Anticorruption Reform: Learning From Experience Across Sectors

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Contents

Executive summary

The Natural Resource Governance Institute (NRGI) Extractives Sector Corruption Diagnostic Tool[1] supports reformers to build evidence-based action plans to combat corruption. Corruption is a complex problem and the task of developing and implementing anticorruption reforms effectively is challenging. In this briefing we present a series of case studies showing how reformers in different sectors have approached this challenge. The aim is to show what can be achieved and support users of the diagnostic tool to learn from experiences outside the extractives sector.

The tool provides guidance to multi-stakeholder groups to identify forms of corruption harming a country's extractive sector. Developing an anticorruption action plan is the sixth step in the tool and a key outcome of the diagnostic process. The action plan should follow from a broader discussion on strategy, through which users make choices on the issues to tackle, the people and agencies to engage, and how to brand reforms (see section 6.1. in the diagnostic tool, "Strategizing").

To ensure the action plan provides a sound basis for reform, users of the tool should apply the following key principles:

- **Engage all relevant stakeholders throughout the action planning process to secure buy-in for reforms.**

- **Set clear and specific objectives which balance feasibility and ambition.**

- **Ensure clear ownership and incentives, and lines of responsibility for actions.**

- **Set clear indicators and conduct regular monitoring to assess progress.**

- **Build in flexibility and be prepared to adapt plans to changes in the context.**

The diagnostic tool includes templates and guidance for users when developing an action plan.

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1   Alex Gillies, Sebastian Sahla, Matthieu Salomon, Tom Shipley, Susannah Fitzgerald (2023) *Diagnosing Corruption in the Extractive Sector: A Tool for Research and Action*. NRGI.

About this briefing

Even with a thorough corruption diagnostic, making the right choices on what to do next can be difficult. Solutions to corruption problems do not always readily present themselves. The politicized nature of the issues also means generating real momentum behind reform can seem daunting. To help reformers with these choices, this NRGI briefing brings together eight case studies from other sectors. We selected cases where positive changes can be demonstrated, even if the reform process is often incomplete. We also selected reforms which have potential replicability in the extractives sector, while recognizing that the details will look different. The case examples are organized by reform categories, as shown in the table below. The briefing presents a short summary of each case and provides links to further materials (see end of document). We present as accurate and up-to-date a summary as possible in each case, with the caveat that circumstances frequently change in anticorruption work. The briefing concludes with five lessons on anticorruption reform which can be drawn from across these cases. **For all case references, see the end of the document.**

Table 1. Index of cases

Reform category	Case examples	Sector(s)	Country	Case/ page number
Institutional and process reforms/ increasing fair competition	Changes to inspection regimes for shipping cargoes	Agriculture/ shipping	Argentina	1 / p.5
	Governance and procurement reform at state-owned defense companies	Defense	Ukraine	2 / p.6
Strengthening oversight and participation	Community management of small water supply systems	Water	Kenya	3 / p.7
	Community participation in forestry governance	Forestry	Uganda	4 / p.7
Increasing transparency	Increased availability and use of road contract data	Infrastructure	Honduras	5 / p.9
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Reforming institutions and processes, and increasing fair competition

As in many sectors, government management and regulatory agencies responsible for supervision of extractives can be key sites for corruption. Reformers may seek wholesale reform of these agencies or changes to specific processes affected by corruption. License and permit issuing, import and export controls, and environmental inspection regimes are examples of administrative processes vulnerable to corruption. State-owned enterprises are institutions which occupy important roles in the sector, but often suffer from systemic corruption and governance issues. Increasing fair competition in areas such as procurement can be an important part of the response to corruption.

Case study 1: Changes to inspection regimes for shipping cargoes in Argentina

The *Servicio Nacional de Sanidad y Calidad Agroalimentaria* (SENASA) is the regulatory agency responsible for inspections of agricultural cargoes at Argentina's ports. Incident data collected in 2014 by the Maritime Anti-Corruption Network (MACN), a collective action group for shipping companies, identified that SENASA and customs officials frequently demanded cash payments from vessels during inspections. Factors increasing the likelihood of bribery were ambiguous inspection criteria, poor record keeping, and pressure on shipping companies created by the high financial costs of delays.

