Piercing the Veil: Using Peer Reviews in theFight Against Corruption

A Guide for Transforming Analysis into Action

States that ratify or accede to the United Nations Convention against Corruption and other regional treaties and commit to the standards of entities such as the African Union, European Union and Organization of American States are obligated to prevent and apply penalties for corruption. In recent decades, a series of peer review mechanisms have emerged to evaluate their compliance with international anti-corruption commitments both regionally and thematically. Immense effort and technical skill go into producing these evaluations, which generally culminate in reports that identify gaps and recommendations for improved practice. However, the findings of peer review mechanism evaluations are often underutilized. There are several barriers to turning their analysis into action – from low public awareness about review processes and uncertainty around which recommendations should be prioritized, to the dense and legal nature of the reports – which can make it challenging for stakeholders to extract findings and lessons.

With support from the U.S. Department of State Bureau of International Narcotics and Law Enforcement Affairs, the International Foundation for Electoral Systems this guide for civil society organizations, international organizations, donors and other stakeholders seeking to overcome these barriers and maximize the impact of valuable peer review mechanisms. It walks readers through a series of practical activities to help them understand the review processes, analyze and synthesize the reports they yield, amplify important messages, set priorities for anti-corruption initiatives and engage in action planning to drive meaningful change.

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Piercing the Veil: Using Peer Review Reports in the Fight Against Corruption

A Guide for Transforming Analysis Into Action

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Angela Canterbury led the editing, design, production, publishing, communications and outreach on the report with team members Janine Duffy and Keaton Van Beveren.
## Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>EU</td>
<td>European Union</td>
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<tr>
<td>GRECO</td>
<td>Council of Europe’s Group of States against Corruption</td>
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<td>IFES</td>
<td>International Foundation for Electoral Systems</td>
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<tr>
<td>OECD</td>
<td>Organisation for Economic Co-operation and Development</td>
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<td>PRR</td>
<td>Peer Review Report</td>
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<td>Res</td>
<td>Resolution</td>
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<td>U4</td>
<td>U4 Anti-Corruption Resource Centre</td>
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<tr>
<td>UN</td>
<td>United Nations</td>
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<td>UNCAC</td>
<td>United Nations Convention Against Corruption</td>
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<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
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Foreword

Over the last two decades or so, the global fight against corruption has seen a proliferation in the practice of peer review. It has become almost the norm for a government to submit its commitments to taking action against corruption to the detailed scrutiny of others.

This intrusion into the usually well-protected realm of “national sovereignty” is seen as justified (and even formally welcomed) in response to the scale of the damage that corruption is now universally acknowledged to be causing. Few now dispute that corruption undermines prospects for sustainable development, corrodes the social fabric, weakens public institutions, strangles the business environment and fuels instability and conflict. Its impact on people who are low-income is harsher than on any other stratum of society. They spend a higher proportion of their incomes than others in navigating daily demands from officials who extract undue payments.

A crucial step in making progress against corruption has been the establishment of accepted standards for individuals, organizations and governments to live up to. This process began at the regional level through agreements under such bodies as the Council of Europe and the Organization of American States, and in sector-specific spheres such as the Financial Action Task Force in anti-money laundering and the Organisation for Economic Co-operation and Development (OECD) Convention on Anti-Bribery. It has culminated in the global consensus that is now represented by the United Nations Convention against Corruption (UNCAC).

Each of these processes introduced a mechanism for peer review. The UN reached a milestone with UNCAC — the first use of peer review in the UN system, although it has since been adopted by the Convention on Transnational Organized Crime. From the perspective of intentions, the ever-widening use of peer reviews suggests a change in the way governments believe they should operate. From the perspective of impact, however, there is still some way to go.

There is worrying evidence that the products of peer review exercises receive far less attention than they might, leading to lost opportunities to make progress against corruption. The existence of reports, and what they contain, can often be shrouded in mystery. They may be hard to find and difficult for nonspecialists to understand.

This publication is an attempt to remedy these barriers.

A peer review possesses huge potential to draw insights, ideas and advice from the experiences of others. Through this cross-fertilization, new pathways to progress can emerge. While good information is essential to good policymaking, good information alone does not change anything. The analyses that peer reviews produce, if not acted on, will remain just analyses.
This guide is based on the conviction that peer reviews should — and can — have a much greater practical effect and make stronger contributions to anti-corruption than they do at present. Our aim is to provide some concrete help to those both within and, particularly, outside governments to enable them to make better use of peer review reports as instruments of real change.

Too often, the completion of a peer review is seen as the end of the exercise. We must turn this sentiment around. A good peer review report is merely the start of the next leg of the anti-corruption journey.

The reports generated from peer reviews reflect a huge amount of human energy, application and wisdom. They involve great opportunity costs, both in terms of time and finance. This guide recognizes their value and seeks to derive as much impact as possible from the effort involved by transforming analysis into action.

The world has never understood the problem of corruption as clearly as it does today, and it has never had so many tools with which to fight the battle. Now we must make the best use of this tool — the peer review.
Methodology

This guide was developed as part of the “Effective Combat Against Corruption” project, funded by the U.S. Department of State Bureau of International Narcotics and Law Enforcement Affairs and implemented by IFES and the Central and Eastern European Law Initiative (CEELI) Institute, alongside partners in Bosnia and Herzegovina, Bulgaria, Montenegro and Romania. The project supports national implementation of international and regional anti-corruption commitments. A common finding among project partners was that peer reviews focus heavily on legislative changes – which may fall short of achieving real change if reversed or ineffectively implemented following peer review. This finding was the genesis for this guide, which is designed to help diverse national stakeholders leverage the peer review process to highlight gaps in law and practice and drive meaningful change.

This guide focuses on the peer review mechanisms of UNCAC and the Council of Europe’s Group of States against Corruption (GRECO) — the former because of its comprehensive scope and the near-universal adherence that this convention now enjoys, and the latter because it represents a practiced regional example that has evolved from its original approaches and offers a significant body of practical experience. Only time and space prevent wider coverage in this review.

We believe the approaches we recommend can be applied with equal effect when working with other anti-corruption peer review mechanisms. Our exclusion of them here should not be regarded as devaluing their significance.

The principal audiences for this guidance are those outside government who are currently largely excluded from aspects of the peer review process — either the review itself or follow-up actions after a report is completed. However, this guidance should also be useful for public officials who may not have been involved in the peer review exercise but who are interested in the outcomes of the process and follow-up.

The guide is based on desk research, the technical experiences of the authors and extensive interviews with a wide range of practitioners in the anti-corruption field who are familiar with the UNCAC and GRECO processes.

Note: For ease of use, references to external documents or websites are presented as hyperlinks in the main text. Annex 1 lists their full online addresses.
Part I

This section outlines the creation and evolution of peer review mechanisms, the roles they play in preventing and combating corruption and how review processes unfold in practice.
Setting the Scene

Beginnings

Corruption has existed since time immemorial¹ and has afflicted all political systems ever since. The huge damage it causes is widely recognized.²

The accumulating evidence of the destructiveness of corruption prompted a surge of action in the mid-1990s at the regional or functional level.³ Only in 2003 did the international community as a whole reach consensus on how to tackle corruption. The UNCAC, which entered into force in December 2005, laid out the first globally endorsed roadmap. With 187 current signatories, it is one of the most widely accepted international treaties.

The introduction of a peer review process to assess signatories’ compliance with their convention undertakings is a first for the United Nations. By adopting a mechanism of this kind — one country opening itself to scrutiny from others — UNCAC reflects a growing international trend toward using this approach for verifying how far countries are living up to their commitments. While UNCAC’s approach mirrors the broad approaches of systems pioneered by the early regional and functional anti-corruption instruments of the 1990s, it has some distinctive elements.

At the regional level, GRECO has conducted peer reviews of selected aspects of country arrangements for two decades. Its first evaluation round, in January 2000, focused on specialized anti-corruption bodies, their independence and the tools available to them, as well as the scope and extent of immunities that countries grant. GRECO is currently conducting its fifth evaluation round.

GRECO was established on May 1, 1999, with 17 founding members⁴ and has since grown to 50 members (48 European countries, the United States and Kazakhstan) and 11 observers. Also in 1999 the Council of Europe’s two anti-corruption conventions opened for signature — the Criminal Law Convention on Corruption and the Civil Law Convention on Corruption. By signing either, a state becomes a member of GRECO. Signature is also open to countries that are not members of the Council of Europe.

Evolutions

Wide variations in procedures developed across peer review processes. In their earliest stages of development, peer review mechanisms traditionally focus on “formalism” — whether laws are written adequately to meet the requirements of the relevant convention, and whether the required institutions and bodies formally exist. UNCAC is currently at this stage.

¹ The classic study of governance, S. E. Finer’s The History of Government (Oxford University Press, 1997), first mentions corruption on page 15 of the 1,700-page work — just 0.9 percent into the story of humans and government.
² See, for example, Why corruption matters: understanding causes, effects and how to address them (UK Department for International Development evidence paper, 2015).
⁴ Belgium, Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Iceland, Ireland, Lithuania, Luxembourg, Romania, Slovakia, Slovenia, Spain and Sweden.
The longest-operating mechanisms have broadened their perspectives beyond this original focus. For example, both the Financial Action Task Force and OECD bribery conventions have moved beyond assessing the “formalism” of a country’s adherence to obligations. They now consider not only whether the necessary legal framework (laws and institutions) formally exists but also how well it is being applied in practice (the “effectiveness” test).

GRECO, too, advanced toward the effectiveness approach in its later evaluation rounds, after an earlier, almost exclusive, emphasis on reviews of legislation. Actual implementation of legal norms is increasingly addressed in the reports in an effort to assess the effectiveness of relevant legal provisions.

The World of Anti-Corruption Peer Reviews

Global Process
- **UNCAC** (peer review process agreed 2009; launched 2010)

Regional Processes
These include:
- The Organization of American States **Inter-American Convention Against Corruption** (1996)
- The Council of Europe **Group of States against Corruption (GRECO)** (1999)
- **Anti-Corruption Network for Eastern Europe and Central Asia (OECD)** (1998)
- **The Cooperation and Verification Mechanism for Bulgaria and Romania** (EU) (2007)

Functional Processes
These include:
- The **Venice Commission** (Council of Europe) (1990) — on judicial independence and integrity

The review mechanisms differ in approach. The development of the UNCAC mechanism was a prolonged endeavor; the ground rules for conducting reviews (the **Terms of Reference**) were agreed to only after a four-year negotiation after the convention came into force in 2005. The concerns of some states are visible in the guiding principles that underpin the review process, giving a specific character to the UNCAC mechanism that needs to be kept in mind. Part 3 of this guide examines the resulting implications.
How Peer Reviews Help

Peer reviews in the anti-corruption sphere serve a wide range of possible purposes. Identifying the optimal and diverse uses of a peer review requires an assessment of the local context and conditions.

Five Functions of Peer Reviews

Of the many possible purposes of peer reviews, five are commonly identified.

Generating peer pressure — horizontal accountability in the global community. Countries’ need for reputation and standing on the international stage can often influence their behavior.

Generating public pressure — vertical accountability of the state to its citizens. Public information on a government’s performance against its commitments enables people to hold their authorities to account. This pressure can strengthen a state’s responsiveness to citizens.

Engaging in mutual learning and exchange of practice — exposure to and absorption of the experiences of others. For reform-minded authorities, learning of good practices can provide models to follow. There is also evidence that officials benefit as much from participating in the review exercise as from the findings of those reviews.

Organizing provision of technical assistance — identification of gaps to be filled and an entry point for external providers of assistance (such as aid donors) to support national efforts. In particular, reviews can help to present a consolidated picture of overall need and enable donors to coordinate their support to address specific needs.

Facilitating international cooperation — review processes can help reduce the barriers created by mutual suspicion and build confidence among states. The cross-jurisdictional nature of modern corruption makes it vital to improve cooperation among states — for example, when pursuing stolen assets secreted in other jurisdictions.

The lessons that have emerged from peer reviewing are reasonably clear and intuitive. The more inclusive and transparent the process, and the greater the prominence given to the findings, through diverse dissemination methods, the greater the prospects that a review exercise can stimulate needed change.

How Peer Reviews Work

**FIG 1: FIVE STAGES OF PEER REVIEW**

**1 Preparation**
- Reviewed government:
  - Identifies focal point to co-ordinate review nationally
  - Establishes relevant contact points across departments
- Reviewing governments identify peer experts to conduct review
- Preliminary joint meeting/call to agree timetable

**2 Self-assessment**
- Reviewed government completes own assessment on its compliance with requirements of Convention
- Submits self-assessment to Convention Secretariat

**3 Review / Site Visit**
- Peer reviewers analyse self-assessment and have direct dialogue
- Secretariat organises direct dialogue between reviewers and country reviewed
- Site visit by reviewers (norm for GRECO; widely adopted in UNCAC)
- Visit normally includes consultations with stakeholders outside government

**4 Report**
- Discussions brokered by Convention Secretariat to achieve mutually agreed report
- Report formally approved (in GRECO, by plenary; in UNCAC only by parties to review)
- Publication:
  - in GRECO, report in full, often accompanied by Secretariat press release
  - In UNCAC, reviewed governments have discretion on publishing full report: Executive Summary posted on UNODC website

**5 Follow-up**
- UNCAC - no prescribed follow-up to verify action taken on findings
- GRECO – separate follow-up mechanism developed

SETTING THE SCENE
Peer review exercises commonly have five stages (see Figure 1). While each peer review mechanism has distinct characteristics, some elements are common:

- The country under review produces a statement describing how it believes it is meeting the convention’s requirements. This self-assessment becomes the basis for the review.\(^5\)

- The external reviewers are drawn from more than one other country to try to maximize impartiality. They are selected because of their relevant expertise and are thus “peers of those they are reviewing.”

