

Transparency International Anti-Corruption Helpdesk Answer

Anti-corruption across the public procurement cycle

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Accounting for roughly one third of government spending on average (OECD, 2015), public procurement represents a strategic government function, involving the buying of public goods, works and services. At the same time, with significant funds involved, complex procedures, numerous stakeholders, and room for discretionary decisions, public procurement is susceptible to high levels of corruption, affecting the value for money of public spending (UNODC, 2013).

Public procurement reforms are crucial to strengthen anti-corruption safeguards throughout the entire procurement cycle. These reforms play a key role in ensuring good governance and transparency in government operations. In the past decade, many countries and international bodies have sought to reform public procurement towards more openness and integrity. Learning from these examples, this Helpdesk Answer presents a selection of good practices for corruption prevention across the three main phases of the public procurement cycle: preparation, purchasing and performance.

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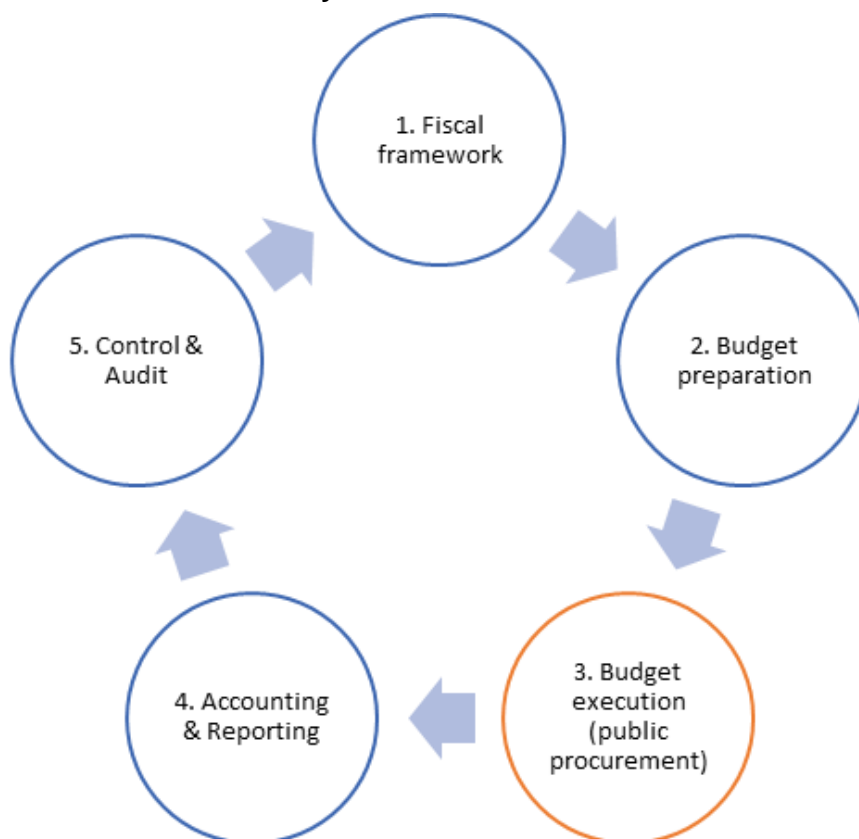
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Background

Public procurement within the wider PFM cycle

Within the public financial management (PFM) cycle, public procurement constitutes the third phase of execution of public policies and investments as laid down in budgetary plans. In other words, this is where the allocation of public resources is implemented (see figure 1 below). As an integral part of PFM, public procurement requires adherence to budgetary constraints, strategic planning, as well as accounting and reporting requirements to ensure the efficient allocation and management of public funds. Thus, effective public procurement processes contribute to the overall fiscal discipline and sustainability of government finances (Kristensen et al., 2019).

Figure 1: Public procurement in the PFM cycle



The role of public procurement extends beyond mere financial management and extends to supporting the implementation of public policies and initiatives. For instance, public procurement systems can be leveraged to integrate specific criteria that align with government policies such as gender equality and environmental sustainability. By prioritising contractors and contractors who adhere to these principles, public procurement becomes a tool for advancing broader policy objectives. It can also be utilised to drive economic development and support local industries through strategic sourcing practices, such as promoting the growth of small- and medium-sized enterprises.

Overview of the public procurement cycle

Public procurement can serve many types of government purchases. A typical typology of purchases includes:

1. **Goods Procurement:** This involves the acquisition of physical items such as supplies, equipment, technology, and materials necessary for the functioning of government entities and the delivery of public services.
2. **Services Procurement:** Services procurement pertains to the acquisition of specific services, including consulting, maintenance, professional services,

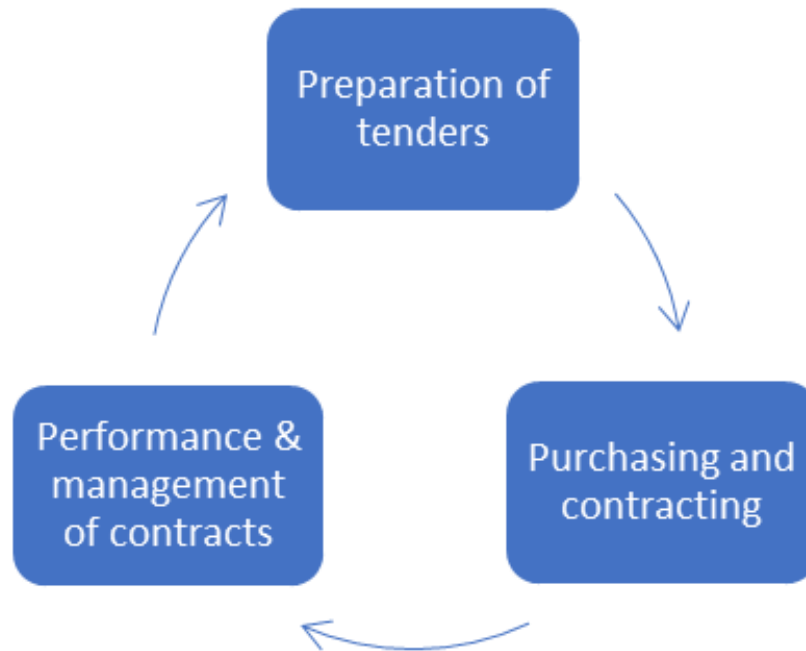
research and development, and other outsourced activities essential for supporting government operations or aimed at advancing knowledge and addressing specific societal challenges.

