

U4 Expert Answer



Mainstreaming anti-corruption within donor agencies

Query:

What are the experiences of mainstreaming anti-corruption within donor agencies? Why has mainstreaming failed elsewhere? What role could a common political analysis tool play in ensuring that factors relevant for anti-corruption are exposed in various sectors? What role have incentives/incentive structures played in achieving such mainstreaming elsewhere? If so, what types of incentives are needed? How does organisational structure and leadership matter to mainstreaming anti-corruption? Would mainstreaming be enough to secure high level competency in anti-corruption or does effective mainstreaming also require access to more in depth anti-corruption expertise?

Purpose:

Our agency is currently in the midst of developing an approach as to how best to mainstream anti-corruption into the various sectoral departments.

Content:

1. Experience with Mainstreaming Anti-Corruption within Donor Agencies
2. Challenges Involved in Mainstreaming Anti-Corruption
3. Lessons Learnt from Mainstreaming Processes
4. Further Reading

Summary:

Given the cross-cutting nature of anti-corruption interventions, multilateral and bilateral agencies are increasingly moving away from stand-alone anti-corruption programming to mainstream anti-corruption as an integral dimension of the design, implementation, monitoring and evaluation of programmes and policies. In practice, however, such efforts have often failed due to the dispersion of actors and interests, insufficient political will as well as lack of awareness, capacity, incentives, and effective coordination and monitoring of mainstreamed processes. Effective anti-corruption mainstreaming requires credible leadership, adequate internal structures, effective coordination and monitoring mechanisms, supporting organisational incentive systems, and need to be backed by adequate staffing, resources, skills and expertise.

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Date: 27 January 2010

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1 Donors' experience with anti-corruption mainstreaming

Mainstreaming anti-corruption refers to the process of implicitly or explicitly incorporating anti-corruption in all sectors and at all intervening levels of development cooperation. In such approaches, anti-corruption strategies are not only regarded as part of the general support to the governance sector, but as an integral component of the support provided to other sectors such as health, education and infrastructure projects.

General overview

As part of the current debate on aid effectiveness, donors are increasingly integrating governance and anti-corruption concerns into their programmes and policies to achieve better development outcomes. Donors' efforts to mainstreaming anti-corruption in their projects and programmes usually include three major dimensions:

- Putting in place mechanisms to ensure transparency, accountability and integrity of their operations and staff;
- Protecting their projects and loans from corruption, respectively ensuring that aid is used for its intended purpose; and
- Supporting aid recipient countries to effectively address corruption and the underlying causes of corruption.

Internal integrity management system

Institutions can only genuinely require partners to integrate an anti-corruption perspective into their practices and policies if they abide by the same standards and principles. Therefore, the pre-requisite for institutionalizing integrity issues is to create an organizational culture that supports anti-corruption, where all staff adhere to the highest integrity standards and actively demonstrate their commitment to advance anti-corruption in their daily work as well as in their interaction with others. Most bilateral and multilateral agencies have anti-corruption policies in place targeting their staff. U4 partners for example have developed integrity frameworks and codes of conducts promoting ethical principles that are integrated in staff employment contracts. Effective internal complaints

mechanisms and whistleblower protection also belong to these internal integrity management efforts.

The U4 has produced a report synthesising the U4 partner agencies' set of internal anti-corruption measures. (Please see: [Fighting the bug within: Anti-corruption measures of the Utstein development agencies](#))¹. These provisions are meant to provide control, guidance and management of professional ethics through internal and external accountability mechanisms like independent audits, investigations and reporting controls. The ethics infrastructure is usually implemented by an "integrity or ethics" advisor or unit in place, serving as a reference point for ethics related issues and coordinating anti-corruption efforts at the organisation level. Further prevention measures aim at raising awareness and training staff in dealing with integrity related issues, as well as regularly rotating personnel in sensitive areas to avoid the development of corrupt networks.