- Dialogue between reviewers and the reviewed is a core principle. It can be in writing but is more often through face-to-face discussions, and most mechanisms include a site visit, where reviewers are encouraged to seek the views of a broad range of interlocutors inside and outside the government.

- In all peer reviews, the resulting report must be acceptable to the reviewed country, although the degree of consensus required varies among mechanisms. In all processes, a reviewed country may challenge factual errors and contest qualitative judgments that it believes are misconstrued. In UNCAC, this discussion is held only with the reviewing parties and the Secretariat. In the absence of any time pressure to complete the report, and because of the low visibility of the process, some reviews take prolonged periods to finish. This can lead to speculation that contested findings were vigorously “negotiated.” Although similar pressures exist in the GRECO process, its more open approach to accepting draft reports, through plenary meetings of all members, limits the scope for countries to contest findings.

- The final review report is published in some form. In UNCAC, only a short executive summary must be made public. In GRECO, publication of the full report is the norm. In the vast majority of cases, the government being reviewed approves to publication shortly after the plenary accepts the report.

- For all mechanisms, the reviewed country decides whether and how to act on the recommendations. No enforcement powers are available to ensure compliance with the findings of any review mechanism.

\(^5\) Since this task requires the collection of information from a wide range of ministries and agencies, an individual or a small team acts as a focal point. Where an anti-corruption authority or cross-departmental task force exists, this body often is responsible for collecting information and managing the peer review exercise. Where such an authority does not exist, the location of the focal point can vary — for example, in a Ministry of Justice or Foreign Ministry. The international agreements that establish review processes require signatories to identify (and notify the Secretariat overseeing the mechanism) the focal point for local management of the process.
Part II

This section outlines barriers to translating analysis from peer review processes into action and provides an orientation on how to use this guide.
Why Do We Need a Guide Like This?

Objectives of This Guide

To increase the use of peer review reports (PRRs) in formulating and taking practical action against corruption
To increase the number of interest groups that can use PRRs as levers for action against corruption
To increase public awareness of peer review processes and their potential to foster change
To increase governments’ responsiveness to peer review processes

This guide aims to help users respond to some practical challenges that have emerged in using the reports generated by peer review mechanisms.

There is almost no evidence that PRRs are currently used as tools to support anti-corruption efforts. This is unfortunate, given the significant human and financial cost of producing them. The practical utility of these exercises appears disproportionately slight.

Many reasons are given for nonuse of PRRs. Their proceedings can be opaque; the presentation of findings can be deeply technical and hard for nonspecialists to grasp; and the report findings often do not flow easily into action. **Opacity, obscurity and operability** are the three key binding constraints to better use of PRRs. This guide tries to address these obstacles, which are summarized on the next page.

What This Guide is Not

This guide does not assess the review mechanisms themselves. Rather, it focus on ways to secure the best impact from the mechanisms’ products (e.g., evaluation reports and recommendations). Consideration of how they could be improved lies outside the scope of this discussion.

We hope, however, that the insights generated here offer ideas and pathways for strengthening each mechanism as it evolves.
Challenge of Usefulness

Opacity

The entire process has little visibility beyond the government officials who conduct the exercise. Important segments of society, such as citizens, academia, the media and parliamentarians, may be entirely unaware that a review is taking place. Often, no information is made public about the timing, for example, of site visits by reviewers — events on which interested parties might wish to consult. Similarly, the completed reports often receive almost no publicity.

Obscurity

The highly legal nature of analysis can overwhelm government policymakers who wish to understand the practical ramifications of the findings. Wider society is even less equipped to use the reports (if they can find them). Since one objective of reviews, particularly in developing countries, is to help identify where assistance could be provided, the impenetrability of many peer reviews represents a significant lost opportunity. For reviews in countries that seek external assistance, prospective donors need to be brought on board more easily. Findings are likely to have limited value in practice unless they are presented in more digestible form and demonstrate their relevance for society more clearly.

The focus on formal legal compliance severely limits their practical value. Reviews that assess only the quality of law, but not how well it is applied in practice, tell nothing about a country’s actual achievement in combating corruption. Conventions have reached different stages of addressing the problem. GRECO has moved to assess practical application (“effectiveness”), while UNCAC remains at the earliest stage, reviewing only the formal legal landscape. Reviews that confine themselves to these narrow limits do not offer advice on implementation issues that can be as important as the formal legal provision. For example, identifying the need for legislation on freedom of information is, in itself, of limited help. Advice on the supporting administrative procedures and practices needed to make the legal framework operationally effective has significant potential value.

Operability

The lack of signals regarding prioritization and the relative weight of individual recommendations does not help in identifying a specific plan of action. The overall value of reviews could be enhanced by a follow-up exercise, conducted by the government, ideally through consultation with a broad range of interests in society, to identify priorities and develop a plan of action to effect the necessary changes.

The absence of formal follow-up to PRRs under UNCAC means that there is no automatic way to ensure reviews have any practical effect on a government’s actions. GRECO differs in this regard. It includes a subsequent compliance check with a new report if recommendations are not acted on. An ad hoc evaluation is also possible in case of significant deterioration in a country or where its performance is judged unsatisfactory across a broad range of issues.

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6 One development agency interviewee told us, “As donors, we find reports almost impossible to use.”
WHY DO WE NEED A GUIDE LIKE THIS?

Going Beyond: Three Shifts

To respond to these difficulties, we see a need for three essential shifts to help reduce the opacity and obscurity of PRR findings and enhance their practical operability. We see benefits in going:

- **Beyond government** to expand the number and type of interests that can be engaged in turning reviews into practical action.

- **Beyond compliance** to expand the scope of actions to focus not only on writing new (or better) laws but also on implementing actions that help turn formal commitments of intent into actual improvements on the ground.

- **Beyond a checklist event** to avoid a tendency to consider reviews as episodic exercises that merely meet treaty obligations — the exam mentality — but rather to consider them as valuable incremental and cumulative contributions to a country’s anti-corruption journey. We suggest ways that can help to internalize PRRs as components of the national effort, enabling them to feed into existing anti-corruption structures and operational frameworks.

Our Lenses — UNCAC and GRECO ... and Prevention

This study focuses on experiences from UNCAC and a regional example with a longstanding pedigree — the Council of Europe’s review process under GRECO. The insights and lessons that we can gain from these are widely applicable to other peer review processes, such as the Follow-Up Mechanism for the Implementation of the Inter-American Convention Against Corruption (Organization of American States), the African Peer Review Mechanism, the OECD Bribery Convention and the anti-money laundering review system of the Financial Action Task Force.

Focusing on the prevention provisions of the two instruments offers the widest range of policy issues and potential institutional partners, both within and outside government. This maximizes the chances that stakeholders who follow this guide can find some issue on which to engage an institution, regardless of the specific settings in any particular location.

Structure of This Guide: A Framework for Action

After reviewing the UNCAC and GRECO processes, we set out a four-phase framework (see Figure 2) to address the obstacles we identified that currently prevent better use of PRRs. Each phase addresses a stage in the development of a plan of action that derives from review findings, fits well with prevailing social priorities and political possibilities, and is both practicable and manageable in scope. Through good communications and alliance-building among interest groups, such plans should enjoy wide public support.

In Part 4, we suggest Actions to Consider, although we do not specify who should take these actions; this would be too prescriptive. Since the purpose of this guide is to help unveil processes that are often closed to the public, the most likely audiences for these suggestions are groups outside of government. However, governments could well consider a number of the suggestions as actions to undertake themselves.
FIG 2: A FRAMEWORK FOR ACTION

PHASE I

Learning about the reviews

Laying the groundwork for effective analysis and engagement
1. Gathering information about how reviews operate, and when
2. Understanding the commitments a government has signed up to
3. Understanding which reviews matter most to a government
4. Promoting greater public awareness of reviews

PHASE II

Analysing and synthesising reviews

Identifying recommendations and crystallizing the message
5. Understanding how review reports are written
6. Identifying the key messages – legal, political and institutional
7. ‘Reading between the lines’ – spotting what may be missing
8. Compiling a comprehensive digest

PHASE III

Amplifying the message and prioritising

Reaching the widest audience
9. Creating ‘explainers’ for non-specialist audiences
10. Making findings relevant to ordinary people
11. Rating options for importance and feasibility

PHASE IV

Action planning

Building the broadest interest
12. Building coalitions in support of implementation
13. Designing practical actions, reporting and monitoring
Part III

Understanding standards and obligations established by UNCAC and GRECO conventions and corresponding peer review mechanisms is a critical step in translating international analysis into action. This section outlines review processes for both UNCAC and GRECO and what readers can expect to find in their respective peer review reports.
The UNCAC and GRECO Conventions and Their Review Processes

Below we summarize some of the available introductions to the UNCAC and GRECO conventions (and associated provisions).

**UNCAC**

Notably accessible summaries are available from the U4 Anti-Corruption Resource Centre. *UNCAC in a Nutshell* (updated in 2019) provides an overview of the content of the convention, outlines the review mechanism process and suggests ways that development assistance donors can use UNCAC in their work. *UNCAC for Ambassadors* (2013) is designed for readers outside the development community.

The Secretariat to UNCAC produced a clear guide for development partners under UNODC’s Partnering in Anti-Corruption Knowledge program (2013), and the UNCAC Coalition, a group of nongovernmental organizations dedicated to the implementation of UNCAC, produced a guide to *Using the UN Convention against Corruption to Advance Anti-Corruption Efforts* (2013).

Due to the size of UNCAC, the review process is divided into two cycles. The first covers the chapters on criminal law and international cooperation, and the second and current cycle covers the chapters on prevention and asset recovery. Each cycle is expected to take five to seven years. The year in the cycle when a country will be reviewed is decided by drawing lots, as is the selection of the two countries that conduct the review. The drawing process ensures that at least one of the reviewing countries comes from the same region as the reviewed state. Around 40 reviews are planned for each year of the cycle. A country may be a reviewer up to three times in any cycle.

**GRECO**

The provisions of GRECO’s *Criminal Law* and *Civil Law* instruments are described in comprehensive explanatory reports. Each GRECO evaluation round covers elements from these and other provisions of the legal instruments adopted by the Council of Europe related to the prevention and fight against corruption — in particular:

- Additional Protocol to the Criminal Law Convention on Corruption (ETS No. 191)
- Twenty Guiding Principles Against Corruption (Resolution (97)24)
The UNCAC and GRECO Conventions and Their Review Process

- **Recommendation on Common Rules Against Corruption in the Funding of Political Parties and Electoral Campaigns (Recommendation Rec(2003)4)**

The list of provisions to be evaluated per round and the questionnaires for each are published. A wide range of supporting material on themes covered in each round (reference texts, reports, guidelines, standards, handbooks, policy papers, training material) has been developed by other organizations, including OECD, the Organisation for Security and Co-operation in Europe and the Global Organization of Parliamentarians Against Corruption.

For each round, GRECO utilizes a questionnaire outlining the features that evaluators and the evaluated state should explore. GRECO’s philosophy is that countries have their own ways to meet the objectives of the provisions. Further, even if some features are absent in a given country, a recommendation to introduce them will not necessarily be issued if the national system delivers the expected result. A clear aim is to avoid a “one size fits all” approach.

GRECO’s starting point for each round of evaluation is a vote on the themes to be assessed, followed by the development of the questionnaire that evaluators will use during onsite visits. The Secretariat prepares guidelines on procedural and substantive matters for evaluators; these are approved by the GRECO Plenary. The documents are publicly available online and are useful resources regarding the focus of and process for each evaluation round.

An evaluation calendar is then adopted. Each country completes a self-evaluation and receives an evaluation visit. The member state may provide comments on draft reports, including requests to correct factual inaccuracies. During the plenary meeting, GRECO evaluators present the report and findings for discussion by all member states. Each GRECO member is represented by a delegation of representatives who are usually from institutions with competence in anti-corruption. The composition of the delegation can change to include institutions with specific competences in evaluation rounds.7

After the negotiations on the draft text, the plenary adopts the report. The evaluated state may grant permission for publication immediately or at a later time. Most are published in full on the GRECO website upon agreement by the countries.

GRECO established a follow-up mechanism to assess implementation of the recommendations in the evaluation reports. In general, 18 months after PRRs are published, the countries are expected to report to GRECO on compliance. One or more compliance reports may be issued, depending on the pace compliance. Compliance reports rate the countries’ measures as fully, partially or noncompliant. The compliance reports follow the same publication rules as the evaluation reports, with most made public on the GRECO website.

