key to ensure the full cooperation of all stakeholders across agencies, sectors and departments, to avoid duplication of efforts, and to ensure that all actors share a common anti-corruption approach in implementing the SDGs.

In **Estonia**, the National Anti-Corruption Strategy (2013-2020) sets out a clear implementation plan with roles for all ministries, government agencies, as well as non-governmental organisations, local governments, and other relevant actors. The overall coordination and implementation of the Strategy is managed by the Ministry of Justice, while all ministries and government agencies are also involved in implementing the strategy.

Recognising the importance of a whole-of-government approach to the prevention of corruption, each ministry has assigned a responsible person for coordinating corruption prevention, acting also to ensure the implementation of the Anti-Corruption Strategy's activities in the ministry and its area of government.²² Such an approach ensures that anti-corruption is integrated at all levels of government.

4.4 Integrating anti-corruption in national, sectoral and local development plans and processes

²² Estonia Anti-Corruption Strategy (2013-2020) <https://www.korruptsioon.ee/en/anti-corruption-activity/anti-corruption-strategy-2013-2020>

Integrating anti-corruption is the process of implicitly or explicitly incorporating anti-corruption in all sectors and at all levels of intervention in development plans and processes. While integration entails effective coordination between agencies, integration of anti-corruption in the SDGs is also about informing key result areas and results frameworks of countries' national, sectoral or local development plans, policies and strategies, acting as a tool contributing to sustainable development. For example, in **Bhutan**, its 12th Five-Year Plan (2018-2023)²³, which aspires to pursue sustainable development and is closely aligned with the SDG framework, has dedicated one of its sixteen National Key Result Areas (NKRA) to 'Reduce Corruption'. This NKRA aims to strengthen good governance and contribute towards building a corruption-free society.

Moreover, to promote transparency, accountability and effectiveness of national, sectoral and local development plans and strategies, anti-corruption should inform all phases of development planning processes: formulation, implementation, and monitoring and evaluation.

In short, the integration of anti-corruption in development plans and processes entails the following:

- ✓ National, sectoral and local development plans and strategies to achieve the SDGs include governance and anti-corruption as an integral part of these plans.
- ✓ Corruption risk mitigation, integrity building, and transparency and accountability initiatives are a part of these plans.
- ✓ National SDG implementation and monitoring mechanisms engage and involve key anti-corruption actors.

In **Botswana**, the Government reaffirmed its commitment to the full-scale implementation of the 2030 Agenda, by mainstreaming the SDGs into national policies, sectoral plans and strategies. Four strategic pillars were established under Botswana's Vision 2036: Sustainable Economic Development Pillar, Human and Social Development Pillar, Sustainable Environment Development Pillar, and Governance, Peace and Security Pillar.²⁴

In particular, reaffirming its commitment to integrating anti-corruption in Vision 2036, the Governance, Peace and Security Pillar includes measures on the separation of powers, effective oversight, transparency and accountability, and freedom of expression and association.

Apart from Vision 2036, the Government of Botswana also enhanced its sectoral integration of anti-corruption. The Ministry of Health in Botswana developed an Anti-Corruption Policy for the **health sector**²⁵, in line with its National Anti-Corruption Strategy. The Policy is built on two

²³ Bhutan 12th Five-Year Plan <https://www.gnhc.gov.bt/en/wp-content/uploads/2017/05/Finalized-Guideline.pdf>

²⁴ Botswana Vision 2036 <https://vision2036.org.bw/>

²⁵ Botswana Ministry of Health Anti-Corruption Policy <https://www.moh.gov.bw/Publications/policies/corrupt%20booklet.pdf>

fundamental pillars: prevention and law enforcement. The pillars focus on the areas of: Leadership and Governance; Education and Training; and Investigation and Law Enforcement. These aim to foster ethics and integrity within the Ministry of Health.

For the effective implementation of the Policy, the Ministry of Health works closely with agencies such as the Directorate on Corruption and Economic Crime (DCEC) in Botswana, which is mandated with investigating corruption, preventing corruption, training and educating the public on corruption. It also works closely with other oversight and audit institutions, to reinforce the integrated approach and ensure effective coordination across agencies.

In **Moldova**, the City Hall of Straseni municipality, supported by UNDP, implemented a local strategic plan on integrity and anti-corruption²⁶, through an innovative method to tackle and prevent corruption at local public administration level in the Republic of Moldova. The ‘Islands of Integrity’ methodology²⁷ is a practical tool to identify and change public policies and organizational systems prone to corruption through a strategic and participatory process. It adopts a multi-stakeholder approach to analyse the vulnerability of stakeholders to corruption, and develop inclusive and responsive solutions.