3. **Works Procurement:** Works procurement encompasses the contracting of construction, infrastructure development, and engineering projects aimed at building or enhancing public facilities and infrastructure (Lloyd, 2015).

Each type of public procurement requires tailored strategies, evaluation criteria, and contract management approaches to ensure the efficient and transparent execution of the procurement process. Accordingly, diverse regulatory frameworks and considerations govern these different procurement types, reflecting the unique nature of the goods, services, or works being procured.

While each procurement type entails its own specificities, the purchasing process typically follows the same phases in the public procurement cycle: 1) the preparation of a tender based on the identification of needs, planning and budgeting; 2) the purchasing process leading to supplier selection and contracting; and 3) contract management and performance evaluation (see figure 2).

Figure 2: Simplified phases of the public procurement cycle



Preparation (needs assessment and tender design)

The first phase of the public procurement cycle involves identifying the goods, services, or works needed to support public administration and service delivery. Given the significance of public goods and services for society, it is important to consider the needs of all potential beneficiaries and affected communities when determining the appropriate prioritisation of various investment options with different opportunity costs.

For example, when deciding whether to spend a limited budget on hospitals or roads, governments need to weigh the costs and benefits. If the government chooses to allocate more funds to healthcare infrastructure, it may lead to better health outcomes for the population, reduced healthcare disparities, and increased access to

medical services. However, this decision comes at the opportunity cost of potentially slower economic growth and less efficient transportation systems, which could hinder mobility and accessibility for some communities. In this trade-off, the opportunity cost of investing in one type of infrastructure over the other involves considering the potential benefits foregone by not allocating resources to the alternative option. This highlights the importance of carefully weighing the needs of all potential beneficiaries and affected communities. A thorough process for effective public investment management would consider cost estimates, funding availability, and risk assessment to ensure that they align with the overall goals and constraints of the government to maximise overall societal welfare (Dabla-Norris et al., 2011).

Following the identification of needs and the determination of development priorities to guide project selection and resource allocation, public entities can draw up concrete designs and specifications for tenders. The tender design phase encompasses the preparation of procurement documents, outlining the requirements, evaluation criteria, and terms and conditions for potential bidders.

Purchasing

The purchasing phase involves several key steps, including tender advertisement, bid submission, bid evaluation, selection of contractors, negotiation and signing of contracts, and addressing complaints and remedies. Ideally, government entities publicise tenders above a nationally specified value threshold¹ through transparent and accessible channels, providing potential bidders with adequate information to participate. Interested parties submit their bids in accordance with the requirements outlined in the tender documents, upon which a thorough evaluation process is conducted, considering factors such as compliance with specifications, pricing, and quality, as well as the absence of conflict of interest. Following the evaluation, the contract is awarded to the successful bidder, ensuring that the contract adheres to the established criteria and legal framework. Provisions should be in place to address any complaints or grievances related to the procurement process, allowing for transparency and accountability in handling disputes.

Performing (contract execution, ex-post audit)

The final phase involves the management and execution of the contract according to the agreed specifications, be it the construction of physical infrastructure, the provision of a contracted service, or the delivery of purchased goods. Ex-post audits, i.e. audits that are conducted retrospectively – either by official bodies such as supreme audit institutions, or by external actors such as civil society groups – assess whether the actual outcomes align with the intended objectives of the procurement, and to identify any areas for improvement or lessons learned for future procurement processes. Audits can involve a comprehensive review of the contract execution, financial transactions, the overall performance of the awarded contractor, and are intended to highlight any potential irregularities.

Variations in the procurement cycle according to different types of purchases

While the above section describes the standard procurement cycle in three typical phases, there are some types of procurement that cater to specific needs and where, as a consequence, the exact procedural steps might differ slightly. For example, a simple procurement processes typically involves the acquisition of goods or services through straightforward and standardised procedures, and generally results in a certain company being awarded a contract directly. These procurement processes are characterised by their streamlined nature, which is intended to achieve efficient and cost-effective acquisition of goods

¹ For example, in the European Union, the thresholds for mandatory publication of procurement data are determined by the value of the contract. For supply and service contracts, the threshold is €139,000 for central government authorities and €214,000 for sub-central government authorities. For works contracts, the threshold is

€5,350,000. Tenders and contracts that exceed these thresholds are required to be published in the Official Journal of the European Union to ensure transparency and fair competition (Graells, 2019). These thresholds are designed to balance the need for transparency with administrative efficiency.

and services and meet immediate needs. On the other hand, infrastructure procurement often encompasses the contracting of large-scale construction projects, civil engineering works, and the development of public facilities. These procurement processes are often very complex and intricate due to the number of entities involved in infrastructure projects. Their evaluation criteria may need to include technical expertise, long-term sustainability, environmental impact assessments, and community engagement considerations.

Furthermore, emergency procurement arises in response to unforeseen circumstances, such as natural disasters, public health crises, or urgent security needs. These situations necessitate rapid procurement actions to address needs in short timeframes. Hence, emergency procurement procedures often involve the relaxation of standard regulations and expedited decision-making to ensure swift delivery of goods, services, or works. While the urgency of these processes is essential for mitigating immediate threats or challenges, the need to bypass standard controls can increase the risk of corruption.

