

Transparency International Anti-Corruption Helpdesk Answer

Experiences of compliance reviews by CSOs: Lessons learned and challenges

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Date: 13 March 2020

Civil society organisations around the world are increasingly leading corruption compliance review processes. After analysing a series of examples around the world, it can be seen that some common mechanisms are being implemented, such as impartiality, transparency, accountability, data collection, analysis and final report production, and communication of the results. There are also some tendencies which are repeated; for example, the growing involvement of local communities in monitoring processes and the vital role of access to information legislation. Some challenges have also been identified, such as the importance of ensuring accountability from community-led initiatives and offering protection to citizens in dangerous contexts

This approach can be used to assess compliance reviews at an international level; however, this Helpdesk answer has focused mainly on local and national compliance review processes from Latin America and elsewhere in the world.

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This Anti-Corruption Helpdesk is operated by Transparency International and funded by the European Union.



Query

Please provide an overview of experiences of compliance reviews by NGOs, with special attention to Latin America but not limited to that region, and addressing lessons learned and challenges ahead.

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Overview of anti-corruption review mechanisms

Over the last decade, anti-corruption movements and policies have seen a simultaneous growth of two trends: participation of civil society organisations (CSOs) and compliance policies. The participation of CSOs in monitoring governments to detect and denounce corruption has seen a growing level of institutionalisation in governments and international governance bodies, through initiatives like the Open Government Partnership, the International Aid Transparency Initiative and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

Compliance refers to “the procedures, systems or departments within public agencies or companies that ensure all legal, operational and financial activities are in conformity with current laws, rules, norms, regulations, standards and public expectations” (Transparency International 2015a). With regard to corruption, compliance mechanisms focus on guaranteeing that public and private actors abide by anti-corruption legislation,

Main points

- CSO corruption compliance reviews are external procedures carried out to analyse if a private or public body is correctly complying with external or internal anti-corruption standards.
- The most common forms of compliance reviews undertaken by CSOs are shadow reports, social audits, citizen reports cards and corruption complaint follow-ups.
- The principles that these mechanisms should strive for are impartiality, transparency, accountability, and clear and understandable research and results

transparency procedures, financial integrity mechanisms and orient towards official policies to guarantee more oversight, transparency or accountability.

Compliance mechanisms may be sector-specific or relate to specific procedures. For example, the Extractive Industries Transparency Initiative (EITI) establishes a global standard to promote the open and accountable management of oil, gas and mineral resources (EITI 2016). Another example involves financial sector standards for anti-money laundering practices, such as the Financial Action Task Force (FATF) standards, which aims to

prevent money laundering and terrorist financing by bringing about national legislative and regulatory reforms (FATF 2020).

Compliance reviews may be undertaken by external, third-party actors to ensure that a private or public body is correctly complying with external or internal anti-corruption standards. According to Gunningham (2017), external actors can “influence the behaviour of regulated groups in complex and subtle ways”, and, sometimes, “mechanisms of informal social control often prove more important than formal ones”. Furthermore, when third parties intervene in a compliance review process, they can achieve better results, and are often “perceived as more legitimate”.

Reviews by external actors may be undertaken consensually by private and public actors as part of internal policies or external regulations, such as external financial audits. Audits can be internal or external and focus on the examination of an organisation’s accounts, processes, functions and performance to elaborate an independent and credible assessment of their compliance with applicable laws and regulations (Transparency International 2015b). Third-party reviews may also be carried out by external actors without the express consent of those being reviewed. CSOs, for example, may choose to carry out compliance reviews to guarantee that a private or public actor is complying with official rules.

Types of CSO compliance reviews

CSOs are increasingly carrying out anti-corruption compliance reviews. Historically, CSOs have undertaken parallel, external initiatives to review compliance, but more recently, public and private actors are institutionalising CSO involvement in compliance reviews. When a CSO gets involved in a compliance review process, it is as an external compliance audit. CSOs use many common mechanisms to monitor and review compliance. There are a few general principles that ensure a thorough process:

- **Impartiality.** These formal or informal reviews are led by organisations that are independent from the institution being reviewed.
- **Transparency.** The organisation abides to the principles of transparency.
- **Accountability.** The methodology selected by the organisation to carry out the assessment must be justified, well explained and easily accessible.
- **Data collection.** This can be done by independent expert-led research, reviews of public documents or governmental websites, involve citizens through a social audit mechanism, interviews and/or surveys.
- **Analysis and production of final report.** Thorough analysis of the collected data, a discussion and production of the final document with an outline of recommendations.
- **Communication of results.** Publication of the final report, accounting for the review process.

