

# ANTI-CORRUPTION HELPDESK

PROVIDING ON-DEMAND RESEARCH TO HELP FIGHT CORRUPTION

## OVERVIEW OF NATIONAL APPROACHES TO ANTI-CORRUPTION PACKAGES

### QUERY

Can you provide information on countries that have recently passed anti-corruption packages? What are the main areas covered by the packages? How was the package proposed and who proposed it? Was the public consulted on the content of the package? Was there public support or pressure to approve it? What can be considered as key for the approval of the package?

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### SUMMARY

Several recent examples exist of countries deciding to address corruption through a comprehensive anti-corruption package. Such reform packages have been passed, or attempts have been made to pass these packages, in Mexico, Ukraine, Greece, Iraq and the EU. They were all comprehensive in nature and addressed a range of levels of governance.

While dependent on the country context, these reform packages typically address several aspects of national governance, including civil society space, transparency in public finances, economic policy, the civil service, financial controls, judicial independence and institutional mandates.

Implementing such a wide package of reforms successfully requires several factors to be in place. This includes political leadership and strong political will for the reforms, supportive coalitions of actors driving the process forward, and a data-driven approach to understand how corruption is occurring and consequently where reform is needed.

Key to the successful passing of packages in Mexico and Ukraine were the strong role of civil society and citizens in initiating the process and in reinforcing political will when it is weakened.

Conversely, reforms in Greece and the EU, which have only been partially successful, have not had a strong citizen and civil society push to drive the change. In Iraq, political manoeuvring and capture for other political purposes of the initial drive for reform have been identified as factors stalling the reforms there.

## 1 ANTI-CORRUPTION PACKAGES: AN OVERVIEW

Several governments and legislatures, including Mexico, Ukraine, Greece, Iraq and the EU, have recently opted to strengthen their anti-corruption frameworks through a comprehensive reform programme – an anti-corruption package. While the concept of an anti-corruption package is not clearly defined in the literature, a number of features and characteristics distinguish them from anti-corruption laws.

Anti-corruption laws tend to be standalone pieces of legislation designed to either comprehensively address corruption, such as the German *Gesetz zur Bekämpfung der Korruption* (2015), which is a general law addressing several aspects of corruption, or to deal with a specific aspect of corruption, such as the USA's Foreign Corrupt Practices Act (1977), which criminalises bribery of foreign officials.

An anti-corruption package, on the other hand, is often made up of a wide range of measures that aims to change the legal framework in a particular instance and address other, related legislation, policies and institutions, including by combining “economic reform with institutional and political reform” (Khan 2006: 6).

Anti-corruption reform packages tend to include (European Commission DG Migration and Home Affairs 2011, Khan 2006: 6):

- interrelated laws and policies
- measures that tackle corruption at the economic, social and policy level
- combinations of economic, institutional and political reform.

The World Bank Institute's Governance Team has identified a range of factors that constitute, and should be considered for inclusion into, anti-corruption reform packages (Kaufmann et al. 1998: 2-5). This includes:

- Economic policy. Reform efforts should consider where regulations provide opportunities for corruption, whether monopolies are concentrating economic power that can be used to influence the political process and how to ensure transparency in any privatisation process.

- Civil society. Citizens and civil society should be empowered through the package to be part of anti-corruption reform processes and should have access to the information needed to participate fully.
- Public oversight. Political leadership should demonstrate its own commitment to fighting corruption by public disclosure and transparency in their own finances, such as through declarations of assets, conflict of interest statements and reviewing parliamentary immunity.
- Civil service. Merit-based civil service appointments are important to prevent corruption, and reform efforts should include introducing performance management systems and feedback loops from service recipients.
- Financial controls. Reforms should include public budgets, transparency of expenditure, competitive public procurement and independent, external audits examined by the legislature.
- Legal-judicial measures. Reforms should strengthen the independence and capacity of the judiciary, including through training courses and insulating them from political interference. Reforms can also include alternative dispute mechanisms where the judiciary suffers from endemic corruption.
- Institutional reforms. Restructuring parts of the government apparatus, including the customs, licencing, health and education structures to achieve anti-corruption reform.

## 2 EXAMPLES OF RECENT ANTI-CORRUPTION PACKAGES

Anti-corruption reform packages in recent years have been implemented in Mexico, Ukraine, Greece, Iraq and the EU. While each of these processes has been unique and dependent on their national context, they have all tended to incorporate a range of the measures outlined above. The processes and background to these reforms, as well as their relative success, have largely differed.