After an evaluation round, GRECO often prepares a horizontal report on the themes covered and analyzes the recommendations issued to all countries. Horizontal reports can be particularly useful in identifying common problems, best practices and lessons learned. An example is the horizontal report on the fourth evaluation round.8

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7 The information is available on GRECO’s website at [https://www.coe.int/en/web/greco/structure/member-and-observers#22358830](https://www.coe.int/en/web/greco/structure/member-and-observers#22358830)

In addition to regular evaluation rounds, GRECO may conduct ad hoc evaluations in exceptional circumstances if it receives reliable information that developments in a member state might result in a serious violation of an anti-corruption standard that has been the subject of an evaluation round. To date, four ad hoc procedures have taken place, and the reports are published upon the agreement of the evaluated state.

The multiplicity of review mechanisms may result in conflicting recommendations. This would not only undermine the credibility of the processes but would hamper a country’s ability to comply. Review mechanisms are making efforts to avoid this problem.

The multiplicity of review mechanisms may result in conflicting recommendations. This would not only undermine the credibility of the processes but would hamper a country’s ability to comply. Review mechanisms are making efforts to avoid this problem. UNCAC urges reviewers to be aware of existing reviews and recommendations. The European Commission has begun to incorporate the most relevant GRECO findings into its own regular assessments of member states.

Political Context of Peer Reviews

In addition to the procedural formalities of the arrangements described above, it is important to understand the many political and diplomatic factors that underpin the processes. These are specified most explicitly in the case of UNCAC. Only by agreeing to these “rules of the game” was it possible to secure consensus on having a review mechanism at all. Therefore, it is critical to keep such political and domestic issues in mind when considering how to engage with the products of the exercise.

Awareness of these nontechnical factors will help explain why PRRs take the forms they do, provide insights into how governments approach peer reviews and help anticipate some barriers that those wanting to use PRRs might encounter in using the resulting material.

Underlying “Rules of the Game”

No Rankings or Comparisons

Some states make it a top priority to ensure that reviews not lead to the creation of comparative rankings. Accordingly, UNCAC’s rules state that peer reviewing should be “non-intrusive ... non-adversarial and non-punitive” and “of a technical nature.”

GRECO also avoids making comparisons between countries and tries to ensure equal treatment and consistency across evaluations. The only consolidated information appears in the horizontal reports at the end of each round, but member states are not ranked.

Government-to-Government

Explicit emphasis is also placed on UNCAC reviews as “intergovernmental process(es)” that are “conducted in a non-political manner.”

Comprehensive, not Selective

UNCAC rules state that reviews should be conducted in a “non-selective manner” (unlike GRECO, which assesses a subset of issues in each round of evaluations).

Presumption of Confidentiality

The UNCAC rules make clear that “country review reports shall remain confidential” but that a state is “encouraged to exercise its sovereign right to publish its country review report or part thereof.” Approximately 50 percent of reviews in the first cycle were published in full. The rules require an executive summary of each report to be published.

The guidelines for GRECO evaluators stress the importance of neutrality, diplomacy and confidentiality. However, almost all GRECO reports are made fully public.

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9 The countries assessed to date through the ad hoc procedure are Greece, Poland, Romania and Slovenia. [https://www.coe.int/en/web/greco/ad-hoc-procedure-rule-34](https://www.coe.int/en/web/greco/ad-hoc-procedure-rule-34).
Comparison of the UNCAC and Greco Mechanisms

<table>
<thead>
<tr>
<th>UNCAC</th>
<th>GRECO</th>
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<tbody>
<tr>
<td><strong>Coverage</strong></td>
<td></td>
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<tr>
<td>• A universal approach means that reviews are conducted on an article-by-article, section-by-section basis.</td>
<td>• Selected topics (from the Twenty Guiding Principles and the relevant Council of Europe Convention) are chosen for each evaluation round.</td>
</tr>
<tr>
<td><strong>Process</strong></td>
<td></td>
</tr>
<tr>
<td>• Countries being reviewed determine the timing of, and any publicity associated with, their reviews. The are not required to announce when reviews take place or the timing of any site visits that occur.</td>
<td>• Publication of advance notice of reviews and timings of exercises.</td>
</tr>
<tr>
<td>• A site visit by reviewers is not required but is at the discretion of the country under review.</td>
<td>• A site visit is mandatory under the rules of procedure for the review mechanism.</td>
</tr>
<tr>
<td>• Involvement of, or consultation with, nonstate actors as part of the review is not required but is at the discretion of the country under review.</td>
<td>• The wide involvement of nonstate actors, including civil society, academia, parliamentarians and the media, is expected for all reviews.</td>
</tr>
<tr>
<td><strong>Outputs</strong></td>
<td></td>
</tr>
<tr>
<td>• Reviews are legalistic in analysis. Compliance tends to be assessed in strict formal terms rather than consideration of the effective use of laws in practice.</td>
<td>• Reviews cover formal legal analysis and assessments of practice.</td>
</tr>
<tr>
<td>• Rather than formal recommendations, reviews list “challenges in implementation;” in practice, these are suggested areas for improvement.</td>
<td>• Reports contain recommendations for remedial action and observations for the reviewed country to consider but on which it is not required to report during the follow-up procedure.</td>
</tr>
<tr>
<td>• There is no requirement for publication of reviews beyond a short executive summary. Countries are encouraged, but cannot be required, to publish their full reports.</td>
<td>• Draft evaluation reports are discussed in the plenary session of GRECO before being finalized and approved.</td>
</tr>
<tr>
<td>• UNODC uploads executive summaries on its UNCAC website. No other publicity is associated with the finalization of a review.</td>
<td>• The vast majority of review reports are published upon the agreement of the state concerned.</td>
</tr>
<tr>
<td><strong>Follow-Up</strong></td>
<td></td>
</tr>
<tr>
<td>• The publication of the executive summary (and full report, if a country agrees) represents the end of the review process. No further discussion at the UNCAC level is required or envisaged.</td>
<td>• GRECO assesses the measures a country has taken to respond to the recommendations embedded in the published reports under a separate compliance procedure.</td>
</tr>
</tbody>
</table>

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9. For manageability, the review has had to be broken up into two cycles. The first covers the chapters on criminal law and international cooperation, and the second and current cycle covers the chapters on prevention and asset recovery.

10. Recent reports tend to avoid “observations” as much as possible.
What the Conventions Cover

As discussed in Part 2, our lens in this guide is prevention. Below, we address the specific content of the conventions. The provisions of both are summarized here and detailed fully in Annex 2.

UNCAC’s prevention provisions are contained in Articles 5-14 and Article 52 in the chapter on anti-money laundering. The convention adopts a graded approach to its obligations:

- Some provisions are mandatory, giving signatories no discretion in these areas. Mandatory provisions are those which a country “shall” (or occasionally “shall endeavor to”) apply.
- Less obligatory are provisions that the signatories “shall consider.” These can apply to actions for which there is an expectation that countries would usually legislate in that area.
- A third category, provisions that signatories “may” adopt, can be considered optional. They represent actions that some countries have adopted and are widely regarded as examples of best practice, but that may not always be possible in some national legal systems.

UNCAC

The prevention articles reflect the global consensus of anti-corruption practitioners on what must be put in place to guard against corruption occurring. They complement the provisions of the criminal law chapter that deals with sanctioning corrupt acts that have occurred.

The convention requires signatories to take action in these areas:

- Policy coherence and strategic planning
- Management of the public service
- Public procurement
- Management of public finances and public reporting
- Judiciary and the integrity of judicial proceedings
- Private sector and corporate governance
- The participation of society
- Anti-money laundering
As seen earlier, GRECO’s process draws on a wide range of Council of Europe instruments. Each round has focused on specific themes:

**Round 1**
- Independence, specialization and the means available to national bodies engaged in the prevention and fight against corruption
- The extent and scope of immunities

**Round 2**
- Identification, seizure and confiscation of the proceeds of corruption
- Public administration and corruption (auditing systems, conflicts of interest)
- Prevention of legal persons being used as shields for corruption
- Tax and financial legislation to counter corruption
- Links between corruption, organized crime and money laundering

**Round 3**
- Incriminations provided for in the Criminal Law Convention on Corruption (ETS 173), its Additional Protocol (ETS 191) and Guiding Principle 2 (GPC 2)
- Transparency of political party funding with reference to the Recommendation from the Committee of Ministers on common rules against corruption in the funding of political parties and electoral campaigns (Rec (2003) 4)

**Round 4**
- Prevention of corruption involving members of a parliament, judges and prosecutors:
  - Ethical principles and rules of conduct
  - Conflict of interest
  - Prohibition or restriction of certain activities
  - Declaration of assets, income, liabilities and interests
  - Enforcement of the rules regarding conflicts of interest
  - Awareness

**Round 5**
- Prevention of corruption and promotion of integrity in central governments (senior executive functions) and law enforcement agencies:
  - Ethical principles and rules of conduct
  - Conflict of interest
  - Prohibition or restriction of certain activities
  - Declaration of assets, income, liabilities and interests
  - Enforcement of rules regarding conflicts of interest
  - Awareness

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12 That is, companies or other entities that have legal rights.
Part IV

This section provides a framework for understanding the types of activities stakeholders can implement to translate analysis into action.
Framework for Action

The principal audience for the ideas discussed below is the wide body of stakeholders (institutions, agencies, groups, sectors) who may not currently be included in PRR processes. Their lack of involvement appears to be a more significant feature of UNCAC reviews than GRECO ones, where most stakeholders have some degree of involvement. We suggest ways for such groups to penetrate the veil that can often shrouds PRR exercises.

Adopting these ideas may enable reform-minded governments to derive larger benefits from the reviews. In light of the heavy burden that PRRs place on officials' time and attention, the public should have the greatest interest in securing maximum return from the efforts expended.

Caveat on Sequencing

Although we present our ideas in four phases, further divided into activities, we do not suggest a strict sequence for the actions listed. Overall, there is a starting point and a tangible objective — gaining basic familiarity with the nature and content of review exercises, whose details often differ, through to an end point of creating an informed, relevant and practical action plan that enjoys wide public awareness and support.

However, the timing of intermediate steps may be highly fluid. For example, building coalitions of interest usually occurs throughout the four phases, not least because it takes time and rarely consists of a single action at a specific time. Maintaining a comprehensive digest of a government's commitments (and monitoring its performance) is also an ongoing process, subject to periodic updating. Communication to influence public awareness is also more likely to be a continuous effort than a single activity.

Users should continuously assess their progress in all the elements of the framework and revisit or repeat some actions as necessary.
Learn About the Reviews

Activities:
1. Gather information about how and when reviews are conducted.
2. Understand what a government has committed to.
3. Understand which reviews matter most to a government.
4. Promote great public awareness of reviews.
Phase I: Learn about the Reviews

Lay the Groundwork for Effective Analysis and Engagement

Activity 1: Understand How Reviews Operate and Who Has Information About Them

The central challenge with current arrangements for UNCAC and GRECO peer reviews is to actually know they are taking place at all and, when they are completed, what the outcomes are.

While governments usually emphasize the government-to-government nature of these exercises (which means most of the proceedings take place behind closed doors), it can help to recall that most governments have committed to transparent governance. Reminding them of these commitments can be a useful starting point.

For example, all UNCAC member states have committed repeatedly to openness in the fight against corruption. The most recent restatement is the 2019 Resolution 8/5 of the Conference of States Parties on enhancing integrity by raising public awareness. Governments are also likely to have committed on numerous occasions in broader contexts to enhancing the transparency of their operations. Major examples include the Council of Europe’s 12 principles of good democratic governance (2008) and the African Union’s Declaration on Transparency and Sustainable Development in Africa (2015).

These commitments to a policy of openness can serve as useful foundations for challenging governments that conduct their reviews in a secretive fashion.

GRECO evaluation teams always reach out to and interview civil society groups and individual experts during their onsite visits. This enables sharing of nongovernmental perspectives with the reviewers, balancing input from public institutions. However, unless civil society is capable of closely following GRECO’s calendar in relation to a particular country, it is unlikely that nongovernmental organizations will prepare position papers before meeting with evaluators. It follows that the input they provide will depend on the correlation between the topics under review and the interests and the ongoing programs that civil society is implementing at the time of the visit.

Examples include 2009 CoSP, Res 3/2 (paragraph 14) and 2011 CoSP, Res 4/3 (paragraph 14) — public obtaining information on the organization, functioning and decision-making processes of their public administrations; 2013 CoSP, Res 5/4 (paragraph 23) — enhancing transparency in public administration; 2015 CoSP, Res 6/6 (paragraph 4) — enhancing integrity, transparency, accountability ... in public administration; Res 6/7 (paragraph 5) — making available “as much government information as feasible ... in relation to the implementation of the Convention ...”; and Res 6/8 (preamble) — “promoting integrity, transparency and accountability and preventing corruption are responsibilities to be shared by all sectors of society.”
Increasing the visibility of the review process will likely generate more in-depth input from civil society on the themes under evaluation. More publicity about the outcomes of the evaluation would provide civil society a starting point for a discussion with the public sector about a roadmap to carry out any recommendations in the reports. Similarly, publicity around compliance reports would help to track progress on the roadmap and offer impetus when reforms are stagnant. Lacking this kind of publicity, the reports, while public, may remain on their shelves.