CSO-led compliance review mechanisms vary depending on the context, the level of institutionalisation and the level of access granted to the CSO.

Shadow reports

Shadow reports involve parallel reporting by CSOs, generally in the monitoring process of anti-corruption conventions, and provide an alternative to the reports produced by the audited party. This kind of reporting provides CSOs with a perspective on state obligations and progress made towards the domestication of international conventions.

Several anti-corruption convention review bodies produce shadow reports. The Organization of American States (OAS), for example, uses them to assess the implementation of the Inter-American Convention against Corruption. The tracking mechanism, known as MESICIC, brings together 33 member states to analyse their legal frameworks and institutions according to the provisions of the convention. In this way, civil society can play a key role in reviewing and

providing support to states implementing the convention and the mechanism's recommendations (OAS 2009; OAS 2018).

External social auditing

At the national and local level, CSO compliance reviews can also take the form of external social auditing, a social accountability tool that examines decisions taken by public officials and tries to identify administrative or financial irregularities. (Frag 2018). The tool uses a participatory approach, and participation of marginalised groups is key to a successful social audit. The procedure enables CSOs to establish social values and criteria and then measure external and internal performance along with a diverse range of initiatives (Dwivedi and Vikram Singh 2010). By including and training citizens to monitor and assess the activity of private and public institutions, a high level of social control can be achieved. Complex processes, such as large-scale public construction or reconstruction works, the implementation of social programmes, or even the activities of extractive industries can be monitored by the people who are directly affected.

Citizen report cards

A citizen report card (CRC) is another method of compliance reviewing. This social audit tool also uses a participatory approach by engaging citizens who assess the quality of a diverse range of public services, based on their experience. The assessment is usually carried out through a survey to measure citizens' perceptions of the quality and satisfaction of specific attributes of services, such as access, availability, quality, reliability, agency responsiveness and transparency (Lakshisha 2018).

Transparency ratings

Transparency ratings are used to assess the level of compliance with local, national or international standards for a diverse range of processes. In this case, CSOs monitor and assess public initiatives to evaluate integrity standards. Monitoring may be done with or without government involvement and

may include the review of public documents and governmental websites, on-the-ground research, interviews and surveys of institutions or processes.

Many of Transparency International's advocacy and legal advice centres (ALACs) conduct corruption complaint follow-ups, where cases are tracked to ensure that proper procedures are taken to investigate and address corruption complaints, and to ensure that protection is afforded to whistleblowers.

Examples of CSO-led compliance review mechanisms

Latin America

Local level

Colombia: Social control and access to information in the extractive industry – Transparencia por Colombia

In the departments of Antioquia, Guajira and Casanare, places where extractive activities are carried out, Transparencia por Colombia led a social control initiative. They trained the local community to trace and control extractive industries' activities. The aim was to encourage informed and active citizens to have an impact on the protection of public resources and the social sanction of corruption. Transparencia por Colombia approached this initiative from three angles:

- Citizen monitored royalties enforcement: by learning how the royalties system works and using tools such as petitions for public information, communities could audit and control the investment and execution of royalty resources.
- Citizens in the care of peace: this involved training on reporting and social sanction mechanisms, as well as fostering

mobilisation and strengthening strategies for organisations and citizens.

- Social organisations united by transparency in extractive industries: the Civil Society Bureau for Transparency in Extractive Industries (Mesa de la Sociedad Civil para la Transparencia en las Industrias Extractivas) is a platform of CSOs and academia demanding greater transparency in the extractive industry in Colombia.

With those social control tools, plus access to public information, the communities increased their governance on the use of their natural resources (Transparencia por Colombia 2019a and Transparencia por Colombia 2019b).

Venezuela: Transparency ratings – Transparencia Venezuela

Transparencia Venezuela developed a set of instruments and procedures to measure the transparency of management processes at the municipal level through numerical indexes called municipal transparency ratings (Índice de Transparencia Municipal: ITM). The idea was to identify corruption risk areas and areas of improvement. The initiative started in 2005 and was replicated in 2006, 2008, 2010 and 2017. In the last edition, 150 municipalities from 20 states were analysed.