Therefore, oversight and accountability mechanisms become especially crucial in emergency procurement to prevent misuse of authority and resources as has been seen during the Covid-19 pandemic, for example (TI Global Health, 2023). In general, preventive measures at the agency level are considered crucial to mitigate corruption risks during emergency situations (Schultz & Søreide, 2006). According to Jenkins et al. (2020), procurement safeguards in emergencies include the following measures:

1. Including experienced procurement staff in emergency response teams.
2. Continuing to maintain a separation of duties in finance teams and decision-

3. making committees to prevent conflicts of interest that can result in corruption.
3. Where procurement staff are granted some additional freedoms, such as the ability to solicit quotes orally and shorten application deadlines, setting clear limits on the use of emergency non-competitive processes.
4. Continuing to issue contracts and document transactions, as well as document exceptions to standard procedures, even after contracts are signed.
5. Including anti-corruption clauses in contracts.
6. Where pre-approved lists of suppliers and partners are available, using these to procure goods and services from suppliers with established track records and mobilise organisations with extensive experience in disaster response.
7. Soliciting as many offers as possible and involve at least two people in evaluating these offers.
8. Collecting as much high-quality data as possible on suppliers and prices during the tendering stage. This will be critical for pursuing disciplinary action against fraud and other irregularities later.
9. Where they exist, removing the paywalls that tender notices may be locked behind.
10. Publishing all emergency contracts in full open data format, including names and beneficial ownership information of companies awarded contracts, as well as terms of payment, delivery and value.
11. Encouraging civil society to monitor procurement procedures.
12. Publicising complaint and grievance mechanisms for applicants and protecting whistleblowers to help identify red flags and irregularities.
13. Setting aside designated resources to conduct spot checks on the quality of goods and services.

Cross-cutting anti-corruption approaches

To strengthen public procurement systems as a whole and integrate anti-corruption measures, several cross-cutting legislative and policy practices can be implemented. This includes access to information, e-procurement, oversight mechanisms, and governance/public administration measures.

First, governments can enhance **public access to information enabled by ICTs**. This involves enacting freedom of information laws that establish the right of access to procurement-related records, requiring procuring entities to proactively disclose procurement information through dedicated websites or portals, and establishing mechanisms for the public to request specific procurement-related documents (Davies & Fumega, 2014). Furthermore, promoting open data principles, such as publishing data in standardised, structured and machine-readable formats, can facilitate broader access to information and support quantitative analysis and monitoring (Gurin, 2014). The most common technology to enable access to information works via integrated e-procurement systems that provide real-time updates on procurement processes, not only for improving access to information, but also accountability, competition, and fairness of public procurement systems as a whole (Lewis-Faupel et al., 2014). This encompasses the electronic exchange of procurement-related documents, such as requisitions, purchase orders, invoices, and requests for proposals, as well as the automation of the various stages of the procurement lifecycle and the publication of the collected data (Buyse et al., 2015).

Second, a number of **oversight mechanisms** can strengthen anti-corruption in public procurement, including internal controls designed to improve risk

management within the system. In addition, mechanisms through which external stakeholders can submit complaints, grievances, and appeals help strengthen the system of checks and balances. Furthermore, supreme audit institutions – essential independent bodies responsible for auditing government expenditures – can track whether funds are used efficiently and effectively. Combining audits with civil society monitoring can be an effective anti-corruption approach where civil society acts as additional watchdogs, adding independent oversight while advocating for the public interest. Individual citizens should also be able to report corruption incidences through protected, confidential and secure whistleblower mechanisms.

Third, **integrity measures** such as codes of conduct or reward and sanction systems can establish safeguards within public organisations and help reduce corruption on both sides of the procurement chain. Moreover, companies serving as government contractors can be encouraged to foster integrity through the application of a mix of enforcement sanctions and good practice incentives (UNODC, 2020).

Lastly, supporting the capacity building and **professionalisation** of procurement officials helps to ensure efficient and effective procurement operations, through finding the right level of discretion for procurement officials, creating an accountable organisational culture, and considering performance pay (Rasul & Rogger, 2015).

Good governance and anti-corruption measures across the public procurement cycle

From planning new projects through to the tendering process and the contract implementation

phase, corruption risks persist throughout all stages of the procurement cycle, necessitating a range of mitigation strategies (Kenny, 2006). Although the purchasing phase is commonly perceived as most susceptible to corruption (World Bank, 2017), there are multiple ways in which the integrity of a procurement process can be compromised at each of the three major stages. Moreover, corrupt practices during early phases may pave the way for misconduct later on. While many countries have taken steps to address obvious corruption risks by enhancing transparency and competitiveness in major tender processes, targeting only specific risks could simply lead to the displacement of corrupt activities to other processes (Fazekas & Dávid-Barrett, 2020). For example, if exercising undue or corrupt influence over contract awards becomes challenging, corrupt activity may focus on modifying the design of tenders or seeking to reduce obligations or quality standards during contract implementation (World Bank, 2020). The next sections outline the key corruption risks for each phase of the procurement cycle and present a number of mitigation measures specific to that phase.

Anti-corruption in the preparation phase

Key corruption risks in the preparation phase

In many countries, the steps of needs assessment and project appraisal are often poorly carried out or conducted behind closed doors (Dabla-Norris et al. 2011), and several corruption risks can undermine the processes at this first stage of the

procurement cycle. Some common corruption risks in the preparation phase include:

Political interference: Weak institutional setup can lead to undue influence and political interference in budget decisions being driven by political interests or personal gain rather than objective criteria such as needs or cost-benefit analysis. Influence peddling, unfair lobbying, hidden political financing, and bribery may take place when potential contractors with vested interests in potential publicly-funded projects provide bribes or other incentives (such as campaign contributions) to sway budget decisions at the political level. Political interference may lead to the approval of projects that do not align well with local requirements and are needlessly expensive due to poor planning and implementation, causing budget overruns and other setbacks such as discontent among affected communities (Wells, 2015).

Unsolicited proposals²: These occur when potential contractors contact government officials with a proposal for a project without the government having issued a public tender for such a project. Unsolicited proposals present different corruption risks compared to typical public-private partnerships that follow standard procedures and are driven by publicly identified needs. Unsolicited proposals are considered vulnerable to corruption due to low levels of transparency, potential bribery or lobbying by private companies, and lack of competition (Bullock, 2019).

Lack of public consultation: When interest groups manipulate the needs assessment process

² For a TI Helpdesk paper on *Unsolicited Proposals*, see: <https://knowledgehub.transparency.org/assets/uploads/helpdesk/Corruption-and-unsolicited-proposals-2019.pdf>

to serve their own agenda, decision-makers may exclude public input or consultation in order to avoid scrutiny and force through projects that are not in the public interest. This can result in projects that fail to meet the genuine needs or preferences of the communities they are intended for.