**Find Available Information**

Some existing sources could point the way to more information. The rules of the UNCAC review mechanism (the Terms of Reference) require governments to identify a focal point to coordinate its participation in the review — an individual official or an institutional body. While this information is not usually made public, knowing that this role is required provides a potential way to gain information about the operation of the review. GRECO has similar arrangements.

Furthermore, in preparing to review other states, each government is required to compile a list of national experts who are competent to undertake reviews. The list is usually published as part of each country’s profile on the UNCAC review database, offering another possible entry point to obtain information.

While limited, there is public information available regarding the broad timing for a country’s review under UNCAC via the Implementation Review Mechanism information page. The planned cycle of reviews is listed as a high-level annual schedule, but it does not include precise timetables, and country reviews may slip from one year to the next due to unexpected circumstances. However, the annual schedule is another potential starting point for campaigns from interest groups and media to press governments for more information.

GRECO publishes a calendar in advance for each year listing the evaluation visits, plenary sessions and other relevant activities. Although this information is publicly available, it could be presented more prominently so interested stakeholders can more effectively channel their input to the evaluators.

A final way to acquire information is to review the publicly available official records of the review bodies’ meetings. The officials representing each government at all meetings are listed in these formal reports. For example, attendees at the UNCAC Implementation Review Group are listed in the final session document, such

**Actions to Consider**

- Groups outside the government can identify and publicize the government’s formal commitments to transparency in governance.
- Groups can use these commitments to press the case for greater openness regarding all aspects of a review exercise — publicizing their timing; disseminating information about the review for wide consultation in society; and committing to publish the outcomes in full, including plans for implementing recommendations.
- Civil society groups can organize press conferences or employ other publicity tools to raise awareness of evaluation and (in GRECO) compliance reports.
as the 2020 Final List of Official Participants. Although high-level, this information could offer additional ways to open channels of communication.\textsuperscript{14}

After each plenary session, GRECO adopts a decision listing all the actions taken at the meeting, including the adoption of evaluation and compliance reports. These decisions are also published on GRECO’s website.

### Actions to Consider

- Request that governments identify the focal point responsible for coordinating reviews.
- Contact national experts listed by the government to secure information on current and forthcoming reviews or learn how to contact the focal point.
- Use public information on review cycles as a starting point to campaign for greater openness about how the review will be performed.
- Focus lobbying efforts on key officials, particularly those who are known to be closely engaged in the conventions by their official participation in intergovernmental meetings.

### Activity 2: Develop a Full Picture of a Government’s Commitment to Anti-Corruption

Most governments have committed multiple times to combat corruption, as illustrated by the broad range of global and regional legal agreements listed in Part 1 of this guide. Gaining a complete picture of these obligations should be a starting point for any stakeholders seeking to influence a government’s implementation of its commitments.

Commitments may be integrated into an overarching anti-corruption structure, such as a national anti-corruption strategy or action plan. Or commitments to particular priorities or timing may have been made in other fora. For example, 43 countries made explicit and extensive commitments at the London Anti-Corruption Summit in 2016; the Group of 20 Anti-Corruption Working Group has issued annual sets of priority actions, and 78 national governments are members of the Open Government Partnership, of which anti-corruption commitments are a core component. These pronouncements can often add practical detail to the general obligations created under peer review instruments.

What is almost certainly true in most countries is that there will be no composite digest of a government’s full set of commitments. However, producing one would provide a baseline for judging a government’s overall performance, as revealed by successive PRRs.

A starting point is the compilation of processes posted on the UNCAC country profile site. Each country’s page links to information regarding its engagement in other corruption-related peer review processes, if any. An emerging practice in review processes is that each should, wherever possible, draw from each other’s analyses to reduce the risks of duplication.

\textsuperscript{14} GRECO does not publish information on the members of national delegations.
**Actions to Consider**

- Compile a register of a government’s commitments to anti-corruption. This work could be done by a single research team or distributed across a coalition of interested bodies.
- To avoid becoming too cumbersome, determine the level of detail necessary to document. The value of the end product will be reflected in its use as an accessible repository for advocacy.

**Activity 3: Understand That Some Reviews May Matter More to a Government than Others**

At any time, a government may be engaged in different stages of multiple peer review exercises. We address the practical implications of this overlap in Section 4.3. Here, the message is strategic: It is important to recognize that, for any government, the significance of different review exercises is likely to vary at a particular time. Each exercise, therefore, could have different degrees of influence on a government. This may become evident through the publicity that a government gives to its preparations for the review (Financial Action Task Force reviews, for example, require significant preliminary action given the potential consequences of a bad report). There may also be reasons why a government views reports from one mechanism as more significant to its reputation than others.

Each set of circumstances is specific to each government and will vary over time. It is vital that those seeking to influence governments understand the incentives at play for the government at any one time to convey the right messages at the right time to have the greatest impact.

**Actions to Consider**

- Keep a broad perspective about the range of possible review exercises that may be underway at any one time.
- Identify the opportunities that may arise from different exercises.
- As well as developing and articulating specific interests when lobbying for greater involvement in peer reviews, understand the likely incentives for the government. These may make some objectives easier to achieve than others.

**Activity 4: Do as Much as Possible to Increase Public Awareness of Reviews**

Well before a review, interest groups outside the government could develop plans for lobbying their authorities to describe explicitly, in advance, how they plan to organize the review exercise. Given the range of potential purposes for peer reviews (see Part 1), there is wide scope for marshalling arguments that, for

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15 The Financial Action Task Force is recognized as having the most stringent regime of practical sanctions that can be imposed following a poor report on compliance with the required standards.
a particular time, best resonate with the authorities. Depending on the country’s priorities, arguments could highlight the potential for accessing external assistance or stress the opportunity to boost its reputation through a strong review. The crucial point is that there are multiple angles available for advocates to use.

Governments are not monolithic, so it is important to distinguish their dimensions. Different parts have different interests, which can be the foundations for alliances.

Different ministries will have their own perspectives and priorities regarding policies. Understanding these differences can be critical to identifying potential drivers of reform. State institutions beyond the executive branch, especially parliaments and independent oversight bodies (such as national audit offices and anti-corruption commissions), are likely to have distinct interests in the outcomes of a review and could be influential allies in any campaign focused on making the details of the review process known to the public.

The efforts of such coalitions could be boosted by developing partnerships with well-established international players.16

Approaches to consider are elaborated below. The efforts should be organized around enabling more people to understand the relevance of the review and what it says, by translating the formal documents into more easily understood language, tailored for specific interest groups; helping to prioritize and ensure that change is not just superficial, such as simply writing a new law; and ensuring implementation by helping to chart the steps needed to operationalize the new legal provisions and maintain progress by creating intermediate benchmarks.

Actions to Consider

- Well before a review, nongovernment groups can develop a plan to marshal interests to influence the “rules of the game” for the review.
- As part of the plan, list potential benefits that can be derived from the review.
- Engage with, and examine the interests of, other state institutions to create alliances of aligned interests.
- Focus on creating sustained momentum. It can help raise awareness of the significance of the review exercise and attract new interests.

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16 One example is Montenegro, where the Centre for Monitoring and Research, a think tank that promotes strengthening political institutions to protect human rights and fight corruption, has received assistance from the International Foundation for Electoral Systems (IFES), generating momentum for continued reform. The project under which this guide was developed is a good example of such synergies, being implemented by IFES and the Central and Eastern Law Institute in partnership with three local organizations: the Expert Forum (Romania), Bulgarian Institute for Legal Initiatives and the Centre for Monitoring and Research (Montenegro).
Analyze and Synthesize Reviews, Identify Recommendations and Crystalize the Message

Activities:

5. Understand how PRRs are written
6. Identify a PRR’s key messages — legal, political and institutional
7. “Read between the lines” to spot what may be missing
8. Compile a comprehensive digest
Phase II: Analyze and Synthesize Reviews, Identify Recommendations and Crystalize the Message

Activity 5: Become Familiar with the Structure of Review Reports Before Beginning Analysis

Encountering an UNCAC or GRECO PRR for the first time can be a daunting experience. The reports tend to be densely technical and for the most part comprise legal commentary on the formal quality of a country’s laws (see Part 2). (GRECO reports include wider descriptive observations, including data on the actual implementation of laws.) Reports under UNCAC often run to several hundred pages, while GRECO PRRs are significantly shorter. Both can present real challenges to readers who are not legal specialists.

UNCAC and GRECO reviews both follow clear rules that lay out how the reports are presented. UNCAC uses a rigorous template and a systematic, paragraph-by-paragraph review of each article. For each paragraph, the relevant text from the convention is reproduced, followed by extracts from the government’s self-assessment and, at the respondent’s discretion, examples of practical implementation. The peer reviewers’ assessment (“observations”) in compliance with the convention provision follows.

GRECO similarly sets out detailed instructions for the structure and coverage of a PRR, such as the rules for the current round. These require a descriptive section with relevant factual background and an analytical assessment, followed by recommendations.

The reports under both processes are subject to varying degrees of “negotiation,” as discussed in Part 1. This practice has pros and cons. On the downside, it is possible (less so under GRECO) for governments to reduce or eliminate critical observations that it does not wish to see. Those analyzing PRRs need to be aware of what the review does not include, as well as what is present. The upside, however, is that what remains is content and observations that a government agrees it should address.

Actions to Consider

- Find other countries’ reports on the UNCAC and GRECO documentation sites to understand what to expect in the review.
- Look at other examples to help spot omissions in a given country report.
Activity 6: Extract Key Messages From a Review by Identifying the Most Important Findings

We suggest a three-pronged approach to extracting key messages from a PRR. First, understand what a PRR has found; then, consider the findings in context to understand what is most important in the current social and political circumstances. Third, use this understanding to enable advocacy.

The first order of business is to derive key messages from a PRR. Below we suggest topics to consider in reading a PRR.

Extract Key Messages from PRRs

Legal Framework

- What does the PRR suggest is the overall quality of the legal framework? Do gaps in coverage appear to be the exception or the rule?
- What does the PRR reveal about implementation? PRRs usually present only what the law says should happen. This formal baseline can provide a starting point for in-depth analysis of whether actual practice conforms or deviates from the law. A legal analyst familiar with anti-corruption practice in the country should be able to identify two key messages: the most important gaps in formal legal coverage (where law on an issue is absent) and the most important shortfalls between formal legal provision and actual practice (the "implementation gap").
- "Reality check" assessments of this kind may help develop a broad understanding of the issues due to gaps between legal formality and performance. Such assessments can also aid in prioritization.
- PRRs can set out in one place (sometimes for the first time) the full range of legal provisions that affect a particular issue — for example, public procurement or recruitment to the public service. This elaboration of the formal framework can be useful in identifying inconsistencies, anomalies or conflicts between provisions, and obstacles to progress. They can also point to priority areas for further monitoring by civil society.

Policy

- What tone does the PRR convey? Does it suggest a forward-looking, proactive approach by government or a reluctant, half-hearted one?
- What does the evidence suggest about how change has come about? Has it occurred through consultation with interests outside the government or in a closed and more controlled manner? Are some areas more closed to engagement with those outside of government than others?
- Are the recommendations largely confined to formal changes in the law, or are there more action-oriented recommendations that may imply government willingness to act? (These initial lines of inquiry can help to identify authorities’ receptiveness to influence.)
- Does the PRR help suggest whether the government is pursuing a strategic approach to anti-corruption (e.g., through a national strategy), or are efforts largely ad hoc? Evidence of regular reporting on, and review and updating of, strategic plans, for example, might indicate that a government is actively managing the issue.
• What is the condition of the public service ethos? The relationship between the public service and citizens can be a telling measure of government responsiveness to the public’s expectations. Will recommendations for strengthening laws and regulations for the public service likely be sufficient, or are further measures needed to change behavior?

• Recommendations are likely to be confined to what governments can or should do. How could actors outside of government contribute to identified actions, whether to buttress government efforts or, in the absence of action or commitment, to motivate action?

Institutional Relations

• Does the PRR reveal the potential for, or existence of, factors that undermine interinstitutional cooperation, such as duplicative functions or conflict between mandates?

• Does the evidence point to overall institutional coherence on anti-corruption, or are dysfunctions identified?

• PRRs can reveal the key international interlocutors (other countries and multilateral) with whom the country engages on anti-corruption. Knowing the partners in whom a government has confidence can help in developing future advocacy and finding potential influencers.

Learn Who Can Extract a PRRs

Drawing out the big picture from legal minutiae demands broad skills from a person or a team with:

• A good conceptual understanding of corruption — its drivers, the types of offenses and misbehavior it encompasses and the institutional approaches adopted to combat it.

• Familiarity with the prevailing state of the anti-corruption effort in the relevant country. It is likely that those able to do this analysis are already closely engaged in this policy space, so the content of the PRR may be familiar to the analyst.

• Legal acumen to extract from a legal analysis the impact in practice that a finding implies, and to articulate it clearly for nonspecialists; and the ability to reach comparative judgments on the relative importance for anti-corruption of individual findings.

• The ability to translate complex legal assessments, and their implications, into language and communication formats that are readily accessible to a nonspecialist audience, especially policymakers (in and outside government) and other key influencers, such as the media.