ITM is carried out through an audit process in the municipalities by reviewing a variety of information sources. One of the main findings was that 59 per cent of municipalities carry out activities other than those within their competences, which can indicate a high risk of corruption as it provides favourable conditions for the diversion of resources and activities related to promoting a specific political party. Among the final recommendations were: public tenders should be used for procurement processes; internal audits should be done at least once a year; public officers should be trained on transparency and anti-corruption; a corruption reporting channel should be set up with protection for whistleblowers and the capacity to properly

identify and investigate cases of corruption; an ethics code should be enforced for public officers. (Transparencia Venezuela 2017a and Transparencia Venezuela 2017b).

Venezuela: Unfinished construction work – Transparencia Venezuela

In November 2016, Transparencia Venezuela led an inquiry to monitor 12 construction works in the states of Caracas, Miranda, Zulia, Bolívar, Carabobo, Anzoátegui and Guárico. The inquiry focused on three key elements to understand the situation in each case: target resources, execution deadlines and contractor companies. The monitoring process included the following steps: i) review and analysis of the reports and accounts of the years 2011 to 2015, consigned by the Ministry of Popular Power for Transport and Public Works to the National Assembly; ii) review of the Indebtedness Law of 2006 to 2015; and iii) access to the online system of the national contractor registry.

The final report found that the 12 construction works analysed were overpriced by Bs.222,082,491,665 (around US\$3 million). Moreover, due to the lack of transparency in the public institutions involved in the allocation of the construction works, it was almost impossible to carry out a precise assessment of the public procurement and follow-up processes. The report revealed that five out of the twelve construction works were allocated to the Brazilian company Odebrecht (Transparencia Venezuela 2016 and González & Transparencia Venezuela 2016).

Peru: Citizen commitment to transparent reconstruction – Proética

Proética along with the Pontificia Universidad Católica del Perú, Universidad del Pacífico and the Asociación Civil Transparencia are members of the interagency initiative Integrity Observatory, a platform for promoting, disseminating and

monitoring measures in favour of integrity, transparency and measures to counter corruption as essential elements of democracy. In 2017, they trained local committees from five regions (Ancash, Lambayeque, La Libertad, Piura, and Tumbes) affected by heavy rains known as *El niño costero* in citizen oversight of the reconstruction process in their neighbourhoods and on the roles and competencies of government bodies, likely progress and difficulties and to see the oversight as a manifestation of a citizen's right to participate and monitor. CSOs and citizens became involved in gathering information on the progress of the construction by gathering evidence from direct observation. They issued periodic reports on the work done and issued alerts when they detected apparent irregularities (Observatorio de Integridad 2017 and Observatorio de Integridad 2018).

Guatemala: *Overcome resistance to citizen audit – Acción Ciudadana*

Acción Ciudadana implements its social audits in four stages:

1. When a complaint is received by the ALAC or via a formal or informal groups of citizens in social audit commissions, Acción Ciudadana signs a memorandum of understanding with the commissions to establish responsibilities and obligations.
2. The ALAC train the social audit commission in: i) social auditing and transparency; ii) citizen problems and needs that give rise to a social audit, and; iii) access to public information.
3. The audit process is a strategy to access information from transparency portals and information registers supported by ALAC's legal advice. The information is then analysed.
4. Reports are produced of the social audit findings. If signs of corruption were detected (the social audits do not always find irregularities), the ALAC files complaints using the report as evidence. The reports

generally include recommendations and are disseminated to the public and to oversight institutions.

After a social audit in San Pedro de la Laguna, a social audit commission filed a complaint against members of the municipal corporation for alleged overpricing in a sports facility. In retaliation, the members of the municipality filed a criminal complaint for defamation against the commission. The judge in charge of the case restricted the fundamental right of citizens to demonstrate peacefully. The judge was a candidate for attorney general and, with support from the ALAC, the judge's competency was questioned for having issued an unconstitutional resolution restricting citizen's freedom of expression. As a result, the judge was not shortlisted for the position. This is an interesting case because it shows how a social audit "is a political process that depends on building alliances and understanding the incentives and constraints that exist from the perspective of governments. This requires a thorough knowledge of the political context in which the social audit is implemented" (Frag 2018, Boche 2018).

