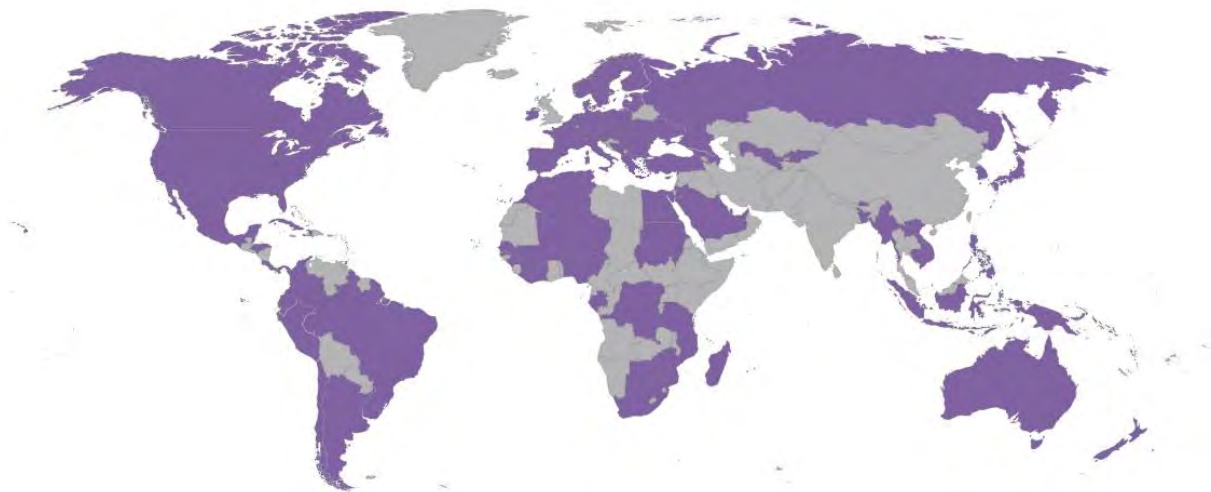


Global Mapping of Anti-Corruption Authorities

ANALYSIS REPORT



A project of the French Anti-Corruption Agency (AFA) in partnership with the Council of Europe's Group of States against Corruption (GRECO), the Organisation for Economic Co-operation and Development (OECD) and the Network of Corruption Prevention Authorities (NCPA)

May 2020

Foreword



Charles DUCHAINE

Director of the French Anti-Corruption Agency

2020 President of the NCPA Network

From the very beginning of our Agency in 2017, we have noticed an unmet need for cooperation between anti-corruption authorities at the operational level. To address this need, we have launched, together with the Italian National Anti-Corruption Authority and the Serbian Anti-Corruption Agency, an international network of corruption prevention authorities, the NCPA Network. This initiative aims at providing a platform for practitioners around the world to exchange technical information, share good practices, and find concrete solutions for common challenges. By learning from each other's experience and joining our efforts, our goal is to prevent corruption more effectively, and to promote a global culture of integrity.

In view of exploring new avenues for international cooperation, AFA and the NCPA Network have carried out, in partnership with the Council of Europe's Group of States against Corruption (GRECO) and the OECD, a global mapping of anti-corruption authorities. The present report's objective is to illustrate and analyse the findings of this joint project, based on data provided by the 171 participating national authorities from 114 countries and territories. Greatly satisfied with these substantial contributions, we would like to express our gratitude to the institutions, and the people behind them, that made this global mapping possible in the first place.

We would like to thank GRECO and the OECD for endorsing this project from its earliest stages. Their support was essential for its success. We are also grateful for the valuable inputs and feedback of NCPA members during the development of the project. Moreover, we would like to acknowledge the dedication of our colleagues from AFA's international unit, who were involved in collecting and analysing the results of the survey. Special thanks are due to the team of Galileo, the digital service from the French Ministry of Economy that hosted our online survey and offered much appreciated technical assistance. Finally, we would like to warmly thank all the national anti-corruption authorities that have answered the survey and shared it with their contacts. Their collaboration was crucial. We were very fortunate to have them on board for this project, and hope to continue our fruitful cooperation. Thanks to them, while looking for counterparts, we found real partners.

Executive Summary

Enshrined in numerous international and regional conventions, national anti-corruption authorities (ACAs), i.e. public bodies with a specific mandate to combat and prevent corruption, have emerged as key players in the global anti-corruption arena. Despite their importance as institutional tools to counter corruption, there is an overall lack of up-to-date information about ACAs. In an attempt to fill this gap, the French Anti-Corruption Agency (AFA), in partnership with Council of Europe's Group of States against Corruption (GRECO), the OECD, and the Network of Corruption Prevention Authorities (NCPA), have launched a global mapping project of ACAs. Through an online survey, the project's objective is to gather, centralize, and disseminate information about the various anti-corruption institutions established worldwide. This extensive data collection aims at helping anti-corruption practitioners to better understand ACAs' characteristics and needs. It also seeks to identify common trends and challenges, and to explore concrete avenues for cooperation between, and with, ACAs.

The present analysis report illustrates and examines the findings of this joint project, based on data provided by 171 national authorities from 114 countries and territories. The report concludes that, in general, a single authority is responsible for combating corruption in a given country. This authority is often endowed with investigative and/or prosecution powers which mainly concern natural persons. Sanction mechanisms, when available, usually are of administrative nature. Most ACAs are involved in developing national anti-corruption strategies, whereas a minority of them are in charge of managing asset and interest declarations. The report also suggests that, globally, the adoption of codes of conduct is more prevalent than risk mapping, and that both are rarely mandatory in the private sector. Finally, it indicates that ACAs wish to further benefit from exchanges of best practices and information at an operational level, and to network with their foreign counterparts.

The results of this global mapping will help to develop an international directory of ACAs, and guide the NCPA's search for better ways to implement peer-to-peer cooperation in the field of corruption prevention. With the support of international organizations, and the commitment of its members, the NCPA is determined to create a dynamic hub for connecting ACAs across the world.

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1. Introduction

The emergence of anti-corruption authorities as key players at the global level

Since the 1990s, States have adopted numerous international and regional treaties, agreements, and resolutions on the fight against corruption (UNODC, 2005). This profusion of legal instruments reflects a widespread concern about the harmful political, social and economic effects of corruption, a renewed awareness of its transnational nature, as well as a collective commitment to tackle this phenomenon and its enabling factors. In this context, national anti-corruption authorities (ACAs), i.e. public bodies with a specific mandate to combat and prevent corruption, have become a subject of growing interest (De Jaegere, 2012). As a matter of fact, international legal instruments often require the creation of ACAs, for instance:

- In its Article 6, the United Nations Convention against Corruption (UNCAC) stipulates that States Parties should ensure the existence of a preventive anti-corruption body or bodies. Likewise, UNCAC's Article 36 provides for the "existence of body or bodies or persons specialized in combating corruption through law enforcement".

Moreover, regional instruments also recognize the usefulness of establishing domestic institutions dedicated to addressing corruption:

- The Council of Europe's Criminal Law Convention on Corruption contains provisions on entities specialized in the fight against corruption.
- The Inter-American Convention against Corruption supports the creation of oversight bodies tasked with preventing, detecting and eradicating corrupt acts.
- The African Union Convention on Preventing and Combating Corruption emphasizes that States Parties should undertake to establish, maintain and strengthen independent national anti-corruption agencies.
- The Arab Convention against Corruption sets out that States Parties should ensure the existence of an agency or agencies, as needed, to prevent and fight corruption, and that such agency or agencies should be provided with the necessary independence, material resources, specialist staff, and training so as to be able to carry out their duties effectively.

Enshrined in various inter-governmental conventions, the conception of ACAs as “a model institutional response” to corruption has been endorsed by international organizations, financial institutions, donor agencies and NGOs (De Sousa, 2009). Indeed, ACAs came to be seen as a valuable policy tool to grapple with increasingly sophisticated forms of corruption, which failed to be curbed by traditional law enforcement agencies or judicial authorities (Recanatini, 2011; Sekkat, 2018). Consequently, more and more countries chose to set up ACAs as part of their governance reforms (UNDP, 2011).

These new actors have emerged as key players in the global anti-corruption arena. In general, ACAs are:

- responsible for the development and implementation of anti-corruption policies at the national level;
- entrusted with the pivotal mission of translating international standards into domestic action;
- focal points for evaluating national compliance with international legal instruments, and can be held accountable for their States’ concrete results in achieving integrity.

This can lead to significant expectations, and occasional criticism, concerning their performance (Schütte, 2017). International monitoring mechanisms, including GRECO and the OECD, have produced a valuable body of assessments and recommendations on the establishment and functioning of ACAs. A considerable body of literature also discusses the impact of ACAs, and ways to measure it. Although evaluating the real outcomes of ACAs might be difficult, even contentious in certain cases, one thing is clear: ACAs are central institutional actors, which operate on the front line of the fight against corruption. In their daily work, facing multiple challenges, ACAs mobilize continuous efforts to counter corruption and the opportunities for its occurrence. As pillars of national integrity systems, the importance of ACAs’ role cannot be overstated.

The lack of information about ACAs

Nevertheless, accurate, complete, and up-to-date information about ACAs is rather hard to find. Most comprehensive studies about ACAs were conducted in the early 2010s.¹ One decade later, legal and institutional frameworks have palpably evolved. Furthermore, a number of publications focus on ACAs in particular regions, for example in Asia Pacific (Transparency International, 2017) or in some Sub-Saharan African countries (Doig, Watt and Williams, 2005) or analyse a selected sample of ACAs worldwide (Heilbrunn, 2004; OECD, 2008). A global overview of ACAs, embracing the diversity of anti-corruption strategies around the world, appeared to be lacking. Attempting to fill this gap, the French Anti-Corruption Agency (AFA), in partnership with GRECO, the OECD, and the Network of Corruption Prevention Authorities (NCPA), carried out a global mapping of national authorities tasked with preventing and fighting corruption.

The development and objectives of the global mapping of ACAs

Launched in June 2019, the project's objective is to gather, centralize and disseminate information about the various anti-corruption institutions established around the world. This extensive data collection aims at helping anti-corruption practitioners to:

- better understand ACAs' characteristics and specific needs;
- identify common trends and challenges;
- explore concrete avenues for cooperation between and with ACAs.

Besides, the project favours a knowledge-based approach to international cooperation on anti-corruption through research and analysis. In order to design and implement efficient cooperation activities, it is crucial to know who the relevant actors are, what can be asked from them in light of their mandates, and how to contact them. The mapping project endeavours to strengthen peer-to-peer cooperation and mutual capacity building by providing a global picture of current ACAs, and contributing to the creation of an international directory. Based on the

¹ For example, in 2010, the World Bank, in collaboration with the UNODC, the US State Department and the European Commission, have launched an initiative aimed at collecting systematic data and information about ACAs. A diagnostic survey was developed and its results published on an online platform (www.acauthorities.org). The ACAs' profiles available on this platform constitute a very valuable resource. However, they have not been updated in recent years.

contact details of ACAs' staff members in charge of international cooperation, such a directory could facilitate operational exchanges.

The preliminary findings of this global mapping project were discussed during a special event, co-sponsored by France, Italy, Egypt, the OECD, and the Council of Europe, at the Eighth session of the Conference of the States Parties to the UNCAC in Abu Dhabi on 17 December 2019. The event brought together high-level representatives from UNODC, GRECO and OECD, as well as leaders from AFA, the Italian National Anti-Corruption Authority (ANAC), the Office of the Comptroller General of Brazil (CGU) and the Indonesia Corruption Eradication Commission (KPK).

The structure of the analysis report

Drawing on these discussions, the present report illustrates and analyses the sum of findings of the project. After a brief description of the methodology used to produce the global mapping of ACAs and an outline of the respondents, the report will examine the data provided by participating ACAs on their main powers and missions, on the scope of anti-corruption standards in their countries, and on their expectations towards international cooperation.

2. Methodology

The design of an international online survey

The global mapping of ACAs is based on the results of an international online survey conducted between June and December 2019. This quick survey, which took approximately five minutes, was composed of a limited set of straightforward questions that specifically focused on the missions and prerogatives of ACAs. The survey was available both in English and in French. Our goal was to gather the answers of as many respondents as possible. In view of ensuring broad participation, we have chosen to privilege simplicity and alleviate the data collection burden. Experience shows that ACAs are often requested to fill out questionnaires and to provide all sorts of data for evaluation purposes. With that in mind, we have tried to keep our survey short and to the point.

The identification of relevant contact points

In the first phase of the project, the survey was sent by email to all the national contact points on corruption prevention listed in the On-line Directory of Competent National Authorities under the UNCAC. It turned out that many email addresses were not valid. After this first general message using the aforementioned directory, individualized messages were sent to different contact points in 193 States and territories. These contact points were identified thanks to extensive Internet research. In total, 323 targeted emails were sent.

The role of international gatherings, regional platforms and individual ACAs

Representatives of ACAs were also contacted in person at international anti-corruption events like GRECO's plenary sessions and meetings such as the OECD Working Group on Bribery, the G20 Anti-Corruption Group, and the UNODC Open-ended Intergovernmental Working Group on the Prevention of Corruption. The survey was also shared following official visits of ACAs' delegations to AFA. Moreover, regional anti-corruption platforms and networks were instrumental in disseminating the survey among their members. In addition, some ACAs proactively shared the survey with their national partners involved in the fight against corruption. For instance, one respondent translated the survey into Spanish so it would be easier for other authorities in its country to participate.