Activity 7: Read Between the Lines: Look for Omissions as Well as What Is Explicitly Recorded

What a report does not say may be just as important as what it does. The treatment of some issues may have been affected by the negotiation process that leads to agreement on the final version of a report. Therefore, it can be useful to look beyond the explicit recommendations in the PRR.

An UNCAC report should be relatively easy to assess, since each section is preceded by the specific convention text that requires compliance. Since GRECO reviews cover a wider scope than specific conventions, pay
attention to the questionnaire for the relevant round. Also, for GRECO, review horizontal (thematic) reports and the country reports for other member states to determine whether any important issues are missing. Reports for countries that share similar challenges may be particularly informative.

### Actions to Consider

- In addition to any deficiencies in existing laws that the review brings to light, identify whether the PRR indicates (either explicitly or by omission) any gaps in legal coverage of important issues. Map the findings to the provisions of the conventions or instruments.
- Determine whether specific current, high-profile anti-corruption concerns in the country are adequately covered. Such issues can be especially relevant if they have attracted political controversy, as their treatment in the report may be at risk of being “negotiated” to less critical assessments. Make allowances for the fact that significant delays often occur between the review and the issuing of the final report.

### Activity 8: Compile a Comprehensive Digest of PRR Findings

In the same way that a digest of a government’s anti-corruption commitments can provide a baseline for assessing what PRRs reveal, maintaining a digest of PRR findings will help track progress and, therefore, help with action plan monitoring (see Activity 13).

This sort of digest is also crucial in enabling monitors to detect backtracking, when a government’s performance retreats from past achievements.

### Actions to Consider

- To gain a comprehensive understanding of PRR assessments, summarize the headline findings of the peer reviews in which a country participates. Consider including relevant material from processes other than peer reviews, such as a country’s progress reports under the Open Government Partnership.
- Consider the digest a living document, updating it after successive reviews. A consolidated record of this kind can serve as a monitoring tool and check on commitments.
- Explore the potential for linking to existing monitoring processes, such as a national anti-corruption strategy.
- Where national monitoring is not done, use a digest of peer reviews as the foundation for a national mechanism that could help inject PRR findings into the government’s internal processes.

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17. A judicious balance must be struck to avoid such a digest becoming unwieldy. The goal is to focus on the strategically important findings.
Amplify and Prioritize the Message

Activities:
9. Create “explainers” for nonspecialist audiences
10. Make findings relevant to the general public
11. Rate options for importance and feasibility
Phase III: Amplify and Prioritize the Message

Reach the Widest Audience

Activity 9: Translate PRRs for Nonspecialists to Communicate Findings to a Wider Public

If PRRs are to be better vehicles for practical action, particularly by a population beyond government legal experts, a crucial step will be to present PRR findings in language and formats that are more accessible to nonspecialists. Doing so can be a pivotal step in operationalizing PRRs since few members of the audience whose attention must be captured — policymakers, parliamentarians, opinion shapers, embassy advisors of potential donors — have the legal expertise and willingness to digest a PRR in its raw state. The variety of audiences suggests that what is needed is not necessarily a single document, although a baseline script could be a useful core resource from which to develop products for different readers.

Producing PRR findings in more easily digestible terms requires caution to avoid undermining the technical quality of the review. This is not an exercise in dumbing down the findings, but re-casting them clearly to point more clearly to ways to develop the practical measures that need to follow.

Boiling down hundreds of pages of technical analysis is essential. Developing clear and succinct toplines can support advocacy efforts.

Circulating high-level messages helps in a number of ways. It raises awareness of peer review processes (and in doing so draws attention to the international interest in how the country’s government is performing); makes the public more aware of the fact that a government has voluntarily made commitments on anti-corruption; and, where public sentiment is diffuse, can focus concerns into a core set of priority problems to resolve.

An easy-to-understand version of PRR findings and recommendations has at least three distinct benefits:

- It helps make connections between findings and the priorities of the current political environment, allowing options that have the most traction to begin to emerge.
- It explains how findings matter in the daily lives of citizens, and how a recommended change could affect them, help mobilize social opinion and build demand for change.
- Through imaginative communication methods, it enables amplification of messages across a broad span of society.

Raising awareness of the outcomes of PRRs is also useful in beginning to manage expectations and elaborate
what reasonable ambitions look like. While having a piece of legislation passed can be a victory in itself, its implementation and the institutional capacity building that follows is often more daunting and resource-intensive. Realistic pathways must be established to convey what the required changes involve and, in particular, to avoid overly optimistic assumptions about how quickly change is likely to occur.

**Actions to Consider**

- Prepare easy-to-digest summaries of PRR findings. These “explainers” can take many forms, including factsheets, media briefs, and op-eds for influential news publications. Whatever form these summaries take, they should:
  - Be written in language that the public will easily understand.
  - Highlight the most important areas for remedial action or continued reform.
  - Make compelling arguments that substantiate the importance of the topics, such as the damage that current failure to act is causing.
  - Where possible, suggest specific actions, taking care to go beyond simple formal change (such as passing a law) to present the practical issues involved in ensuring effective implementation.
  - Segment messages for specific audiences, such as parliamentarians, academia, think tanks, professional associations and the media.
  - Utilize social media channels as part of the effort to communicate PRR findings.

**Activity 10: Put PRR Findings Into Context to Make Them Relevant to the Public**

We outline here ideas for communicating PRRs’ relevance to citizens and decision-makers. Making better connections to the public increases the prospect of generating wide social interest in the issues and pressure for change. And doing the same with decision-makers can open channels for reform-minded governments to secure the help they need.

To arrive at a viable action plan that receives wide public support, the local context is an important consideration. Reviews never take place in a vacuum; they occur in, and deliver reports to, a specific political environment that may be fluid or static at different times.

Whatever the trend, an environment at any moment presents a constellation of possibilities for action against corruption. For example, a corruption-related controversy in a particular part of the body politic, such as behavior by parliamentarians or members of the judiciary —may be a lightning rod that draws attention and focus. It could help propel the public to urge that the issue be dealt with, and a relevant finding in a PRR could provide a solution. A political party coming to power might have laid out a program of actions that amounts to a de facto priority list on anti-corruption.

Every local context is different. In whatever direction political and public sentiment flows, it will fundamentally shape the chances of gaining traction on an anti-corruption issue that a PRR raises. It is therefore crucial to understand how what is derived from a PRR will be perceived in the current political environment.
FRAMEWORK FOR ACTION

To this end, a review of earlier evaluations may help to understand the political and institutional landscape, and threats to reforms. Past GRECO evaluation and compliance reports are good mirrors for a member state’s previous circumstances. Such reports can help identify opportunities for and challenges to reform, particularly if an issue under evaluation in the current round has been considered previously. For example, the issue of conflicts of interest has been reviewed in the second round and revisited in the fourth and fifth rounds, albeit with respect to different categories of public officials.

Actions to Consider

In identifying the most workable findings to take from a PRR, questions like these can provide useful filters:

- Are there current hot topics in anti-corruption on which PRR findings can support impetus for change? Is public sentiment directed toward particular concerns? Have they been on the agenda before? What happened?
- What is the current political discourse about tackling corruption? Where is it most or least conducive to making progress?
- Do any findings match stated government policy priorities?
- Do the interests and agendas of any influential stakeholders align with particular findings? Might those stakeholders be effective agents for change?
- Is there recent history of attempts to reform in an area covered by the PRR? If these were unsuccessful, have circumstances changed to increase the prospect of success, or can lessons from past failures be applied?
- Have other review processes in which the government participates identified issues similar to those that this PRR addresses?
- Could any international pressures for reform give additional impetus to a PRR finding?

Tailor the Message

A clear understanding of the needs of each audience is essential. For example, knowing how busy parliamentarians operate will help shape the style of material that will best capture their attention. Concise, sharp messages in attention-grabbing language that emphasizes how taking action can be to their political advantage is likely to have greatest impact. In contrast, the attention of an embassy official or a potential aid donor is likely to be attracted by material that focuses on the developmental benefits of taking action and offers a standalone, nonspecialist brief on the issues, the action required and its likely costs.

Each audience will have their respective ‘buttons’ to press for gaining their attention. A particular complication is that the timeframe for each audience is likely to be different. Some actors, such as parliamentarians, may focus more on the short term and immediate action, and be more responsive to quick-win ideas, while donors may be more receptive to longer time spans. Such differing perspectives suggest that proposal designers need to consider short-, medium- and long-term objectives within their overall plans.
Actions to Consider

- Develop profiles of key audience groups that advocacy efforts will target. Identify the characteristics that will affect the style and content of communications to each group. For example, what is likely to be their primary reason to give support? Could they derive direct benefits from reforms, increase their influence or see increased opportunities to acquire funds to implement programs?

- Use these profiles to develop tailored briefing materials for target groups. Profiles may also be helpful in identifying shared interests across ostensibly separate groups. Finding such mutual interests increases the prospects of galvanizing broad social momentum. For example, an advocacy group pursuing a reform for its intrinsic value may share this interest with a business development group seeking inward investment because the reform would indicate a strong legal framework that builds investors’ confidence.

Make It Real...

Drawing a connection between recommendations for change from a PRR and how such change affects the general public can be a powerful engine for social action. But this kind of perception remains underdeveloped in the anti-corruption activist’s toolbox.

A common technique for making proposed actions relevant is depicting the direct impacts of corruption peoples’ lives. Whether associating corruption in public services to the frequency of power cuts, potholes in highways or empty hospital dispensaries, the power of demonstrating corruption’s damage through graphic illustrations that are meaningful in people’s everyday lives can be an effective way to raise consciousness. Drawing a direct line between damaging consequences and the changes that could result from implementing a PRR recommendation can generate popular support and advocacy.

Actions to Consider

- Research local sources and measurements of the social costs and impacts of corruption. The more detailed these analyses, the better. For example, sector-level studies can reveal the extent to which corruption dilutes public services. Local action groups can often discover and publish specific community-level impacts.

- Where information does not exist, map and measure the social impacts of corruption in key sectors.

- Develop communication materials that publicize these connections and link them to recommendations for action from PRRs.

...Compelling...

Creating a message that is clear is a beginning. Creating one that is compelling is the final aim. The table below identifies some crucial characteristics that can make a message compelling.
### Seven Characteristics of a Compelling Message

<table>
<thead>
<tr>
<th>Characteristics</th>
<th>Actions to Consider</th>
</tr>
</thead>
<tbody>
<tr>
<td>It is crystal clear what point is being made.</td>
<td>Test the understandability of messages with representative audiences before disseminating them broadly.</td>
</tr>
<tr>
<td>The issue is important to listeners.</td>
<td>Nuance messages for different audiences to connect with what matters to each.</td>
</tr>
<tr>
<td>It is understood quickly.</td>
<td>Craft crisp wording; avoid overly detailed or technical language.</td>
</tr>
<tr>
<td>It is strikingly memorable.</td>
<td>Assess the effect of different types of media in different contexts and for different audiences.</td>
</tr>
<tr>
<td>It rings true with listeners because it matches their experience.</td>
<td>Connect abstract problems to their effects on people’s daily lives.</td>
</tr>
<tr>
<td>It explains something that previously seemed a mystery.</td>
<td>Present an issue in a way that makes people think differently about the topic.</td>
</tr>
<tr>
<td>It is convened by someone considered an authority on the matter.</td>
<td>Use a communication channel that the target group trusts and uses.</td>
</tr>
</tbody>
</table>

### How a Message is Conveyed

How a message is conveyed can be at least as influential, and sometimes a lot more, as what it says. It is important to consider the modes of communication best suited to the target audience.

Modern communication techniques offer a wide range of possibilities for mobilizing social action and capturing the attention and interest of nonspecialist audiences. Consider visual presentation as well as the choice of words. Advocates should consider the potential of data visualization approaches that can present often complex information and crucial messages in compelling ways.

### ...and Heard

Efforts to develop influential messaging on the occasion of a peer review exercise can be supplemented by practical actions surrounding a PRR’s publication where this happens. Currently, this stage of the process receives...
little attention. UNCAC PRRs are merely posted on the UNODC website, but governments have no obligation to draw attention to the report — and in practice little further happens. A GRECO PRR is often accompanied by a formal announcement to the media, but publication rarely triggers specific actions.

It is likely that it will take some time after the release of a PRR for its contents to be digested and summarized in the ways we suggest above. That does not mean, however, that nothing valuable can be done at the time of publication. Where possible, advocacy groups should consider how their work will benefit if they help to make the PRR better known.

Actions to Consider

- Organize media events and publicity around the time of publication.
- Ideally, secure agreement for a formal launch of the PRR. An event can bring officials from the reviewing body and the reviewed government before the public.
- Use events to raise awareness of the peer review process and its purpose.
- Through events, sensitize the public to the idea that the PRR starts a new stage in the anti-corruption journey — it is an intermediate evaluation, not a final exam.
- Convey preliminary messages about the relevance to society as a whole of the issues raised in a PRR, and the importance of follow-up actions. The involvement of recognized authorities, such as from the academic community, can help set the desired tone.
- Pair launch events with policy dialogues and roundtables involving prominent thinkers and practitioners to help build momentum for follow-up actions.