### Mexico

From 2015 to 2016, Mexico passed an extensive anti-corruption package that included reform to 14 constitutional articles, the passing of two new pieces of legislation and the reform of five further laws (Rios 2016).

### Background

Anti-corruption reform had been discussed by Mexican politicians for a long time. However, it was the election of Mexican President Peña Nieto that put it seriously back on the table as he had promised to create an anti-corruption commission as the first of 266 manifesto commitments in his election.

The initial proposals for reform were, however, poorly received by the public and among civil society, and proposed legislation remained dormant in Congress until the end of 2014.

Disappointed with the proposal put forward and with the lack of initiative on the part of the government, a coalition of academics, experts and civil society organisations took the lead in early 2015 by drafting proposals for reform and advocating with politicians for the creation of a National Anti-Corruption System (Rios 2016).

### Main areas covered

The reforms, proposed and passed starting in May 2015, cover a range of legal and policy areas, as well as the establishment of new institutions. This includes (Rios 2016):

- creating a National Anti-Corruption System, a coordination entity to bring together institutions with capacities to fight corruption that had been operating separately under a single body run by a citizen board and able to investigate and prosecute corruption
- increasing the penalties for graft, bribery, embezzlement and illegal enrichment
- establishing an independent anti-corruption prosecutor
- requiring public officials to submit asset declarations
- enhancing the capacity of Mexico's supreme audit institution to conduct real-time audits and follow ups

An important aspect of the reforms is that they applied to all levels of government and were tailored to the governance structure of Mexico by also requiring Mexican states to develop and implement their own anti-corruption systems (OECD 2016; Rama 2016; Rios 2016).

### Process

The process of passing the Mexican reform package was largely driven by civil society and a coalition of non-state actors.

Starting in early 2015, the coalition began advocating with politicians at the federal and state level for changes to the constitution that would allow for the establishment of the National Anti-Corruption System. This included creating a countdown clock that recorded the time each state legislature took to discuss and approve the reform from the start to the end of the process. The times were then shared widely on social media and used to encourage the legislatures to pass reforms at speed. Through this mixture of direct advocacy with politicians and public pressure, the reforms were passed within five months of the process starting (Kaiser 2016; Rios 2016).

Once the National Anti-Corruption System was passed, civil society also played a strong role in ensuring other laws were put in place to implement the strategy.

Rather than comment on government draft laws and revisions, they proposed the laws themselves and used a petition-based citizen initiative that existed in Mexican law, which required Congress to discuss initiatives receiving a certain number of signatures, to present the bills to Congress. These bills, under civil society pressure and with strong public support, were discussed entirely in public, without the closed processes bills normally receive in the Mexican legislative system (Rios 2016).

A final attempt by the Senate to exempt themselves from public asset disclosure was also limited by public pressure and civil society action. This related to a change introduced in the Senate that would have required them and all persons receiving public funding – from contractors to social security recipients – to submit asset, conflict of interest and tax declarations, but would have kept these private. This was viewed by some as a retaliation for proposing reforms. Making direct civil society representations, through mobilising protests on the street, including by businesspeople, and using social media actions towards the president, the coalition successfully secured a presidential veto of this legislation, and it was passed back to the Senate. Bending to pressure, the final legislation was amended to only apply to officials and to water down

the initial blanket right of public officials to private asset declarations (Rios 2016).

### *Effectiveness and lessons learned*

Despite empirical data on implementation not yet being available, assessments of the reform package have hailed it as largely meeting its objectives of ensuring the “coordination, collaboration, and systematization of the operations of anti-corruption institutions” and of establishing independent and effective authorities, a comprehensive set of administrative responsibilities for anti-corruption, a new criminal legislative regime and new controls and oversights of local authorities (Rios 2016). However, there has been criticism that the reforms fail to address high-level immunity from prosecution and that reforms to the supreme audit institution do not make it fully independent. The government’s commitment to the reforms, since they have been passed, has also been questioned, as the government had to, as of 2016, appoint a special prosecutor for corruption offences, part of an earlier 2014 reform package (Millan 2016).

An important lesson learned, identified in passing the reforms, was the role played by the coalition of academics, private sector actors and civil society in driving the process, securing public support and making it difficult for politicians to lose political will in putting the reforms in place (Rama 2016; Rios 2016).

