



The measurement of corruption in G20 countries: Overview and good practices

METHODOLOGY

The exercise of gathering information from countries on how to measure corruption has been extremely successful. A questionnaire on measuring corruption was sent to all G20 countries; the Presidency has received 18 completed questionnaires and the information and data collected have allowed the drafting of this document, dedicated to an overview of the measurement of corruption in G20 countries and the sharing of good practices.

Level of accuracy and completeness relies on the received feedback. From this point of view not receiving feedback for a specific item does not necessarily mean that a country does not produce or collect data related to it. Statistics and considerations that follow are based on what countries “declared” in the answers to the questionnaires, and not to what potentially is in use but not included in the questionnaire feedback.

The Compendium after the presentation of this exercise and a brief overview of different methodologies for measuring corruption adopted at the global level, provides a summary of the context of the regulatory and institutional reference frameworks.

Then follow chapters dedicated to the administrative based data collection on corruption taking into account the crime and justice statistics framework, a general overview and a selection of national practices both on population surveys on corruption and corruption surveys in the business sector.

The seventh section is dedicated to data, studies, methods exploring related issues of corruption and more specifically focus on:

- Public Procurement
- Reports/data on public administration transparency
- Proceedings by courts of auditors
- Standard costs for goods and services
- Disciplinary sanctions for illicit/abusive conducts by civil servants
- Asset declarations
- Gifts and benefits registers
- Related parties/conflicts of interest registers
- Political donations
- Beneficial ownership of companies
- Denial of entry
- Financial intelligence exchanges

The Compendium concludes with a selected bibliography of studies regarding corruption indicators and measurement.

Each chapter also includes boxes with the description of some existing practices, selected to highlight, when possible and relevant, specific good experiences to represent all the countries participating in the exercise.

At a global level, the Compendium address the topic of measuring corruption in a synthetic and analytic way. The G20 Compendium of Good Practices on Measuring Corruption is a background document for the development of the debate on this subject in the coming years.

Introduction

The phenomenon of corruption affects, although to a different extent, countries all over the globe and for this reason, it is one of the main themes at the centre of the international debate. Goal 16 of the 2030 Agenda¹, adopted by the United Nations General Assembly for Sustainable Development, also calls for the need to "*significantly reduce corruption and abuses of power in all its forms*".

Corruption, in addition to undermining the rule of law and trust in institutions, damages international credibility, distorts competition and reduces investment, especially foreign. According to the World Bank, corruption is the biggest obstacle to a country's social and economic development (Shang-Jin Wei, 1999)². The G20 Anti-Corruption Working Group highlighted this negative correlation between corruption and growth as early as 2014, with the G20 High Level Principles on Corruption and Growth³, negotiated under the direction of the Italian co-presidency.

Corruption⁴ is a deliberate action against the public interest, a misuse of public power for private gain, an illegal malpractice with the goal of personal enrichment, a wilful violation of rules of conduct.

A precondition to better understanding and fighting corruption is data, to identify, make it available and collect it using sound methodologies. Strong evidence based analysis is required to design and improve prevention and enforcement strategies and, more broadly, to inform governments' responses to corruption and to measure progress. The creation of new tools of measurement based on actionable, objective, identifiable and valid data is an essential precondition for the affirmation of the rule of law and the principle of legality: the better is the knowledge of the corruptive phenomenon and its measurement, the better and more focused are the policies put in place by the countries for prevention and enforcement. Such data is also critical to better understand the impact of these policies on anti-corruption and integrity outcomes.

The importance of producing evidence-based, objective data resulted also from the G7 - Workshop on measuring corruption (where OECD, UNODC, INEGI, Istat underlined this aspect - Italian Presidency, Rome, 2017). The attention is on the improvement of existing methodologies to measure corruption, beside perception indicators which run the risk of biased conclusion when

¹ <https://sdgs.un.org/goals>

² Shang-Jin Wei (1999) Corruption in Economic Development: Beneficial Grease, Minor Annoyance, or Major Obstacle?, Policy Research Working Papers. November 1999

³ https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Principles/2014_G20_High_Level_Principles_on_Corruption_and_Growth.pdf

⁴ The International Classification of Crime for Statistical Purposes defines as corruption the "Unlawful acts as defined in the United Nations Convention against Corruption and other national and international legal instruments against corruption" (2015), https://www.unodc.org/documents/data-and-analysis/statistics/crime/ICCS/ICCS_final-2015-March12_FINAL.pdf

ranking countries if not supported by evidence-based indicators. According to the so-called “Trocadero Paradox”, in fact, “the more you fight against corruption, higher becomes its perception” (Tartaglia Polcini, 2017⁵).