Corruption risk mitigation strategies in development projects

Most donors have also put in place anti-corruption systems and measures to safeguard development projects from corruption. The basic "typical" components of these anti-corruption strategies include three dimensions, namely **prevention**, **detection**, and a regime of appropriate **sanctions**. There is a [U4 thematic page on corruption in aid](#) that provides an overview of issues, case studies and practical tools to safeguard development projects from corruption.

As part of the **prevention** regime, many donors, such as SIDA or GTZ, introduce an anti-corruption clause in all cooperation agreements as a way to integrate corruption into the political dialogue with development partners. Other prevention measures consist in strengthening public sector management systems in key areas such as procurement or financial management as an integral component of sectoral development projects.

Beyond specific anti-corruption clauses, the need to introduce effective mechanisms to promote more transparency, citizen accountability and participation cut across all prevention measures. Multi-stakeholder approaches and the formation of coalitions of all

¹ This report is currently being updated to assess the extent to which such integrity mechanisms are actually working.

sectors of society seem to be the growing trend in this regard. In its **Governance and Anti-Corruption (GAC) strategy** for example, the World Bank states that most anti-corruption programmes with a track record of success focus on increasing transparency of decision making and involving beneficiaries in policy making and oversight. As a result, one of the core principles of the GAC implementation plan is the systematic engagement with a broad range of stakeholders, by strengthening transparency, participation, and third-party monitoring of its operations. There is also broad consensus that effective information management, including improved transparency, information disclosure and access to information is the prerequisite for promoting public accountability and transparency.

In terms of **detection**, donors have strived to put in place effective investigative regimes through monitoring and supervision of development projects, external audits of specific projects, independent monitoring by the media, parliament or civil society and the introduction of effective complaints mechanisms and whistleblower protection. There are many tools that can be used for detection purposes such as social audits, public hearings, citizens report cards, new technology tools, etc.

Regarding **sanctions**, there are many options and tools such as internal disciplinary measures, blacklisting, debarment from procurement processes, that can be envisaged. One of the most recent examples of sanctions used against companies involved in bribery is the comprehensive settlement reached between the World Bank and Siemens, that in addition to time debarment measures and voluntary restraint from bidding on Bank Group business, includes a commitment by Siemens to pay \$ 100 million over 15 years to support anti-corruption work. A transparency dimension can be integrated by making public policies and sanctions public as well as the publication of sanctions as deterrent, as is currently implemented by the Inter-American Development Bank.

Addressing the underlying causes of corruption

The third dimension of donors' anti-corruption mainstreaming interventions has been to support recipient countries' anti-corruption efforts. Recognising the cross-cutting nature of anti-corruption, the growing trend in this regard across the donor community is to move away from stand-alone anti-corruption interventions and integrate anti-corruption measures in

all aspects of country assistance strategies as part of broader public sector policies and sectoral reforms.

Within the framework of the current debate on aid effectiveness, donors have come to recognise the issue of ownership of reforms as a key factor to successful development programming and committed themselves align to country-led development initiatives. This involves making increased use of country systems for aid assistance and relying on the financial management, accountability and procurement system of recipient countries. As donors are also responsible to ensure that aid is used for its intended purposes, this approach provides promising entry points for anti-corruption mainstreaming and strengthening the partner country's accountability mechanisms, and implicitly integrate governance and anti-corruption objectives in other sectoral programmes.

In practice however, the link between anti-corruption strategies and other main government policies/sectoral reforms often remains limited due to dispersion of actors and interests, insufficient political will, as well as lack of capacity, awareness, and effective coordination and monitoring. As a result, many agencies are still struggling with the implementation of these well meaning policies, and anti-corruption activities at country level continue to be mostly conducted as add-on activities through various ministries and state institutions. (Please see: **Anti-corruption Policy Making in Practice: Implications for Implementing**).

The World Bank's experience with anti-corruption mainstreaming

The anti-corruption mainstreaming framework

The World Bank has pioneered governance and anti-corruption mainstreaming in its **Governance and Anticorruption (GAC) Implementation Plan**, which identifies three major levels of action at the country, project, and global level. It then identifies a set of internal actions that are needed to support the effective implementation of the plan, focused on staffing, budget, and change management.