As of April 2020, **171 national authorities in 114 countries and territories** have contributed to the global mapping, representing a significant number of ACAs worldwide.

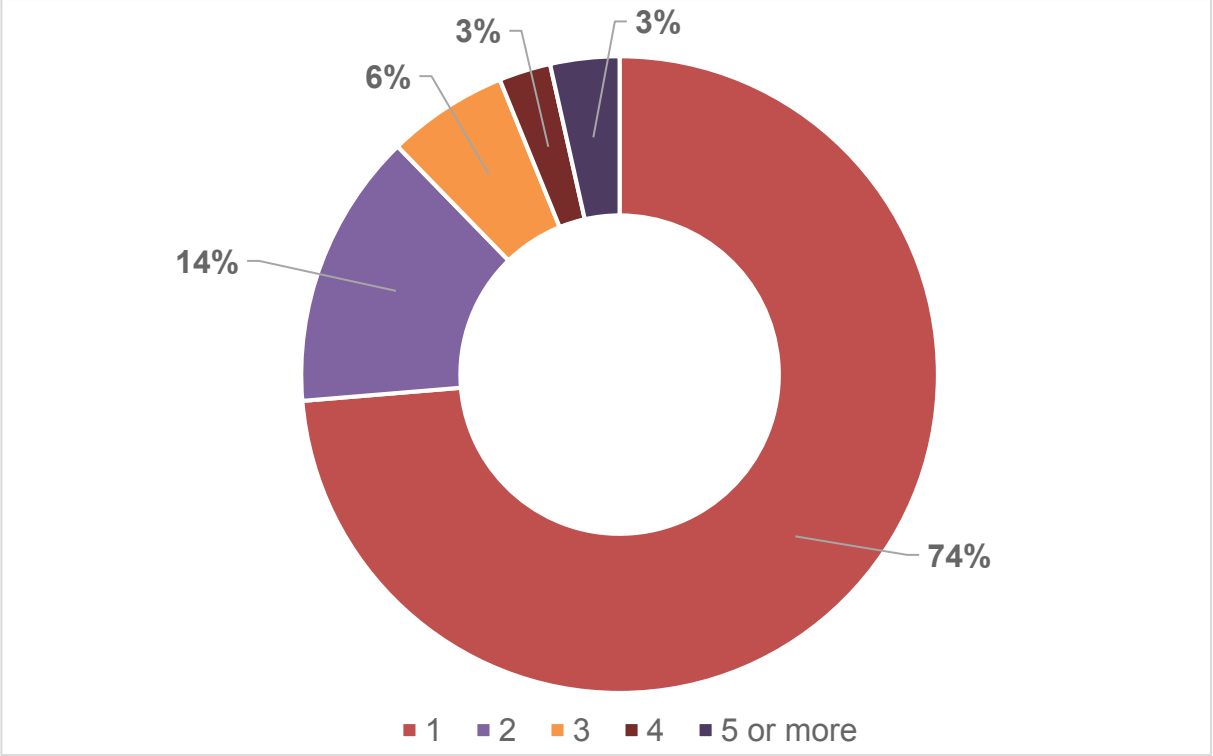
3. Respondents

The diversity of anti-corruption institutional arrangements

The variety of ACAs that participated in the global mapping project testify to the diversity of choices made by States when implementing their international anti-corruption obligations. The UNCAC does not prescribe whether responsibility for institutional focus on corruption prevention should rest in a single agency or in more than one agency (UNODC, 2009). There is no universally accepted model for shaping national integrity systems, but the centralized single-agency approach to the anti-corruption mandate seems to be predominant. In

a clear majority of countries (84 out of 114), a single authority answered to the survey (see Figure 1).

Figure 1. Number of respondent authorities per country



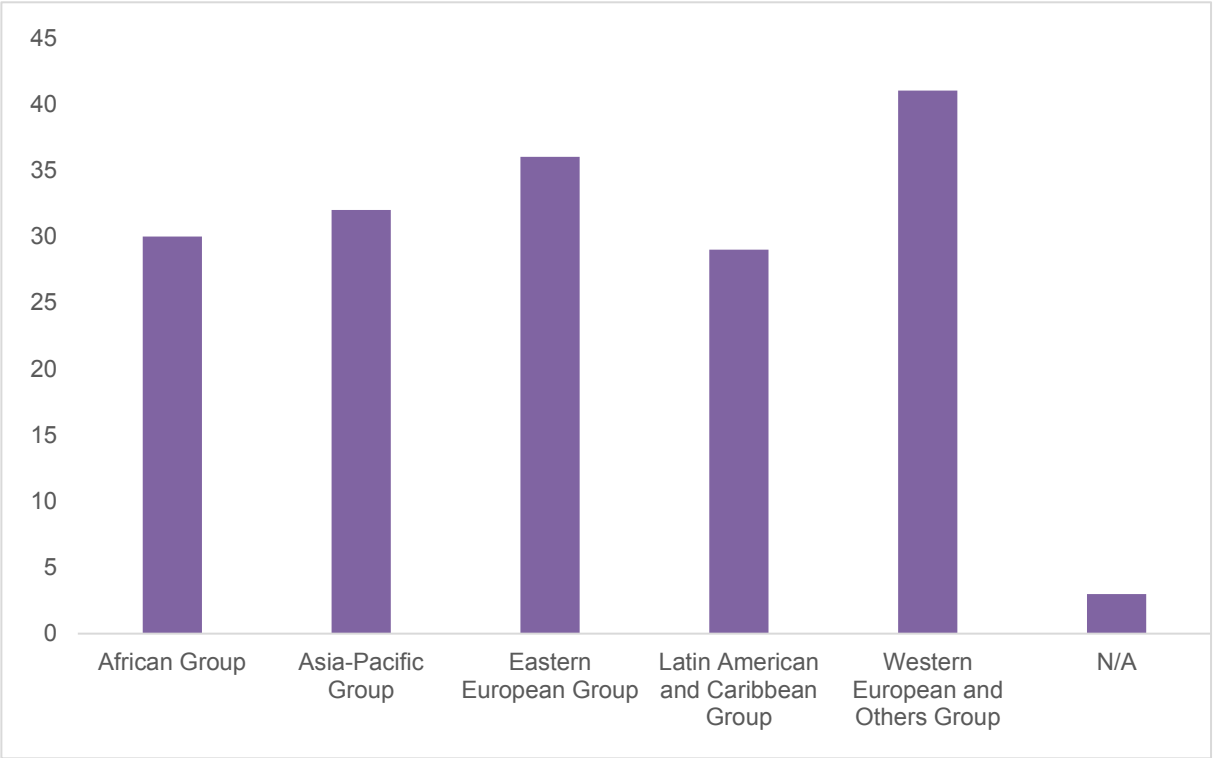
Nonetheless, in a number of countries (14 percent), anti-corruption functions appear to be split between two distinct entities. In a minority of countries (14 out of 114), multiple agencies (3 or more) are in charge of combating and preventing corruption. On the one hand, the plurality of respondents can indicate a certain fragmentation of national anti-corruption systems in which there is no strong leading organization to coordinate the country’s efforts. On the other hand, the participation of several authorities from the same country can also reveal that anti-corruption responsibilities are distributed in a horizontal, yet integrated, way. In any case, States can consider different options to comply with UNCAC. Anti-corruption institutional arrangements may change depending on each State’s political context, administrative environment and resource envelope (UNDP, 2011).

The global reach of the survey

Regarding the reach of the global mapping of ACAs, it can be pointed out that there is a relatively balanced representation of all United National Regional Group of Member States,

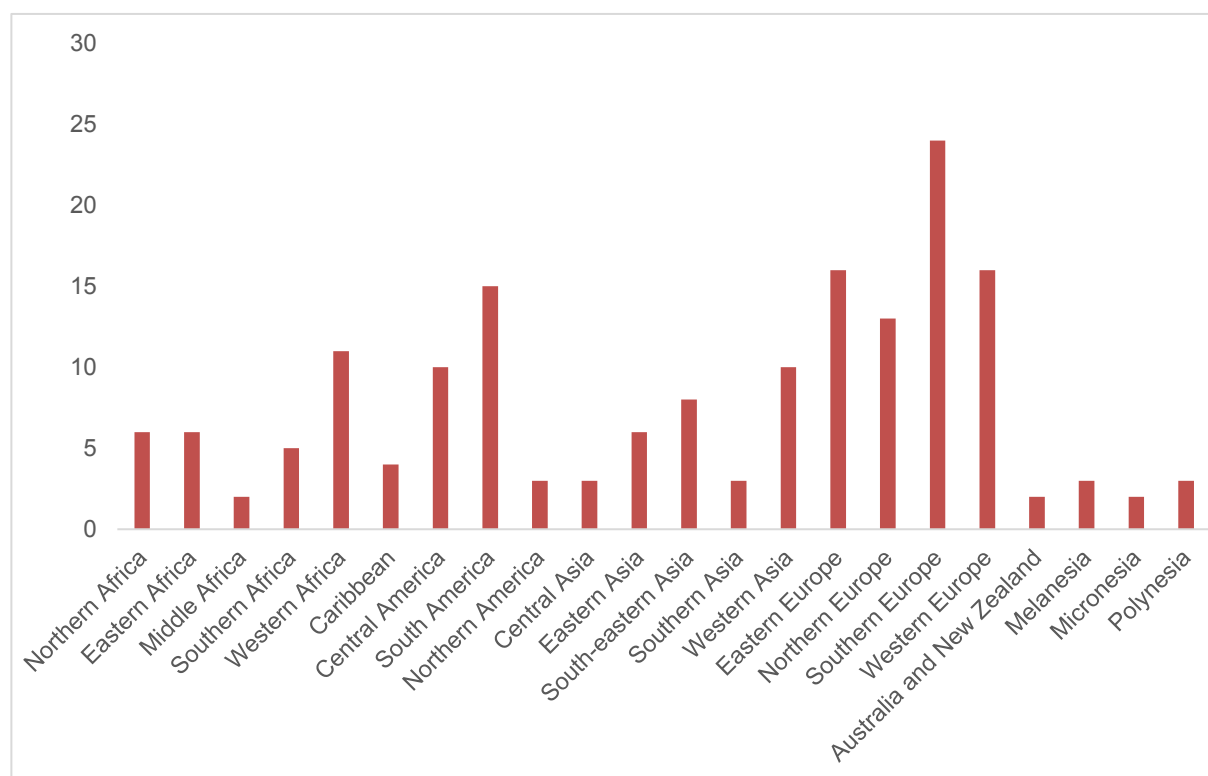
even though a larger number of respondents (41 out of 114) come from States belonging to the Western European and Others Group (see Figure 2).

Figure 2. Number of respondent authorities per United Nations Regional Group of Member States



Besides, it can be highlighted that ACAs from every geographic region of the world have participated in the survey (see Figure 3). The ACA model seem to be fairly pervasive in Southern Europe compared to other regions. This might be explained by the fact that many Southern European countries have engaged in anti-corruption reforms as part of their democratic transition and progressive integration into the European Union (Tomić, 2019). Practical considerations should also be taken into account: geographical proximity and already well-established relations made it easier for us to involve European ACAs in this initiative. Furthermore, the EPAC/EACN Network, which brings together ACAs and police oversight bodies from Council of Europe and EU Member States, helped to disseminate the survey in Europe by encouraging their members to participate.

Figure 3. Number of respondent authorities per geographic region



The respondents' membership in GRECO and adoption of the OECD Anti-Bribery Convention

Moreover, it can be observed that 43 percent of respondents are from GRECO Member States (see Figure 4), and 48 percent are from countries that have adopted the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (see Figure 5). Given that GRECO and the OECD are partners of this global mapping project, the participation of countries that have joined their anti-corruption instruments is understandable. Moreover, as already mentioned, States that have adhered to international anti-corruption conventions tend to have set up specialized anti-corruption bodies to comply with their legal obligations. Thus, respondents are more likely to be from such States.