The need to improve measurement methods has been recently acknowledged at the eighth session of the Conference of the States Parties to UNCAC⁶ in Abu Dhabi in December 2019 through the adoption of resolution 8/10 on Measuring Corruption⁷. These efforts are also mutually supportive of the global approach taken to monitor global progress towards target 16.5 of the 2030 Agenda for Sustainable Development.

The topic has been recognized as a priority for the G20 Anti-Corruption Working Group (ACWG). The G20 Anti-Corruption Working Group committed in its 2019-2021 Action Plan to deepen the understanding and consider possible actions on emerging issues, such as measuring corruption. This commitment was taken forward in 2020 under the Presidency of Saudi Arabia and the co-Italian Presidency by facilitating a first discussion in the ACWG and launching the questionnaire exercise.

In 2020 after the COSP resolution, Italy designed a questionnaire⁸ in order to examine the status of corruption measurement in G20 members. Countries approved the questionnaire and after the revision, it was sent to G20 countries for the fulfillment in February 2021. During the first meeting of G20ACWG (30 March 2021), members were informed about the followed steps and an outline of the Compendium was proposed.

Under the Italian Presidency in 2021, G20 members have embarked, with the support of the OECD, on the collection of good practices on corruption measurement, resulting in this Compendium of Good Practices on Measuring Corruption. It was drafted on the basis of countries’ responses to a Questionnaire on Corruption Measurement, provided on a voluntary basis by 18 delegations.

The questionnaire included a series of questions on existing practices and approaches used in G20 countries to measure corruption. Starting with a brief description of the national detection and enforcement system generating data and statistics on corruption cases, the ultimate goal is to take stock of current practices by collecting and sharing detailed information on methodological approaches, data sources, concepts in use, actors involved, access to and use of produced data/information. Feedback on various types of operational, methodological, conceptual and other challenges has been also collected. To capitalize on the diversity of countries’ situations, G20 countries have been encouraged to provide information on a variety of approaches used to measure corruption and related vulnerabilities.

⁵ <https://eurispes.eu/news/eurispes-comunicato-ricerca-corruzione-tra-realta-e-rappresentazione/>

⁶ <https://www.unodc.org/unodc/en/corruption/COSP/session8.html>

⁷ <https://www.unodc.org/unodc/en/corruption/COSP/session8-resolutions.html>

⁸ A fruitful collaboration between Istat, Anac and the Ministry of Foreign Affairs, in collaboration with OECD and UNODC and the G20 Countries allow to achieve the purposes of this important exercise.

The main objective of this compendium is to focus on national experiences in measuring corruption to have better quality (valid, reliable, actionable, etc.) data on corruption, on the measurement of the level of corruption risk and of the effectiveness of anti-corruption policies.

The spirit of this exercise is indeed to collect good practices of G20 countries and to raise the awareness of the general anti-corruption global community, including the private sector, academia and civil society, on the need to overcome exclusively subjective/perceptive indicators and to promote a collective discussion and reflection on ways to improve corruption measurement and develop more reliable data, also in line with the “leading by example” principle that qualifies the action of the global forum. As the OECD suggested, “investing in better data to enhance risk assessments can provide a context for organisations to address broader issues across the data value chain (e.g. data governance, collection, sharing, processing, etc.) to improve the use of data for decision-making” (OECD, 2019)⁹.

In response to this measurement challenge, the OECD has launched its new Public Integrity Indicators¹⁰. This comprehensive set of indicators is the first to be based on an agreed international legal instrument (the OECD Council Recommendation on Public Integrity). The indicators aim to inform on the preparedness and resilience of countries’ public integrity system at the national level, to prevent corruption, mismanagement and waste of public funds, to assess the likelihood of detecting and mitigating various corruption risks, and are designed to inspire actionable change. They will improve data availability and quality and increase the level of harmonization of key data sets internationally. In this sense, the further development of the OECD Public Integrity Indicators is a useful next step in addressing the shortcomings identified by the Compendium. The hope is, of course, that the outcomes of the ongoing work will go to the benefit both of G20 countries and other countries¹¹ and that the growing relevance of better measurement in the global fight against corruption will be further developed under the next Presidencies.