## Ukraine

In late 2014 Ukraine passed an anti-corruption package that included several legal changes, new anti-corruption laws and established an anti-corruption bureau (Pishchik 2015; AALEP 2015).

### *Background*

The reform came in the wake of the 2014 Ukrainian revolution that ousted President Yanukovich. Coming to power initially in 2004, allegations of electoral fraud and mass protests, known as the Orange Revolution, led to a re-election that he subsequently lost. He then became prime minister in 2006 and was eventually elected to the presidency in 2010.

Under Yanukovich’s presidency, allegations of corruption were widespread, focusing on channelling private sector contracts to political leaders, including through removing procurement transparency standards. Sparked by a refusal to sign an association

agreement with the EU, protests began in November 2013 which led to Yanukovich fleeing to Russia in February 2013 and his subsequent impeachment by parliament (Pishchik 2015).

Following the revolution, and keen to make addressing corruption the priority of the new government, the Yatsenyuk administration introduced an anti-corruption package in October 2014 (Pishchik 2015, OECD 2015).

### *Main areas covered*

Similar to the Mexican reforms, the Ukrainian anti-corruption package included a range of new general measures and included tailored reforms to the post-revolutionary situation in Ukraine (Pishchik 2015, AALEP 2015). Measures introduced in the anti-corruption package included:

- a lustration law banning former high-level officials from the Yanukovich government, Soviet Communist Party or KGB from holding an official post for up to 10 years
- reducing the powers of prosecutors and setting new anti-corruption standards for them
- establishing an anti-corruption bureau aimed at addressing corrupt behaviour in high-profile individuals, including through pre-trial investigation and prosecution
- a requirement to publicise beneficial ownership information on companies
- an anti-corruption strategy outlining the initiatives to be taken by the president, government and parliament
- a prevention of corruption law, which included the establishment the National Commission on the Prevention of Corruption, with responsibility for anti-corruption policy; additional corruption offences related to gifts, conflict of interest and offences related to corruption; principles for international cooperation; and obligations on public officials to transfer corporate rights to third parties.

### *Process*

Ukraine’s reform process started from a position of strong public support, with the pressure of the revolution and popular demands for reform pushing politicians to act (Pishchik 2015; OECD 2015). However, some of this public anger was deflected with

the Russian intervention in Crimea and attention shifted to that (De Waal 2016).

As a possible consequence of this, two other factors have been identified as helping to sustain and build on the initial support and ultimately ensuring that the reform package was passed.

The first of these was the collaboration established between the EU, governments of Western countries, Ukrainian civil society and reformist members of the Ukrainian parliament. This process, which has been called “sandwiching”, involved the actors partnering to put pressure on the government and parliament, from several sides at the same time, to put reforms in place (de Waal 2016).

The second factor was the role of Western governments in the adoption of the reforms. There were two aspects to this.

The first was direct pressure applied and the support Western governments gave to put reforms in place following the revolution. This included pushing for the government to establish independent anti-corruption agencies and directing financing to these institutions (De Waal 2016).

The other aspect relates to the EU-Ukraine association agreement. This was signed in March 2014 and establishes a political and economic association, including a free trade zone and visa liberalisation. The agreement commits Ukraine to a number of reforms before it comes into force, including complying with the EU acquis, as well as several anti-corruption reforms, such as implementation of the anti-corruption package and adhering to the recommendations of the Council of Europe’s Group of States Against Corruption (De Waal 2016: 8; European Commission 2015: 6, 14-15).

### *Effectiveness and lessons learned*

While the reforms were passed and the EU has noted in its progress reports that its anti-corruption benchmarks have been achieved, questions have been raised over the commitment of Ukrainian politicians and institutions to these reforms. In particular and despite the package, a number of key persons implicated in former corruption cases remain in their positions, prosecutions for corruption have been low and, in some instances, the initial proposals

by Ukrainian lawmakers for reform were weak and only improved under international pressure (De Waal 2016).

In an example of this, in April 2017, Ukrainian President Poroshenko signed into law an amendment to the anti-corruption package that will require journalists and civil society to publish public asset declarations, even when not receiving public funds. This has been seen by some as using the anti-corruption reform to target freedom of speech (Human Rights Watch 2017)

A partial explanation for the challenges in the reform process may be due to the lack of engagement of citizens in the process. The degree to which citizen support was maintained through the process has been questioned, with indications that anti-corruption reforms in Ukraine since the revolution have been poorly communicated, creating unrealistic expectations on the part of the public (De Waal 2016: 2).