Figure 4. Membership in the Group of States against Corruption (GRECO)

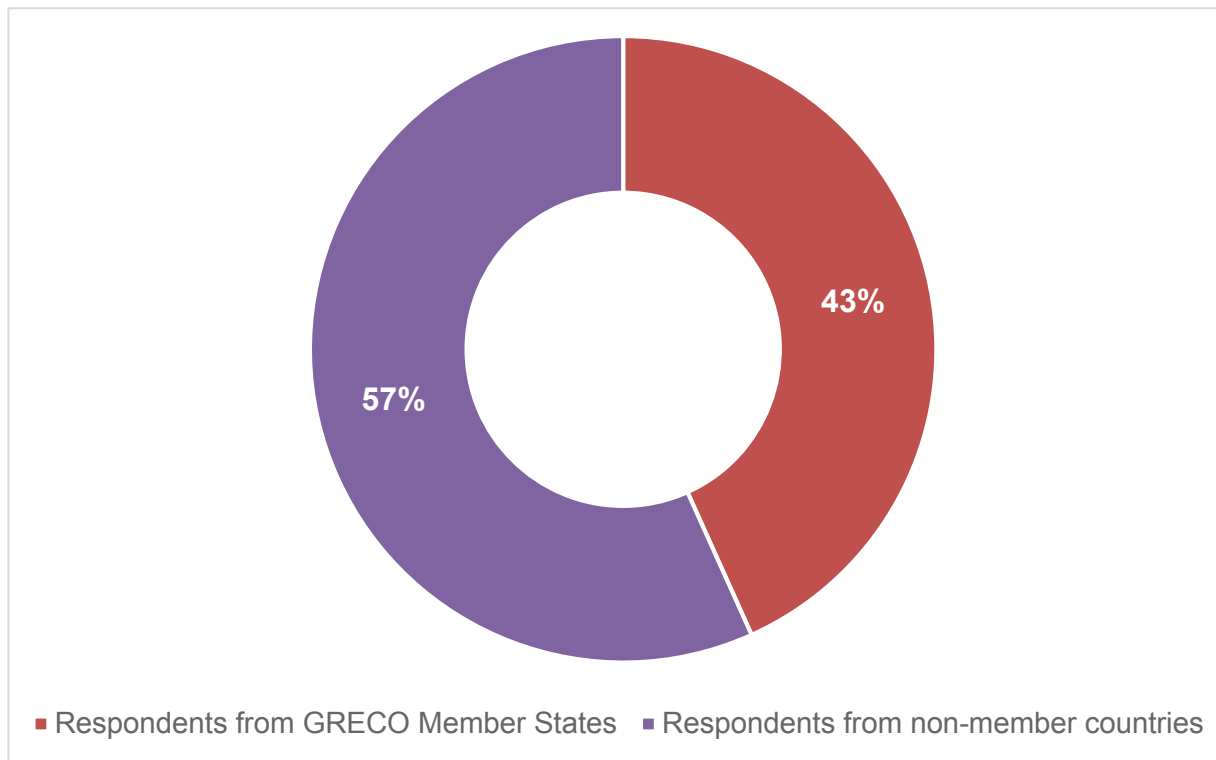
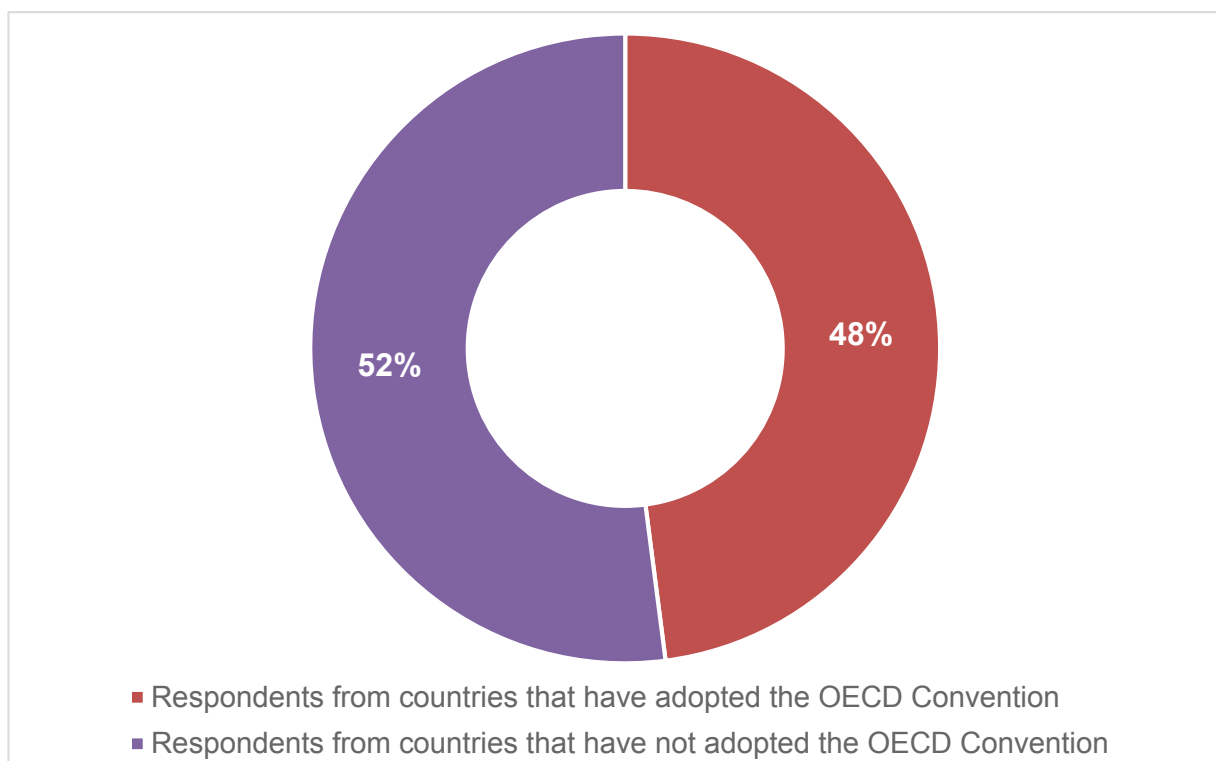


Figure 5. Adoption of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions



4. Findings

4.1. Powers of anti-corruption authorities

4.1.1. Power to investigate and prosecute

The survey shows that 63 percent of respondent ACAs (108 out of 171) are authorised to conduct investigations and/or criminal proceedings (see Figure 6). These investigations and criminal proceedings mainly concern natural persons, but legal persons also fall within the scope of 79 authorities (see Figure 7).

Figure 6. Is your organisation authorised to conduct investigations and/or criminal proceedings?

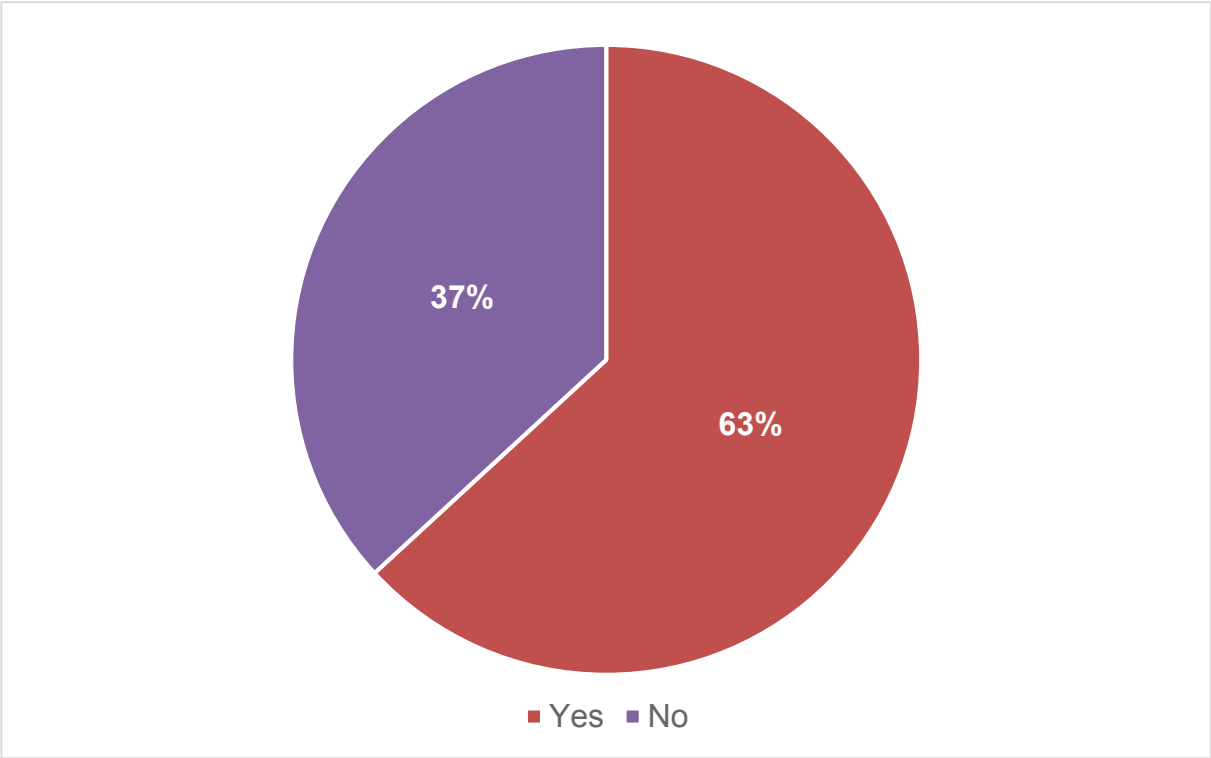
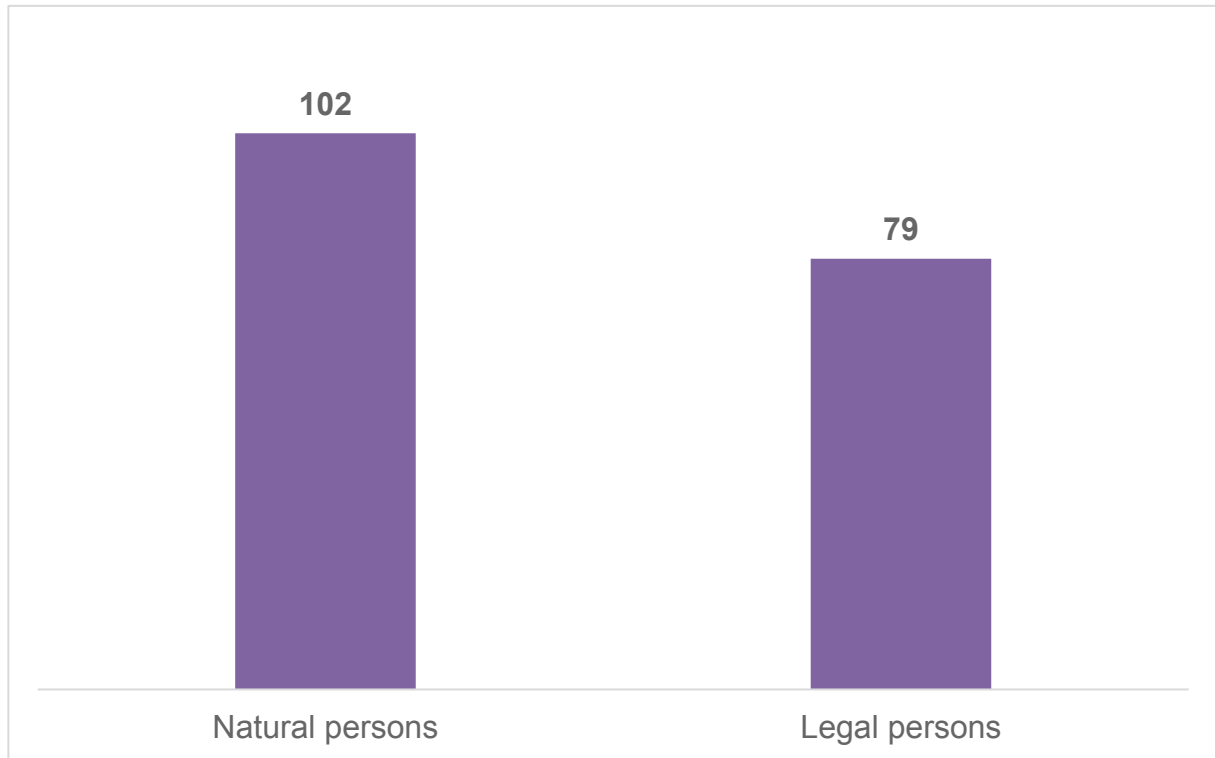


Figure 7. The investigations and/or criminal proceedings carried out by your authority concern:



The distinction between repressive and preventive ACAs

Many studies divide ACAs between those that are endowed with investigative and/or prosecution powers, which can be usually associated with law enforcement agencies and the requirements of UNCAC's Article 36, and the ones that are entrusted with preventive, educational and informative missions set out in Article 6 (De Sousa, 2009; Kuris, 2015). This distinction can be perceived in the survey's findings, which indicates that purely preventive ACAs (63 out of 171 respondents) are slightly less prevalent.

The subject of investigation and prosecution

Besides, the survey suggests that ACAs are more used to investigate and prosecute individuals for corruption than companies. This might be evidence of a need to further enforce the responsibility of legal persons for corruption in accordance with Article 2 of the OECD Anti-Bribery Convention.

4.1.2. Power to sanction

The availability and nature of sanction mechanisms

Concerning ACAs' power to sanction, it can be highlighted that less than half of the respondents (48 percent) have sanction mechanisms, and that these mechanisms are mainly administrative (in 56 authorities out of the 82 respondents with sanctioning powers) (see Figures 8 and 9). Actually, administrative sanctions seem to be a common tool to punish failure to comply with anti-corruption norms, in particular with prevention obligations that do not necessarily entail criminal liability. Administrative sanctions also might favour a more timely enforcement of anti-corruption rules. In contrast, penal sanctions are typically pronounced after longer proceedings.

Figure 8. Does your organisation have any sanction mechanisms?