At the core of this implementation plan are processes established to ensure a systematic analysis of GAC issues in the design and implementation of Country Assistance Strategies (CAS), as well as in sector work, sector programmes and projects, with the view to more

systematically addressing GAC impediments to delivering development outcomes. The underlying principle of this approach is to identify at an early stage where GAC risks are present, as well as what their drivers are, in order to address them more systematically and effectively at country or programme level. This can include spelling out explicitly GAC actions plans that include a series of measures designed to mitigate GAC risks associated with programmes and activities.

Within the framework of this implementation plan, areas of emphasis for World Bank support to improve governance and anti-corruption in CAS include:

- Systematically addressing sector specific GAC challenges and enhancing sector-level transparency, participation and accountability;
- Strengthening “core” cross cutting and accountability systems such as public management systems (financial and budget management, procurement, public administration) and independent oversight institutions;
- Strengthening the “demand side” enabling frameworks and capacity by enhancing transparency/information disclosure, CSO capacity, social audits, etc;
- Including the private sector and civil society in reform processes; and
- Monitoring progress via results and governance indicators (including a new generation of “actionable indicators”²).

In addition, World Bank staff is also guided by a set of guidelines and policies that have been reviewed to reflect good practice approaches on governance and anti-corruption in areas such as disclosure policies,

² The World Bank has embarked on developing such indicators for governance. In short, the term “actionable” refers to the extent to which governments are in control of the improvement of indicators: “i.e. if most observed changes in the indicator are explained by factors beyond the control of governments, it is not likely to be useful as an indicator for monitoring government’s progress in implementing public sector reforms.” (<http://go.worldbank.org/BN5GB74IV0>)

public financial management monitoring and controls, procurement policies, etc. While these approaches are not new in the development community, the implementation plan recommends that they be systematically considered in developing programmes and projects.

Anti-corruption mainstreaming in practice

To operationalize these principles, a **framework for integrating GAC elements in CAS** has been developed for use by staff, taking the Indonesian and Ghanaian governance focused CASs as examples for successfully integrating GAC elements into country strategies. For example, in addition to explicitly discussing corruption and governance risks in the Country Assistance Strategy, the Indonesian CAS requires all Bank assisted projects to devise an anti-corruption plan, assessing inherent risks of corruption in the project and proposing design and supervision mechanisms to mitigate those risks.

A 2004 review of progress on mainstreaming anti-corruption made since 1997 concludes that the understanding of GAC issues has improved and anti-corruption has been integrated into operational activities and internal processes. However, the Bank has demonstrated only modest success in achieving durable outcomes, mainly due to the limited influence the Bank has on the political and social contexts that breed corruption at country level. The review suggests that a better understanding of social and political factors at the country level would enhance the quality and impact of anti-corruption interventions and recommends that sustained attention be given to:

- fostering demand among a wide spectrum of stakeholders;
- continuing with assessments of governance environment;
- defining governance requirements for lending;
- focussing lending instruments on accountability for results; and
- providing more assistance for bottom up reforms. (Please see: **Mainstreaming Anti-Corruption Activities in World Bank Assistance: A Review of Progress Since 1997**)

A **2009 GAC progress report** concludes that while steady gains can be observed in the development of GAC tools and their mainstreaming in bank's operations – from upstream assistance strategies to downstream design and implementation of lending operations – challenges remain in terms of documentation and communication of impact, as well as in promoting organisational arrangements that assure sustainable mainstreaming in all Bank operations.