This data provided MACN and its local partner, law firm Bruchou & Funes De Rioja, with a strong case to push for change. Following their advocacy, the Argentinian authorities introduced a new regulatory regime in 2017 standardizing inspections and customs procedures. This entailed using private surveyors to carry out inspections, with SENASA also conducting cross-checks, introducing a competitive element to what had been a monopolized process. Standardization of processes and a new data system reduced the discretionary powers previously available to officials. The authorities also set out an escalation process for managing conflicts and a mechanism for reporting complaints.

MACN data shows that following these reforms, the number of corruption incidents fell by 90 percent by 2019 and this was maintained through to 2021. An important lesson from this case is the essential role of thorough problem analysis. In addition to incident data, reformers used surveys, interviews and workshops to pinpoint the problem areas needing reform. Emphasis on multi-stakeholder collaboration, including engaging agricultural and shipping companies, inspectors and public officials, generated broad support. Selling these reforms as helping facilitate trade in Argentina further sustained momentum.

Case study 2: Governance and procurement reform at state-owned defense companies in Ukraine

Reformers in Ukraine have challenged long-standing networks of corrupt actors operating in the defense sector. Many corruption issues centered on UkrOboronProm (UOP), a defense conglomerate comprising more than 100 state-owned enterprises (SOEs). In 2019, a Ukrainian civil society organization (CSO), the Independent Defense Anti-Corruption Committee (NAKO), identified various types of corruption schemes at UOP, including misappropriation of assets, use of offshore companies in fraudulent schemes, and overpricing in public procurement.

Since 2015, there have been several reforms aiming to improve corporate governance and anticorruption standards at UOP. These reforms were in part guided by detailed research undertaken by UOP management, CSOs and international donors, which generated a "transformation roadmap." The company subsequently established a supervisory board and implemented stronger oversight measures for director appointments. An international firm undertook several independent audits of UOP's operations. Procurement was one of the major focuses for reform.

Between 2019 and 2021, UOP overhauled its procurement systems, introducing an e-procurement system (Prozorro) and more transparent and competitive selection procedures for suppliers. UOP estimated procurement reforms had saved the company around USD40 million in 2021. Russia's invasion of Ukraine in February 2022 has set back some of these reforms. A new law on defense procurement (approved July 2020) has not been fully implemented at the time of writing and, in these extreme circumstances, UOP has reverted to less competitive and non-transparent direct contract awards. A law originally adopted in July 2021 to formally dissolve UOP and replace it with a new entity, Ukrainian Defense Industry, eventually came into force after a two-year delay. However, the governance structure of this entity was still uncertain at the time of writing.

Despite the security pressures, dialogue has continued on improving defense governance. Part of the explanation for this lies in there being a broad coalition supporting reform, including civil society activists, parliamentarians, law enforcement officers and defense officials. The CSO NAKO has played an especially important role, providing both constructive criticism and technical expertise to UOP. Domestic actors have also been able to leverage international pressure for higher standards. A strong evidence-base on forms of corruption at UOP again provided justification for reform.

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Strengthening oversight and participation

Groups benefiting from corruption are closed networks and seek to avoid scrutiny. One reform approach is therefore to expand the range of critical voices involved in decision-making. This is especially relevant to the operations stage of the extractives value chain, where it is critical to engage local communities in decision-making to mitigate corruption risks.

Case study 3: Community management of small water supply systems in Kenya

The Water Integrity Network (WIN) has developed an Integrity Management Toolbox which supports communities in rural areas to address corruption problems related to the delivery of water services. The toolbox is premised on a participatory approach in which communities and local governments collaborate to improve management quality of small water supply systems.

Caritas Switzerland has used the toolbox in work with several communities in Kenya. A 2018 case study from Tabaita in Kericho County in Western Kenya illustrates the types of integrity issues around these systems. A community member who had donated land for the construction of water infrastructure was abusing their position to influence water allocations. Equipment theft and non-payment of fees were also common.

In this community, as in others, women were typically excluded from decision-making, despite being most vulnerable to common forms of corruption around access to water, including sextortion.