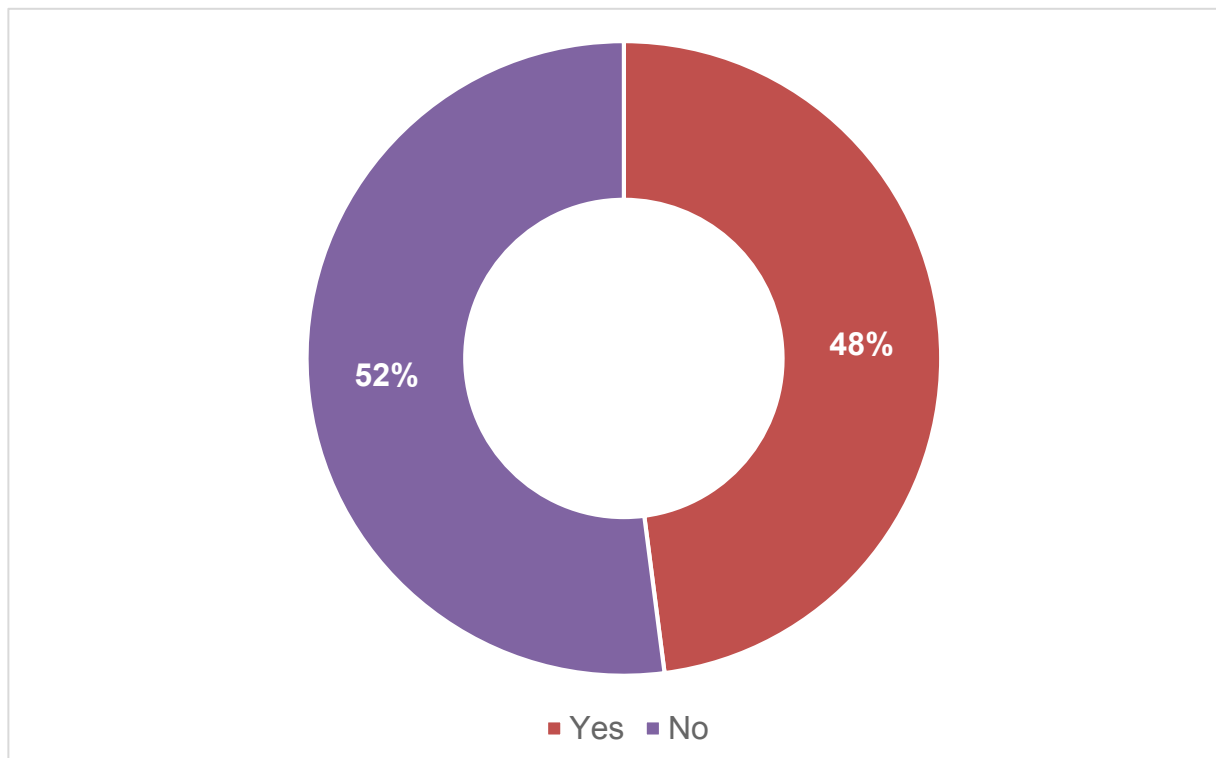
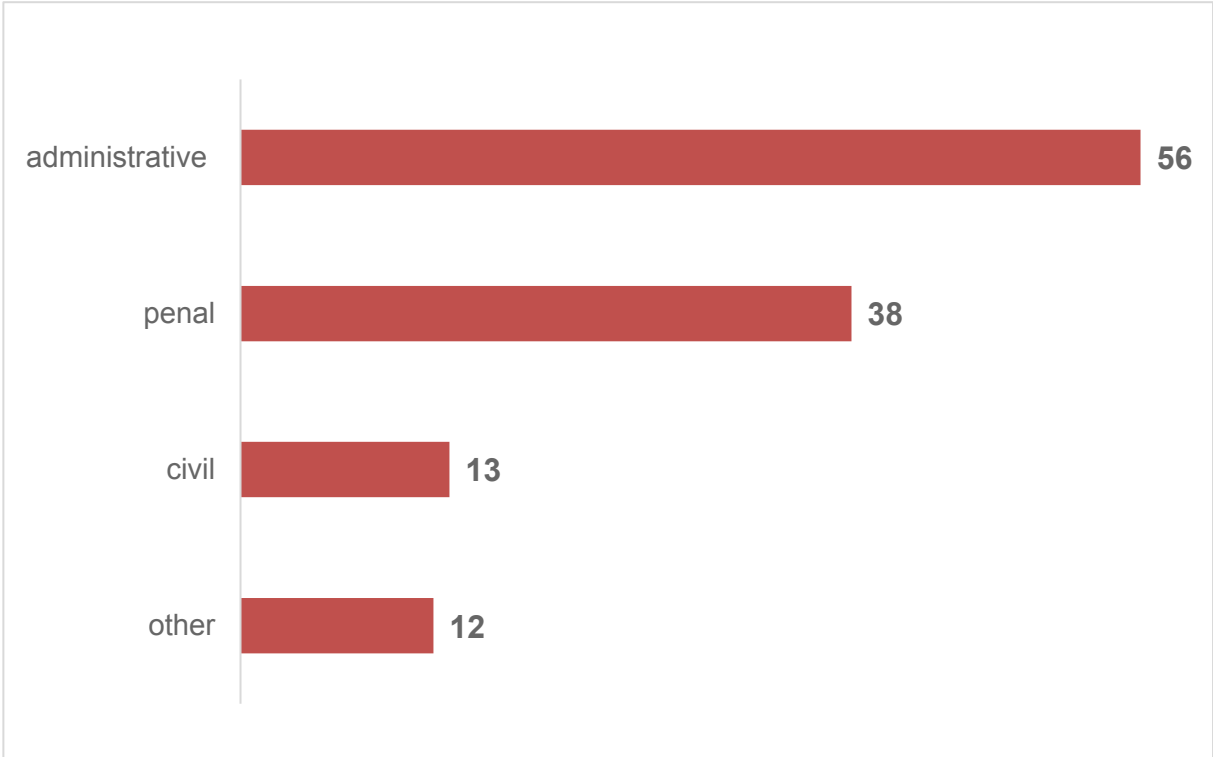


Figure 9. The type of sanction mechanism(s) held by your organization is/are:



4.2. Missions of anti-corruption authorities

4.2.1. Developing national anti-corruption strategies

The prevalence of national anti-corruption strategies and the role of ACAs

When it comes to the missions entrusted to ACAs, it can be underlined that a majority of respondents are tasked with designing and implementing national anti-corruption strategies (see Figure 10). Some organizations lead these processes (52 percent), whereas others provide inputs as contributors (48 percent) (see Figure 11). In the latter case, an inter-ministerial coordinating body or task force might preside over the creation of the national strategy. Few respondents (9 out of 171) indicated that there is no national anti-corruption strategy in their countries (see Figure 12). The survey seems to confirm that many governments have chosen to fulfil the requirements of UNCAC, in particular of Article 5 that calls upon States parties to adopt effective, coordinated anti-corruption policies, through the development of a national anti-corruption strategy or action plan (UNODC, 2019).

Figure 10. Is your organisation involved in the creation and execution of a national strategy on anti-corruption?

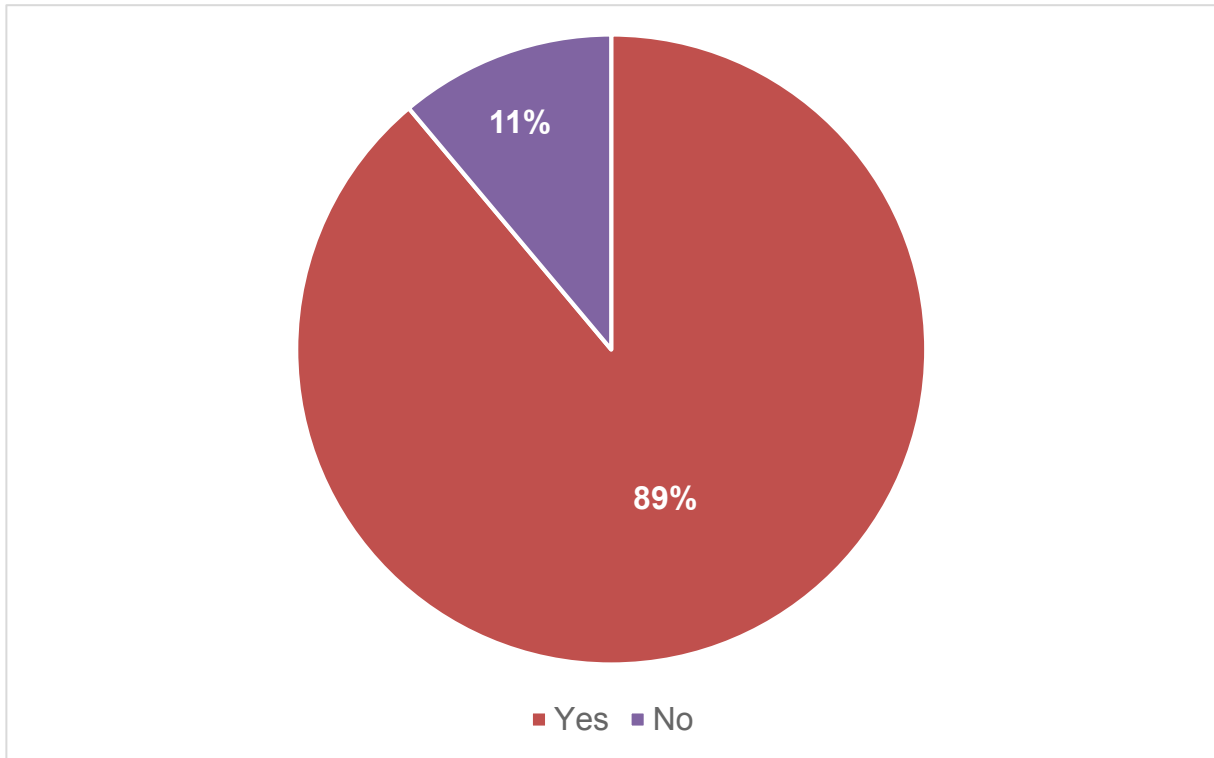


Figure 11. Your organisation is involved in the national anti-corruption as:

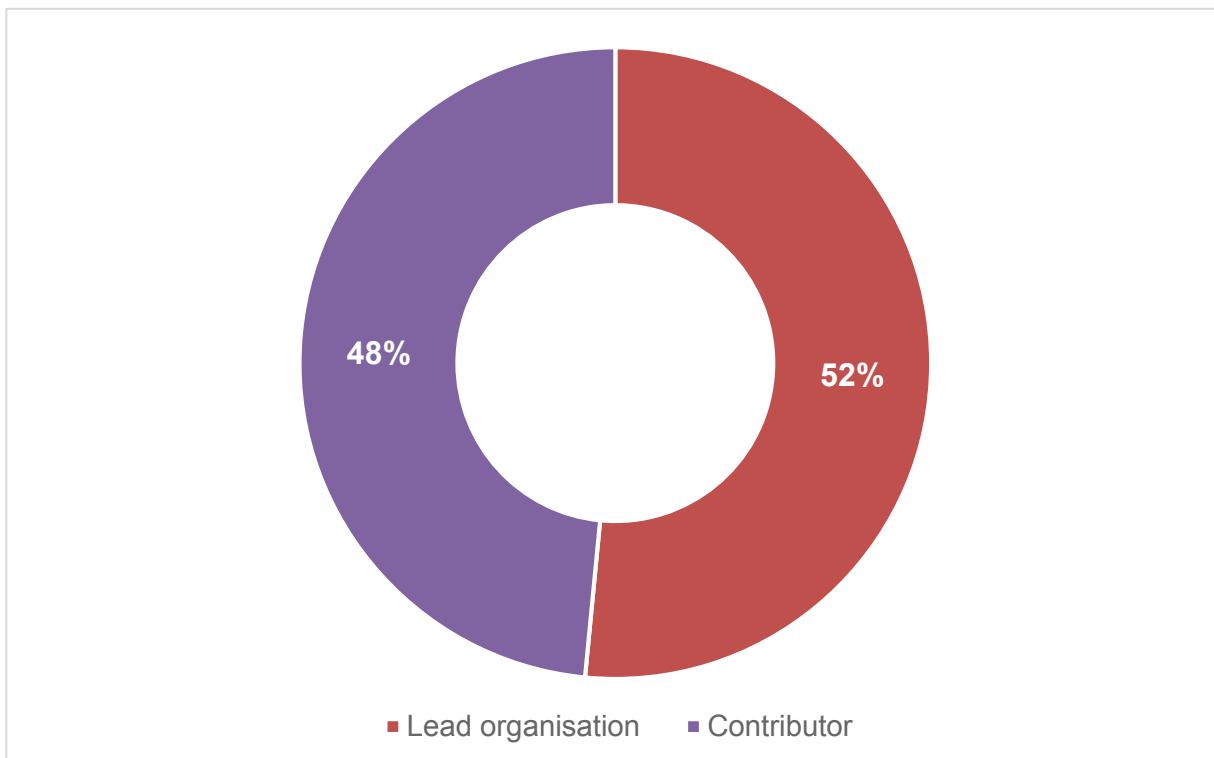
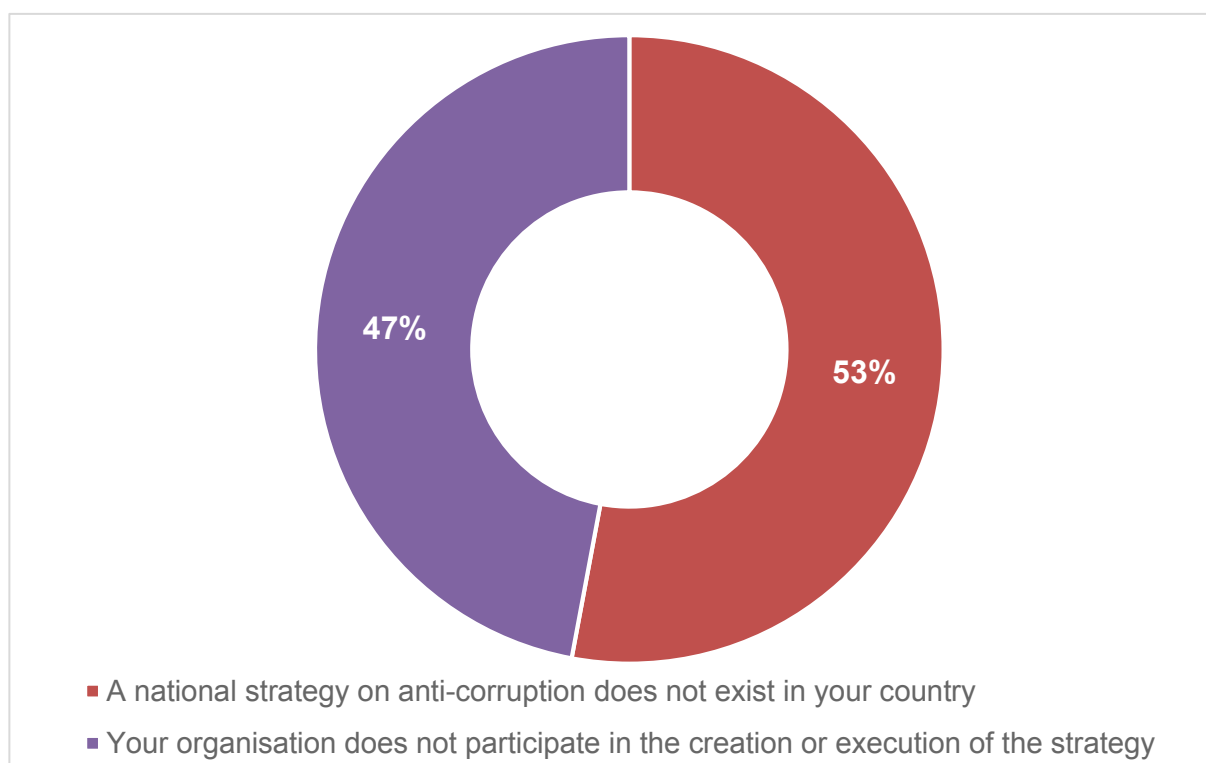