National level

Honduras: *Compliance with procurement regulations and human resource management – Asociación para una Sociedad más Justa (ASJ)*

ASJ signed a collaboration agreement with the national government to improve the performance of public institutions and promote services that respond to the needs of citizens. ASJ then carried out a series of evaluations to measure compliance with regulations and good practices in purchasing processes and contracting of goods and services, human resources management, public safety, health systems, education, infrastructure, tax management and transparency. After 27 performance evaluations, ASJ found deficiencies in the procurement planning, purchasing and contracting stages. Within human resources management, they identified high discretion rates

in personnel hiring processes and a lack of performance evaluation systems and payroll controls. There was also a lack of compliance and transparency when the reliability of results was examined and limited integration of information systems (ASJ 2019).

Venezuela: Observatory of Social Programmes – Transparencia Venezuela

This initiative, led by Transparencia Venezuela, constantly and consistently monitors the national government's "social missions" across the country. Through the daily monitoring of seven social programmes (Misión Alimentación, Misión Barrio Adentro, Gran Misión a Toda Vida Venezuela, Gran Misión Vivienda Venezuela, Carnet de la Patria, Bonos, and Comités Locales de Abastecimiento y Producción-CLAP), Transparencia Venezuela has highlighted irregularities, abuse and the political agenda behind these missions. For example, benefits were denied to those who did not support the government.

One of their latest reports on local supply and production committees (CLAPs), entitled CLAP: Great Failure and Great Corruption, looks at whether the programme fulfils its objectives and goals of effectiveness and transparency. To do this, Transparencia Venezuela implements a methodology developed by the Latin American chapters of Transparency International, adapted from a pilot project called Igualdad Económica en Latinoamérica (EELA), economic equality in Latin America. The project analysed corruption and integrity risks in conditional cash transfer programmes. According to this methodology, a social programme needs to fulfil eight steps in its implementation: targeting, entry, allocation or transfer, management, exit, accountability, monitoring and follow-up, and claims. The monitoring found that since CLAP's implementation there has not been sufficient oversight of the money invested, which allowed corruption at the local level. Furthermore, much of

the food supplies provided by the government are imported from Mexico, and Transparencia Venezuela verified this has been overpriced up to 112 per cent (Transparencia Venezuela 2019).

Venezuela: Corruption risks in the health sector: Experience of the Antiguiso Command – Transparencia Venezuela

One of the most iconic anti-corruption initiatives of Transparencia Venezuela is the Antiguiso Command, which promotes citizen complaints of corruption practices. In 2013, Transparencia Venezuela carried out a thorough assessment of the numerous complaints of corruption in the J.M. de los Ríos Hospital in Caracas, along with a more comprehensive analysis of the national health sector.

The final report notes that: 86 per cent of medicines distributed nationally are imported, but the lack of foreign exchange prevents an adequate supply; bureaucracy hinders good management; there is a lack of public investment; confusion about public officials' roles and responsibilities; dispersion in the system with no coordination of health public policies; a lack of budget planning; a lack of corruption prevention mechanisms; a lack of supervision and control, which creates conditions for corruption; and frequent changes of ministers, which leads to institutional weakness.

Transparencia Venezuela offered a series of recommendations to design, approve and execute a systematic and structured anti-corruption programme, which included details on procedures, managers, resources and an implementation plan (Transparencia Venezuela 2013).

Venezuela: Non-compliance with the law decrees on public contracting and public administration – Transparencia Venezuela

In 2017, Transparencia Venezuela revealed that the National Register of Contractors breached the law decree on public contracting and the law

decree on public administration as the register published insufficient information on entities contracted by the state. This revelation came after in-depth continuous monitoring of the public procurement law decree applications through site visits, digital media monitoring and access to information requests.

The monitoring showed that none of the national ministries complied with the legislation. The National Register of Contractors is responsible for the centralisation, organisation and the provision of registration and ensuring that the necessary information is published on the legal and financial qualifications, technical experience and speciality classification of natural or legal persons, national and foreign, public or private, who apply for contracts with the state. *Transparencia Venezuela* corroborated that only 5 of 29 items were available online. There was a lack of crucial information on, for example, the date of incorporation of the legal entity, the fiscal address according to the statutes, shareholders identity cards, and on the positions and share percentages of members of the boards of directors (*Transparencia Venezuela 2017c*).