An easy-to-understand version of PRR findings and recommendations has at least three distinct benefits:

- Genuine reform is about more than simply changing the law. It is about putting in place supporting administrative measures that give effect to what the law demands. For example, introducing an asset declaration system relies on a clear understanding of the procedural and management requirements involved (collection and verification methods, storage security, quality control, dealing with false submissions, etc.). Advocacy can help present the elements of a successful reform.
- Important sectors of society, whose contributions are vital for eventual success, may need to be brought on board through targeted outreach. Organized alliances can help to build momentum, for example, by preparing and giving briefings to parliamentarians or providing clear explanatory material for the media to disseminate.
- Especially relevant to the prevention dimension of anti-corruption is reframing the challenges to be faced under labels such as “civil service reform” or “open data.” This rebranding could increase the chances of success by making them more digestible to the political establishment. Astute advocacy can help shift the ways that peer review recommendations are perceived or understood.
Every PRR, by its nature, covers an array of concerns — far too many for any government to realistically address at one time. Therefore, prioritization is critical to success. It is vital to ensure that resources are not spread across too many issues. Rather, energy should be applied to efforts with reasonable prospects of success rather than ambitions that are unrealistic in light of prevailing conditions.

Two fundamental factors need to be taken into account in any prioritization process: the intrinsic importance of addressing a topic and the feasibility of doing so. The latter requires a good understanding of key drivers in society and the actors likely to support or block change.

Creating a list of priorities that balances importance and achievability requires an assessment of topics against both dimensions.18

An exercise of this kind is part science and — to a much greater extent— judgment, based on local perspectives and experience. The guidance below is intended to assist in reaching a reasonable and fair assessment of what is possible under the prevailing conditions.

The table below offers pointers to consider in weighing each topic’s importance and feasibility. After this, we then propose a method to attach scores to help establish a clear picture of the options available.

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18 Timescale can be another factor that, for ease of presentation, we do not treat as a separate issue here. Time issues may intrude in considering importance (Does this issue need to be solved now, or can it wait?) and feasibility (is there enough political energy to see this through to the end?). As noted earlier, in attracting different sources of assistance, it can be helpful to create plans that are segmented into short-, medium- and long-term objectives.
### Assess the Importance of a Topic and the Feasibility of Achieving Change

<table>
<thead>
<tr>
<th>Factors That Increase Importance</th>
<th>Factors That Reduce Importance</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The topic lies at the heart of the anti-corruption problems facing the country.</td>
<td>• The topic is largely technical in character and affects only a narrow element of the overall anti-corruption landscape.</td>
</tr>
<tr>
<td>• The topic is a preliminary stage in a sequence of required reforms.</td>
<td>• Strong pressure is being exerted on the government, either domestically or internationally, to concentrate on other topics.</td>
</tr>
<tr>
<td>• The topic has been identified by other review mechanisms or external influencers that matter to the government. External aid donors, for example, consider it a symbol of overall commitment to reform.</td>
<td>• Claims about the damage caused by the topic are contested.</td>
</tr>
<tr>
<td>• The damage caused by the topic is well understood and widely accepted as a problem.</td>
<td>• Benefits flowing from change are judged as small (a “nice to have” reform).</td>
</tr>
<tr>
<td>• Quantifying harm from the topic is relatively easy, enabling clear demonstration of its significance.</td>
<td>• Failure to implement the change does not appear likely to have significant adverse consequences, either directly or by obstructing other reforms.</td>
</tr>
<tr>
<td>• The topic is, or has the potential to be, a threat to social cohesion by fostering division or discontent among certain groups.</td>
<td></td>
</tr>
<tr>
<td>• The topic provides an opportunity for innovation, or for becoming a regional or global exemplar.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Factors That Increase Feasibility</th>
<th>Factors That Reduce Feasibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The topic already features in the program of the current government.</td>
<td>• Strong vested interests resist change. The closer to the seat of power these are, the less feasible the change.</td>
</tr>
<tr>
<td>• The topic has gained interest in senior circles that can set the political agenda.</td>
<td>• The perceived benefits of change are not commensurate with projected financial or staffing investments.</td>
</tr>
<tr>
<td>• There are political gains to be achieved by addressing the topic, either nationally or from the international community. The time for change is right.</td>
<td>• The topic involves highly complex and technical solutions that current local skill capacities and/or financial resources cannot address.</td>
</tr>
<tr>
<td>• Strong civic feeling and/or action has mobilized around the topic.</td>
<td>• The topic can be addressed in several ways. Deciding which to adopt requires time and attention from the civil service, making it a more complex undertaking than a competing topic.</td>
</tr>
<tr>
<td>• There is broad support for change among state institutions, such as the public service and parliament.</td>
<td>• The topic has fewer advocates than do other topics.</td>
</tr>
<tr>
<td>• The topic raises few or no political controversies.</td>
<td></td>
</tr>
<tr>
<td>• The topic is technically straightforward to solve and does not require unpalatable financial costs.</td>
<td></td>
</tr>
</tbody>
</table>
Crystalize the Choice

No purely scientific or mechanistic method exists for arriving at a set of priority actions. Much depends on qualitative judgments about, for example, the current political mood, the complexity of a problem or potential obstacles (foreseen or unanticipated, deliberate or inadvertent). The best judges of these issues operate in the anti-corruption policy space of the country concerned. The resulting priorities will always be best guesses — which have far greater value than attempts to do everything. The latter can give the appearance of appearing busy while achieving little.

Making judgments through quantification can help clarify the choices at hand. Using the parameters of importance and feasibility, recommendations from PRRs can be scored for both dimensions. The broader the score range (within reason), the greater the scope for distinguishing among topics. But caution should be exercised against becoming overly sophisticated for the purpose at hand. A scale of one to 10 should be sufficient to distinguish differences between options and arrive at a set of preferences. Figure 3 illustrates the process.

**FIGURE 3: SAMPLE SCORING TABLE**

<table>
<thead>
<tr>
<th>PRR Recommendations</th>
<th>Score from 1 (lowest) to 10 (highest)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Importance</td>
</tr>
<tr>
<td>Adequately resource the election commission to enable full monitoring and verification of political finance reports</td>
<td>7</td>
</tr>
<tr>
<td>Criminalize passive bribery</td>
<td>8</td>
</tr>
<tr>
<td>Clarify criteria for judicial appointments</td>
<td>4</td>
</tr>
<tr>
<td>Develop appropriate measures to strengthen the independence of the state audit office</td>
<td>9</td>
</tr>
<tr>
<td>Ensure timely completion of state audit reports and their publication</td>
<td>4</td>
</tr>
<tr>
<td>Publicly report the identities of recipients of contracts let under state-funded procurement</td>
<td>3</td>
</tr>
</tbody>
</table>

The result sought is not the numerical total of the two measurements, but the strength of their relationship for any recommendation. Plotting the score of each recommendation as a scatter diagram can readily reveal their difference, as depicted in Figure 4.

The approach can also reveal connections between recommendations that may not be readily apparent from existing analyses — for example, reasons for common barriers (or potential avenues for success) for ostensibly diverse issues.
FIGURE 4: MAPPING PRIORITIES

- **A**: Important but low feasibility
- **B**: Important and feasible
- **C**: Low importance and not feasible
- **D**: Low importance but feasible
- **E**: Implemented
- **F**: Consider if resources permit

**ACTION**
- Reduce the barriers to feasibility
- Implement
- Leave for now
- Consider if resources permit
Action Planning

Activities:
12. Build Coalitions to support implementation
13. Design practical action, reporting and monitoring plans
Phase IV: Action Planning

Build the Broadest Interest

Having digested a PRR by extracting its key findings, created resonant messaging to explain matters to a wider public and condensed a list of target issues into a clear set of priorities on which to focus, the next task is to marshal supportive allies and develop practical actions.

This section is primarily geared toward those outside government. Clearly, where governments begin to implement a PRR, external pressure may not be critical to success (although there will always likely be benefits to governments from being open to views and advice from outside). These circumstances are rarely the norm. More often, the greatest risk for PRRs is that they go unheeded.

No single group in society has the breadth of knowledge, organizational capacity or influence to bring about change on its own. Mobilizing diverse coalitions with shared interests brings together a variety of skills and can create tipping points that shift the political outlook on a topic. Civic pressure can exert powerful influences on governments (and individual politicians), particularly those that rely on maintaining public sentiment and support to remain in office.

Activity 12: Build Action Coalitions by Analyzing Stakeholders’ Interests and Incentives

Stakeholders interested in anti-corruption can be extremely diverse. They go beyond the classic civil society anti-corruption lobbyists who provide the essential drumbeat on the damage that corruption causes and the shortcomings of those in authority. The table below suggests a range of influencers and their potential contributions. Understanding their perspectives and incentives to participate can be useful in building a set of allies for any specific action.

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Interests and Incentives</th>
<th>Capabilities and Role(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Academic</td>
<td>• Generally hold high status in society. Voices can command authority.</td>
<td>• Provide technical capabilities for analysis and communicating.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Help frame public discourse, especially on new and emerging issues.</td>
</tr>
<tr>
<td>Aid donors</td>
<td>• Strong interest in being able to show they are contributing to (positive) change.</td>
<td>• Offer external funding and know-how.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Exert external pressure on government.</td>
</tr>
</tbody>
</table>
| **Civil society activities** | • Raising awareness of an issue and proposing solutions.  
• Gaining public recognition.  
• Expanding support base. | • Instigate and drive pressure for change.  
• Mobilize opinion in society. |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Independent administrative or watchdog authorities</strong></td>
<td>• Theoretically (and, ideally, in practice), providing independent checks on the executive arm of government.</td>
<td>• Through authoritative status in society (when honored in practice) to lend significant weight in articulating shortcomings in administration and implementing and monitoring remedial action.</td>
</tr>
</tbody>
</table>
| **International organizations (non-aid)** | • Setting global norms and standards for behavior.  
• Preventing dilution of commitments from individual members. | • Issue pronouncements that can affect a government's global reputation. |
| **Inward investors** | • Providing a stable and predictable legal framework to ensure business success. | • Help shape actions of governments that want to attract inward investment. |
| **Media** | • Attracting attention of the public.  
• Being seen to set and drive a social agenda. | • Explain complex issues in plain language.  
• Mobilize opinion in society. |
| **Parliamentarians** | • Preserving role as “cockpit” of the nation.  
• Attracting public attention for members’ individual actions, successes and policy stances. | • Set the tone and substance of public discourse.  
• Raise the profile of issues through debates and oversight committees.  
• Formally change the legal framework. |
| **Political parties** | • Garnering public support for policy platforms. | • Create political competition for anti-corruption credentials to help advance efforts. |
| **Professional associations** | • Maintaining status of a profession in society.  
• Maintaining professional standards. | • Contribute to sustaining a public integrity ethos.  
• Act as a collective authority when mobilized for change. |
| **Think tanks** | • Analytical examination and exposition of underlying strands of development in society. | • Perform authoritative analyses of the “big picture.”  
• Frame public discourse and shape opinions. |

There may also be scope for collaboration with government authorities, for example, by raising awareness of PRR outcomes through presentations to officials in relevant departments or ministries. The level of contact will contribute to the effectiveness of the presentations. Generally, the more senior levels reached within the organization, the better, but it is important to be wary of going to the very top. Such contacts can present more...
form than substance. Instead, securing contact at the highest operational levels of an organization can often be the most astute objective.

Consider establishing connections to policy and operational frameworks for combating corruption at an early stage, especially where these mechanisms have a record of achieving progress. PRR outcomes stand a better chance of being taken up if they align with existing commitments, in a National Anti-Corruption Strategy, for example, or where work on the issue at hand is underway.

**Activity 13: Identify Practical Actions, Create an Action Plan and Monitor Progress**

All the activities described above — understanding what PRRs say, communicating their relevance to daily life and marshalling diverse interests into collective demand for action — should culminate in well-thought out plans to help deliver priority actions.

The extent to which such plans can be developed and implemented in collaboration with government depends on each country context. Where a government is ostensibly committed to reform, such plans can help it to consolidate social support.

Where public demands for action on anti-corruption outstrip what a government is prepared to do, nongovernmental interest groups can develop plans that may help channel public pressure on priority issues. Developing solutions, outlining the steps to implement change and offering, for example, drafts of legislation and procedural arrangements can begin to consolidate support for change. Thus, even in the absence of clear government commitment or engagement, there is value in describing the required work as a way to keep issues in the public eye. A delivery plan can also serve as a prospectus that attracts the attention of external funders such as aid donors.

Clear planning can also help clarify roles and responsibilities. Often, it is unclear at first which part of government is responsible for addressing particular recommendations. Design work can help to clarify this (and the steps to achieve the required reform).

A very wide variety of activities (beyond those discussed above) can help draw attention to a PRR and what must be done in response to it. Below we suggest some kinds of objectives that such activities should aim to achieve.

**Actions to Consider**

- **Hold policy roundtables** at the time of the initial release of a PRR to help draw out the key issues, show how and why they matter and begin to formulate necessary actions. At this stage, before digesting the PRR and triaging its recommendations, the focus should be on raising awareness of the existence of the review. Involving key figures from academia, think tanks and the media, as well as politicians and other influencers, can help create critical mass for the future. These events can be particularly valuable if they convene actors who do not normally come together.
• **Publish op-eds in respected media outlets.** Opinion pieces by authoritative and trusted public authorities can also help to raise awareness across society, clarifying the relevance of the PRR for the public. Op-eds can begin to seed the types of messages described in the amplification stage of this guide.