In response, Caritas supported the creation of a community management committee to oversee the water system. It also trained community members on budgeting and bookkeeping. As of 2018, the community had seen improvements in management of its water system, evidenced by increased fee payments and extension of connections. Managing power dynamics in committee meetings, workshops and training sessions was essential to ensure participation by women. In the Tabaita case, women comprised seven of 15 committee members and also held key bookkeeping roles.

Case study 4: Community participation in forestry governance in Uganda

Systemic corruption has been a contributing factor to high levels of deforestation in Uganda. Forest cover in the country fell from 25 percent in 1990 to 9 percent in 2015. Corruption manifests in the sector at different levels and in varying forms. Politically connected individuals have abused their influence to obtain land titles and illegally develop agribusiness on forest land. Bribery of National Forestry Authority (NFA) and other officials allows illegal logging operations to go unchecked.

The Forestry Resources Sector Transparency (FOREST) program led by CARE Uganda from 2013 to 2017 worked to address these issues by promoting improved accountability practices. The main elements included:

- Expanding the number of community-based monitoring systems in protected forest areas from 112 in 2013 to 778 in 2017. The program also provided a free SMS service and phone line to community members to report abuses to multiple authorities.

- Providing communities with more information on laws, permits and forms of abuses through community meetings, social media, radio programs and the mainstream press.

- Creating forums at regional and district level in which community groups could raise concerns with representatives of the NFA and the Uganda Wildlife Authority.

The project registered successes in mobilizing public attention to the issues, with over 1,000 illegal practices reported by communities during the project period.

There was also evidence of stronger working relationships between community groups and the authorities. Concerns raised in one forum in 2017 led the authorities to cancel 154 illegal land titles. Overall, the actions played a part in improved forestry governance. Illegal extraction in forests fell by 60 percent during the project period.

One lesson from this case was the benefits of using a variety of channels to solicit action at national and local levels, both by the public and the national authorities. Mobile technology also helped facilitate reporting and generated improved knowledge on the geographic locations of abuses. As with similar projects, groups nonetheless faced difficulties in ensuring sanctions for those involved in corruption, particularly politically connected actors. In one region, 625 cases were resolved between 2014 and 2017 (an 86 percent resolution rate), but in others the response was much lower, at around 20 percent. This appears to have been due partly to varying levels of commitment by different local authorities.

Photo by Mika Korhonen on Unsplash

Increasing transparency

Increasing transparency is an important step which reformers can take to lower corruption risks. In the extractives sector, the availability of revenues data in particular has improved, thanks to the Extractive Industries Transparency Initiative (EITI). However, there are other areas in the sector which would benefit from greater transparency, such as resources contracts, extractives company ownership, operational data, and procurement and supply chain information. Reformers should plan not only to make data available, but to find ways to ensure its use.

Case study 5: Increased availability and use of road contract data in Honduras

The Infrastructure Transparency Initiative (CoST) shares a similar emphasis to the EITI on multi-stakeholder working and data transparency. Its work follows three main steps: government disclosure of 40 contract and project-level data points; assurance of this data by independent experts to identify potential issues of concern; and social accountability to push for higher infrastructure quality. CoST's work in Honduras shows how improved transparency can lead to concrete progress in reducing corruption risks.

Honduras joined CoST in 2014. From 2015 to 2019, the level of data disclosure on road projects increased from 27 percent to 75 percent against CoST's infrastructure data standard.

The launch of an e-procurement portal further supported access to increased data. At an early stage, the assurance process confirmed concerns at the Road Fund, the public agency then responsible for maintaining the Honduran road network. The Road Fund had a poor management record and was suspected of being under the influence of organized crime. Data availability was most limited in the contract management and implementation phases of projects. After the CoST multi-stakeholder group raised concerns about the Road Fund in 2016, the Honduran authorities dismissed its directors and initiated investigations into suspected corruption. The authorities also established the Directorate of Road Heritage Conservation as a replacement agency.

These changes were possible because of a political window of opportunity which saw a government champion provide high-level backing for the work. CoST Honduras has also focused on ensuring accountability follows improved data availability. This has involved CoST creating a Social Audit for Infrastructure School, where community members are trained to undertake social audits of projects; directly supporting capacity building at state procuring agencies; and providing training to journalists on analyzing infrastructure data. Major corruption challenges remain in the roads sector in Honduras. Some data gaps are persistent and ensuring independent recommendations are followed through is difficult. However, there has been progress in the last decade.