Inadequate project design: Deliberately incomplete or inaccurate project designs and failure to conduct thorough risk assessment may serve to benefit contractors financially, show favouritism towards a particular contractor, or create opportunities for corrupt manipulation in the future. This can result in inflated expenses, project delays, lower quality outcomes, and potential openings for unethical practices (Fazekas & Tóth, 2018). For instance, contractors might exploit unfinished or imprecise designs to inflate the scope of work and raise costs. The intentional downplaying of expenses and the exaggeration of advantages in order to obtain approval for financially unsound projects or to create a financial buffer for the future misappropriation of funds often results in projects with few economic benefits and substantial cost increases.

Tailoring / Overspecification of tender requirements: Government officials involved in the preparation phase may formulate overly narrow specifications in tender documents in order to favour a specific contractor and exclude other firms with fewer political connections.

Mitigation measures in the preparation phase

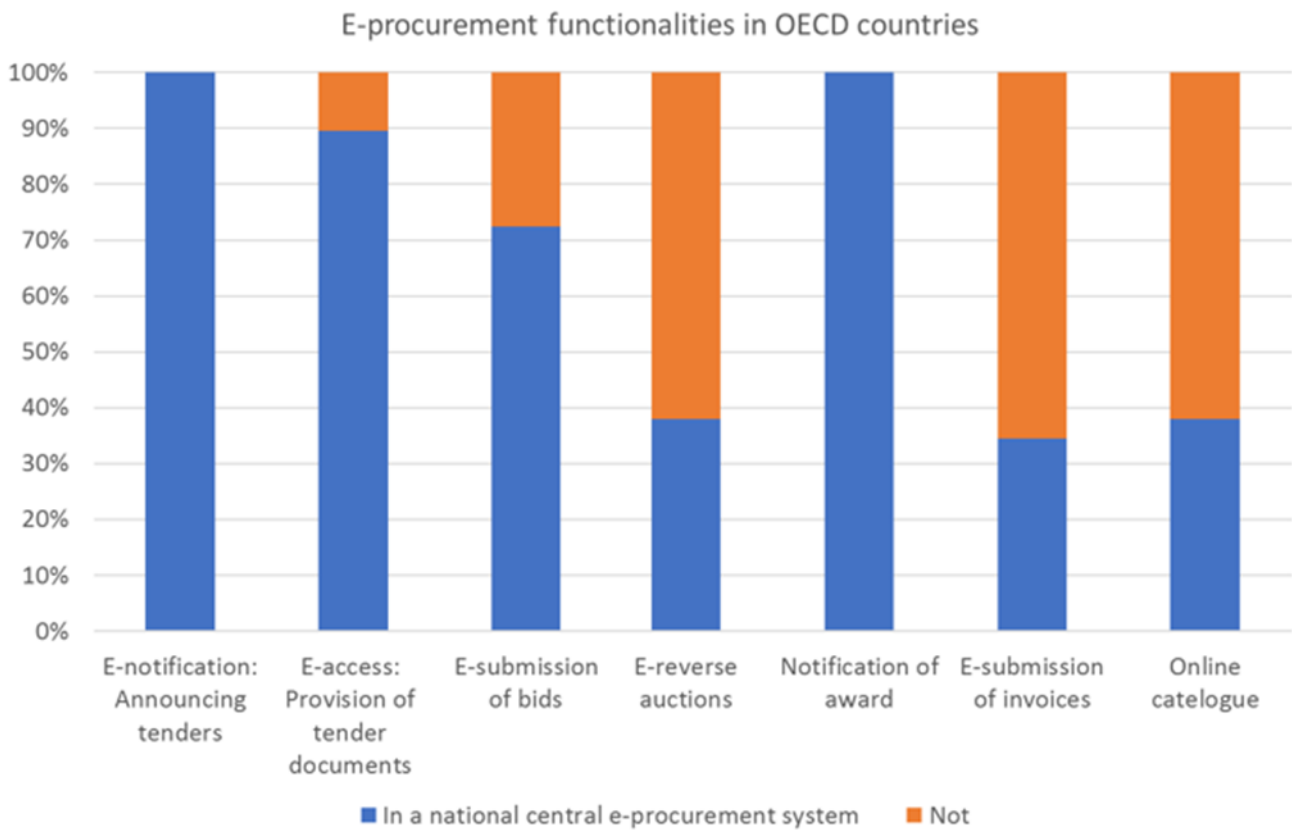
To mitigate these corruption risks, it is crucial for government entities to implement control

mechanisms such as transparency of needs assessment and budget plans, mandatory reporting of conflict of interest and financial disclosure by procurement officials, , stringent tender design rules to promote fair competition and transparency, use of capacity building and digital tools for procurement personnel to enhance their awareness of corruption risks and equip them with tools to identify and address unethical practices effectively. The following section provides a selection of anti-corruption measures and examples of existing tools in the procurement preparation phase.

Digital tools: e-procurement functionalities in the preparation phase

E-procurement systems offers four key functions for the tender preparation and advertisement phase: e-notification, e-access, e-attestations, and e-submission. E-notification involves the official electronic announcement of tenders or contract awards on a publicly accessible website. E-access refers to the electronic publication and availability of tender documentation prepared by the contracting authorities for download. E-attestations involve electronically submitting and storing qualification documents such as company registration proofs or prior experience evidence. Meanwhile, e-submission allows for electronically submitting tenders to procuring bodies via a purpose-built IT system, which also facilitates the electronic opening of received tenders (Fazekas & Blum, 2021). As the below figure shows, among these functions, e-notification and e-access are the most widely implemented tools in OECD countries (OECD, 2016).

Figure 3: E-Procurement functionalities in OECD countries



Source: Fazekas & Blum, 2021, based on OECD (2016), for full data see: https://qdd.oecd.org/subject.aspx?Subject=GOV_PUBPRO_2016

E-notification and e-access play a crucial role as all interested parties, including potential bidders and the public, can equally be informed in detail about upcoming opportunities, the procedures involved, as well as access tender documents, specifications, and other relevant information electronically. This eliminates the possibility of certain bidders obtaining unfair advantages through privileged access to project details (Fazekas & Blum, 2021). Hence, by leveraging e-notification and e-access in the preparation phase, e-procurement can enhance transparency, promote fair competition, and mitigate the risk of corruption often associated with traditional paper-based procurement processes (Buyse et al., 2015).