The Asian Development Bank (ADB)'s experience

In 2005, ADB conducted a joint review of its **governance and anticorruption policies** to assess and refocus its efforts to effectively implement these policies within the context of ADB's Poverty Reduction Strategy. (Please see: <http://www.adb.org/Governance/Review/default.asp>)

As part of its anti-corruption strategy, the ADB requests that development projects and loans include a fiduciary risk assessment – including a complete financial accountability and procurement assessment – and provide a careful evaluation of the capacity of the various development partners to manage corruption risks. During the preparation and appraisal phase of the project cycle, all projects are to include an explicit assessment of how the project may be affected by corruption and how to address these risks, including an action plan for high-risk projects. This is meant to ensure that special attention is given to design interventions in ways that limit corruption and promote transparency and accountability. The implementation stage, project documentation, reports, and assessments and evaluations should also explicitly and systematically address and monitor corruption-related factors. In parallel, the ADB promotes the integrity of its own operations by i) strengthening procurement systems and procedures; ii) requiring independent internal reporting; and iii) providing staff training and seminars.

In practice, the implementation of these policies has faced major challenges. Corruption and fiduciary risks assessments and action plans have only been partially implemented, suggesting that staff do not systematically link project design to reducing opportunities for corruption. The above mentioned review also concludes that the ADB's current **incentive system** does not encourage staff to invest time,

resources and efforts into the implementation of anti-corruption policies. The review further highlights a **lack of guidance, training, capacity and in-house expertise** to implement these policies. In addition, the institution seems to **lack a framework for coordination** of anti-corruption work across the various departments.

The UNDP approach

United Nations Development Programme (UNDP) strategic plan recognises anti-corruption as one of three international principles and cross-cutting governance issues to be integrated into all UNDP practices, programme areas and processes such as Poverty Reduction Strategy Papers, Medium Development Goals, thematic working groups etc. The UNDP's 2008 **Anti-Corruption Practice Note on Mainstreaming Anti-Corruption in Development** takes the UN Convention against Corruption (UNCAC) as a framework for anti-corruption activities and further states that mainstreaming efforts must be closely integrated into other key relevant areas of democratic governance, such as local governance, public administrative reform, economic governance, access to justice, parliamentary strengthening, electoral processes, independent media, e-governance, and human rights, with the view to reinforcing governance principles such as rule of law, participation, responsiveness and equality. As the note also states, in countries where there is limited political will, mainstreaming anti-corruption in development processes can help programmes without an "anti-corruption" label to become less politicized.

The above mentioned anti-corruption practice note identifies a number of challenges with regards to mainstreaming, including the tension between mainstreaming efforts on the one hand, and the need to be strategic, targeted and focussed on the other hand. Operationally, mainstreaming also requires awareness, resources, skills and expertise on the ground. While efforts have been made to raise staff's skills, knowledge and expertise across its operations, the methodologies available still seem too limited to provide adequate guidance to country offices.

Experience from selected bilateral donors

The German development agency **GTZ** has developed a guide on **Mainstreaming Anti-Corruption** targeting development practitioners that identifying risks

and manifestations of corruption, as well as anti-corruption strategies, which serves as an analytical framework for different sectoral guides. Topics covered in these practical guides include preventing corruption in public finances, public administration, judiciary, privatisation processes, resource allocation and the education system. For each sector, sector specific forms of corruption and their cause are identified, possible strategies, measures and good practices to counter corruption risks are explored and indicators to measure impact are suggested. Generally, this approach involves identifying systems and incentives for corruption and designing appropriate sector specific approaches to address them, with the view to thoroughly incorporating anti-corruption in the structures and processes of the partner organisations, as well as in the competencies of their employees.

In its **Manager's Guide to Mainstreaming Anti-Corruption into Activities**, Australia's development branch **AusAID** identifies a number of key entry points for anti-corruption work, such as political reform, state capability, public procurement, local governance. Enhancing voice through advocacy, access to information and monitoring of public service delivery – with special attention given to civil society involvement – is an important dimension of such an approach. The guide identifies several options for mainstreaming anti-corruption, including developing specific anti-corruption activities, tracking anti-corruption indicators in existing activities, or incorporating specific anti-corruption objectives into new activities.