Promoting integrity

Initiatives which aim to promote integrity can often present a less politically contentious means of tackling corruption issues than more direct measures. Government bodies and private-sector firms can be a focus for compliance capacity building and ethics initiatives. These should prioritize actors identified through a diagnostic exercise as most exposed to corruption risks.

Case study 6: Building compliance capacity at national and international firms in China

The Beijing New Century Academy on Transnational Corporations (NATC) is a CSO working to raise compliance standards at Chinese firms. Since 2011, NATC has received funding from the Siemens Integrity Initiative, with its work recently focusing on three sectors: energy, industry and healthcare. Corruption is widely prevalent in these three sectors in China, and historically there has been limited emphasis on developing compliance functions at firms.

NATC's principal activity has been to develop a network of compliance professionals in China. This involved training over 750 individuals at 300 firms between 2019 and 2022. NATC has additionally established a "compliance club" to support knowledge exchange between firms on anti-bribery standards. NATC works both with national firms and those with international operations, while also looking to engage government bodies in raising corporate standards. In collaboration with government agencies in the city of Shenzhen, NATC developed a compliance system certification standard for firms with overseas activities, and has further produced guidelines and handbooks to support these firms.

NATC's work shows it is possible to build corporate engagement on integrity even in a highly challenging context. However, it is important to acknowledge potential limitations to these types of initiative. Building compliance systems should not be an end goal in itself, but needs to translate into tangible changes in firms' behavior. In addition, these systems are often ineffective if they are not supported by top-level management commitments to eschew all forms of corruption.

Strengthening enforcement of the rules

Too often in the extractive sector, countries have adequate rules in place on paper to lower corruption risks, but these are not enforced in practice. Known as the "implementation gap," this often explains why many anticorruption efforts prove ineffective. Reformers might consequently concentrate on strengthening enforcement of existing rules, such as by incentivizing compliance, enhancing monitoring, and increasing sanctions for rule-breaking.

Case study 7: Social Responsibility Agreements in Ghana's forestry sector

Ghana first introduced Social Responsibility Agreements (SRAs) in the forestry sector in the late 1990s. These agreements require timber companies to pay 5 percent of stumpage duties – the fees paid to landowners to harvest timber – directly to communities affected by their operations. The rationale for creating SRAs was in part to reduce corruption. Timber companies wielded extensive influence over rule-making in the sector, regularly undertaking lobbying to reduce their financial and environmental obligations. Companies also preferred ad-hoc, direct negotiations with traditional leaders, which often resulted in poor deals for communities.

Requirements for SRAs were at first weakly enforced and poorly implemented. Communities typically had limited awareness of negotiating processes and lacked the necessary information on stumpage fees to secure the right payments.

Traditional leaders continued to control the process, while government authorities generally failed to fulfill an oversight role in negotiations.

The Ghanaian Forestry Commission began reviewing implementation of forestry laws, including SRAs, following a timber trade deal agreed with the European Union (EU) in 2009. The Forestry Commission initiated several reforms, which included:

• Developing a compliance checklist and monitoring framework requiring monthly reporting on SRA implementation by forestry managers.

• Improving the availability of data on stumpage fees to provide a more transparent basis for negotiations.

• Amending regulations to require a democratically elected committee to represent communities in negotiations, while also increasing government administrative support to these committees.

• Promoting company compliance by making payment of SRA fees a requirement for certification of timber as legal to export to the EU.

These reforms led to a marked increase in the number of SRAs concluded, as well as positive feedback from communities on improved fairness of the process. Data from one forest district shows the number of SRAs concluded rose from near zero to 16 annually. A multifaceted approach combining different reform measures appears to have been critical in exploiting the opportunity created by the EU trade deal. There was also good collaboration between the Forestry Commission and CSOs in sharing information and creating forums to engage forest communities with these reforms.

Addressing foreign enablers

Diagnostic exercises in high-income countries should especially consider what role the country may play in corruption schemes in other jurisdictions. Domestic extractive companies headquartered in high-income countries may bribe abroad, the country may be host to professionals who enable transnational corruption, or it may be the end-destination for flows of corrupt money. Reformers can target weaknesses in their own systems which allow these forms of corruption to take place.