An example of the successful adoption of e-procurement tools in the preparation phase comes from France. As part of the National Plan for e-Procurement in 2018, the government incorporated tools across the entire procurement process, and has introduced two openly available tools to specifically promote transparency in the preparation phase of procurement. First, the *APP* tool is a digital tool designed to streamline the preparation process and support companies and public buyers specifically during the planning phase of procurement. It provides a platform for interactive planning and collaboration between buyers and contractors and offers practical functionalities, including the ability to create project plans, define needs, and consult potential contractors. It also facilitates the

preparation of procurement documents and the management of contractors' responses. In addition, the Procurement Notices Module is another valuable tool that the French government has made openly accessible. This module serves as a platform for creating, sending, and downloading notices related to procurement projects, further contributing to the transparency and accessibility of procurement information (UNCAC, 2023).

Transparent budgeting and integrated anti-corruption safeguards

In the preparation phase of public procurement, the transparent publication of public budgets and plans, especially for large infrastructure and expenditure projects, is essential to enable public oversight and deter corrupt activities – see for example [the infrastructure portal of the Australian government](#). The availability of business cases and feasibility studies provides insight into the justification and planning behind the projects for the public, potential contractors, and other stakeholders (Graycar, 2019). Furthermore, assurances on the availability of funds for investment plans are crucial in the preparation phase. It is also important to ensure that there is an authorised body responsible for independent review and decision-making in the allocation of funds for infrastructure projects. This authorised body should have clear guidelines and procedures for approving and disbursing funds, ensuring that they are allocated efficiently and effectively (Adam & Fazekas, 2023; World Bank, 2020).

Second, implementing mechanisms to manage conflicts of interest in project selection is essential to identify corruption risks within specific industries and specific projects, considering political pressures. Allocating funds specifically to anti-corruption monitoring within procurement budgets should be mandated (World Bank, 2020). Clear

evaluations and specific timelines throughout the process can help reduce opportunities for corrupt coordination (Bullock, 2019). For example, to counter the risks of unsolicited proposals, the Swiss challenge system, which has been applied in the Philippines, India, Italy and Taiwan, uses competitive tendering while giving the original proponent the right to counter any better offers, promoting competition and innovation (Hodges & Dellacha, 2007).

Public consultations

Public consultations present a crucial mitigation strategy for corruption in the procurement preparation phase. Involving the public in the needs assessment and tender design processes by soliciting input from diverse stakeholders (civil society organisations, private sector entities, affected communities, and the general public), governments can ensure that the procurement aligns with the needs and interests of the broader population (Rustiarini et al., 2019). For instance, in the Philippines, the Department of Budget and Management conducts public consultations to gather input on the preparation and design of procurement projects. This allows the public to voice concerns and provide feedback on potential corruption risks (UNODC, 2023).

Another example of ensuring consultation within procurement divisions comes from Belgium, which has installed an Advisory Body for Public Procurement (ABA/CPA) (European Commission, 2023: 144-148). This body provides legal advice and support to the procurement divisions of the Federal Public Services, especially in the phase of tender preparation. Although consulting with ABA/CPA is not mandatory and their advice is non-binding, it is often solicited and followed in practice. The ABA/CPA consists of four in-house lawyers and engages in activities such as the formulation of public procurement strategic plans

and the creation of committees for better implementation of their initiatives (European Commission, 2023). ABA/CPA's work includes the following aspects (which go beyond the preparation phase):

1. Offering immediate legal advice during all procurement stages from drafting tenders to executing contracts;
2. Providing training and producing e-learning modules and other materials on public procurement topics, including ethics and anti-corruption measures;
3. Participating in the creation of a comprehensive e-procurement system;
4. Working towards a new public procurement model that aims to offer legal security and reduce administrative burden, potentially decreasing conflicts of interest (European Commission, 2023).

Anti-corruption measures in the purchasing phase

Key risks in the purchasing phase

This stage of the procurement cycle – which involves bid evaluation, the selection of bidders and contract signing – is considered particularly susceptible to corruption due to the intricate nature of the process and numerous loopholes that can be used to steer a contract towards specific bidders (Adam & Fazekas, 2023; Kingsford Owusu & Chan, 2021).

The obvious corruption risk is influence peddling, where external factors such as bribery, lobbying, or favouritism influence the decision-making process during bid evaluation and contract award. For example, a government official may be unduly influenced by a contractor offering incentives or

kickbacks, resulting in an unfair advantage during the evaluation process and ultimately leading to an inappropriate contract award. This can involve middlemen – for example, three out of four foreign bribery cases in procurement have been found to involve intermediaries, such as local subcontractors, consultants, agents, or corporate vehicles (including subsidiary companies, local consulting firms, offshore companies in tax havens, etc.) (OECD, 2014).

Besides, the presence of conflicts of interest can occur when individuals involved in the evaluation or awarding of contracts have personal or financial interests in the bidders, leading to biased decision-making, such as when a public official responsible for evaluating bids has a personal connection to a specific contractor. Such practices generally result in inflated prices and reduced quality and quantity and are associated with corrupt financial gains through bribes as well as the use of intermediary firms, subcontractors, offshore entities, and fake consultancy agreements (Fazekas, Cingolani & Tóth, 2016).

The corrupt *modus operandi* of steering a contract to a favoured bidder without detection in a recurrent and organised fashion have been studied in detail (e.g. Fazekas & Tóth, 2014). It typically involves at least two infringements of principles related to fair distribution of public resources: 1) avoiding competition by using unjustified sole sourcing or direct contract awards; and 2) showing favouritism towards a particular bidder by tailoring specifications or sharing insider information. A non-exhaustive list detailing these practices that indicate corruption risks in public procurement is shown in Table 1 below.