Panama: Transparent Panama – Fundación para el Desarrollo de la Libertad Ciudadana

Between 2015 and 2016, *Fundación para el Desarrollo de la Libertad Ciudadana*, along with *Alianza Ciudadana Pro-Justicia* and *MEDCOM Corporation* implemented the *Transparent Panama* project. The aim was to follow up on governmental obligations on transparency, contained in Law 6 of 22 January 2002, as well as the government promises regarding transparency and institutional development, and on the main criminal and administrative processes related to corruption cases.

The project was divided into sections: monitoring of transparency and access to public information on official websites; monitoring of corruption complaints; database of public information; tracing information requests; tracing campaign promises on institutionalisation; transparency and

accountability; monitoring of municipal decentralisation transparency; and data display (*Fundación para el Desarrollo de la Libertad Ciudadana 2016a*).

Part of this initiative was the project on monitoring access to information in municipal decentralisation. In 2016, *Fundación para el Desarrollo de la Libertad Ciudadana* sent seven questions to the 77 municipalities of Panama. The questions were sent by email, using contact information available on the Association of Municipalities of Panama's website. After a month, when the organisation had not received any answers, they called the municipality, and if the municipality indicated that they had not received the email, a new one was sent and an extra 30 was given to respond. The questions concerned municipal budgets and the implementation of Article 136-E/C of Law 66 from 2015 on citizen participation. Only 25 municipalities answered the questions completely, 36 municipalities did not answer at all, and 16 could not be contacted (*Fundación para el Desarrollo de la Libertad Ciudadana 2016b*).

Argentina: Transparency in the national public procurement system – Asociación Civil por la Igualdad y la Justicia (ACIJ)

In 2018, *ACIJ* assessed published information on the National Public Administration's procurement and contracting mechanism. Using the Open Contracting Data Standard (OCDS) as a baseline, *ACIJ* analysed the information available on the public website *COMPR.AR*, and detected the following problems: a lack of information from state bodies; a lack of dispersion of information; low level of data accessibility; low level of detail in open databases; low level of data structuring; low level of data classification; and absence of information on the planning and execution stages (*ACIJ 2018*).

Paraguay: Transparent public procurement rating – TEDIC

In 2019, TEDIC, in partnership with the Institute for Development of Freedom of Information (IDFI), analysed every important element of a public procurement process. They used the Transparency Public Procurement Rating (TPPR) methodology that consists of 64 indicators in five groups: i) uniformity of the legislative framework – 14 indicators; ii) efficiency – 10 indicators; iii) transparency – 18 indicators; iv) accountability and integrity – 7 indicators; v) competitiveness and impartiality – 10 indicators. Five extra indicators were used to measure the transparency environment. The final rating for Paraguay was 82.78 per cent, placing the country in fourth position of the rating, from a total of 36 countries (TEDIC 2019).

Peru: *Anti-Corruption Brigades – Proética*

Proética led the review of public documents from areas with a high risk of corruption (for example, operating licences, building licences, public works and contracting). The Anti-Corruption Brigades promoted the application of Article 12 of the Law on Transparency and Access to Public Information is. However, the process for consulting public documents was not simple and, in some cases, officials were reluctant to deliver certain types of documents, especially those on public procurement.

The audit process also includes the evaluation of transparency portals, which were the initial filter to identify public documents. As yet, the brigades have not discovered any case of corruption, but their existence alone contributes to fewer irregularities and deters corrupt practices; for example, a study of social audits in Peru showed that public works that were subject to monitoring by civil society cost 50 per cent less than those that were not monitored. This meant savings of 455,370 Peruvian soles (US\$140,309). Proética's experience shows that social auditing has preventive effects (Farag 2018).

Guatemala: *Social auditing of the military expenditure – GAM-CIIDH-Observatorio Ciudadano*

From 2000, GAM-CIIDH-Observatorio Ciudadano examined information on military expenses through a detailed monitoring and surveillance of the public budget. The organisation unveiled some important findings: the military did not carry out public bidding processes for any of the goods purchased; all payments were made in cash, even soldiers' salaries; and 40 different enterprises that delivered services to the military had the same owner. After the publication of these findings, the Ministry of Defence was obliged to release its accounts in 2004 (which had previously been considered a state secret). Since then, military expenditure has become increasingly transparent, thanks to this oversight from civil society (Berthin 2011).