While, after the adoption of the Resolution 8/10 of the Conference of State Parties to the United Nations Convention against Corruption (UNCAC), UNODC launched the 2nd Task Force On Corruption Measurement with the aim to broaden the scope and toolkits to measure corruption, in order to continue developing methodological guidelines to improve the comprehensive, evidence-based and multifaceted measurement of corruption in all its forms¹².

⁹ OECD, Analytics for Integrity. Data-driven approaches for enhancing corruption and fraud risk assessments. 2019. <https://www.oecd.org/gov/ethics/analytics-for-integrity.pdf>

¹⁰ OECD, Analytics for Integrity. Data-driven approaches for enhancing corruption and fraud risk assessments. 2019. <https://www.oecd.org/gov/ethics/analytics-for-integrity.pdf>

¹¹ Also, the World Bank started to work on the Worldwide Governance Indicators, since the nineties, at the aim to compare countries over time and space. (<https://info.worldbank.org/governance/wgi/Home/Documents>)

¹² The first three meetings (June-July 2021) started to address the challenges of measuring objectively measuring corruption and related issues, considering also new data sources and methods.

2. Brief background on corruption measurement and indicators

Corruption is a complex phenomenon that is difficult to define unequivocally, and even more challenging to measure and monitor it. It is well known that corruption can be defined in different ways, depending on the context, the regulatory system or the legal regime and sectors within which corruption is analysed.

To prevent and fight corruption it is therefore necessary to understand the phenomenon in its many forms and come up with general methodologies and tools that can be adapted to a specific national legal, institutional and socio-economic context.

Corruption can be properly addressed only on the basis of systematic exchange and integration of data and different skills and expertise among all the concerned institutions.

Measurement is the first step towards its understanding, the context where it arises, its determinants, social and cultural settings that favours it, institutional and organizational structures and political environments that encourage it.

Many data sources lead to the detection of the phenomenon of corruption, from the most traditional ones to the most innovative¹³. The Praia City Group¹⁴ identified five types of data collection - administrative data, surveys among population and business, civil servant surveys, composite indices and other sources of data - describing strengths and limitations of each source in measuring corruption, and also presenting which indicators produce the several dimensions of corruption (the level of intolerance to corruption, the levels and patterns of corrupt practices and the State response to corruption).

For studying corruption, a multi-dimensional approach is needed: the “versatile nature” of corruption includes in fact several different behaviours, from small-scale bribery to assets misappropriation, from trading in influence to nepotism, reinforcing the concept of the complexity of corruption measurement and leading to the idea that only a complex approach is possible and acceptable.

Solid and transparent methodologies, tested and promoted at international level, addressing different aspects of corruption and considering the different involved subjects are basilar in these perspective.

¹³ UNODC-INEGI Centre of Excellence in Statistical Information on Government, Crime, Victimization and Justice, Critical review of existing practices to measure the experience of corruption, 2018, https://www.cdeunodc.inegi.org.mx/unodc/wp-content/uploads/2020/02/Critical_Review_Corrupt_Measrmts.pdf
UNODC at al., International Practices to measure, monitor and evaluate corruption levels and anti-corruption policies, 2020, https://www.cdeunodc.inegi.org.mx/unodc/doc/UNODC_AnticorruptionPolicies_CorruptionCases_Indicators_ENG.pdf

¹⁴ Praia City Group, Handbook on Governance Statistics, 2020. https://ine.cv/praiagroup/wp-content/uploads/2020/08/PRAIA-Handbook-final_web.pdf

Indicators based on surveys are very important tools to measure direct experiences of corruption phenomenon. Surveys are essential to measure the extent and prevalence of corruption, including the non-reported cases of corruption, and to identify risk factors, the dynamic of corruption and the context where it happens. Surveys among citizens and business are valuable to address petty corruption and can reveal, at least for business surveys, something about grand corruption cases. In some cases, they measure also the subjective perception of corruption. Nevertheless, indicators of perception that investigate the opinion about corruption, even if important especially as a mirror of perceived efficacy of the policies in the main public, can be affected by wide media echo. While, in the other direction, in some cases repressive regimes suppressing information about corruption can give the idea of a better situation, influencing in this way the perception of corruption of the main public. In 2018, UNODC developed a Manual on Corruption Surveys¹⁵ that provides countries with methodological and operational guidelines to develop and implement sample surveys to measure bribery both among the population and among businesses (special attention is given to SDG Goal 16.5) and other forms of corruption, as nepotism and vote-buying.