Table 1. Procurement practices and supplier characteristics indicating corruption risks

Corruption Risk	Description
Non-competitive or less competitive procedure types	Using procedure types such as direct contracting which can favour a certain bidder. While open competition is relatively hard to avoid in some tendering procedure types where large sums of money and public scrutiny is involved, others such as procedures involving accelerated negotiation or negotiation without competition are by default much less competitive. As such, the decision by public officials to use less competitive and transparent types of procurement procedure can be a red flag, indicating the possible risk of corruption (Chong, Klien, & Saussier, 2015).
No call for tenders publication	Where officials do not publish a call for tenders or similar notice prior to bid submission deadline and evaluation of bids, this can also indicate corrupt intention, as it makes it harder for competitors to prepare a bid.
Restrictive or tailored tendering terms	The technical, financial, and legal requirements and the product descriptions are defined so as to favour a certain bidder.
No contract award publication	Avoiding the publication of contract awards on required platforms, such as national e-procurement portals, can obscure the process and hinder competitors' ability to complain or appeal against the decision.
Suspiciously short advertisement period	If the advertisement period, i.e. the number of days between publishing a tender and the submission deadline, is too short to prepare an adequate bid, especially for large tenders, this can serve corrupt purposes; whereby the public officials informally tells the well-connected company about the upcoming opportunity ahead of the publication of the tender, in order to give them a significant advantage (Piga, 2011).
Single bidding	This refers to situations in which only one bid is submitted to a tender on an otherwise competitive market. While single bidding might also reflect non-corrupt behaviour such as contract renewal, its widespread presence over longer periods across many procuring bodies is more likely to signal systematic deviations from competitive norms.
Non-transparent supplier registration	The supplier company is registered in a tax haven or country considered a secrecy jurisdiction and/or beneficial owners are unknown/untraceable.

Political connections of contractors	Contractors have links to political office holders such as donating to party campaigns or employing politicians (e.g. revolving door).
Insufficient supplier size	The supplier is not large enough to credibly deliver the contracted work (e.g. its annual turnover is smaller than the contract value).
Insufficient supplier age	The supplier has insufficient experience to credibly deliver the contracted work (e.g. it was founded less than a year before contract award)
Supplier sanctions record	The supplier or any of its owners/managers have been sanctioned in the past or are under investigation at the time of contract award.
Extensive subcontracting	The contract includes an extreme share of subcontracted content (e.g. more than 50% of the contract value). Contractors with weak technical or financial capacity may subcontract work to less qualified companies, which can result in delays, cost overruns, and quality issues.
Non-competitive prices	Unit prices for standardised inputs such as ton of gravel are higher than local competitive market prices

Adapted from: Fazekas, Cingolani & Tóth (2016); Fazekas & Tóth (2018)

Mitigation measures in the purchasing phase

In general, corruption risks in the purchasing phase can be mitigated by adhering to the following principles:

1. Tender specifications should be clear, and an appropriate time should be given to respond to the tender;
2. Building transparency and proactive disclosure into the process, i.e. publicly disclosing the bid evaluation criteria, evaluation committee composition, and contract terms;
3. Modern e-tools for the procurement processes should be used to eliminate direct contact between procurement officials and potential suppliers;
4. Establishing rigorous oversight mechanisms through procurement authorities and independent review boards or audit committees;
5. Government departments should undertake wide, pre-market consultation processes with all relevant stakeholders;
6. Promoting fair and competitive bidding through open tenders and pre-qualification processes enabling the best proposal to win, or else proper justification of a closed/direct tender process;
7. Implementing comprehensive conflict of interest policies and mandatory disclosure requirements for individuals involved in the procurement cycle, particularly officials on evaluation committees;
8. Conducting thorough due diligence on prospective contractors and or include mandatory disclosure requirements to verify their qualifications, financial integrity, and past performance.

The next section highlights some examples of tools that contribute to implementing these mitigation measures.

Digital tools: E-auction and e-evaluation, contract publication

Among the numerous functions an e-procurement system can provide, two are particularly relevant to the assessment of bids and the awarding of contracts: e-auction and e-evaluation. E-auction involves a repetitive pricing presentation process, often with downward revisions (reverse auction), conducted through a structured electronic platform. This means that instead of just one round of bidding, the auction platform keeps presenting the offered prices to all bidders, usually lowering it each time. On the other hand, e-evaluation refers to either partial or full automation of tender assessments as well as comprehensive tracking of decisions made during the evaluation process (Fazekas & Blum, 2021).

Typically, e-auctions involve the transparent disclosure of crucial bidding details such as prices at each phase of the procedure, restricting opportunities for buyer manipulation and fostering bidders' confidence in the fairness of the process. This is expected to heighten competition and has been associated with lower prices in Slovakia and Russia (Pavel & Sičáková-Beblavá, 2013; Yakovlev, Bashina, & Demidova, 2014).

E-evaluation enhances the transparency of the evaluation process, as managers can review their staff's decisions, as can the broader public including bidding firms and NGOs who are able to examine detailed records of evaluation decisions. It also reduces the administrative workload of evaluators and bureaucrats by automatically verifying some submitted certificates or calculating overall scores based on prices and other quantitative criteria. However, the viability of such

systems depends on the computer literacy and skills of bureaucrats (Fazekas & Blum, 2021).

Furthermore, the mandatory publication of procurement contracts has been seen to greatly improve transparency and accountability, such as in the case of Czechia and Slovakia (European Commission, 2023: 41-45). Slovakia passed legislation on mandatory online publishing in January 2011 as part of broader reforms and a new Freedom of Information law, which stipulated the mandatory publication of all public contracts on a [centralised online repository](#). Under the new law, all government entities were required to publish almost all contracts, receipts and orders online. Importantly, government contracts were not considered valid without having been published within three months of being signed. Also, after concluding a contract, the procuring authorities became obliged to send relevant documents (as hardcopies or by electronic means) within seven days of publication to the Public Procurement Office. Notably, the entire reform process was completed within two months and technical and financial issues were reportedly minor, despite some initial pushback from the municipal level and a number of exemptions defined in the first year of the law. This legal reform, alongside with changes in staffing at public entities, is believed to have had a sizeable impact in improving integrity in procurement processes in Slovakia (Adam, Fazekas & Tóth, 2020).

Furthermore, since 2017, Slovakia has also established a Public Sector Partners Register to improve transparency in the ownership of companies conducting business with the state. It has registered over 100,000 entries listing the names of ultimate beneficial owners and resulted in the disclosure of the ownership structure of some firms that benefited from state investments. This has led to several legal actions, and

companies associated with oligarchs have been removed from the register, preventing them from doing business with the state for a defined period (European Commission, 2023: 138-143).