2 Challenges involved in mainstreaming anti-corruption

In spite of the growing awareness across donor agencies of the potential benefits of adopting mainstreaming approaches rather than conducting specific anti-corruption activities, efforts in this regard are still in their infancy and have largely failed to yield the expected results, as they face numerous challenges of a political, institutional and operational nature both at agency and country levels.

A 2007 U4 Report drawing lessons from case studies provides an overview of the challenges faced by six countries in anti-corruption policy implementation at country level that are similar in nature to those faced at agency level. (Please see: **Anti-corruption policy making in practice: What can be learned for**

the implementation of Article 5 of UNCAC?).

The report emphasizes that efforts to mainstream anti-corruption policies or strategies have often failed because the link between them and other sectoral strategies has remained limited in practice, due to the dispersion of actors and interests, insufficient leadership or political will, as well as lack of awareness, capacity, incentives, and effective coordination and monitoring.

Political challenges

Leadership

The first challenge consists in building a credible leadership that demonstrates sustained political will as well as a strong institutional commitment to anticorruption policies throughout the whole project cycle and at all levels of project implementation, both inside and outside the organisation. To this end, the organisational commitment to eradicate corruption needs to translate in concrete steps and measures such as providing appropriate incentives to staff and partners to address corruption issues in development projects, allocating adequate resources to the anti-corruption plan as well as providing staff and partners regular guidance and technical assistance.

Ownership

While necessary, a credible leadership is not enough to ensure successful implementation, as the institutional commitment against corruption must spread over the various levels of the organisation as well as among development partners and implementing agencies. In many cases, those ultimately in charge of implementing the anti-corruption strategies did not actively participate in their design and do not fully own them, resulting in weak buy in from implementers at sectoral level. At the same time, given the cross-cutting nature of corruption, many anti-corruption reforms have also failed, due to the lack of clarity in ownership and unclear authority to implement, as joint ownership across sectors, departments and agencies may dilute responsibilities and result in a loss of accountability and real ownership of the reform.

Institutional challenges

Overcoming donor's traditional "silo" approach

The first overarching challenge involved in anti-corruption mainstreaming consists in identifying specific

aspects of core sectoral reforms that are crucial for increasing transparency, integrity and accountability³. In principle, this involves overcoming traditional functional „silo" vision and approaches that continue to persist across sectors and agencies, with the view to more systematically integrating cross-cutting issues in sectoral policies, programmes and practices. In practice, this has proved to be challenging. At sector level, technical staff often doesn't have the required incentives, skills and understanding to engage with the issue. Also, anti-corruption mainstreaming meets resistance and biases of sector specialists who are more focussed on the project's other technical aspects. At another level, mainstreaming also entails the risk of diluting the anti-corruption perspective with other issues that are also important to mainstream into programmes of development cooperation, such as gender or broader governance issues.

Change management

Mainstreaming anti-corruption can be seen as an organisational reform which is likely to deeply affect work processes, existing procedures and institutional arrangements. It requires major procedural changes, often involving officials and employees who are used to the "old" way of doing business and may lack incentives for reform. The incentive structure that may undermine political will for reform must therefore be adequately assessed and addressed from the early stage of the reform process. For donors, looking at incentive systems may imply addressing the **tension that often exists between the scaling up of aid and donors' pressure to disburse** on the one hand and the need to protect development funds from corruption. At the agency level, it is of crucial importance for successful implementation that all sectors, departments and **implementing agencies recognise the need and benefits of the reform as part of the broader concern for aid effectiveness**. Change management is therefore a critical and often neglected aspect of anti-corruption mainstreaming for overcoming resistance to change from those whose work might be profoundly altered by the new approach.

Coordination

Mainstreaming requires engaging with a wide range of actors, sectors, departments, implementing agencies and institutions that may have very different priorities,

competing agendas, conflicting interests, etc. Coordination is key to ensure the full cooperation of all stakeholders across sectors and departments, avoid duplication of efforts as well as make sure that all actors speak with one voice throughout the agency, sharing a common anti-corruption vision and approach when interacting with external stakeholders. In practice, however, coordination does not always receive enough political and operational attention from the onset, both at country or agency level. In many cases, the institutions or departments charged with the coordination and monitoring of anti-corruption strategies often lack the authority, political backing resource and capacity to encourage other sectors and departments to implement the anti-corruption agenda and report on progress.