Figure 12. Your organisation is not involved in the national anti-corruption because:



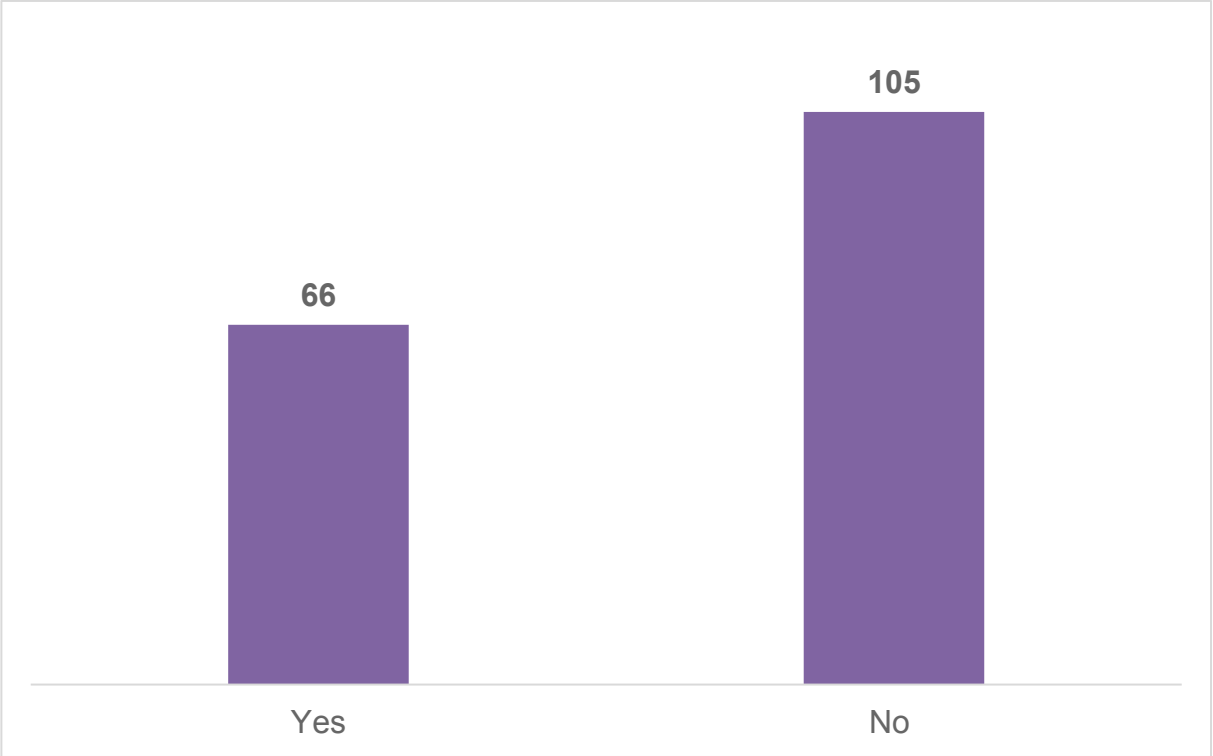
The added value of ACAs in ensuring the effectiveness of anti-corruption strategies

Experience shows that the effectiveness of national anti-corruption strategies often rely on the accurate assessment of a country's situation. For instance, the identification and examination of high-risk sectors for corruption can help a State to set strategic priorities and allocate resources where most needed. In this sense, ACAs' expertise can be particularly beneficial: their specialised knowledge on corruption and integrity risks may be mobilised to support evidence-based problem analysis and to devise appropriate anti-corruption measures. Furthermore, ACAs may be involved in evaluating national anti-corruption strategies. According to the UNODC's guidelines, there should be reasonably frequent periodic evaluations of relevant strategies, instruments, and measures with a view to determining their adequacy to prevent and fight corruption (UNODC, 2009). Likewise, the OECD (2017) recommends that, as part of their strategic approach to integrity, States develop benchmarks and indicators, and gather credible data on the overall effectiveness of their national integrity

systems. Once again, ACAs' specialized knowledge might contribute to inform and perform such evaluations.

4.2.2. Managing asset and interest declarations

Figure 13. Is your organisation in charge of managing the asset and/or interest declarations of senior public officials?



The role of asset and interest declarations in combating corruption

A number of ACAs are assigned to controlling the probity of public officials and to enhancing the transparency of public decision-making. Indeed, 39 percent of respondents (or 66 out of 171) stated that their organizations are in charge of managing asset and/or interest declarations of senior public officials (see Figure 13). Such declarations are widely considered as a useful tool to prevent illicit enrichment and conflicts of interest, and are therefore part of the anti-corruption arsenal of many countries (OECD, 2011b). In particular, the concealment of the proceeds of corruption may be prevented by asset disclosure systems that closely monitor the wealth variations of individual politicians and civil servants (UNODC, 2018).

Additionally, asset and interest declarations may help to dissuade decision-makers from misconduct and strengthen ethical standards. By improving transparency, one of the goals pursued by disclosure systems is to increase the trust of citizens in their leaders. In light of the expected benefits of disclosure systems, many international and regional organisations recommend their implementation (OECD, 2011b, p. 23-25). The role of declarations in promoting integrity among public officials is also acknowledged in UNCAC's Article 8.

The management of disclosure systems and its integration to broader anti-corruption functions

Although asset and interest declarations can be useful for detecting and preventing corruption, ACAs do not seem to be primarily responsible for their management according to the survey. The UNODC (2018) distinguishes two different types of disclosure systems, with public official being required to submit their declarations either to the institution that employs them or to a central authority tasked with collecting asset and interest declarations. A variety of public bodies might perform this function, including supreme audit institutions, ACAs, tax authorities, and separate systems might be in place for certain categories of officials, such as magistrates or parliamentarians. Hence, in several countries, ACAs are not the competent bodies for verifying asset and interest declarations. To unleash the full potential of declarations as anti-corruption tools, cooperation between ACAs and oversight bodies in charge of disclosure systems could be further developed.

4.3. Dissemination of anti-corruption standards

4.3.1. Codes of conduct

The survey's focus on mandatory key standards

In addition to reviewing ACAs' powers and missions, the survey aims at measuring the degree of dissemination of anti-corruption standards at the global level. With this purpose in view, it includes specific questions on the existence and scope of obligations concerning codes of conduct and risk mapping in the respondents' countries. These two measures are singled out because they are largely considered as the cornerstone of a successful anti-corruption

compliance programme, both in public and private organisations (AFA, 2017). Moreover, the survey focuses on mandatory standards, which are frequently enforceable and thus more consistently respected. In fact, for the public and private sectors, legal obligations can be seen as important drivers of a culture of integrity within an organisation (World Economic Forum, 2018).

The main features of an anti-corruption code of conduct

Recommended by numerous international and national authorities, the adoption of an anti-corruption code of conduct demonstrates that top management has decided to commit a given public or private organisation to preventing and detecting corruption. The code should:

- be clear, unconditional and unambiguous;
- cement the organisation's ethical values and principles;
- describe and illustrate the various types of behaviour that are not acceptable as they could lead to corruption or related offenses;
- provide the basis of disciplinary action in the event of violations (UNDOC, 2009).

Recognizing the fundamental role of this document, the NCPA Network (2019) released a technical guide to assist practitioners in developing and implementing an effective code of conduct. This guide, which was elaborated under the presidency of the Italian Anti-Corruption Authority (ANAC), compiles the best international practices in the field, and offers concrete advice for ACAs.

The widespread dissemination of the obligation to establish a code of conduct

The survey suggests that most countries are in line with this anti-corruption standard. Three quarters of respondents say that having a code of conduct is mandatory in their countries (see Figure 14). This obligation is particularly prevalent in the public sector (see Figure 15). This can be explained by the fact that, under UNCAC's Article 8, States should endeavour to apply codes of conduct for the correct, honourable and proper performance of public functions. Conversely, standards applicable to the private sector are rarely compulsory. Only a minority of respondents reported that drafting a code of conduct is a legal requirement for companies in their countries.

Figure 14. Is there an obligation to establish a code of conduct in your country?

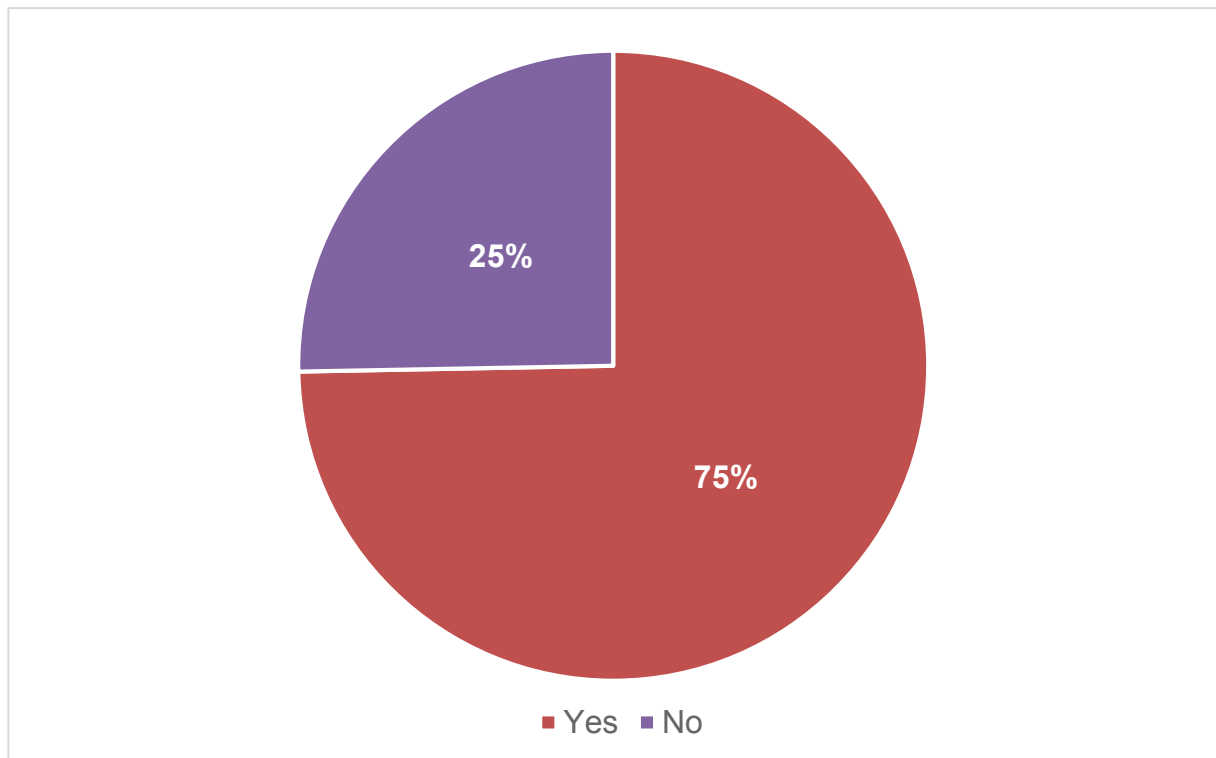
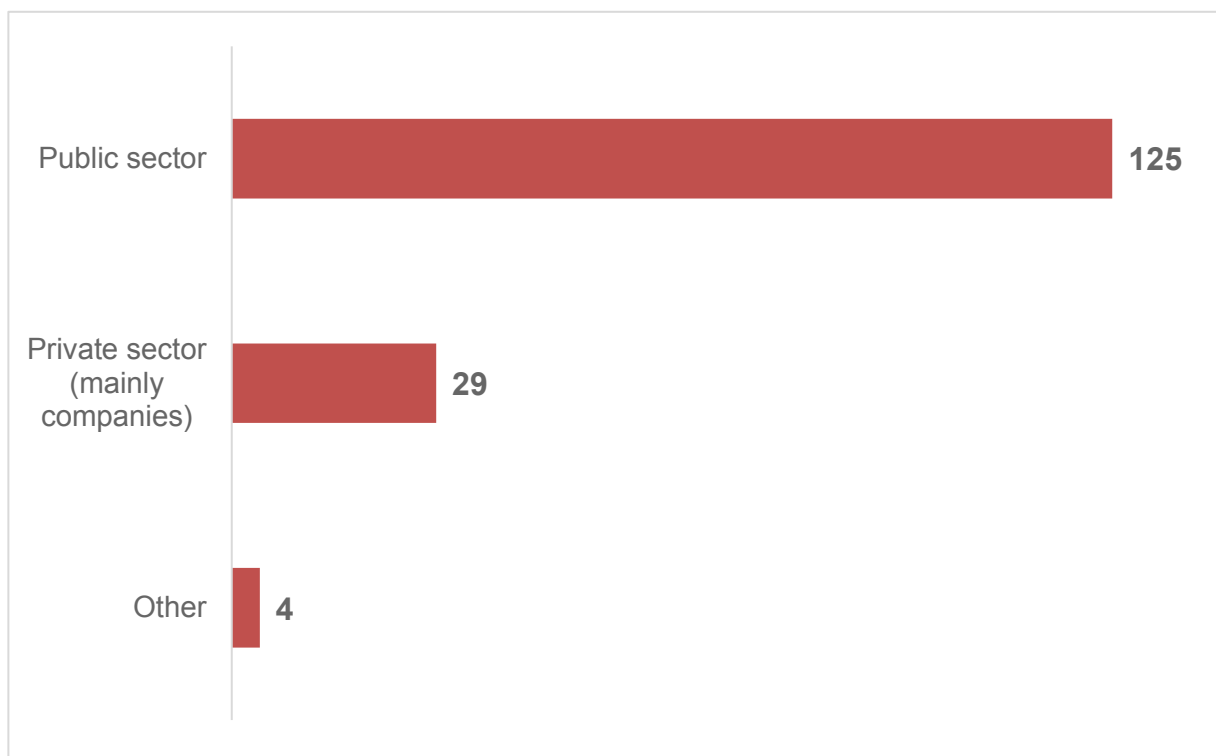