Administrative data can be divided mainly in two subgroups. The first and most common are administrative based data that focus on the response of the criminal justice system, mainly aimed to detect whether the State response to corruption is adequate. In this context, data on investigations and legal proceedings relating to corruption illustrate the challenges and difficulties of investigating and substantiating corruption cases reported to official authorities. These data are based on a variety of sources (according to the different regulatory systems), like police or law enforcement authorities' reports, prosecutors, court, anti-corruption agencies and produce very important indicators on corruption offences, persons brought in formal contact with law enforcement, proceedings, persons brought before court, persons convicted and held in prison for corruption, just to name the principal ones. It is possible to assess that they represent above all the response of the States. As stated by UNODC: "Data on reported cases of corruption should therefore be interpreted with caution, as they may provide more information about the activity and the response of criminal justice systems to corruption, than about the actual extent of the phenomenon"¹⁶. In fact, on one hand, data on reported cases and investigations suffer from the huge "dark figure" that prevents to use them as corruption measures, on the other hand, reported or detected cases of corruption can represent mostly particular cases of corruption. In fact, if a corruption transaction arrives to the law enforcement attention it can happen also because something wrong happened in the transaction itself between the actors.

Furthermore, some caveats need to be considered, since the use of these indicators for the State response efficacy assessment is not an easy issue, because they depend on how the laws are

¹⁵ UNODC and UNDP (2018). Manual on corruption surveys: Methodological guidelines on the measurement of bribery and other forms of corruption through sample surveys. Vienna https://www.unodc.org/documents/data-and-analysis/Crime-statistics/CorruptionManual_2018_web.pdf

¹⁶ Ibidem

formulated, the resources and independence of enforcement authorities, the style of action of the law enforcement authorities, etc.

The second group of administrative data focus the attention on risks of corruption. These data sources rely on other important public registers, such as procurements data, beneficial ownership, administrative sanctions, asset declarations, audit of institution (internal and external), and the standard costs. OECD (2019)¹⁷ emphasizes that the data-driven risk assessment and an analytics capacity demonstrate that improvements to data governance are possible in the risk management of large-scale infrastructure projects. In particular, the “data value chain” helps in developing benchmarks and indicators and gathering credible and relevant data on the level of implementation, performance and effectiveness of the public integrity system.

More specifically, analysis of procurement information is based on contracts and relative tenders, winning companies and contracting bodies, in order to individuate risk factors, assess corruption risks in the public procurement procedures and how it is widespread in the territory or for different sectors. These data provide an *ex-ante* view, i.e. indicators of corruption risks, red flags, or early warnings (for instance the tender process indicators, supplier risk indicators, buyer risk indicators, political connections indicators), which are not a means of corruption measurement in themselves, but warnings of potentially problematic situations. The identification of these red flags would facilitate the implementation of preventive and law enforcement measures and the identification of areas that are more highly exposed to corruption in order to direct the attention of civil society and citizens to these areas, and encourage greater investment in prevention.

Finally, other branches of research are the analysis based on expert opinions and judgements and big data analysis.

Big data analysis concern for instance information campaigns or sensitization programmes addressed either to specific categories of the population (youth, civil servants, etc.) or to the general public to monitor the citizen’s awareness of the existence of any official anti-corruption mechanism, and on their views on its effectiveness.

Although each of these sources presents advantages and disadvantages, these sources and measurement methodologies produce different types of indicators, which, by their very nature, give a differentiated picture of corruption. Results are encouraging for the development of studies on corruption measurements, even if several studies and publications have highlighted some limits and caveats always necessary for the use of indicators. Caveats must always be specified when using a corruption indicator, mainly related to the methodologies used to aggregate the data and the presence of significant standard errors, the reliability of the sources, the different definitions of corruption used.

Therefore, in order to measure corruption, every country needs to have access to data that can be processed to provide indicators that are capable of detecting corruption at a territorial level, to

¹⁷ OECD, Analytics for Integrity. Data-driven approaches for enhancing corruption and fraud risk assessments. 2019. <https://www.oecd.org/gov/ethics/analytics-for-integrity.pdf>

support prevention and integrity and promote transparency in the actions of the public administration.

Also a number of composite indices¹⁸ on corruption have been developed over the years. These indices are mostly derived from expert assessments, perception surveys and proxy indicators and are not treated in this Compendium that, instead, refers to data sources and indicators.