## **Greece**

Starting in 2012, Greece passed a number of anti-corruption laws and instituted several reforms designed to act as a package of measures to reduce the opportunities for corruption (Sotiropoulos et al. 2016 :32).

### *Background*

Beginning in 2010 and as a result of the financial crisis, Greece began receiving financial support from the Eurozone countries and the International Monetary Fund (IMF) to address its economic difficulties. These came through a series of memoranda of understanding, which contained agreements between Greece and its international partners covering a range of economic and political reforms, including commitments to address corruption (European Commission). This led to the development of the anti-corruption strategy and action plan in early 2013, known as Transparency (European Commission 2014).

### *Main areas covered*

Greece’s anti-corruption reform package, through this national anti-corruption strategy, included hard law proposals and gave increased focus to citizen engagement, policy and leadership initiatives than other recent reforms. This includes (Sourlas 2013):

- a leadership commitment to anti-corruption, including through legal revisions, codes of conduct for political integrity, control mechanisms and parliamentary discussions on anti-corruption
- assessing and decreasing public tolerance for corruption through measures such as increasing citizen participation in local government budgetary oversight, conducting polls on tolerance of corruption and running public awareness campaigns
- increasing legal compliance, with measures such as regular review of anti-corruption legislation, establishing internal monitoring in government departments, compliance with UN, OECD and GRECO recommendations, and compliance with anti-corruption recommendations in the EU memorandum
- increased compliance with management regulations and accountability of public and private bodies, through risk assessments, improved information storage, improvement of anti-fraud management and control, and accountability reports and assessments
- ensuring compliance with the anti-corruption strategy, through setting out policies, strengthening capacities of law enforcement, undertaking research and development of a risk assessment.

### *Process*

Differing from Mexico and Ukraine, the impetus for the anti-corruption reform was the 2012 Memorandum of Economic and Financial Policies between the Papademos government in Greece, the European Commission and the IMF. This memorandum contained several anti-corruption commitments, including a commitment to rotation in management of corruption-critical positions, introduction of codes of conduct, whistleblower protection, introducing greater transparency and producing an anti-corruption strategy (European Commission DG Economic and Financial Affairs 2012: 162)

Bolstering this, in 2015, SYRIZA, a coalition of left wing parties, won the Greek elections and formed a government. Anti-corruption reform was a part of their programme and, to some extent, spurred the passing of the commitments (Sotiropoulos et al. 2016 :32).

The reforms have yet to be fully implemented, however, and while progress is being made overall, it

has not always been stable, with some areas advancing rapidly and others stalling (Sotiropoulos et al. 2016 :32-33)

### *Effectiveness and lessons learned*

Several issues have been identified as contributing to the progress and lack of progress in the Greek reforms.

While legislation was passed under the agreements with the Eurozone and IMF, political will was initially lacking for reform, which particularly played out in the lack of prosecution of suspected corrupt officials.

With the success of SYRIZA in the elections, political will greatly increased to effectively pass and implement reforms, including beginning prosecutions of former officials. However, a lack of experience and difficulties in steering the process led to initial setbacks in fighting corruption through the reform package.

Difficulties have also resulted from the range of laws that have been passed and the institutions established to regulate corruption under the package, which has led to challenges in coordination.

A lack of constitutional reform, meaning that former and serving ministers still have immunity, has also led to legal impediments in being seen to be achieving the reforms (Sotiropoulos et al. 2016 :32-33).

### *Iraq*

In August 2015, the government of Prime Minister Abadi announced an anti-corruption package, to include several measures designed to prevent corruption and limit the conditions for it to occur.

### *Background*

Iraq is one of the lowest ranked countries on Transparency International's Corruption Perception Index (166 out of 176 in the 2015 Index). Since the removal of Saddam Hussein, the former president of Iraq, in 2003, the public and private sectors have been beset by allegations of corruption (Pring 2015: 2-3).

Public protests against corruption, in particular in wake of electricity cuts and allegations of corruption in several government programmes in 2014 and 2015,

provided the backdrop for the announcement of the anti-corruption package (Al-Hawat 2016).

#### *Main areas covered*

The reforms aimed to “limit financial and administrative corruption, relieving the burden on the Iraqi treasury and providing some money to pay the delayed salaries of governmental employees”, making them more focused on the control of finance by public officials and reducing opportunities for patronage than other reforms, as well as going beyond anti-corruption aims. They included (Al-Salhy 2015; Adamczyk 2015):

- reducing and merging the number of ministries and independent commissions
- freezing financial privileges for public sector officials
- limiting the number of advisors allowed for each branch of government
- removing the positions of vice-presidents and deputy prime ministers
- the reopening of previously closed graft investigations against public officials.