Case study 8: Property register reform in the U.K.

The U.K. and its overseas territories and crown dependencies have been implicated in numerous transnational corruption schemes. The country is home to a range of service professionals, including accountants, bankers, company service providers, lawyers and real estate agents, who enable and benefit from corruption schemes typically originating outside the U.K.. The country's property market is a leading global destination for laundering money derived from corruption. To give one example, Chatham House estimated in 2021 that Azerbaijan's President Ilham Aliyev and family members secretly hold property assets in the U.K. valued above £400 million, through a network of offshore companies. President Aliyev and family members are suspected of abusing their political position to build vast wealth.[2]

For over a decade, advocacy organizations have been campaigning to close regulatory gaps which allow the U.K. to be used as a holding point for corrupt capital.

A landmark came in March 2022 with the establishment in law of the Register of Overseas Entities. The law requires foreign businesses holding land and property in the U.K. to register with Companies House, the U.K. companies register, and disclose their beneficial ownership. The aim was to remove secrecy around property ownership and discourage corrupt networks from investing in U.K. property. An early analysis of transaction records published by the United Nations University in January 2023 indicates some success in this regard. Following the announcement of the policy, the number of new transactions involving companies based in offshore jurisdictions favored by individuals from highly corrupt countries fell substantially. The decline has continued since the policy came fully into force in early 2023.

The U.K. has a long way to go before it can claim to have addressed this problem. As of September 2023, researchers at the London School of Economics and the University of Warwick found that 71 percent of assets held by offshore firms in England and Wales are still held anonymously. U.K. Companies House suffers from capacity issues to adequately enforce the new requirements, and actors have exploited loopholes in the legislation. Despite these issues, the adoption of the law represents progress and is an outcome of long-running advocacy efforts by a network of organizations and individuals promoting reform. Building a diverse coalition of supporters helped lay the ground for exploiting a political window of opportunity created by the Russian invasion of Ukraine. Reformers were able to demonstrate links between corruption and security risks stemming from Russian investment in the U.K.. This helped to turn the political tide in favor of reform.

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2   www.occrp.org/en/the-pandora-papers/azerbaijans-ruling-aliyev-family-and-their-associates-acquired-dozens-of-prime-london-properties-worth-nearly-700-million

Lessons from across cases

Each of these cases demonstrates that progress in addressing corruption issues is possible, but there is no silver bullet. Set-backs to reform processes are common and it is challenging to deliver sustained change. The cases hold useful lessons for reformers in the extractives sector. Here are five key take-aways:

1. In all these examples, **reform followed from careful analysis of corruption problems and their drivers**. Gathering evidence on corruption not only helped reformers determine which issues to target, but also provided arguments to convince other actors to take action. Where data is available, advocates can use information on corruption trends and the resulting harms to make a compelling case for change.

2. As our categorization of the reforms in the case stories suggests, **it is often more viable to address corruption indirectly than head on**. Reforms which increase transparency, expand participation and promote integrity create environments in which it is harder for corruption to flourish. They are also arguably less prone to sudden changes following shifts in the political context than direct, law enforcement-led responses to corruption.

3. **The most resilient reforms typically involve stakeholders from across government, civil society and the private sector**. The diagnostics process provides an opportunity to engage different stakeholders and gather various perspectives on corruption issues. It is important to sustain this by involving different stakeholders in the development and implementation of action plans. Where relevant, anticorruption actors should also consider whether allies in other countries, or at regional or global levels, can support their efforts.

4. In several of these cases, **reformers seized political windows of opportunity** to bring about change. In the Argentina, Ghana and U.K. examples, these windows were largely created by external factors but exploited by national reformers. To gain political support, it can also help to "sell" anticorruption reforms by linking these to other national priorities, such as combating environmental degradation, managing security risks or advancing trade policy.

5. Ensuring **sustained implementation of reforms** is the common challenge facing these initiatives. Changes to laws and regulations are only helpful if they are enforced, but this requires capacity, resources and political will, which are often lacking. Demonstrating impact can also be difficult. Building clear milestones and indicators of progress into action plans can help show incremental progress and keep up momentum.