3. Context - institutional and normative frameworks

Corruption is characterized as a complex, ubiquitous and multi-faceted social phenomenon which represents a threat to societies at a global scale¹⁹. Global and local responses to corruption present equal levels of complexity, varying substantially depending on the institutional and normative context as well as the scope of its functions. The institutional setup in some countries are characterised by specialised agencies, such as the National Crime Agency (organised crime), the Serious Fraud Office (top-level bribery, fraud and corruption cases) and the City of London Police Force (broad role on fraud and corruption) in the United Kingdom, which reflects the efforts of government to establish national lead agencies in specialised areas of crime management and at different points along the criminal justice pathway, while other countries, like the United States, deployed numerous decentralized channels of information. The same can be said in relation to law enforcement and prosecutorial agencies in charge of dealing with corruption cases. Countries like South Africa, for example, present a multi-agency investigative power, combined with a single prosecutorial authority and a special tribunal. Countries like Germany for example, have comprehensive institutional frameworks to fight corruption characterised by the country's federal system and the important role of the Laender in both the prevention and prosecution of corruption. The same concepts can be applied to the prevention of corruption systems, with some countries that adopt a "centralized" system of regulation and supervision (in some cases with the provision of independent authorities as in the case of Italy) and other countries that by tradition and institutional characteristics adopt "distributed" systems at local level or between different institutions. Overall, the strategies towards addressing corruption need to be tailored in accordance with the context and social dynamics of the country in which it will operate. Policymakers ought

¹⁸Unodc (2009). Quantitative approaches to assess and describe corruption and the role of UNODC in supporting countries in performing such assessments. Background paper prepared by the Secretariat. <https://www.unodc.org/documents/treaties/UNCAC/COSP/session3/V0987564e.pdf>

¹⁹ Issa Luna-Pla and José R Nicolás-Carlock, 'Corruption and Complexity: A Scientific Framework for the Analysis of Corruption Networks' (2020) 5 Applied Network Science 13, 2; OECD, 'OECD Public Integrity Handbook' (OECD 2020) 3 <<https://doi.org/10.1787/ac8ed8e8-en>>.

to avoid “one-size-fit-all” strategies and need to take into consideration the institutional and social background of the country.²⁰

In general, the response of countries varies substantially considering their mode of government, the overall strategy of law enforcement agencies, or the priorities of the government. In this sense, scholars and international bodies have called for reforms based on evidence and measurements that enable targeted policies.²¹ These institutional and normative frameworks, in turn, influence how interagency collaboration is established and what data is needed at what level of government.

UNITED STATES

The **United States** implements a decentralized framework against corruption at the federal level that involves a diversity of agencies with anticorruption responsibilities. This system provides a number of different channels for reporting and detecting acts of corruption, including whistle-blowing platforms located on several government websites. Federal corruption cases are prosecuted mainly by the Department of Justice along with several law enforcement bodies such as the FBI, Homeland Security, or the Internal Revenue Service’s Criminal Investigation division. Prosecutors have wide discretion to determine if, whom, how, and where to prosecute under the guidance of the Principles of Federal Prosecution, within the United States Attorney’s Manual. In terms of cooperation, while the US does not have a permanent coordinating body against corruption, it does have ad hoc working groups and task forces investigating specific aspects of corruption.

²⁰ Ting Gong and Sunny L Yang, ‘Controlling Bureaucratic Corruption’ <<https://oxfordre.com/politics/view/10.1093/acrefore/9780190228637.001.0001/acrefore-9780190228637-e-1463>>.

²¹ OECD (n 1) 5;

GERMANY

Germany's comprehensive institutional framework to fight corruption is characterised by the country's federal system and the important role of the Laender in both the prevention and prosecution of corruption. The prevention framework is included in several provisions at both federal and state level. The Federal Directive concerning the Prevention of Corruption in the Federal Administration (CPD) provides the legal framework as regards the prevention of corruption in the Federal Government. The CPD is complemented by detailed guidelines for implementations (Code of Conduct, Guide for Superiors and Public Authorities, Focus on Risk Assessment). Each ministry has to guarantee the implementation of the CPD in their own area of responsibility. A network of contact persons for corruption prevention has also been established. These contact persons provide citizens and employees with assistance and advice for corruption-related questions or concerns. The implementation of repressive anti-corruption policies and criminal cases prosecution lies with the Laender. Some Laender have specialised prosecution offices for corruption offences, others have specific corruption-related expertise distributed across all prosecution offices. In Germany, corruption is detected via a range of sources including tax authorities, the FIU, self-reporting by companies and whistle blowers.