• **Maintain a commitment tracker.** Collecting commitments from various review processes in one place can help clarify the big picture. They add value by extending coverage beyond formal international treaty commitments to voluntary anti-corruption efforts conducted through non-peer-reviewed processes such as the Open Government Partnership and the International Budget Partnership. Trackers can be used as monitoring tools to check and record progress and guard against reversals in performance over time. A tracker can become the source for periodic progress reports, summary assessments of performance, strategic “look backs” and material for communication activities.

• **Use trackers as entry points to engage governments.** Consider the benefits of formalizing a tracker as far as possible. For example, although there is value in a nongovernmental organization maintaining a tracker, it may be more effective for the organization to work with formal institutions such as parliaments and support their secretariat functions to develop and maintain the tracker.

A wealth of detailed technical advice is available on developing measures to respond to recommendations. Most relevant are UNODC’s guides covering the legal and policy issues included in UNCAC: the Legislative Guide and the Technical Guide. UNODC’s UNCAC legal database is a repository of provisions from the legal codes of all member states, allowing the texts of others’ laws to be viewed for each component of the convention.

Under GRECO, detailed explanatory reports are available for the Civil and Criminal conventions, and background materials are produced for each evaluation round.

### Monitor Progress

A critical element of any action plan is keeping track of results. Doing so is relevant both to document achievements and also to ensure they are not diluted or reversed later. Establishing a long-term monitoring mechanism could safeguard against backtracking.

The communication techniques identified earlier in the guide to help raise awareness of PRR recommendations will be equally valuable in publicizing progress on meeting commitments. Doing so in varied and imaginative ways will help to sustain the widest possible interest. Thus, investing in innovative methods for presenting information should be a priority.
Part V

Conclusion: 10 Guiding Lights
Conclusion: 10 Guiding Lights

The preceding parts of the guide detail the issues and considerations at each stage of the peer review process. Throughout, some common themes have appeared in the background. This section explores them more fully and provides strategic markers to keep in mind.

1. **See the strength of numbers.**
   We cannot overstate the power of collective action. No single agent is likely to secure change alone; bringing together actors with different skills, perspectives, contacts and access is the best way to create social momentum of significant magnitude.

2. **Embed the PRR in national processes.**
   Governments are often tempted to treat a peer review as a one-off exercise — prepare for it, conduct it, sign off on the resulting report and conclude the exercise. To get the best from PRRs, this mindset must shift. PRRs need to be seen as a sequence of contributions to ongoing national processes on anti-corruption: bricks to build up the bigger wall, not occasional exercises to get through.

3. **Keep the big picture in mind.**
   Recognizing the plethora of issues that a PRR will cover, it is vital for any interest group to be able to rise above narrow specialist concerns and agree on priorities that may not include its own topic. The ability to put aside sectional interests and see the bigger picture guards against diluting the strength that comes from numbers. Adopt the “stiletto heel” principle of policy influence: concentrate, rather than dissipate, the pressure being exerted.

4. **Expect setbacks.**
   Anti-corruption evolutions rarely proceed only in a forward direction. Legislative improvements passed today can be undone tomorrow. Political attention to a particular issue can lapse quickly or be overtaken by other urgencies of the day. Those who support reforms need to remain vigilant and cohesive as conditions change. Managing expectations can be essential to communication efforts. In particular, acknowledging the length of time that change might take can help limit disenchantment when hurdles are encountered.

5. **Keep looking back.**
   There is always a high risk of relapse in anti-corruption efforts. Too often, those pushing for reform focus on the next change they want to see but fail to notice cracks in the ground they have covered. Looking back is just as important as charting a way forward. As when walking across a frozen pond, it is just as important to check behind as to keep an eye on what lies ahead.
6. **Remain nimble.**

While robust planning is undoubtedly important to anti-corruption efforts, so is taking advantage of windows of opportunity. Operating with flexibility and the ability to adapt to often rapidly changing circumstances can be a critical success factor. However, it is also important to be able to judge when to respond to setbacks by changing course.

7. **Be patient.**

Change takes time, and sustaining momentum is the biggest challenge in anti-corruption. PRRs present particular risks in this regard, as they often focus on formal legal changes, rather than practical implementation. It is therefore all too easy to regard the passage of a new law as the end of the story. Patience and endurance are needed to transform formal changes into actual change. Donors must be prepared for a long journey, full of uncertainties and nonlinear trajectories. This can be particularly challenging for the donor community, which is almost always under pressure to deliver rapid results.\(^9\)

8. **Never underestimate the power of communication.**

Given the highly technical content of PRRs, it can be tempting to apply only a technical lens to what they say. This guide stresses the power and importance of translating highly complex technical issues into language that communicates their relevance to wider audiences. Making PRRs more accessible to more readers can energize civic actors. Grasping the broad implications of PRRs through effective communication can be just as important, if not more so, than technical understanding of the findings.

9. **Document achievements...and failures.**

Since little current practice exists on using PRRs to effect change, there is much to learn and share. There would be great value in documenting implementation of this guide and building a sourcebook of methods and practices.

10. **Understand why things went as they did.**

Practical evaluations of efforts are vital. While there is a natural tendency to want to understand why failures occur, it is equally important to analyze successes. The success factors for programs that work are rarely analyzed and documented. Understanding why a series of actions succeeded can be just as vital as learning about mistakes.

\(^9\) The issue of donor approaches to anti-corruption is analyzed in *Reassessing donor performance in anti-corruption: pathways to more effective practice* (U4, 2021).
Annexes

Annex 1: References and Links
Annex 2: The Conventions and Their Contents — A Short Guide to Their Prevention Elements
Annex 3: List of Interviewees
Annex 1: References and Links

Part 1: Setting the Scene

African Peer Review Mechanism
https://www.aprm-au.org/

Anti-Corruption Network for Eastern Europe and Central Asia Review Mechanism
http://www.oecd.org/corruption/acn/istanbulactionplan countr yreports.htm

http://www.oecd.org/site/adboecdanti-corruptioninitiative/publications.htm

Combating Corruption the Soft Way: The Authority of Peer Reviews in the Global Fight Against Graft

Cooperation and Verification Mechanisms for Bulgaria and Romania

Council of Europe Civil Law Convention on Corruption
https://www.coe.int/fr/web/conventions/full-list/-/conventions/treaty/174?_coeconventions_WAR_coeconventionsportlet_languageId=en_GB

Council of Europe Criminal Law Convention on Corruption
https://www.coe.int/fr/web/conventions/full-list/-/conventions/treaty/173?_coeconventions_WAR_coeconventionsportlet_languageId=en_GB

Financial Action Task Force
http://www.fatf-gafi.org/publications/mutualevaluations/?hf=10&b=0&s=desc(fatf_releasedate)

Global Forum on Transparency and Exchange of Information for Tax Purposes

Group of States against Corruption (GRECO) Review Mechanism
https://www.coe.int/en/web/greco/evaluations

Inter-American Convention Against Corruption Review Mechanism

OECD Anti-Bribery Convention
http://www.oecd.org/daf/anti-bribery/countryreportsontheimplementationoftheoecdanti-briberyconvention.htm
ANNEX 1: REFERENCES AND LINKS

Terms of Reference for UNCAC Review Mechanism
https://www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/
Mechanism_for_the_Review_of_Implementation_-_Basic_Documents_-_E.pdf

UN Compendium of International Legal Instruments on Corruption
https://www.unodc.org/documents/corruption/publications_compendium_e.pdf

UN Convention Against Corruption

Venice Commission
https://www.venice.coe.int/webforms/events/

Why Corruption Matters: Understanding Causes, Effects and How to Address Them

Part 3: The Conventions and Their Review Processes — UNCAC and GRECO

GRECO — Additional Protocol to the Criminal Law Convention on Corruption (ETS 191)
https://www.coe.int/fr/web/conventions/full-list/-/conventions/treaty/191?_coeconventions_WAR_coeconventionsportlet_languageId=en_GB

GRECO — Twenty Guiding Principles Against Corruption (Resolution (97)24)
https://rm.coe.int/CoERMPublicCommonSearchServices/
DisplayDCTMContent?documentId=09000016806cc17c

GRECO — Recommendation on Codes of Conduct for Public Officials (R(2000)10)
https://rm.coe.int/CoERMPublicCommonSearchServices/
DisplayDCTMContent?documentId=09000016806cc1ec

GRECO — Recommendation on Common Rules Against Corruption in the Funding of Political Parties and Electoral Campaigns (Recommendation Rec(2003)4)
https://rm.coe.int/CoERMPublicCommonSearchServices/
DisplayDCTMContent?documentId=09000016806cc1f1

GRECO — List of Provisions to Be Evaluated and Questionnaires
https://www.coe.int/en/web/greco/evaluations

GRECO — Horizontal Report: Fourth Evaluation Round

Partnering in Anti-Corruption Knowledge

UNCAC for Ambassadors (U4)

UNCAC in a Nutshell (U4)
ANNEX 1: REFERENCES AND LINKS

Using the UN Convention Against Corruption to Advance Anti-Corruption Efforts (TI)

Part 4: A Framework for Action

Activity 1

African Union Declaration on Transparency and Sustainable Development in Africa

Council of Europe — 12 Principles of Good Democratic Governance
https://rm.coe.int/12-principles-brochure-final/1680741931

GRECO Calendar
https://rm.coe.int/schedule-2021/1680a08c0b

GRECO Decisions
https://www.coe.int/en/web/greco/plenary-meetings#(%22222360354%22[1])

UNCAC 2009 Conference of States Parties (CoSP) Resolution 3/2

UNCAC 2011 CoSP Resolution 4/3

UNCAC 2013 CoSP Resolution 5/4

UNCAC 2015 CoSP Resolutions 6/6, 6/7, 6/8

UNCAC 2019 CoSP Resolution 8/5

UNCAC Annual Schedule

UNCAC Implementation Review Group Participants

UNCAC 2015 CoSP Resolutions 6/6, 6/7, 6/8


UNCAC Implementation Review Mechanism
ANNEX 1: REFERENCES AND LINKS

**UNCAC Review Database**

**UNCAC Terms of Reference for Review Mechanism**

**Activity 2**

**Group of 20 Anti-Corruption Commitments**
https://www.unodc.org/unodc/en/corruption/g20-anti-corruption-resources/by-thematic-area.html

**London Anti-Corruption Summit Country Commitments**
https://www.gov.uk/government/publications/anti-corruption-summit-country-statements

**Open Government Partnership**
https://www.opengovpartnership.org/policy-area/anti-corruption/

**UNCAC Country Profiles**

**Activity 5**

**GRECO Rules for Evaluators**
https://rm.coe.int/guidelines-get-eval5/16809005cd

**GRECO Country Reports**
https://www.coe.int/en/web/greco/evaluations

**UNCAC Country Reports**

**Activity 10**

**Guide to the Principles of Data Visualization**

**Impact of Each Country on Global Corruption and Instability**

**Bangladesh Justice Audit**

**Our World in Data**
https://ourworldindata.org/corruption

**Tutorial on Visualizations**

**Using Visualizations in the Public Sector**
Visualizing Corruption Around the World  
https://www.visualcapitalist.com/visualizing-corruption-around-the-world/  

Activity 13  
GRECO Civil Convention — Explanatory Report  

GRECO Criminal Convention — Explanatory Report  
http://www.worldlii.org/int/other/COETSER/1999/1.html  

UNCAC Legal Database  

UNCAC Legislative Guide  

UNCAC Technical Guide  

Part 5: Conclusion  
Reassessing Donor Performance in Anti-Corruption: Pathways to More Effective Practice  
ANNEX 2: THE CONVENTIONS AND THEIR CONTENTS

Annex 2: The Conventions and Their Contents — A Short Guide to Their Prevention Elements

For UNCAC, red signifies this is a mandatory provision ("shall" or "shall endeavor") in the convention; blue signifies a semimandatory provision ("shall consider"); green signifies the provision is cast as optional ("may").

<table>
<thead>
<tr>
<th>UNCAC</th>
<th>GRECO</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>National Policy Coherence</strong></td>
<td></td>
</tr>
<tr>
<td>Tackling corruption requires a holistic approach. Success in one area can be undermined or negated by failure to address other areas, particularly where corruption is pervasive. Governments need to develop approaches that ensure a coherent response.</td>
<td></td>
</tr>
</tbody>
</table>

**Articles 5 and 6**

- Coordinated anti-corruption policies
- Periodic evaluation
- International collaboration
- Preventative anti-corruption body or bodies... to implement and/or co-ordinate and...to increase and disseminate knowledge
- Independence of and necessary resourcing for such bodies

**Round 1**

- Corruption threats, anti-corruption policy, priorities, connection with organized crime
- Division of functions among national- and local-level institutions in the prevention and/or combat corruption
- Independence and autonomy of specialized institutions to prevent and/or combat corruption
- Specialization within law enforcement, the judiciary and other state bodies
- Specialization on internal corruption
- Interinstitutional and international cooperation

**Round 2**

- Anti-corruption policy and strategy
- Assessment of the effectiveness of actions targeting public administration

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20 For the purposes of this tool, we consider “prevention” to be the measures included in Chapter II of UNCAC and related provisions in Chapter V on asset recovery. A prerequisite, but outside the scope of this exercise, is a strong foundation of domestic law with clear, unambiguous and well-publicized legislation that criminalizes corruption. The effective prosecution of these laws is an essential component of national action. The required laws are enumerated in Chapter III of UNCAC, covering criminalization and enforcement.
Public Service Management

The public service is fundamental to good governance. Holders of public office (including elected officials and, especially, government ministers) should act solely in the public interest and not to gain undue benefits for themselves, their families or their friends. Governments need public services that are merit-based, ethical, professional and nonpartisan, managed with appropriate recruitment and retention systems and transparent arrangements for promoting ethical conduct.