Through this methodology, the Straseni municipality implemented practical solutions in four areas identified to be most vulnerable to corruption: public procurement; public property; urban development; and the sanitation public service. As a result, the municipality managed to integrate anti-corruption at local public administration level, including by utilising e-procurement, removing bureaucratic barriers within the city hall, and promoting social accountability.

To reinforce a shared vision and integrated approach to SDG 3 and SDG 16, the **Anti-Corruption, Transparency and Accountability (ACTA) for Health Alliance** was set up by UNDP together with WHO, Global Fund and the World Bank, to support countries in mitigating corruption risks in the health sector. Given the particular importance of this agenda amid the global health challenges during the COVID-19 pandemic, the ACTA for Health Alliance is working with governments and communities to institutionalize appropriate anti-corruption mechanisms in the COVID-19 health response^{28,29}.

²⁶ Local Strategic Plan on Integrity and Anti-corruption Actions of The City Hall of Straseni Municipality 2017-2020
<https://corruptionfreecities.org/wp-content/uploads/2018/07/STRASENI-A-C-PLAN-.pdf>

²⁷ Corruption Free Cities <https://corruptionfreecities.org/>

²⁸ “Tackling corruption in governments’ COVID-19 health responses”
<https://blogs.worldbank.org/governance/tackling-corruption-governments-covid-19-health-responses>

²⁹ “Promoting accountability and transparency during COVID-19”
<https://www.undp.org/content/undp/en/home/blog/2020/promoting-accountability-and-transparency-during-covid-19.html>

4.5 Data collection for monitoring anti-corruption and the SDGs

Measuring corruption is not an easy task. Given the complexity of corruption, including its many forms and manifestations, it is difficult to measure corruption with confidence or accuracy. It is also difficult to quantify a phenomenon that happens across many levels, involves many actors, and differs depending on the context. For example, measuring the abuse of power, cronyism, nepotism, illicit enrichment, or favouritism, is a challenging endeavour. Capturing precise data on corruption is also difficult, thus many datasets capture the perceptions and experiences of corruption, or use proxy indicators to measure corruption.³⁰

On the other hand, measuring anti-corruption involves measuring what should exist to prevent or address corruption. It measures transparency, accountability, and integrity within government or in the private sector. This includes legal and policy frameworks, institutional arrangements, processes, mechanisms, practices, outputs, and outcomes associated with these three concepts. However, measuring anti-corruption is also a challenging task. It is difficult to measure and delineate individual concepts – such as transparency or accountability; and anti-corruption may also be a reflection of overall governance capacities, which is difficult to measure.

Despite the challenges, the anti-corruption community has created many tools, indicators and methodologies over the years, to assess the levels of corruption and progress in anti-corruption efforts in countries. These include measures of perception, experiences, assessments, and administrative data. For example, expert surveys such as Transparency International’s Corruption Perceptions Index, Open Budget Index, and the World Justice Project’s Rule of Law Index have been helpful for assessing the nature and quality of governance systems. Other corruption surveys such as Transparency International’s Bribe Payers Survey and Corruption Barometers have also been utilised to capture experiences and perceptions of corruption. The UNCAC Implementation Review Mechanism and the Open Government Partnership also represent forms of external review and assessment of existing anti-corruption policies, systems and institutions.

To measure SDG indicators 16.5.1 (individuals’ experiences of bribery with public officials) and 16.5.2 (businesses’ experiences of bribery with public officials), the UNODC-UNDP Manual on Corruption Surveys³¹ provides countries with methodological and operational guidelines for developing and implementing population- and business-based sample surveys to measure the experiences and prevalence of bribery and to collect other relevant information on corruption.

³⁰ UNDP (2015) User’s Guide to Measuring Corruption and Anti-Corruption <https://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/user-s-guide---measuring-corruption-and-anticorruption.html>

³¹ UNODC-UNDP (2018) Manual on Corruption Surveys https://www.unodc.org/documents/data-and-analysis/Crime-statistics/CorruptionManual_2018_web.pdf

In **Nigeria**, the National Bureau of Statistics (NBS), in partnership with UNODC, conducted its Second Survey on Corruption in Nigeria³², assessing the actual experiences of citizens when they come into contact with up to 20 different types of public officials. The survey evaluates the likelihood of being approached for the payment of bribes as well as the frequency of such requests and actual payments. It provides insights into citizens' attitudes towards corruption, their readiness to refuse requests for bribes and to report corruption incidents. It also provides data on bribery and nepotism in public sector recruitment as well as the phenomenon of vote buying.

The design of the survey instruments benefited greatly from the input of a wide-ranging group of stakeholders in Nigeria, to ensure that the survey results are relevant for informing the anti-corruption policy and that the results can be used for developing an evidence-based national response strategy to corruption in Nigeria.