Reference materials

For more ideas on sectoral anti-corruption reforms, see:

• **Curbing Corruption, <u>curbingcorruption.com</u>**

• **World Bank. 2020. "<u>Enhancing government effectiveness and transparency. The fight against corruption</u>."**

Table 2 below provides links to the reference materials for each case. NRGI would like to express its thanks to all the individuals who provided valuable input to create and review this compilation of cases.

Table 2. Reference documents for cases

Case number	Description	Reference materials
1	Changes to inspection regimes for shipping cargoes	MACN website, "<u>Argentina</u>" (accessed 31 October 2023) Business for Social Responsibility. "<u>The Maritime Anti-Corruption Network: Argentina Collective Action.</u>" 2018.
2	Governance and procurement reform at state-owned defense companies	NAKO. "<u>A historic step: SC Ukroboronprom officially ceased to exist. What to expect now?</u>" 2023. Huss, O. and Musiiaka, S. "<u>Accomplishing the Impossible: How Ukraine Advanced Anti-Corruption Reforms in Defense & Security.</u>" Corruption, Justice and Legitimacy Blog. 2022. NAKO. "<u>Advancing good governance at UkrOboronProm.</u>" 2021. Open Contracting. "<u>Armed with open data: How Ukraine saved billions on defence procurement.</u>" 2021. NAKO. "<u>UkrOboronProm schemes.</u>" 2019.
3	Community management of small water supply systems	Leclert, L., Wanjihia, C. and Fernández Fernández, C. "<u>Preventing integrity risks in a newly established community group in the Tabaita community.</u>" Water Integrity Network (WIN). 2018. WIN. "<u>The role of women in Kenya's rural water sector: Interview with Catherine Wanjihia.</u>" 2019.

Reference materials

Table 2. Reference documents for cases (continued.)

Case number	Description	Reference materials
4	Community participation in forestry governance	Gulzar, A. and Alexander, L. _Building transparency and accountability in natural resource management (NRM): the role of social accountability and civic participation in addressing corruption in the NRM sector._ World Wildlife Foundation, TNRC Practice Note. 2022. Everse, R. _Impact study for the Forest Resources Sector Transparency programme of CARE International in Uganda._ EMIL Associates. 2017.
5	Increased availability and use of road contract data	Habershon, A., Kirk Jensen, S., and Rozo, M. "Accountability in infrastructure: The CoST approach (Thailand, Ukraine, Honduras)." 2020. CoST. "CoST in action: overhauling the Honduras road fund." 2019 "CoST Honduras" website (accessed 31 October 2023)
6	Building compliance capacity at national and international firms	Siemens. _Integrity Initiative Annual Report 2022._ 2022. Basel Institute Collective Action Database. "Strengthen compliance capacity building of all market participants in China." 2015.
7	Social Responsibility Agreements between firms and communities	Hoare, A., Young, D., Uehara, T., Kaluwe Seidu, M., Birkorang, G., Wete Soh, L., Kamga Kamga, J. _Forest sector accountability in Cameroon and Ghana. Exploring the impact of transparency and participation_. Chatham House. 2020. Ayine, D. _Developing legal tools for citizen empowerment: Social Responsibility Agreements in Ghana's forestry sector_. International Institute for Environment and Development. 2008.
8	Property register reform	Goodrich, S. and Cowdock, B. _Through the keyhole: emerging insights from the U.K.'s register of overseas entities_. Transparency International-U.K.. 2023. Collin, M., Hollenbach, F. and Szakonyi, D. _The end of Londongrad? The impact of beneficial ownership transparency on offshore investment in U.K. property_. United nations University, UNU-WIDER Working Paper 2023/11. 2023. Advani, A., Poux, C., Powell-Smith, A. and Summers, A. _Catch me if you can: gaps in the Register of Overseas Entities_. CAGE Working Paper, No. 680. 2023.

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Tom Shipley is a researcher based at the Sussex Centre for the Study of Corruption. Tom has published research on corruption and anticorruption with a number of organizations, including NRGI, Transparency International, USAID and the World Bank.

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About NRGI

The Natural Resource Governance Institute is an independent, non-profit organization that supports informed, inclusive decision-making about natural resources and the energy transition. We partner with reformers in government and civil society to design and implement just policies based on evidence and the priorities of citizens in resource-rich developing countries. Learn more at **www.resourcegovernance.org**

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