Big data analysis and red flagging

Leveraging advanced data-driven insights can additionally enhance oversight and accountability in the purchasing phase of the procurement processes. By utilising sophisticated algorithms and data mining techniques, large volumes of procurement data can be analysed to detect “red flags”, i.e. irregularities or potential risks such as those listed in Table 1. For example, anomalies in pricing trends, supplier relationships, bidding patterns, or other suspicious activities within procurement data can be flagged through big data analysis (Poltoratskaia & Fazekas, 2024).

This is done, for example, by the watchdog portal [Opentender](#). The platform transforms procurement data from 33 countries into a structured database and visualises transparency and integrity indicators for countries, regions and markets as well as individual contractors and buyers. However, crucially, the potential of red flagging depends on the quality of the data going into it. It thus hinges on the reliability and comprehensiveness of those entities collecting and publishing data – above all government departments and public procurement agencies.

In the purchasing phase, big data insights may be used to screen bidders or indicate the corruption risk levels in certain markets. By integrating red flagging into the purchasing process, corruption risks can be proactively identified and mitigated. This is particularly effective where various datasets (e.g. indicators on political financing, beneficial ownership, interest and asset declarations, debarment lists) are cross-referenced and automatically flag issues.

In Romania, for example, the *PREVENT* system has been designed to forewarn contracting authorities of conflicts of interest in procurement procedures before contracts are awarded (European Commission, 2023: 131-138). It has been operational since June 2017 and focuses on analysing integrity data through an online integrated system which cross-checks information with other national databases. It uses an “integrity form” completed electronically by contracting authorities, containing information about procurement procedures, personal details of decision-makers, and bidder details. This form must be filled within five days from the tender opening on the national e-procurement platform. If potential conflicts of interest are detected, *PREVENT* issues an integrity warning. The contracting authorities must act on these warnings by taking all necessary measures to avoid the detected conflicts of interest, such as replacing a committee member or excluding a bidder. The National Integrity Agency monitors warnings to ensure conflicts of interest are resolved and can investigate or notify other bodies if the situation is not remedied. A key benefit of *PREVENT* is that it acts pre-emptively, which avoids lengthy legal procedures and potential annulment of contracts post-award.

Grievance mechanisms for bidders

In addition to proactive measures such as red flagging, it is essential to establish effective grievance mechanisms for bidders in the purchasing phase of public procurement. These mechanisms serve as an avenue for bidders to report unfair treatment or irregularities in the procurement process, without fear of retaliation. Grievance mechanisms not only serve to detect and address potential misconduct but also contribute to fostering a culture of accountability and ethical conduct within the public procurement ecosystem. In this manner, they can build trust and

confidence among bidders, ultimately promoting a competitive and reputable procurement environment.

One example of a grievance mechanism is the [High-Level Reporting Mechanism](#), introduced by the OECD as part of its Anti-Corruption Toolbox, which is a multi-stakeholder collective action tool for business to raise and quickly resolve complaints about suspected bribery or unfair practices in public procurement. It is designed to enable bidders to escalate their concerns to senior management or oversight authorities within the procurement agency. This mechanism ensures that any grievances are brought to the attention of decision-makers at a high level, facilitating swift and impartial resolution of issues that may compromise the fairness and transparency of the purchasing phase (OECD, 2022).

Another notable example is [Dozorro](#), an online platform in Ukraine that allows bidders and civil society organisations to report irregularities and misconduct in public procurement. *Dozorro* provides a channel for whistleblowing and public reporting of suspicious activities, thereby empowering stakeholders to hold procurement officials accountable and contribute to the detection and prevention of corrupt practices.

Anti-corruption measures in the performance phase

Key corruption risks in the performance phase

During the contract execution and monitoring phase, it is essential for procurement officers to diligently ensure that the contractual obligations are met. Corruption risks can emerge when there is insufficient supervision or when supervisors collaborate with contractors to misappropriate funds (Wells, 2015). In contrast to the tendering and contracting phase, public information on

contract implementation is often very limited, which creates an environment that is conducive to corruption and makes it difficult to detect.

Corruption techniques in this phase include:

- **Modified contracts and variations:** Alterations to the original scope or price of the contract can occur when contractors are allowed to inflate the original price or to charge for unnecessary extra products. This can also involve fraudulent invoicing and payment schemes, where contractors submit inflated or fictitious invoices for goods or services that were never delivered or provided.
- **Embezzlement or misuse of materials:** Contractors might use inferior materials, neglect mandatory quality assurance protocols, or provide fewer supplies than specified in an effort to cut costs and keep the remaining funds (Stansbury & Stansbury, 2008).
- **Ghost workers:** Individuals listed on the payroll without actually working on a contract are referred to as "ghost workers." This situation may arise when officials or contractors intentionally exaggerate the number of workers, leading to embezzlement of salaries allocated to employees that do not in fact exist.
- **Delaying tactics:** Contractors might employ strategies to increase expenses and prolong project durations. These tactics may involve decelerating the pace of work, submitting an excessive amount of documentation, or not meeting important milestones (Adam & Fazekas, 2023).

Mitigation measures in the performance phase

Effective contract management and oversight are pivotal in mitigating corruption risks during the contract execution phase of public procurement. This includes using performance-based contracts with clear deliverables, milestones, and quality

standards to ensure that contractors are held accountable for meeting specified requirements. By tying payments to measurable performance indicators, the risk of non-compliance and substandard delivery can be reduced (Wells, 2015). Furthermore, mechanisms for continuous monitoring and evaluation of contract performance include frequent site visits, progress reviews, and quality assessments to verify that goods and services meet the agreed standards. Lastly, enhancing transparency of contract implementation information and payment processes is key to addressing corruption risks associated with fraudulent invoicing and payment schemes. The next section considers tools that can help achieve this in practice.

Digital tools: E-invoicing, e-payment, e-contract monitoring

Among existing e-procurement functionalities, e-invoicing, e-payments, and e-contract monitoring are still relatively underutilised (Buyse et al., 2015), although major players have increasingly been pushing for their incorporation (e.g. the World Bank's STEP e-procurement system). E-invoicing involves the automated issuance, sending, receiving, and processing of invoices and billing for procurement contracts through electronic methods. E-payment refers to financial transactions between a contracting body and a supplier being carried out electronically within the broader framework of an e-procurement system (Fazekas & Blum, 2021).