### Articles 7 and 8

- Merit-based recruitment, retention, promotion and retirement of public officials
- In-service training and management arrangements to reduce corruption risks
- Adequate remuneration
- Rules on candidacy for public office and political party financing
- Promotion of transparency and prevention of conflicts of interest
- Integrity and honesty of public officials, including through codes of conduct
- Systems for reporting corruption by public officials
- Declarations of interest by public officials
- Sanctions for violation of codes or standards

### Round 1

- Codes of conduct and other instruments that aim to prevent corruption (including for exposed professions such as law and accounting)
- Implementation procedures for codes of conduct; responsible body empowered to impose disciplinary or other sanctions
- Asset and income disclosure and control
- Conflict of interest detection and management
- Programs to promote ethical values in public life
- Systems for reporting corruption
- Training on preventing and combating corruption
- Rules on political funding

### Round 2

- Screening of personal records in the selection and recruitment of public officials
- Awareness of ethical principles for public officials
- Regular rotation in vulnerable positions
- Measures to prevent conflicts of interest and incompatibilities
- Revolving door mechanisms
- Codes of ethics and conduct, sanctions and appeal mechanisms
- Gift regulations
- Corruption reporting by public officials and whistleblower protection
- Disciplinary procedures

### Round 4

- Prevention of corruption among members of parliament
- Elections and loss of mandate
- Remuneration, economic benefits and budget transparency
- Ethical principles and rules of conduct for members of parliament
- Conflict of interest rules for members of parliaments
- Prohibition or restriction of certain activities for members of parliament
- Declarations of assets, income, liabilities and interests for members of parliament; related rules, enforcement mechanisms and sanctions
### Annex 2: The Conventions and Their Contents

- Awareness measures regarding the obligations of members of parliament
- Transparency in accounts, records of donations, requirements for contributions from natural or legal persons and reports on expenditures
- Oversight mechanisms: independent monitoring, audits, procedure
- Sanctions types, appeal mechanisms, immunities, statutes of limitation

#### Round 5

- System of government and senior executive functions (status and remuneration, appointment, removal from office)
- Anti-corruption and integrity policy (integrity checks, vetting, risk assessment and management); legal framework on ethics and conflict of interest; measures to prevent undue influence
- Checks and controls: internal audit and inspections, parliamentary oversight, public audit institution
- Conflicts of interest in senior executive functions: legislation and implementation
- Prohibition or restriction of certain activities for senior executive functions
- Declarations of assets, income, liabilities and interests for senior executive functions
- Supervision and enforcement of integrity rules
- Accountability and enforcement mechanisms for senior executive functions
- Awareness of obligations of senior executive functions

#### Law Enforcement

- Organization and accountability of law enforcement and police authorities
- Anti-corruption and integrity policy and regulatory and institutional framework
- Recruitment and career: integrity checks and vetting, performance evaluation, rotation
- Conflict of interest rules, disclosure, management, sanctions
- Prohibition or restriction of certain activities
- Declaration of assets, income, liabilities and interests
- Supervision and enforcement of integrity rules
- Training and awareness
Public Procurement, Management of Public Finances and Public Reporting

Public procurement provides major opportunities for corruption. Corruption is more likely to occur where contracts can be awarded without transparent or competitive procedures; information on contracts is limited; or other elements of due process, such as clear selection criteria and bidding rules, are not followed. Management of public finances needs to be transparent, follow due process and ensure accountability. This includes all aspects of the budget process, key allocation decisions, subsequent reporting and accounting, and timely and effective oversight by independent audit authorities. The public availability of information is an essential antidote to corruption.

### Articles 9 and 10

- Procurement based on transparency, competition and objective criteria
- Appeal and review procedures; effective remedies
- Transparent and accountable management of public finances
- Timely financial reporting
- Audit, risk management and internal control systems, with effective remedies
- Protection of financial records
- Transparent public administration and decision-making

#### Round 1

- Transparency of procurement contracts; equal treatment in procurement, appeal procedures
- Mechanisms to avoid unlawful use of public finances

#### Judiciary and Prosecution

An impartial, effective and reliable judiciary, the effective application of law and the prosecution of offenders are all essential to deter and punish corruption. The judiciary must enjoy adequate autonomy while being accountable. Prosecutions need to be timely and immune from undue influence.

### Article 11

- Enhancement of integrity and prevention of corruption without prejudice to judicial independence
- Enhancement of prosecutorial integrity and prevention of corruption

#### Round 1

- Discretionary or mandatory prosecution and safeguards against undue pressure

#### Round 4

- Recruitment and careers of judges and prosecutors; how integrity is assessed at various stages
- Case management in courts and prosecution offices: incorporating and addressing corruption risks (removal of judges, timely procedures, transparency of judicial proceedings)
- Conditions of service for judges and prosecutors
- Ethical principles and rules of conduct for judges and prosecutors
### Annex 2: The Conventions and Their Contents

- Conflict of interest regime for judges and prosecutors
- Prohibition or restriction of certain activities by judges and prosecutors
- Declaration of assets, income, liabilities and interests for judges and prosecutors: rules, enforcement mechanisms, sanctions
- Awareness measures and training on the obligations of judges and prosecutors

### Private Sector

A sound framework of corporate governance for private sector activity is essential to a national economic management architecture, encourages propriety in business practices and, in particular, helps provide transparency and accountability at the intersection of the private and public sectors.

### Article 12

- Prevention of corruption involving the private sector
- Accounting and auditing standards
- Dissuasive sanctions and remedies
- Codes of conduct and promotion of good commercial practices
- Business ownership transparency
- Prevention of abuse of subsidies and licenses granted by public authorities
- Rules on the transition of public officials to the private sector
- Financial recordkeeping and reporting standards
- Disallowance of tax deductibility for bribes

### Round 1

- Deductibility for commissions paid to commit corruption

### Round 2

- Liability of legal persons for corruption and money laundering offenses (criminal, administrative, civil); statistics
- Disclosure of business interests
- Personal and corporate liability
- Sanctions for legal persons
- Prohibition of tax deductibility for facilitation payments and corruption in general
- Awareness of tax authorities
- Accounting offenses
- Roles of accountants, auditors and legal professions: reporting suspicious transactions, detecting and reporting accounting offenses and money laundering
Participation of Society

Responsible scrutiny of public bodies and services by organizations outside of government contributes to strengthening accountability, increases the likelihood that corruption will be exposed and provides a voice for those who may otherwise have limited or no avenues for redress. Government should regard an active and responsible civil society — and, notably, a free media — as an ally in delivering outcomes sought by the public.

Government’s active engagement with the public is essential to discourage tolerance of corruption. Public education, awareness-raising and publicity and information programs can make important contributions to public opinion.

**Article 13**

- Promotion of the active participation of individuals and groups outside government in preventing and combating corruption
- Transparency of, and public participation in, decision-making processes
- Public access to information
- Promotion and protection of the freedom to seek and disseminate information concerning corruption
- Public education and awareness-raising regarding nontolerance of corruption
- Public knowledge of, and access to, anti-corruption bodies

<table>
<thead>
<tr>
<th>Round 1</th>
<th>Round 2</th>
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<tbody>
<tr>
<td>• Awareness measures related to threats of corruption</td>
<td>• Access to information</td>
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<td>• Tools to enable citizens and the media to access information</td>
<td>• Participation in decision-making processes</td>
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<td>• Appeal mechanisms for public administration decisions</td>
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<td>• Ombudsman function in the government</td>
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<th>Round 3</th>
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<tr>
<td>• Transparency of parliamentary legislative processes</td>
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<th>Round 5</th>
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<tbody>
<tr>
<td>• Transparency and oversight of central government executive activities: access to information, including government documents; public participation in the development of primary, secondary and tertiary legislation; transparent relationships with third parties; lobbying regulations, budgetary transparency</td>
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</tbody>
</table>
Measures to Prevent Money Laundering

A sound regulatory framework for the financial sector is an essential element in protecting against corrupt financial transactions. Elements of regulation include sound corporate governance requirements, appropriate supervisory institutions (with adequate autonomy, capacity, powers and penalties) and, in particular, the capacity to monitor financial intelligence and cross-border transactions.

Article 14

- Comprehensive regulatory and supervisory regime for financial institutions including banks and other institutions susceptible to money laundering
- Beneficial ownership identification, recordkeeping and reporting of suspicious transactions
- Ability of relevant authorities to cooperate domestically and internationally
- Creation of a Financial Intelligence Unit.\(^{21}\) (also Article 58)
- Detection and monitoring of the movement of cash and instruments
- International cooperation to combat money laundering

Round 1

- Designation of money laundering and corruption as criminal offenses
- Measures to prevent and detect money laundering (identification of customers and beneficial owners of accounts; mechanisms for reporting suspicious transactions)

Round 2

- Financial Intelligence Unit
- Obligation to report suspicious transactions
- Statistics on investigations, prosecutions and convictions
- Seizure, confiscation and management of seized assets

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\(^{21}\) A financial intelligence unit is a specialist body that serves as the central agency that receives and analyzes disclosures from financial institutions regarding suspected money laundering. Such units play important roles in disseminating analyses to law enforcement for further investigation. Some financial intelligence units have the authority to investigate suspected money laundering.
Annex 3: List of Interviewees

Victoria Ayer
Anti-corruption advisor (formerly United States Agency for International Development)

Gillian Dell
Anti-corruption advisor, Transparency International

Jens Deppe
Anti-corruption advisor, German Corporation for International Cooperation

Cezara Grama
Legal advisor, Expert Forum

Bilyana Gyaurova
Director, Bulgarian Institute for Legal Initiatives

Kjetl Hansen
Governance advisor, World Bank (formerly secretariat to OECD Anti-Corruption Task Team)

Jane Ley
Anti-corruption advisor (formerly U.S. Department of State)

Shervin Majlessi
UNCAC Secretariat, UNODC

Kellen McClure
Anti-corruption advisor, U.S. Department of State

Andrei Nosko
Director of Europe, PILnet

Juanita Olaya
Anti-corruption advisor, UNCAC Coalition

Septimus Parvu
Project coordinator, Expert Forum

Klas Rasmusson
Anti-corruption advisor, Swedish International Development Agency

Laura Sanz-Levia
GRECO secretariat

Bart Scheffers
Anti-corruption specialist (formerly Open Society Foundations)

Teodor Slavev
Legal expert, Bulgarian Institute for Legal Initiatives

Tim Steele
Anti-corruption advisor, UNODC

Lisa Stensrud
Anti-corruption advisor, Norwegian Agency for Development Cooperation

Brigitte Strobel-Shaw
UNCAC Secretariat, UNODC

Ivan Vukevic
Project coordinator, Centre for Monitoring and Research
Annex 4: Scoring Table and Worksheet Template

Scoring and Mapping Recommendations for Peer Review Reports

Instructions

1. Acting individually or as a team, use the table to score the importance or urgency of each recommendation on a scale of 1 to 10, with 1 being of lowest importance, and 10 being of highest importance. Note – this is not a ranking exercise. Scores for each recommendation should be considered independently. You may find that several recommendations receive similar scores.

2. Repeat the scoring process for each recommendation, focusing on feasibility. Consider whether there is political will to carry out the recommendation, as well as potential resource and capacity constraints that could limit its execution. Score each recommendation independently on a scale of 1 to 10, with 1 being the least feasible for action, and 10 being the most feasible for action.

3. Use the importance and feasibility scores to plot your recommendations onto the graph. The scores of importance will determine where a point falls vertically on the graph, and the scores of feasibility will determine where a point falls horizontally on the graph.

4. Reflect on your scoring decisions and the resulting table. Are there common challenges or barriers that lower the feasibility of several recommendations? How can you mitigate or address these barriers with activities and advocacy? Conversely, does the scoring and graphing process point to any opportunities? Are there potential partners or champions for anti-corruption reform who you can work with?
## SCORING TABLE

<table>
<thead>
<tr>
<th>PRR Recommendations</th>
<th>Score from 1 (lowest) to 10 (highest)</th>
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<tbody>
<tr>
<td></td>
<td>Importance</td>
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**MAPPING PRIORITIES**

- **Important but low feasibility**
  - **ACTION:** Reduce the barriers to feasibility
  - **ACTION:** Implement

- **Low importance and not feasible**
  - **ACTION:** Leave for now

- **Low importance but feasible**
  - **ACTION:** Consider if resources permit