Monitoring and evaluation

Many programmes have an implicit or explicit anti-corruption dimension, although they are not necessary labelled as such, which makes it difficult to track progress, support and monitor change. As a complex process cutting across different sectors and institutions of an organisation/country's governance system, monitoring and evaluation of anti-corruption efforts is a challenging task that does not always receive the required political, operational and technical attention. In many cases, the institutional arrangements in place for monitoring and evaluation face major resource and capacity challenges or lack the political weight to take a pro-active role in this regard. (Please see: [Anti-corruption policy making in practice: What can be learned for the implementation of Article 5 of UNCAC?](#)).

There are also a set of methodological challenges involved in measuring corruption generally, that makes tracking anti-corruption in other sectoral programmes especially challenging, including the identification of simple, meaningful and manageable indicators that can track progress overtime. (Please see [U4 Expert Answer "Assessing impact of anti-corruption measures in Burkina Faso"](#) for an overview of challenges involved in measuring corruption). The poor quality of information and difficulty to access relevant information in most developing countries can also impede monitoring efforts at country level. A further difficulty is that current aid data reporting systems are ill-suited to provide an accurate estimate of donor contributions to cross-cutting issues such as corruption, making it almost impossible to identify in a reliable manner donor's spending for anti-corruption in general and for a specific sector in particular. (Please see: [U4](#)

³ Relevant provisions covered by the UNCAC may help mapping key elements of reforms.

Expert Answer "Donors' Contributions to Anti-Corruption in the Education Sector")

Development partners should therefore invest more in effective monitoring and evaluation, including through strengthening national information management systems and fostering the production of non-state monitoring and evaluation materials.

Operational challenges

Resources and capacity

Experience gained by NORAD, DFID and the World Bank shows that organisations must allocate considerable financial and human resources in order to make it possible to mainstream governance and anti-corruption issues in practice. In many cases there is a gap between limited institutional capacity, insufficient resources allocated to mainstreaming processes and rather ambitious objectives. In addition, as anti-corruption mainstreaming is an ongoing process which can only yield results in the long term, funding needs to be adequate, predictable and dependable (Please see Sida Working Paper [Anti-corruption strategies in development cooperation](#)).

Technical expertise and mentoring

Sectoral staff that has to implement anti-corruption measures may not always have the level of expertise and capacity to integrate these concerns in their daily business operation, while the department/officer in charge of promoting anti-corruption mainstreaming may lack the resource and capacity to remedy this situation. Knowledge must be disseminated and appropriate guidance provided across sectors and departments to equip technical staff with the skills to identify and address corruption risks at sector or project level.

In-depth understanding of the corruption and governance environment

All donors involved in anti-corruption mainstreaming processes recognise the need to fully understand the political and social contexts that breed corruption at country level in order for anti-corruption interventions to have a sustainable impact. In such efforts, special attention should be given to the political dimension of anti-corruption policy making with the view to identifying factors affecting the political will for reforms. Donors increasingly look at the potential of using political economy analysis to analyse the underlying context of developing countries, factors and processes that promote or block governance reforms. Initiatives such as DFID's Drivers of Change or SIDA's Power Analysis

reflect this. While these studies have generated a wealth of knowledge, the challenge remains to incorporate the findings into operational work and use them to inform the development of effective anti-corruption strategies. (Please see: [U4 Expert Answer "Political economy analysis of anti-corruption reforms"](#)).

3 Lessons learned from mainstreaming processes

Organisational structures

Mainstreaming anti-corruption often requires the establishment of appropriate institutional arrangements and new internal structures, supplemented in some cases by governance officers in various units and departments, to ensure horizontal and vertical links between anti-corruption and sectoral policies.