Examples of review mechanisms in the rest of the world

Local level

India: *Social Audits in Andhra Pradesh – Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA)*

After the implementation of MGNREGA, a public policy aimed at the right to work and social security, volunteers carried out social audits to monitor the delivery of the programme. Although this monitoring was a national initiative, its implementation in Andhra Pradesh (AP) was considered a success. The AP social audit mechanism had strong institutional support from the local authorities, which combined a top-down approach with the grassroots participation of the trained volunteers. The institutional support enabled the implementation of the right to information (RTI) act, which is key in a transparent social audit process. The social audit process in AP was as follows:

- A notification was issued to the relevant office for RTI obligations, requesting unrestricted access to project documents.
- A team of public officers recruited and trained the village social auditors (VSAs) on i) MGNREGA rights and regulations; II) how to conduct social audits, and; III) how to obtain information under RTI legislation. The auditors were MGNREGA beneficiaries.
- Over the course of a week, the VSAs conducted audits in all gram panchayats (village councils) in the district. They checked, for example, official labour expenses and complaints.
- A public hearing was organised with mandatory attendance for all implementing officials, and with beneficiaries and key public officers. Complaints were presented and those accused were given an opportunity to defend themselves.
- A decision-taken report (DTR) was assembled by the officer presiding over the hearing (Afridi and Iversen 2013).

Ghana: Social Audit Club – Ghana Integrity Initiative

In Akatsi South, the Social Audit Club monitored the construction of a building in a teacher training centre. The club determined that the materials used for the foundations were so deficient that the blocks would disintegrate with minimal friction. The club put pressure on the district assembly, which halted the construction work. The Social Audit Clubs do not review public documents as there is no right to information law in Ghana. The clubs focus on visits to construction sites to monitor them and to verify the quality of public services. They also monitor whether local assemblies implement the recommendations of the auditor general at the district level. They also sensitise community members and encourage them to report corruption and interact with institutions and public officials (Farag 2018).

Uganda: Monitoring of public procurement at local level – INFOC

Between 2011 and 2012, INFOC Uganda, with support from the Partnership for Transparency Fund (PTF), implemented a programme to strengthen citizens' monitoring of the National Agricultural Advisory Systems' public procurement in the sub-counties of Bubaare and Vurra Sub. Training of 13 community teams focused on monitoring, tracking funds' expenditure, participatory budgeting, feedback and advocacy skills. The activities started with capacity building and inception meetings with local government representatives and CSOs to build consensus. Then, a baseline survey was carried out to identify citizens' knowledge and awareness of the public procurement system and third-party participation. Likewise, a community awareness programme improved the awareness of procurement processes along with conferences on budget and public expenditure tracking. The most significant results of this initiative were that public savings were registered, and local governments became more responsive to anti-corruption collective citizens' demands (INFOC Uganda 2013).

Philippines: Conditional Cash Transfer Program Watch Project – CCAGG

In 2011, with the support from PTF, the Concerned Citizens of Abra for Good Government (CCAGG), monitored the implementation of the Conditional Cash Transfer Programme, in the province of Abra, over the course of a year. The programme involved giving money to extremely poor families with school-aged children provided those families agreed to undertake specific education and healthcare measures. CCAGG used five elements for its monitoring: a baseline survey; community-based monitoring tools to allow local people to assess the implementation of the programme; community-based monitoring teams trained to use the monitoring tools and who continued to monitor the programme afterwards; advocacy on good governance through mass media; and dialogue

with public offices to disseminate project results and advocate for reforms.

CCAGG developed a set of proxy means indicators of the poorest of the poor in the communities as the basis for recommending who should be included or excluded from the list of beneficiaries, along with four monitoring tools and guides for rapid rural appraisal and community organising. CCAGG identified 1,500 families that had not previously been in the beneficiaries list and 60 families that should have been excluded. They also highlighted some problems with cash transfers, such as delays in the receipt of the full grant amount, cash grants received for a few months before stopping for no apparent reason, and long delays before replacing ATM cards that had been lost, destroyed or stolen (Gutman and Bhargava 2015).

India: Citizen report cards in the health sector – Public Affairs Center (PAC)

In 2000, PAC in Bangalore, created a report card system to measure healthcare services to urban poor citizens. The cards helped to identify widespread corruption, mainly in the form of bribes and under-the-table payments for care services. Later, PAC collaborated with the Bangalore Municipal Corporation to implement reforms. A subsequent evaluation found that healthcare services to the urban poor had significantly improved through, for example, outsourcing different services for better accountability, replacement of untrained staff for qualified nurses, and the creation of a board of overseers that included prominent citizens, plus a citizen charter to improve patients' rights (Berthin 2011).