Figure 15. The obligation to establish a code of conduct concerns



Besides, the survey reveals that, in a few cases, respondents from the same country give contradictory answers regarding national obligations. This could attest to a lack of common knowledge or interpretation of anti-corruption standards at the domestic level. Strengthening coordination and exchanges between national agencies could help to address these shortcomings. By regularly discussing with each other and working together, national agencies may be able to achieve a more coherent understanding of the applicable anti-corruption standards, and thereby build a more cohesive national integrity system.

4.3.2. Risk mapping

Figure 16. Is there an obligation to carry out risk mapping in your country?

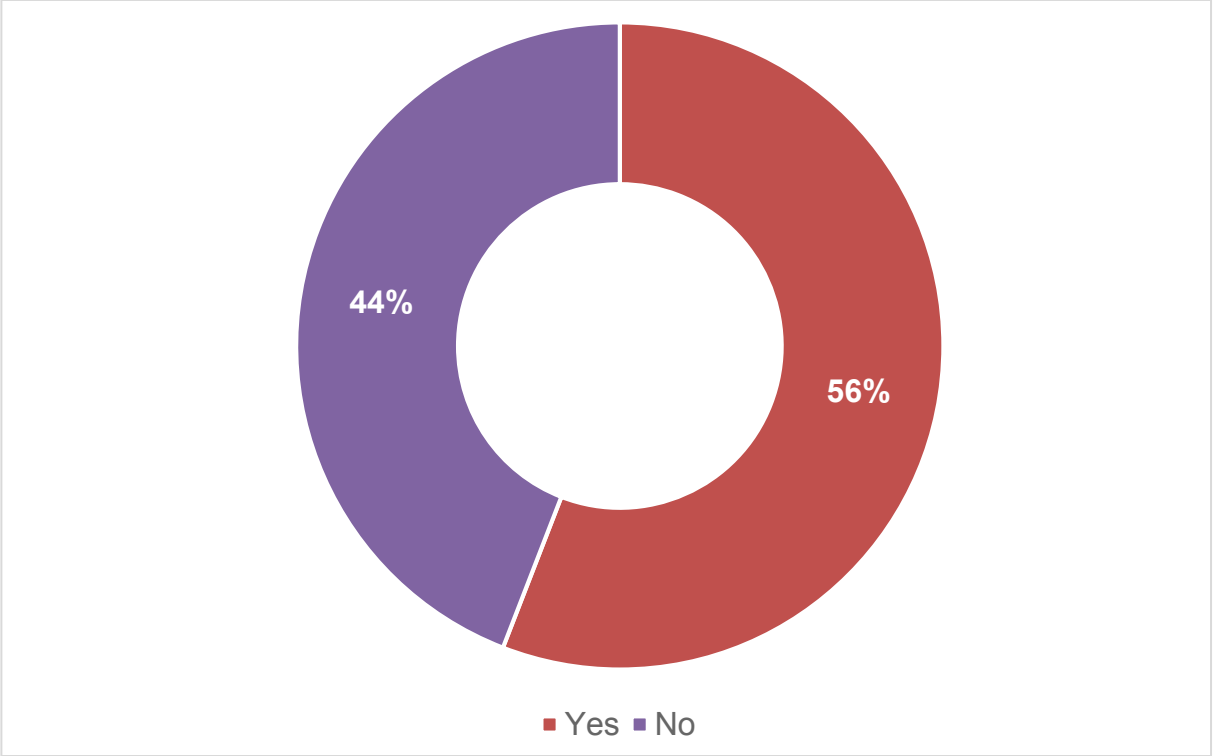
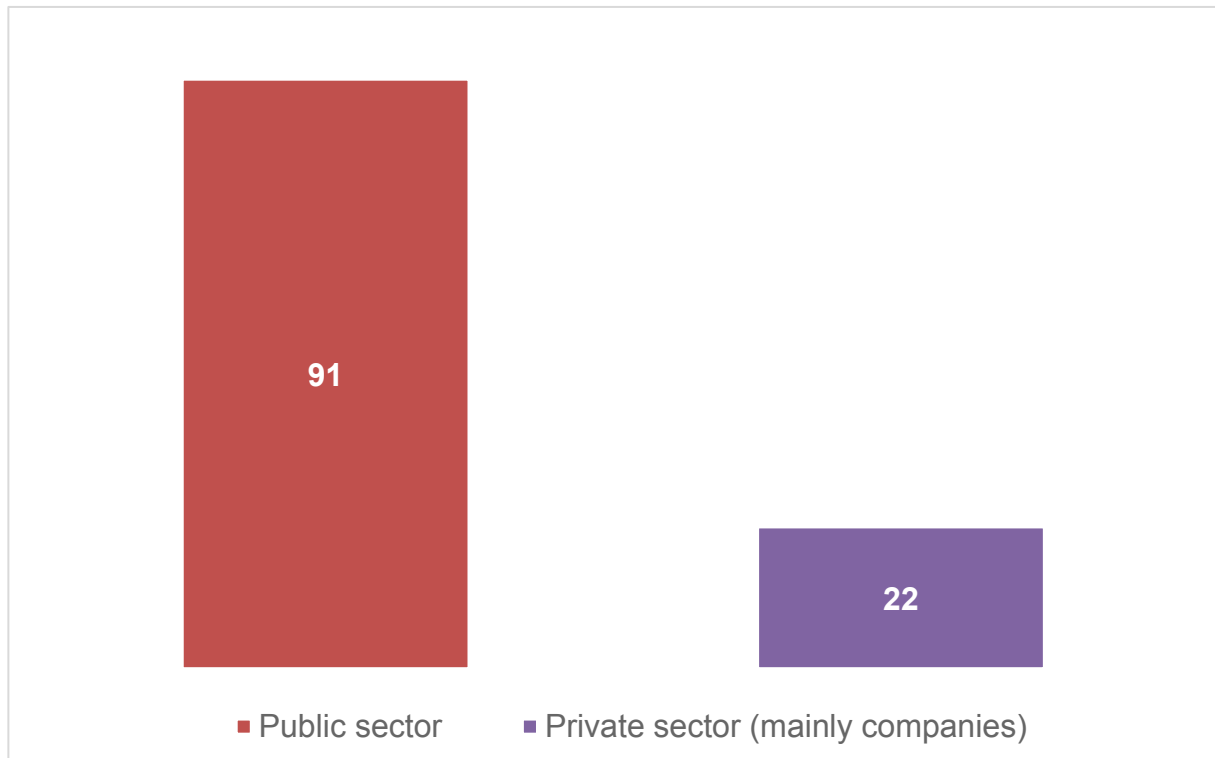


Figure 17. The obligation to carry out risk mapping concerns:



The limited dissemination of the obligation to carry out risk mapping

The survey shows that, in comparison with codes of conduct, risk mapping is not such a widespread practice at the international level. A little over half of respondents (56 percent) pointed out that carrying out risk mapping is an obligation in their countries (see Figure 16). Only 22 respondents out of 171 specified that this obligation was applicable to both the public and private sectors, notably to companies (see Figure 17). Firstly, these findings suggest that the drafting of codes of conduct is not necessarily based on a prior identification and assessment of corruption risks, which calls into question their ability to address these risks adequately. As highlighted by various compliance experts, risk mapping is the foundation of a robust anti-corruption programme (UNODC, 2013; Transparency International UK, 2018; AFA, 2017). It is a crucial procedure that allows organisations to prevent corruption through a risk management strategy. By identifying, analysing, and prioritising the corruption risks inherent to the organisation's activities, risk mapping is instrumental in designing suitable safeguards.

The uneven dissemination of anti-corruption standards in the private sector

Secondly, the survey's results seem to confirm that, in most countries, mandatory anti-corruption standards do not concern the private sector. Corporate responsibility to detect and prevent corruption is rarely established by law. Even though some companies do introduce anti-corruption measures on a voluntary basis, the absence of legally binding commitments might make it difficult to ensure a systematic approach to compliance. To remediate the problem, the proactive role of the business community in upholding integrity, which is acknowledged by a number of international legal instruments including UNCAC's Article 12, could be further formalized at the domestic level, and harmonized at the world level. Globally, the dissemination of high anti-corruption standards, applicable to both the public and private sectors, could be a powerful means to level the playing field and to protect the whole of society from corruption.

4.4. Expectations towards international cooperation

The NCPA Network's ambition to strengthen cooperation between ACAs

The goal of this global mapping is not only to increase knowledge about ACAs, but also to improve international cooperation between ACAs. The findings of this global mapping will underpin the future strategy, development, and activities of the NCPA, a network that promotes cooperation at the operational level and exchange of information between corruption prevention authorities. Consequently, the survey tries to grasp ACA's major expectations towards this international network in order to better meet them in the near future. In this regard, the vast majority of respondents (165 out of 171) declare that they expect more exchange of best practices between peers (see Figure 18). Moreover, a significant number of respondents (118 out of 171) expressed their interest in strengthening the exchange of operational information. In the comment section of the survey, some ACAs mentioned that they would like to:

- benefit from technical assistance;
- conduct joint research projects;
- enhance synergies;
- encourage the adoption and effective implementation of common global standards.

Figure 18. What are your expectations towards an international network of corruption prevention authorities?

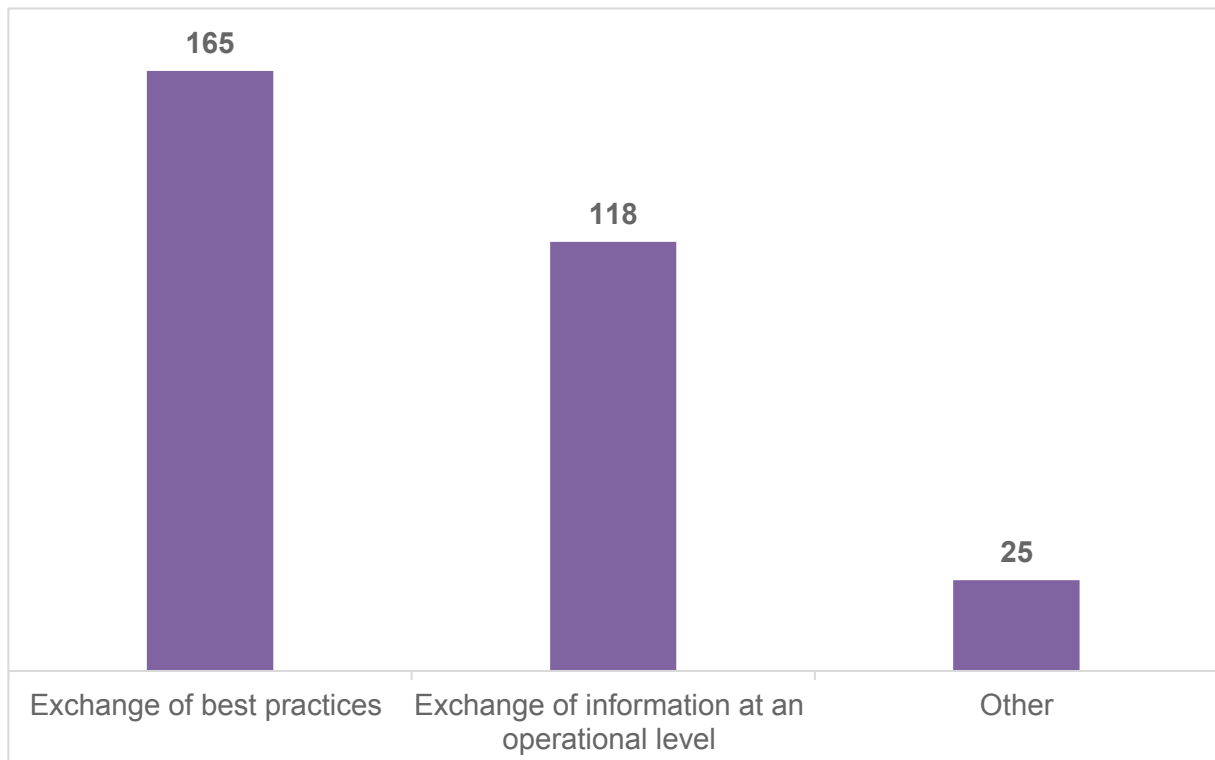


Figure 19 maps the key words used by respondents to voice their expectations. Furthermore, many respondents provided detailed information about their national systems, instructive remarks on the challenges related to international cooperation in the fight against cooperation, and valuable insights into the way forward. For instance, one respondent stated that the rigid dichotomy between judicial and administrative proceedings constituted an obstacle for cooperation, as it is harder to exchange information, provide mutual assistance, and find coordinated resolutions for corruption cases when the national authorities involved do not have the same legal nature. Another respondent highlighted that “international networking is essential to share ideas, strategies and best practices on a field of expertise as slippery, elusive and ever-changing as anti-corruption.”