#### *Process*

As with Mexico and Ukraine, anti-corruption reforms in Iraq came out of protests against corruption.

Mass demonstrations in support of the reforms took place in several Iraqi cities when the reforms were announced (Al-Salhy 2015), and the reforms gained the support of the leading Shia cleric of Iraq, the majority religion, as well as other religious groups, which led another round of protests in support of the reforms in early 2016 (Al-Hawat 2016).

Although the Iraqi parliament initially passed the reforms by providing Prime Minister Abadi with a mandate to implement the reforms in the public sector via a unanimous vote in August 2015 (Adamczyk 2015), in November 2015 they revoked his mandate to implement the reforms. This revocation changed the terms of the reform and only allowed them to go ahead when measures are agreed on with the political groupings in parliament, limiting the prime minister’s ability to implement reforms without extensive agreement building. To date progress in the reforms has stalled (Sowell 2015).

#### *Effectiveness and lessons learned*

Three reasons have been identified for the failure in the reforms to date (Sowell 2015):

- fears of political motivation: while the reform package was announced as anti-corruption measures, many of the proposed legislative and policy areas were aimed at reducing government expenditure, albeit framed as a corruption prevention tool. There were also concerns that these reforms represented a power-grab by the prime minister and his allies, through removing key positions, including the vice-presidency of his former rival and former prime minister, Al Maliki, and appointing allies to new anti-corruption bodies.
- loss of political and public support: public support for the reforms came from demands that senior officials be prosecuted for corruption, yet Prime Minister Abadi watered down commitments to prosecute, thereby reducing public support for reform. At the same time, divisions over the reforms grew within parliament, with several other Shia groups moving to oppose the law, while the prime minister lacked enough of a coalition base to push the laws through without them.
- poor implementation of reforms: a final challenge was in the implementation of a part of the package that adjusted the pay of public sector workers, which poorly communicated the process and led to fears of large pay cuts. This in turn led to public protests against the entire reform package and strengthened the parliamentary parties opposed to the reforms.

### European Union

In 2011, following a public consultation, the European Commission announced a new European Anti-Corruption Package to “address more vigorously the serious harm corruption causes to European societies – economically, socially and politically”. Although presented as a package by the Commission, the reform was seen as part of larger reforms against the illegal/shadow economy in the EU (European Commission 2011; Taseva 2012: 358).

#### *Background*

According to the Commission, the EU’s anti-corruption reform package came as a result of uneven and poor implementation of international and European anti-corruption laws and a lack of political will to do so in some cases, with the purpose of the reform package

being to stimulate this political will (European Commission 2011).

The Council, made up of the governments of EU member states, and European Parliament also appear to have played a role in pushing for reform, with the Council calling on the Commission to develop indicators for measuring corruption in the member states and the European Parliament issuing several resolutions asking the Commission to engage more closely in anti-corruption reform (Taseva 2012: 354).

The backdrop to this push, however, was the financial crisis and the perceived role of corruption in affecting the scale of the crisis, as well as the perception that politicians and the European Commission were unable to address corruption (Taseva 2012: 345; Transparency International 2011).

### *Main areas covered*

The 2011 reforms introduced immediate reforms and a plan for other measures to be introduced as part of a legislative package (European Commission 2011).

The main immediate reforms were: (1) the introduction of a new EU anti-corruption report, which was designed to provide an overview of anti-corruption measures implemented by each member state, with the aim of using these public reports to encourage EU states to become more proactive in fighting corruption; (2) a decision to put greater emphasis on anti-corruption in internal and external policies; and (3) assessing how the EU could participate in the Council of Europe's Group of States Against Corruption.