National level

Papua New Guinea: *Forest governance – Transparency International Papua New Guinea Inc. (TIPNG)*

In 2011, TIPNG used desk-based research and feedback from key stakeholders to assess levels of governance and corruption risks in the forestry sector. The organisation used a monitoring tool, developed by Transparency International, to analyse corruption risks in the whole chain of activities in the forestry sector: licences/regulations; timber supply; revenue; reporting; and enforcement (Avosa and Rungol 2011).

Ukraine: *Control over public procurement – Transparency International Ukraine (TI Ukraine)*

In 2016, TI Ukraine, along with 24 regional CSOs, launched the public procurement monitoring portal, DOZORRO. The portal can process 1,500 tenders every month, and has helped to identify 5,000 violations. One of the main problems the initiative faced was that there were hundreds of reports made by many different CSOs, which complicated the follow-up process. TI Ukraine created a new accountable monitoring approach by implementing a management system for the CSOs monitoring within the DOZORRO portal. If a CSO then analysed a procurement and found no violations, they had to register that in the database. If they had found a violation, they had to select the type of violation in the online catalogue and submit the information to the portal. The next step was to communicate with the procurement agencies. The portal also offers a section for uploading letters sent as well as the answers received. This tool brought accountability to the functioning of the portal and to the work of the CSOs. (Transparency International Ukraine 2016).

Hungary: *Red Flags – Transparency International Hungary (TI Hungary)*

As a team effort between K-Monitor, PetaByte and TI Hungary, the Red Flags project aims to improve transparency in public procurements nationally. Red Flag is an interactive tool that allows the monitoring of procurement processes and their implementation by citizens, journalists or even public officials to catch fraud risks at the different

stages of the procurement process. The tool automatically checks procurement documents from the Tenders Electronic Daily and filters risky procurements through a special algorithm. Users can also subscribe to alerts (Transparency International Hungary 2016).

Spain: Compliance by public institutions with legal regulations on contracts – Transparency International Spain (TI Spain)

Between 2016 and 2017, TI Spain, along with the Public Procurement Observatory (OCP), carried out three analyses on the level of compliance by public institutions with the legal obligation to publish their contracts and tenders in the public sector contracting platform. They found an improvement by the last analysis, but the level of legal breach by the public entities remains too high (Transparency International España 2017).

United Kingdom: UK anti-corruption pledge tracker – Transparency International UK (TI-UK)

After the 2016 Anti-Corruption Summit, held in London, TI-UK developed a tool to track the progress of the commitments made by the UK government, since there was no formal mechanism for follow-up or monitoring to ensure that governments are held accountable for their promises. With the UK Anti-Corruption Pledge Tracker, 16 commitments are monitored based on public evidence of progress (available through media articles, government statements, blogs, websites, etc.). With four categories (overdue, pending, underway, complete), the tracker follows the status of the pledges.

Some lessons learned in the process are that:

- governments were most likely to have acted on ambitious commitments, since one in five of those commitments had already been completed
- it pays to collaborate: different partnerships emerged from the summit (among them, the International Anti-Corruption

Coordination Centre, IACCC, and the Global Forum on Asset Recovery), although it remains to be seen if they will last

- actions speak louder than words: this is one reason why TI-UK is keeping the pledges in the spotlight and checking to see if the work gets done

TI-UK noted that pledges made at the summit were different from those on previous occasions as countries issued country-specific statements, which allowed countries to show leadership and ambition, which is quite different from consensus-based declarations (Transparency International UK 2017a and Transparency International UK 2017b).

Zambia: Review of the anti-corruption legal framework” – Southern African Institute for Policy and Research (SAIPAR)

In 2014, SAIPAR conducted a study to review Zambia’s anti-corruption legal framework and its compliance with international standards like the United Nations Convention against Corruption, the African Union Convention on the Prevention and Combating of Corruption and the Southern African Development Community protocol against corruption. Zambian legal frameworks were discussed, reviewed, analysed and evaluated, along with critical evaluations of comprehensiveness, adequacy and the effectiveness of the tools used to counter corruption. The study concluded that, despite shortcomings in legislation, Zambia has a good framework to counter corruption. Additionally, existing laws and sanctions against corruption needed reinforcement (Ndulo 2014).