It might be advisable to set up an autonomous and multidisciplinary anti-corruption team or working group representing key sectors and departments, with the specific mandate and political backing to address corruption issues, both inside and outside the organisation. Ideally, the group should be composed of individuals who have the technical skills and expertise to review project design, risk rating, anti-corruption actions plans and reports throughout the project cycle. The group should also have a multi-year strategy, that includes a work plan with specific and measurable goals, and its own budget. (Please see Sida Working Paper [Anti-corruption strategies in development cooperation](#)).

The **World Bank** recognises that the success of a mainstreaming agenda also depends on effective engagement at country level, backed by partnerships and learning across networks and sectors. At country level, anti-corruption mainstreaming strategies should be developed in consultation with civil society and government and systematically engage a broad range of stakeholders from the early stage of the project design, with the view to ensuring buy-in from all involved actors and sustain the political will of partners and counterparts. In addition to the establishment of appropriate internal structures, avenues for participation should be provided at all stages of the project cycle to ensure that the public, as well as of beneficiaries are actively involved in the project design and oversight (Please see: <http://go.worldbank.org/ZFUWCFJQ80>).

Monitoring mainstreaming efforts

One of the key responsibilities of a multidisciplinary anti-corruption working group is to facilitate, coordinate and monitor anti-corruption mainstreaming across programmes and sectors. As already mentioned, **coordination and monitoring mechanisms** should have the political backing and weight to conduct these activities and be backed by adequate staffing, skills and resources to be credible.

An important aspect of monitoring efforts further consists in identifying **clear targets and indicators** to monitor performance in achieving objectives. A wide variety of governance indicators have been developed in recent years to capture the various dimensions of governance, as well as to identify areas for improvement in selected aspects of public sector governance. Some of them implicitly cover areas of public reform that are relevant to anti-corruption work, while others explicitly include corruption indicators. The growing trend is to identify actionable governance indicators (For more information, please see <http://go.worldbank.org/BN5GB74IV0>). An U4 Expert Answers published in 2008 gives a useful overview on indicators used to monitor public sector reforms (Please see: **U4 Expert Answer "Corruption and Public Sector Monitoring Systems"**).

Civil society has a key role to play in monitoring anti-corruption, either by actively participating in monitoring processes or by producing alternative "shadow" reports. Any monitoring mechanism should include civil society perspectives and input, as an opportunity to promote internal dialogue on issues related to corruption, as well as build to domestic demand for reform.

The role of transparency, citizen accountability and participation

There is a growing recognition by the various stakeholders that mainstreaming anti-corruption approaches can greatly benefit from civil society engagement in governance processes and should encourage systematic participation of beneficiaries in the design, implementation and evaluation of anti-corruption interventions. This involves supporting voice and accountability initiatives that provide citizens both access to information and opportunities for participation in order to empower them to participate in development policies, as well as to monitor policy making, project design and implementation.

The growing trend in this regard is to promote transparency and participation through the formation of multi-stakeholder coalitions, including government officials, regulators, private sector and civil society. The **Medicine Transparency Alliance**, (MeTA), the **International Aid transparency Initiative** (IATI), the **Construction Sector Transparency Initiative** (COST) are examples of international multi-stakeholder initiatives designed to increase transparency and accountability in different sectors.

The role of incentives

Incentive systems are believed to have a significant influence on individual and thus organisational performances and practitioners are increasingly aware of the importance of taking into account the institutional settings and incentive structures for fighting corruption. At organisation level, incentive systems include factors relating to the institutional structure of the organisation, its rules, human resource management, opportunities, internal benefits, rewards and sanctions and can take the form of reward for good performance or penalties for misbehaviours. In the field of anti-corruption, traditional incentives to fight corruption include increasing sanctions, controls and the risk of being caught/convicted or monetary incentives to perform.