Figure 19. Keywords used by respondents to define their expectations towards international cooperation

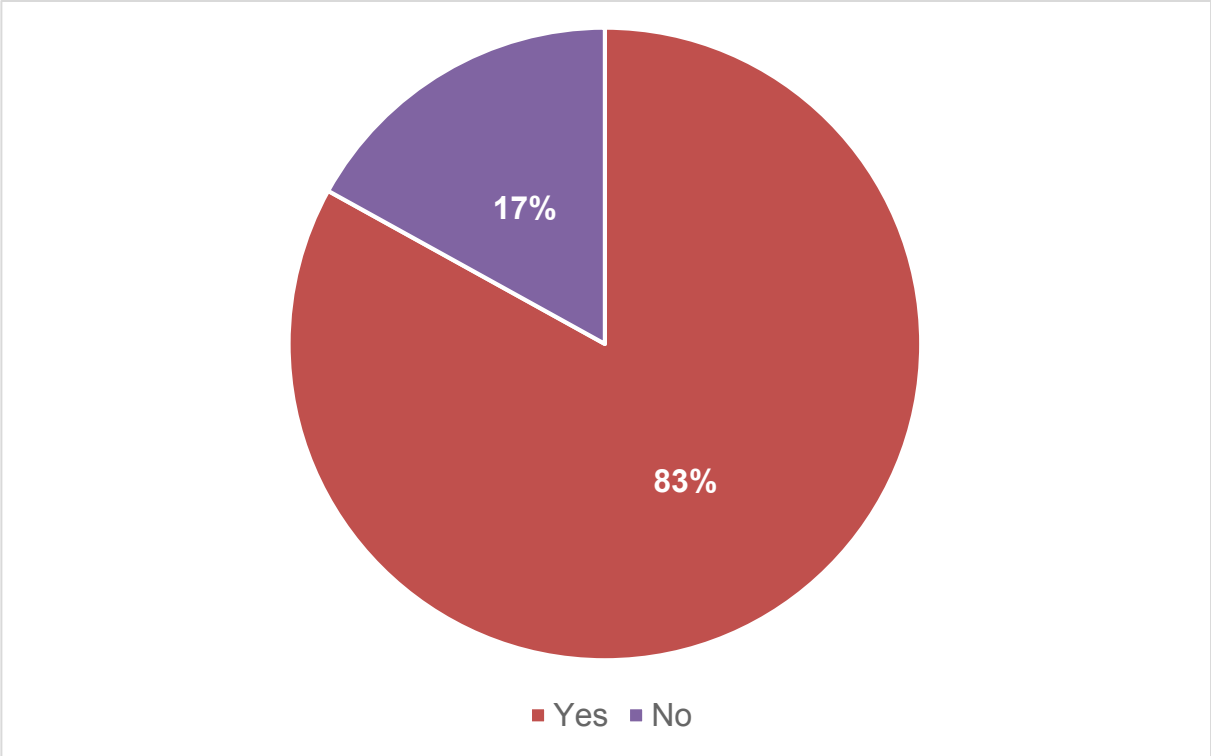


The starting point of an international directory of ACAs

Finally, the survey also gathered the contact details of respondents and asked them if they agree to share this data with their colleagues in other ACAs. A substantial majority of respondents replied positively (Figure 20), providing the basis for the future development of an international directory of ACAs. Such a directory, with up-to-date contact details, could facilitate exchanges of good practices and information between peers. In practice, this could enhance cross-border collaboration, which is one of the Jakarta Principles for ACAs², and strengthen working partnerships.

² The Jakarta Statement on Principles for Anti-Corruption Agencies, adopted in 2012 by leading national and international actors involved in preventing corruption, formulates key recommendations to ensure the independence and effectiveness of ACAs. These recommendations include fostering collaboration with relevant stakeholders at the national and international levels. The Statement can be accessed at: https://www.unodc.org/documents/corruption/WG-Prevention/Art_6_Preventive_anti-corruption_bodies/JAKARTA_STATEMENT_en.pdf

Figure 20. Do you wish to share your contact details with other anti-corruption authorities?



5. Conclusion

By illustrating and analyzing the findings of the survey, the present report provides a global picture of ACAs, with their different profiles, yet similar features. This overview reveals that:

- In most countries participating in the project, a single authority is tasked with preventing and combating corruption. This authority is often endowed with investigative and/or prosecution powers which mainly concern natural persons.
- Less than half of respondent ACAs have sanction mechanisms and those typically are of administrative nature.
- A clear majority of ACAs is involved in developing national anti-corruption strategies, either as a lead organisation or as a contributor.
- Most ACAs are not responsible for managing asset and interest declarations.

Regarding anti-corruption standards, the report suggests that:

- The adoption of codes of conduct is more widespread than risk mapping, and that both are rarely mandatory in the private sector.

Lastly, when it comes to international cooperation, ACAs expect to:

- benefit from exchanges of best practices and information at an operational level;
- network with their counterparts.

The NCPA Network will endeavour to live up to these expectations. Under AFA's current presidency, the insights of the global mapping will guide the NCPA's search for better ways to implement peer-to-peer cooperation in the field of corruption prevention. With the invaluable support of international organizations, in particular GRECO, the OECD and the UNODC, and the unwavering commitment of its members, the NCPA is determined to create a dynamic hub for connecting ACAs around the world.

6. References

- AFA (2017), *Guidelines to help private and public sector entities prevent and detect corruption, influence peddling, extortion by public officials, unlawful taking of interest, misappropriation of public funds and favouritism*, <https://www.agence-francaise-anticorruption.gouv.fr/fr/recommandations> (accessed on 2 March 2020).
- African Union (2003), *Convention on Preventing and Combating Corruption*, Maputo, <https://au.int/en/treaties/african-union-convention-preventing-and-combating-corruption> (accessed on 27 February 2020).
- Council of Europe (1999), *Criminal Law Convention on Corruption*, Strasbourg, <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/173> (accessed on 27 February 2020).
- De Jaegere, S. (2012), “Principles for Anti-Corruption Agencies: A Game Changer”, *Jindal Journal for Public Policy*, Vol. 1/1, pp. 79–120.
- De Sousa, L. (2009), “Anti-corruption Agencies: Between Empowerment and Irrelevance”, *EUI Working Papers*, RSCAS 2009/08, https://cadmus.eui.eu/bitstream/handle/1814/10688/EUI_RSCAS_2009_08.pdf?sequence=1&isAllowed=y (accessed on 28 February 2020).
- Doig, A., Watt, D., and Williams, R. (2005), “Measuring ‘success’ in five African Anti-Corruption Commissions”, *U4 Report*, 2005:1, Chr. Michelsen Institute, Bergen, <https://www.u4.no/publications/measuring-success-in-five-african-anti-corruption-commissions.pdf> (accessed on 28 February 2020).
- Heilbrunn, J. R. (2004), “Anti-Corruption Commissions Panacea or Real Medicine to Fight Corruption?”, World Bank Institute, <http://siteresources.worldbank.org/WBI/Resources/wbi37234Heilbrunn.pdf> (accessed on 28 February 2020).
- Kuris, G. (2015), “Watchdogs or guard dogs: Do anti-corruption agencies need strong teeth?”, *Policy and Society*, 34:2, p. 125-135, <https://www.tandfonline.com/doi/pdf/10.1016/j.polsoc.2015.04.003?needAccess=true> (accessed on 28 February 2020).
- League of Arab States (2010), *Arab Convention against Corruption*, Cairo, <https://star.worldbank.org/document/arab-convention-against-corruption> (accessed on 2 May 2020).

NCPA (2019), *Technical Guide to Corruption Prevention Instruments: Codes of Conduct*, <https://rm.coe.int/technical-guide-to-corruption-prevention-instruments/168098d06a> (accessed on 3 March 2020).

OECD (2008), *Specialised Anti-Corruption Institutions: Review of Models*, OECD Publishing, Paris, <https://www.oecd.org/corruption/acn/39971975.pdf> (accessed on 26 February 2020).

OECD (2011), *Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and Related Documents*, OECD Publishing, Paris, http://www.oecd.org/daf/anti-bribery/ConvCombatBribery_ENG.pdf (accessed on 28 February 2020).

OECD (2011), *Asset Declarations for Public Officials: A Tool to Prevent Corruption*, OECD Publishing, Paris, <https://www.oecd.org/corruption/acn/assetdeclarationsforpublicofficialsatooltopreventcorruption.htm> (accessed on 2 March 2020).

OECD (2017), *OECD Recommendation of the Council on Public Integrity*, OECD, Paris, <http://www.oecd.org/gov/ethics/recommendation-public-integrity/> (accessed on 28 February 2020).

Organization of American States (1996), *Inter-American Convention against Corruption*, Washington, http://www.oas.org/en/sla/dil/inter_american_treaties_B-58_against_Corruption.asp (accessed on 28 February 2020).

Recanatini, F. (2011), “Anti-corruption authorities: An effective tool to curb corruption?”, In Rose-Ackerman, S. and Søreide, T. (Eds.), *International Handbook on the Economics of Corruption, Volume Two*, Edward Elgar Publishing, Cheltenham.

Sekkat, K. (2018), *Is Corruption Curable?*, Palgrave Macmillan (eBook).

Schütte, S. A. (2017), “Bespoke monitoring and evaluation of anti-corruption agencies”, U4 Brief, May 2017/2, <https://www.u4.no/publications/bespoke-monitoring-and-evaluation-of-anti-corruption-agencies.pdf> (accessed on 28 February 2020).

Transparency International (2017), *Strengthening Anti-Corruption Agencies in Asia Pacific*, https://www.transparency.org/whatwedo/publication/strengthening_anti_corruption_agencies_in_asia_pacific (accessed on 28 February 2020).

Transparency International UK, “Risk Assessment”, In *Anti-Bribery Guidance*, <https://www.antibriberyguidance.org/sites/default/files/4.%20Risk%20Assessment%20-%20Anti-Bribery%20Guidance.pdf> (accessed on 3 March 2020).

Tomić, S. (2019), *Leadership, Institutions and Enforcement: Anti-Corruption Agencies in Serbia, Croatia and Macedonia*, Palgrave Macmillan (eBook).

United Nations (2003), *United Nations Convention against Corruption*, United Nations, New York, https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against-corruption.html (accessed on 26 February 2020).

UNDP (2011), *Practitioner's Guide: Capacity Assessment of Anti-Corruption Agencies*, United Nations Development Programme, Bureau for Development Policy, New York, <https://www.undp.org/content/undp/en/home/librarypage/democratic-governance/anti-corruption/Guide-to-Capacity-Assessment-of-ACAs.html> (accessed on 26 February 2020).

UNODC (2005), *Corruption: Compendium of International Legal Instruments on Corruption (Second edition)*, United Nations Office on Drugs and Crime, Vienna, https://www.unodc.org/documents/corruption/publications_compendium_e.pdf (accessed on 26 February 2020).

UNODC (2009), *Technical Guide to the United Nations Convention against Corruption*, United Nations Office on Drugs and Crime, Vienna, <https://www.unodc.org/unodc/en/treaties/CAC/technical-guide.html> (accessed on 26 February 2020).

UNODC (2013), *Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide*, United Nations Office on Drugs and Crime, Vienna, https://www.unodc.org/documents/corruption/Publications/2013/13-84498_Ebook.pdf (accessed on 5 March 2020).

UNODC (2018), “Asset and interest disclosure systems (article 8, paragraph 5, of the United Nations Convention against Corruption)”, *Background paper prepared by the Secretariat for the Open-ended Intergovernmental Working Group on the Prevention of Corruption*, Vienna, 5–7 September 2018, https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/workinggroup4/2018-September-6-7/V1804202_E.pdf (accessed on 2 March 2020).