For instance, the United Kingdom's Government eProcurement System has integrated electronic payment functionalities to enhance transparency and efficiency in public procurement transactions. In the Philippines, the Department of Budget and Management (DBM) provides a transparency seal on its website, allowing citizens to access information on government payments, promoting accountability in the use of public funds (UNDP,

2023). The seal signifies that the DBM is actively working to provide access to important information regarding government expenditures and transactions, and typically includes specific categories of information that the DBM makes available to the public. These categories often encompass financial documents, such as budgets, financial statements, and reports on fund utilisation, and procurement activities, such as bid invitations, bid results, and contracts awarded.

E-contract monitoring encompasses the electronic submission and approval of documentation related to contract execution progress and monitoring activities like proof of delivery. While still being a rarely used e-procurement function, the collection of contract execution data and making this data available to the public would close a significant gap in the transparency of the procurement cycle.

Contract monitoring by oversight bodies

Empowering independent oversight and audit functions within procurement agencies or engaging external audit firms to conduct thorough and impartial assessments of contract execution can safeguard against irregularities and fraudulent activities. For example, the introduction of the External Oversight Function in the procurement process in Colombia has significantly contributed to enhancing transparency and accountability. It involves the engagement of external entities or individuals with expertise in auditing, legal compliance, and procurement practices. These external oversight entities are responsible for conducting comprehensive reviews of contract execution, monitoring financial transactions, and assessing compliance with procurement laws and regulations. By operating independently from the procuring entities, they provide an objective evaluation of procurement processes and highlight areas of concern or potential irregularities (UNDP, 2023).

As another example that demonstrates a useful combination of big data analytics with audit purposes for ongoing and completed projects, the European Investment Bank's (EIB) proactive integrity team uses big data analytics to analyse over 500,000 government contracts of EIB counterparts (borrowers). The Corruption Risk Indicator methodology (Fazekas & Kocsis, 2020) is used to rank organisations according to their total number of red flags. High-risk cases are then further investigated using desk research and selected for on-site audits during project implementation by the team.³

In addition, supreme audit institutions are crucial independent bodies responsible for checking government expenditures and ensuring that funds are used efficiently and effectively. High-level audits and monitoring can heighten the likelihood of uncovering wrongdoing and increase the chance that corrupt individuals and entities are sanctioned. For example, the publication of audit findings and the increased probability of being subject to an audit were found to reduce instances of corruption-related irregularities in Brazilian municipalities. In fact, a 20% rise in audit probability corresponded to a 17% decrease in irregularities detected (Zamboni & Litschig, 2016), as officials knowing that they might be subjected to an audit and potentially facing consequences are more likely to comply with expected standards of behaviour and procedural safeguards. Moreover, a randomised controlled field study examining village road construction initiatives in Indonesia discovered that raising the likelihood of audits from 4% to 100% resulted in an 8% decrease in

unaccounted infrastructure expenditure, much of which was likely caused by corruption. Notably, the primary impact did not stem from criminal proceedings as the probability of formal prosecution and punishment of corrupt village officials was perceived to be low, but rather from publicly disclosing audit findings at village gatherings, which officials might fear could impact their chances of re-election (Olken, 2007). This shows that social accountability can be an influential complement to formal punishments.

Civic contract monitoring

In addition to the established mitigation strategies, civic contract monitoring serves as an additional mechanism for combating corruption in the contract implementation phase. It involves the active engagement of citizen groups in overseeing the execution of public contracts as “eyes on the ground”. In Uganda, social accountability tools such as community scorecards⁴ and public expenditure tracking surveys (Kanungo, 2010) have been utilised to [engage citizens in monitoring the implementation of public contracts](#). These initiatives empower local communities to actively participate in oversight activities, leading to increased transparency and reduced opportunities for corruption in public procurement projects.

As a field experiment in Peru observed, the collaboration between audit institutions and civil society can prove especially powerful. In the study, the combined audit by the audit institution together with a civil society organisation of small-scale infrastructure projects significantly decreased costs by 51% with average savings of \$75,000 per

³ For more details on this case study, see pp. 16-17 of https://www.govtransparency.eu/wp-content/uploads/2023/12/DataanalyticsanticorinPP_chapter_preprint_2023.pdf

⁴ For an example of a community scorecard, see Annex 1 in https://w03.ippf.org/sites/default/files/2021-03/Youth%20Led%20Social%20Accountability%20Manual%20-%20IPPF%20-%20v2_0.pdf

project. This highlights the cost-effective impact combining efforts between relevant authorities and civil society in overseeing contract execution (Lagunes, 2017).

Transparency International has pioneered the implementation of Integrity Pacts in public procurement processes across various countries. [Integrity Pacts](#) are a well-established multi-stakeholder oversight mechanism in public procurement involving an agreement between the public authority and bidders that stipulates a commitment to adhere to a set of integrity standards and rules. Under an Integrity Pact, an independent monitor, often a reputable civil society organisation, is appointed to oversee the entire procurement process. The monitor has the authority to review and scrutinise all stages of the process, provides regular reports and findings to the public and relevant stakeholders. Moreover, Integrity Pacts often include provisions for sanctions or penalties in case of any violations, thereby adding an additional layer of deterrence against corrupt behaviour.

Integrity Pacts have been successfully implemented in [29 countries across four different regions](#) (Europe, Latin America, Asia, Africa) (Transparency International, 2019; 2022). While most Integrity Pacts have focused on the preparation and purchasing phase, recently there has been an increased focus on monitoring of the execution phase, entailing the verification of achievement of project milestones and related payment claims, as well as verification of alignment of material execution with needs identified in the preparation phase. This has also included on-site visits in collaboration with affected communities (Transparency International 2022).

Building on the idea of Integrity Pacts, but focusing on a larger number of more easily monitored

projects (i.e. those that are less complex and technical), the [iMonitor](#) project set out recently to combine big data analytics with extensive civil monitoring of ongoing contracts in Catalonia (Spain), Italy, Lithuania, and Romania. It creates networks of civil monitors and law enforcement agencies to draw on civil society's extensive reach and on-the-ground monitoring capacity. They use a dedicated reporting standard bringing together quantitative corruption risk indicators and detailed civil monitoring results to produce high-quality, targeted and operationally relevant reports for law enforcement and other public authorities. The intended impact of the project is to generate new investigations and other administrative responses to irregularities in contract implementation.

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