Multi-national level

IACC Monitor: Anti-Corruption Commitment Monitoring Tool – Transparency International Secretariat (TI-S)

The 18th International Anti-Corruption Conference (IACC) that took in place in Denmark in 2018 featured a series of high-level meetings among countries and international and regional organisations, where participants made a set of statements on the steps each intends to take to make progress in anti-corruption. Participants at the high-level meetings agreed to set up a follow-up mechanism, IACC Monitor, coordinated by Transparency International Secretariat, engaging all stakeholders (including governments, international and regional organisations, companies and civil society) in monitoring the implementation of these commitments.

IACC Monitor evaluates the progress of more than 300 anti-corruption commitments made by 19 countries and 10 international organisations made at the IACC in six thematic areas (Transparency International 2020). With three categories (fulfilled, partially fulfilled, not fulfilled), the IACC Monitor follows the status of the commitments. IACC Monitor provides insights into the opportunities and challenges for implementation, as well as recommendations on how commitment implementation can be accelerated. It serves as a platform for the stakeholders to provide feedback and updates on specific commitments.

Lessons learned and challenges

Some trends can be identified in CSO corruption compliance reviews:

- Information and communication technology can play an active role in both engaging citizen participation in review mechanisms and offering platforms to communicate results to citizens and governments. TI Hungary's Red Flags initiative and TI Ukraine's DOZORRO portal are examples of how communication technology can provide a collaborative oversight mechanism to control public procurement processes online (Rotberg 2017; Transparency International Hungary 2016; Transparency International Ukraine 2016).
- CSO-led compliance review processes have shown the paramount importance of access to public information laws and promoting their use to gather information. Transparencia por Colombia's initiative to train and raise awareness among citizens of their right to access public information had a notable impact in locals leading social control initiatives to trace and control extractive industry activities and increase governance of their natural resources. MGNREGA in India showed the success of the social audits in Andhra Pradesh for the importance of sub-districts complying with the right to information act and providing the necessary programme documents (Schöberlein, Kukutschka and Wathne 2019; Transparencia por Colombia 2019a; Afridi and Iversen 2013).
- Compliance reviews are likely to be effective at controlling public processes when inter-group coordination mechanisms are implemented. Inter-group coordination mechanisms, like the Integrity Observatory in Peru or the alliance between ASJ and the Honduran Government, engaged stakeholders from different sectors and created multiple avenues for advocacy. These collaborations can contribute greatly to an effective division of work when implementing compliance reviews. For example, in the cases of Peru and Honduras, CSOs contributed resources and experts, while public agencies ensured law enforcement. (Rotberg 2017; Afridi and

Iversen 2013; Observatorio de Integridad 2017).

- The collaboration of public officials and government institutions is crucial to ensure the success of compliance reviews led by CSOs. Cases where local and regional governments opened up to CSOs and cooperated to facilitate information or access to the subjects being reviewed proved to be very successful, as was MGNREGA in Andhra Pradesh and ASJ in Honduras (Afridi and Iversen 2013; ASJ 2019).
- When there is political will in joining and supporting a compliance review, processes and mechanisms can run more smoothly. Moreover, if laws are being enforced during the process and offenders are punished afterwards, public trust can increase, which could motivate citizen participation in future initiatives (Rotberg 2017, Afridi and Iversen 2013).

The examples reviewed have also shown some challenges:

- Citizen engagement, though critical to the impact and policy change, proves to be a

time-consuming activity as training and social audits require important resource inputs (Frag 2018). Security concerns for participants may also be an issue (Gutman & Bhargava 2018). Delays, access to information constraints and lack of engagement from authorities may demotivate citizen participation and lower the efficacy of these mechanisms (Gutman & Bhargava 2018; Frag 2018).

- Afridi and Iversen (2013) note that there are also potential corruption risks associated with community monitoring. Community groups should be accountable for their actions and expenditures through internal quality controls and ethics reviews (Afridi and Iversen 2013).
- Monitoring methodologies used by compliance review mechanisms should be reviewed so that weaknesses, risks and changes to compliance standards or legislation can be identified (Transparency International Ukraine 2016). This may risk the methodological consistency of a compliance review, necessary for time-lapsed result monitoring.

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