UNODC (2019), “Lessons learned on the development, evaluation and impact of anti-corruption strategies (article 5 of the United Nations Convention against Corruption)”, *Background paper prepared by the Secretariat for the Open-ended Intergovernmental Working Group on the Prevention of Corruption*, Vienna, 4–6 September 2019, <https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/workinggroup4/2019-September-4-6/V1904637e.pdf> (accessed on 26 February 2020).

World Economic Forum (2018), *The Future of Trust and Integrity*, White Paper by the Partnering Against Corruption Initiative (PACI), <https://www.weforum.org/whitepapers/the-future-of-trust-and-integrity> (accessed on 3 March 2020).

7. Annexes

Annex 1: Questionnaire of the global mapping online survey

1. I wish to be informed about the result of the survey:

Choose one of the following answers

- Yes, I wish to benefit from the results of the survey.
- No, thank you.

2. I wish that my (or that of the listed contact person) name, title, organisation and contact information be shared along with the results of the survey. This will allow other public authorities working on anti-corruption to contact you (or the listed contact person):

Choose one of the following answers

- Yes, I want colleagues to be able to contact me.
- No, I prefer that the information is not shared.

3. Your country:

4. Name of your organisation:

5. Your organisation's website:

6. Your name and title:

7. Is there a contact person in your organisation for matters regarding international cooperation? If so, please list the contact information (e-mail address is preferred):

8. Is your organisation authorised to conduct investigations and/or criminal proceedings?

Choose one of the following answers

- Yes
- No

You've answered « yes » to question 8, please elaborate: **Does the authority concern natural persons? Does the authority concern legal persons?**

9. Does your organisation have any sanction mechanisms?

Choose one of the following answers

- Yes
- No

You've answered « yes » to question 9, please elaborate: **The type of sanction mechanism(s) held by your organization is/are:**

Check all that apply

- administrative
- penal
- civil
- Other

10. Is your organisation involved in the creation and execution of a national strategy on anti-corruption?

Choose one of the following answers

- Yes
- No

You've answered « yes » to question 10, please elaborate: **Your organisation is involved in terms of:**

Check all that apply

- lead organisation
- contributor

You've answered « no » to question 10, please elaborate: **Your organisation isn't involved given that:**

- Your organisation is not participating in the creation or execution of the strategy.
- A national strategy on anti-corruption does not exist.

11. Is your organisation responsible for asset declarations and/or declaration of interests of high ranking public officials?

Choose one of the following answers

- Yes
- No

12. Is there in your country an obligation to establish a code of conduct (in the public/and or private sector)?

Choose one of the following answers

- Yes
- No

You've answered « yes » to question 12, please elaborate: **This obligation concerns:**

Check all that apply

- the public sector
- the private sector (primarily companies)
- other

13. Is there in your country an obligation to make a risk mapping (in the public/and or private sector)?

Choose one of the following answers

- Yes
- No

You've answered « yes » to question 13, please elaborate: **This obligation concerns:**

Check all that apply

- the public sector
- the private sector (primarily companies)

14. What are your expectations to an international network of corruption prevention authorities?

Check all that apply

- exchange of best practices
- exchange of information at an operational level
- other

15. Do you have any comments and/or suggestions?

Annex 2: List of respondents

Country	Respondent authority
ALBANIA	Prime Minister's Office
	Ministry of Justice
	Prosecutor's Office
	Public Procurement Agency
	Service for Internal Affairs and Complaints
ALGERIA	Office central de répression de la corruption (O.C.R.C)
	Organe national de prévention et de lutte contre la corruption
ANDORRA	Ministère de Justice et de l'Intérieur
ARGENTINA	Anti-Corruption Office - Ministry of Justice and Human Rights
AUSTRALIA	Australian Attorney-General's Department
AUSTRIA	Central Public Prosecutor's Office for combatting economic crimes and corruption

	Federal Bureau of Anti-Corruption (BAK)
AZERBAIJAN	Anti-Corruption Directorate with the Prosecutor General
BANGLADESH	Cabinet Division
BELGIUM	FEDERAL PUBLIC SERVICE POLICY AND SUPPORT
	Le Médiateur fédéral (Centre Intégrité)
	Inspection générale de la Police fédérale et de la police locale
BELIZE	Office of the Auditor General
BENIN	Autorité Nationale de Lutte contre la Corruption (ANLC)
BHUTAN	Anti-Corruption Commission
BOSNIA AND HERZEGOVINA	Agency for the Prevention of Corruption and Coordination of the Fight against Corruption
BOTSWANA	Directorate on corruption and economic crime
BRAZIL	Office of the Comptroller General / Controladoria-Geral da União (CGU)
	Advocacia-Geral da União (AGU)
BULGARIA	The Commission for Anti-Corruption and Illegal Assets Forfeiture of the Republic of Bulgaria

BURKINA FASO	AUTORITE SUPERIEURE DE CONTRÔLE D'ETAT ET DE LUTTE CONTRE LA CORRUPTION
CAMBODIA	Anti-Corruption Unit, Kingdom of Cambodia
CANADA	Office of the Conflict of Interest and Ethics Commissioner / Commissariat aux conflits d'intérêts et à l'éthique
	Unité permanente anticorruption
CAPE VERDE	Ministère Public
CHILE	Consejo para la Transparencia
	Office of the Comptroller General of the Republic / Contraloría General de la República
	Dirección Nacional del Servicio Civil
	Dirección General del Crédito Prendario
	Consejo de Defensa del Estado
	Unidad de Análisis Financiero
COLOMBIA	Procuraduría General de la Nación
	Secretary of Transparency of the Presidency of Colombia / Secretaría de Transparencia

COMOROS	Cour suprême, Section des comptes
COOK ISLANDS	Office of the Public Service Commissioner
COSTA RICA	Procuraduría de la Ética Pública
COTE D'IVOIRE	Haute Autorité pour la Bonne Gouvernance
CUBA	Contraloría General de la Republica
CYPRUS	The Cyprus Ministry of Justice and Public Order
CZECH REPUBLIC	Prosecutor General's Office
	Police of the Czech Republic
	Anti-Corruption Unit, Conflict of Interests and Anti-Corruption Department, Ministry of Justice of the Czech Republic
DEMOCRATIC REPUBLIC OF THE CONGO	Observatoire de surveillance de la corruption et de l'éthique professionnelle (OSCEP)
DENMARK	State Prosecutor for Serious and Economic and International Crime
ECUADOR	Office of the Comptroller General of the State of the Republic of Ecuador
EGYPT	Administrative Control Authority

ESTONIA	Ministry of Justice
	Corruption Crime Bureau of Central Criminal Police of Estonian Police and Border Guard Board
FINLAND	National Bureau of Investigation
	Prosecutor General's Office
FRANCE	Agence française anticorruption
	Haute Autorité pour la transparence de la vie publique
GABON	Commission Nationale de Lutte contre l'Enrichissement Illicite
GEORGIA	LEPL-Civil Service Bureau of Georgia
GERMANY	Federal Ministry of Justice and Consumer Protection
	Federal Ministry for Economic Affairs
	Dezernat Interne Ermittlungen / Internal investigation
GREECE	General Secretariat against Corruption
GUINEA	Agence Nationale de Lutte contre la Corruption et de promotion de la bonne gouvernance (ANLC)

GUYANA	Integrity Commission
HAITI	Unité de lutte contre la corruption (ULCC)
	Primature
HONDURAS	Superior Court of Accounts
HONG KONG	Independent Commission Against Corruption
HUNGARY	National Protective Service
INDONESIA	Indonesia Corruption Eradication Commission (KPK)
IRELAND	Garda Síochána Ombudsman Commission
	Standards in Public Office Commission
	An Garda Síochána
ITALY	Autorità Nazionale anticorruzione (National Anticorruption Authority)
JAPAN	Ministry of Justice
	National Police Agency

	Intellectual Property Office, Economic and Industrial Policy Bureau, Ministry of Economy, Trade and Industry
	Ministry of Foreign Affairs
JORDAN	Jordan Integrity and Anti-Corruption Commission
KIRIBATI	Office of the Attorney-General
KUWAIT	Kuwait Anticorruption Authority (Nazaha)
KYRGYZSTAN	Government of the Kyrgyz Republic
LAO PEOPLE'S DEMOCRATIC REPUBLIC	State Inspection and Anti-Corruption Authority
LATVIA	Corruption Prevention and Combating Bureau (KNAB)
LIBERIA	LIBERIA ANTI-CORRUPTION COMMISSION
LIECHTENSTEIN	National Police
LITHUANIA	Chief Official Ethics Commission
	Special Investigation Service of the Republic of Lithuania
MADAGASCAR	Bureau Indépendant Anti-corruption (BIANCO)

MALDIVES	Anti-Corruption Commission
MALI	Office central de Lutte contre l'Enrichissement illicite
MARSHALL ISLANDS	Office of the Auditor-General
MAURITIUS	Independent Commission Against Corruption
MEXICO	National Institute for Transparency, Access to Information and Personal Data Protection
	Prosecutor General's Office of the Republic (Fiscalía General de la República)
	Tax Administration Service (SAT)
	Auditoría Superior de la Federación, Supreme Audit Institution of Mexico
	Executive Secretariat of the National Anticorruption System
	Judiciary Council (Consejo de la Judicatura Federal)
MONTENEGRO	Agency for Prevention of Corruption (APC)
MOROCCO	Instance nationale de la probité, de la prévention et de la lutte contre la corruption (INPPLC)
MOZAMBIQUE	Anti-Corruption Bureau

MYANMAR	Anti-Corruption Commission Myanmar
NETHERLANDS	Dutch Whistleblowing Authority
	Openbaar Ministerie (Public Prosecution Service)
	Ministry of Justice and Security
NEW ZEALAND	Serious Fraud Office
NIGER	Haute Autorité de Lutte contre la Corruption et les Infractions Assimilées (HALCIA NIGER)
NIGERIA	Economic and Financial Crimes Commission
	Independent Corrupt Practices and other related Offences Commission-ICPC
NORTH MACEDONIA	State Commission for Prevention of Corruption
	Ministry of Interior
NORWAY	ØKOKRIM
PALESTINIAN AUTHORITY	Palestinian Anti-Corruption Commission
PANAMA	National Authority for Transparency and Access to Information

PAPUA NEW GUINEA	Ombudsman Commission of PNG
PERU	SECRETARIAT OF PUBLIC INTEGRITY OF THE PRESIDENCY OF THE COUNCIL OF MINISTERS
PHILIPPINES	Presidential Commission on Good Government
POLAND	Central Anti-Corruption Bureau
PORTUGAL	Central Department of Prosecution and Criminal Investigation - DCIAP
	Council for the Prevention of Corruption
	Inspeção-Geral da Administração Interna
QATAR	Administrative Control and Transparency Authority
REPUBLIC OF KOREA	Anti-Corruption & Civil Rights Commission
REPUBLIC OF MOLDOVA	National Anticorruption Center
ROMANIA	National Integrity Agency (ANI)
	Ministry of Justice
	Anti-corruption General Directorate, within the Ministry of Internal Affairs

	National Anticorruption Directorate
RUSSIAN FEDERATION	Investigative Committee of the Russian Federation
SAUDI ARABIA	National Anti-Corruption Commission
SENEGAL	Office National de Lutte contre la Fraude et la Corruption (OFNAC)
SERBIA	Anti-Corruption Agency of the Republic of Serbia
	Ministry of Interior
SINGAPORE	Corrupt Practices Investigation Bureau (CPIB)
SLOVAKIA	Government Office
SLOVENIA	Commission for the Prevention of Corruption / Komisija za preprečevanje korupcije
	Police
SOLOMON ISLANDS	Office of Auditor-General Solomon Islands
SOUTH AFRICA	National Prosecuting Authority of South Africa
	Department of Public Service and Administration

	Special Investigating Unit
	Directorate for Priority Crime Investigation: South African Police Service
SPAIN	Prevention and Fight Against Corruption Office of the Balearic Islands
	Oficina Antifrau de Catalunya / Anti-fraud Office of Catalonia
	Office for Conflicts of Interest
	Council of Transparency and Good Governance
	Agència per la Prevenció i Lluita contra el Fraude i la Corrupció de la Comunitat Valenciana
SUDAN	PUBLIC GRIEVANCES CHAMBER / SUDAN
SWEDEN	The Swedish Anti-Corruption Institutet
SWITZERLAND	Interdepartmental Working Group on Combating Corruption
	Département fédéral des affaires étrangères
TIMOR-LESTE	Comissão Anti-Corrupção (CAC) de Timor-Leste
TONGA	Tonga Office of the Auditor General

TRINIDAD AND TOBAGO	INTEGRITY COMMISSION OF TRINIDAD AND TOBAGO
TUNISIA	Instance nationale de lutte contre la corruption (INLUCC)
TURKEY	Ministry of Justice
TUVALU	TUVALU SAI or Office of the Auditor General of Tuvalu
UKRAINE	National Anti-Corruption Bureau
	National Agency on Corruption Prevention
	National police of Ukraine
UNITED ARAB EMIRATES	Supreme Audit Institution
UNITED REPUBLIC OF TANZANIA	THE PREVENTION AND COMBATING OF CORRUPTION BUREAU
UNITED STATES OF AMERICA	U.S. Office of Government Ethics
URUGUAY	Junta de Transparencia y Ética Pública
UZBEKISTAN	General Prosecutor's Office of the Republic of Uzbekistan
	The Academy of the General Prosecutor's Office of the Republic of Uzbekistan

VANUATU	Vanuatu Financial Intelligence Unit
VIETNAM	Inspection générale du Gouvernement
ZIMBABWE	Zimbabwe Anti-Corruption Commission