However, evidence of the impact of such approach in developing countries remains largely inconclusive. A **2006 IMF Working Paper on incentives, transparency and rent capture** concludes that traditional incentives are often ineffective in many developing countries, as there is often insufficient political will and capacity to implement and monitor anti-corruption strategies and the legal and financial institutions required for effective enforcement are weak and inefficient. "Positive" monetary incentives such as introducing efficiency wages or increasing salaries are not always feasible in the context of developing countries and most studies agree that increasing salaries without establishing effective control and monitoring systems as well as enforcement of appropriate sanctions is unlikely to have an impact on corruption. (Please see: **U4 Expert Answer "Low salaries, the culture of per diems and corruption"**). A few critical points emerge from the literature on incentives:

- Reducing perverse incentives that favour non conducive behaviours can be more important than inventing new incentives.

- Non-material incentives can also have a significant impact on staff motivation and be used to improve public service performance.
- There is empirical evidence that “carrots” (such as salary increases), and “sticks” (such as audit intensity) are complementary tools for fighting corruption and should be used together. (Please see: [Political and economic incentives during an anti-corruption crackdown](#)).
- When traditional incentives fail, transparency in the form of information provision and disclosure can contribute to improving public outcomes. ([2006 IMF Working Paper on incentives, transparency and rent capture](#))

Change management

To overcome possible resistance to change, it is also very important to “sell” the reform through communication, education and training, using various channels such as the media, workshops, seminars, conferences, as well as mentoring of sector specialists in anti-corruption approaches.

Organisational capacity building and awareness raising activities

As anti-corruption mainstreaming relies on the skills, knowledge and commitment of the staff involved in the management and implementation of anti-corruption strategies on the ground, appropriate capacity-building activities need to be explicitly included in policy and project documents and frameworks, backed up with staff and budgets, and monitored and reviewed through appropriate performance indicators. Clear and practical guidelines for project design including specific anti-corruption indicators for development projects can be integrated into agencies’ overall decision-making and planning machinery.

Awareness raising activities targeting staff and partners are also an important component of the implementation strategy. All stakeholders need to be informed about the mainstreaming efforts, be given clear guidelines and practical guidance as well as develop the capacity to effectively implement the anti-corruption measures and procedures. Training programmes and materials may be developed to build local capacity to detect, assess and act upon early signs of malfeasance. For example, staff must be provided with adequate methodologies and diagnostic tools to realise corruption risk assessment, devise appropriate mitigation and

supervision plans, and report on anti-corruption impact and evaluation.

The role of communication in change strategies

Communication is a key element of any change management process and can help overcome awareness, knowledge and capacity gaps. In change initiatives, communication can serve many functions to promote information sharing and participation, convey the vision, goals and important drivers of change, build support for change across the organisation or provide feedback on performances and change processes. As the effective use of communication can influence opinion, attitude and behaviour change among stakeholders towards supporting governance reform objectives, the World Bank for example has developed a [Communication for Governance and Accountability program](#) (CommGAP) as part of its governance and anti-corruption strategy that promotes the use of communication in governance reform programs and supports the building of democratic public spheres.

4 Further reading

[Strengthening Engagement on Governance and Anti-Corruption: Second Year Progress Report](#) (2009)

This report describes and assesses progress in the second year of implementation of the World Bank Group’s Governance and Anticorruption strategy, which was endorsed in 2007.

[Anti-Corruption Practice Note on Mainstreaming Anti-Corruption in Development](#) (2008)

This UNDP anti-corruption practice note was developed to provide adequate guidance to country offices to integrate anti-corruption in UNDP programming.

[Anti-corruption Policy Making in Practice: Implications for Implementing](#) (2007)

This U4 Brief argues that anti-corruption measures should be embedded in coordinated policies instead of being carried out in isolation or in an ad hoc manner.

[What Transparency Can Do when Incentives Fail: An Analysis of Rent Capture](#) (2006)

This IMF paper analyses the persistence of rent seeking and the respective role of traditional incentives systems and transparency.

Mainstreaming Anti-Corruption (2004)

This GTZ guide targeting development practitioners provides an analytical framework anti corruption mainstreaming for different sectoral guides.