Other measures planned to be introduced under this reform process in the longer term included (European Commission 2011):

- new rules on the confiscation of criminal assets through revision of asset recovery rules to allow for more third-party confiscation and to ensure courts could effectively enforce EU confiscation orders
- a strategy to improve criminal financial investigations in member states through greater focus on information sharing within and between member states and between member states, the EU and international institutions
- increasing judicial and police cooperation and improving the training of law enforcement officials through strengthening EU level institutions and

working to develop a uniform EU system for collecting crime statistics

- modernising EU rules on public procurement, accounting standards and statutory audits for EU companies to improve conflict of interest and favouritism safeguards and to improve transparency
- adopting a strategy to combat fraud affecting the financial interests of the EU, including through improving accounting standards and statutory audits
- putting a stronger focus on anti-corruption issues within the EU enlargement process and neighbourhood policy, including looking into measures to support the capacity to fight corruption and guarantees for sustainability of anti-corruption reforms

### *Process*

The reforms, while announced together and referred to as a package, were not presented as one package for public discussion, nor were they subject to one consultation procedure (European Commission 2011).

It also appears that only two parts of the package were subject to public consultation before the package was announced: the anti-corruption report, which received 70 responses (European Commission 2010) and the public procurement rule changes, which were subject to a green paper and more extensive consultation in 2011, which received 623 responses and was subject to a high-level conference to discuss the consultation responses (European Commission 2011).

### *Effectiveness and lessons learned*

While responses to the package were largely positive, there are concerns that it did not go far enough (Transparency International 2011), that it still relied on the political will of member states to fulfil its aims and that it did not include enough new legislative instruments (Taseva 2012: 357-8, 359-60).

While the immediate reforms have been largely implemented, there is little information on the implementation of the reforms as a package, requiring each proposal to be individually investigated. Some of the concerns over political will seem to have been partly justified too, as the Commission suspended the EU anti-corruption report in 2017 (Nielsen 2017).



### 3 KEY CONDITIONS FOR SUCCESS

Considering the conditions that support successful anti-corruption reform efforts, a number of factors have been identified in the literature that can help ensure reforms are passed and implemented effectively:

- political leadership: political will to effect change, defined as “demonstrated credible intent of political actors to attack corruption at a systemic level”, has been identified as a key factor. Here it is particularly highlighted that policies are not enough without a recognition of the political economy at play and the vested interests that will mobilise against reform, and that as political leadership may wane, depending on other factors, anti-corruption efforts should look at ways to bolster willingness to reform among political leaders (Kaufmann et al. 1998)
- political buy-in is required to compliment international pressure: international pressure for reforms can be effective, and tends to be more effective the more leverage the international actor has. Without corresponding local support, however, international actors risk reducing domestic political will for reform. As such, international actions should be designed to facilitate and support an internal process, rather than drive it from the outside. (Fjeldstad & Isaksen 2008, xi; A. Mungiu-Pippidi et al. 2011, 82-83)
- coalition building: effective coalitions between civil society and government can substantially improve reform efforts. While involvement of a wide range of stakeholders, such as the media, the private sector and civil society, can support high-level political will, coalitions can both improve the content of reforms and give them a stronger chance of being effectively implemented (Kaufmann et al. 1998: 1-2; Fjeldstad & Isaksen 2008, 73). In both Mexico and Ukraine this was extremely important. Civil society played a major role in both reform packages and their alliance with other actors has been credited in both examples as being an important characteristic of the reform's success (Rios 2016; De Waal 2016).
- strong public support: in all the examples looked at, public support for reforms was essential to start the process of reform, or to reinvigorate it, and to sustain it. In Iraq, for example, it was the public protests that drove the reforms and the perceived problems with the reforms which led to a loss of

public support and the ability of other political groupings to stall the package (Sowell 2015).

- rigorous data: each country's reform needs are different and understanding the shortcomings that allow corruption to flourish is essential to design the policies and laws that will prevent it. In particular, it is important that reforms are preceded with a thorough assessment of the country's weaknesses, as a starting point for designing reform measures (Kaufmann et al. 1998: 3-4).
- context matters for the reform: in addition to the data, understanding the context in developing an anti-corruption strategy has been highlighted as extremely important in designing reforms and ensuring that reforms proposed are not proposed just because they worked well elsewhere (Fjeldstad & Isaksen 2008: 71-73). This was important in the examples discussed here. With the OECD highlighting that, in the case of Mexico, an important factor in the reform's success was in tailoring it to the context of Mexico (OECD 2016). Similarly, the reforms in Ukraine included country specific measures, such as lustration laws and asset declarations which spoke to its context (Pishchik 2015).
- citizen empowerment and access to information: a final point is that, for anti-corruption measures to be effective, political reform and restructuring should be accompanied by policies that inform citizens of their rights and entitlements, and support them to be able to monitor and challenge abuses (Fjeldstad & Isaksen 2008, 35).

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