Yet, while tools and methodologies to measure corruption and anti-corruption exist, in many countries, data related to most development sectors, such as health, education, finance, and poverty reduction, have stronger data foundations because their survey tools are integrated into national household surveys. However, in the case of anti-corruption data, many statistical offices do not have an institutional mechanism or capacity to collect data, and it is a complex and expensive exercise. It is thus important to strengthen the capacity of national statistical offices so that all indicators under SDG 16 are measured and all targets under SDG 16 are monitored.

Anti-corruption agencies (ACAs) have an official mandate to monitor governance and corruption, and thus can be an important data source for monitoring anti-corruption targets in the SDGs. Examples of data collection initiatives by ACAs include the Integrity Assessment of government institutions conducted every year by the Anti-Corruption and Civil Rights Commission (ACRC) of the Republic of Korea, as well as the periodic corruption risk assessments and audits of various service delivery sectors conducted by the Directorate on Economic Crime and Corruption (DCEC) in Botswana.

Civil society also play an important role in participating either as part of the official review process or independently through parallel reviews and shadow reports. In many countries, civil society organizations have been engaged in collecting and analyzing data on corruption and anti-corruption. For example, Transparency International's Shadow Reporting Questionnaire³³ for Targets 16.4, 16.5 and 16.10 enables civil society organisations to conduct an independent appraisal of their country's progress in fighting corruption, tackling illicit financial flows, and improving transparency and access to information.

³² UNODC (2019) Corruption in Nigeria: Patterns and Trends
https://www.unodc.org/documents/nigeria/Corruption_Survey_2019.pdf

³³ Transparency International "Corruption and the Sustainable Development Goals: Shadow Reporting Questionnaire for Targets 16.4, 16.5 and 16.10" <https://www.transparency.org/en/publications/corruption-and-sustainable-development-goals-shadow-reporting-questionnaire>

Countries should also utilize the Voluntary National Review (VNR) and post-VNR processes to monitor the implementation of SDG 16. Presented annually at the High-Level Political Forum (HLPF), the Voluntary National Reviews, focused on all of the SDGs, are a part of the follow-up and review mechanisms of the 2030 Agenda, where Member States voluntarily “conduct regular and inclusive reviews of progress at the national and sub-national levels, which are country-led and country-driven.”³⁴ The VNRs are an important accountability mechanism and provide a platform for multi-stakeholder partnerships for strengthened SDG implementation.

However, data collection continues to challenge SDG 16 progress tracking, affecting not just coverage but also the quality of data available for SDG 16 and related targets. As such, addressing the data gap on anti-corruption requires more sustained efforts and investments in data collection at national and local levels. The SDG community and the National Statistical Offices should closely work with Anti-Corruption Agencies, civil society and other stakeholders to regularly produce data on corruption and anti-corruption. Moreover, donor and development partners should also provide resources and support to regularly collect data related to corruption and anti-corruption.

One of the lessons learned from COVID-19 is that more innovative and inclusive ways of generating, incorporating, disaggregating and managing data are needed, including leveraging digital technologies and open data. Ultimately, greater coherence, communication and collaboration are required among Ministries, local governments, National Statistics Offices, UN custodian agencies, national anti-corruption and oversight institutions, civil society and other data providers.

5 Conclusion

The unprecedented shocks the world has faced due to the COVID-19 pandemic have reiterated the urgent need for countries to ensure that anti-corruption is an integral part of all sustainable development efforts. Despite the growing global challenges, from poverty and inequality, to conflict and climate change, countries have choices on how to make societies more inclusive and resilient, and build forward better. In particular, the 2030 Agenda has brought immense opportunities to leverage technology and innovation to meet many development challenges in the 21st century, including preventing and tackling corruption. Both ICTs and new technologies have vast potential to serve as important tools to integrate anti-corruption across all the SDGs.

The rapid spread of ICTs has led to a rise in the use of open data for citizen monitoring, crowdsourcing platforms for reporting corruption, and e-government for effective service delivery. Technology has been an important means to enhance transparency and accountability in fiscal budgets, public finance management, and procurement processes. More recently, new technologies such as artificial intelligence, blockchain technology and big data analytics present enormous opportunities to enhance the detection, prediction, and analysis of corruption cases. While recognising these benefits, there is also a need to prevent the misuse of these technologies and recognize the challenges. In this regard, effective digital governance which

³⁴ <https://sustainabledevelopment.un.org/vnrs/>

safeguards data protection and privacy, and promotes accountability, integrity and inclusion, are necessary.

As the world looks towards 2030, an integrated approach to anti-corruption, leveraging rapid innovations and technological tools, can help accelerate the achievement of the SDGs. Collective action of all major stakeholders – governments, private sector, civil society, communities, academia and international development partners – is key to create an environment of transparency, accountability and integrity, which remain fundamental as we build a more resilient, inclusive and sustainable world.