UNITED KINGDOM

The **United Kingdom** has multiple channels of data collection. Data on recorded corruption offences by law enforcement agencies is collected and reported at the national level by the Office for National Statistics.

The UK Anti-Corruption Strategy 2017-22 establishes an ambitious longer-term framework to guide UK government efforts to tackle corruption at home and abroad in order to strengthen security, prosperity and trust in institutions. In order to consider progress against these objectives, the UK worked with the independent U4 Anti-Corruption Helpdesk and other partners to compile a set of global international indicators to indicate the strategic direction and progress of the UK in tackling corruption. These were first published in June 2020 in the [UK Anti-Corruption Strategy Year 2 Update](#) and a further update will be available in due course.

MEXICO

“Since 2014 **Mexico** enacted the General Law of the National Anti-Corruption System whose objective is to establish general bases, public policies and principles of coordination among the authorities of prevention, detection and sanction administrative offenses related to corrupted acts, corruption crimes, and auditing public resources in all levels of government.

On January 29, 2020, the Coordinating Committee of the National Anti-Corruption System approved the National Anti-Corruption Policy (NACP). One of the priority objectives of the NACP is to establish the Follow-up and Evaluation Model (MOSEC), as a tool designed to collect, systematize, exploit and follow-up indicators that measure the evolution of the corruption phenomenon over time. MOSEC is planned to be launched by late 2021.

National Anti-Corruption Policy (in Spanish): <https://www.sesna.gob.mx/politica-nacional-anticorrupcion/>

SOUTH AFRICA

The **South African** response to corruption focuses on a wide variety of information channels, such as surveys, hotlines, auditing reports and data analytics. The main bodies of enforcement include special investigative units, police, financial intelligence units and the public protector. Regarding the judicial efforts to tackle corruption, South Africa has specialized prosecution units as well as specialized tribunals covering different aspects of corruption such as asset tracing and recovery. At the level of inter-agency strategies against corruption, South Africa has an overarching interdepartmental National Anti-Corruption Strategy that sets the objectives for the governmental efforts against corruption as well as monitoring and evaluation of the results. The strategy is further complemented with the Anti-Corruption Task Team in charge of implementing the anti-corruption agenda of the Government, and specialized bodies such as the Fusion Centre which coordinates anti-corruption efforts on cases related to COVID-19.

Considering the breadth and depth of corruption as well as its both global and local dimensions, and the different institutional responses reviewed in this section, there is a need to acknowledge minimum levels of international consensus to provide a common front against corruption. The needs for data and measurement tools will differ depending on the institutional and normative context of countries, but all hunger for better evidence. Inter-agency collaboration, transparent data collection, data-sharing, and overarching governmental strategies with robust monitoring and evaluation frameworks, are vital to effectively target corruption risks.

4. Administrative data on corruption: the crime and justice statistics framework

Police statistics and crime statistics in general are typically a count of all criminal offences reported to, or detected by, the law enforcement authorities and subsequently recorded as crimes. Since only a small portion of all criminal events are reported to the law enforcement authorities or become known to the police, they represent only a part of the phenomenon, the so called “the emerged part”²². In fact “To become known to the police a crime must survive a succession of victim and police decisions, including recognition by the victim that a crime has occurred, police notification, and, entering the occurrence into official police records” (UNODC-UNECE, Manual on Victimization Survey, 2010: 7).

Data based on administrative statistics are very helpful to compare information in the same country over time, but many warnings should be considered: for instance, an increase of cases can be due to a change in legislation, or to an increased awareness of the importance of the phenomenon, that in some way, lead the law enforcement authorities to investigate more on a topic, as well as, a victim to report to the police/law enforcement authorities the suffered crime. These are some of the reasons why changes in the phenomenon, as shown in statistics, have to be contextualized and carefully analysed.

Furthermore, when making comparison between countries it is important to consider many aspects that affect the data comparability, from the used definition, to the methodology of data collections, including the counting rules, and the strategies for the data release. For this reason, metadata and a good documentation of the process of data acquiring are a basilar part of the data production.

Regardless, police statistics and judicial statistics, such as statistics on proceedings, persons charged, persons convicted and persons held in detention are extremely important to represent the response of the State to crimes, and to measure its effectiveness.

As mentioned before, a common definition is needed to have comparable data over time and across countries and this is especially true for corruption. The notion of corruption is in many instances somehow vague, and, being vague, a weak basis for measurement. Definition is indeed the first step of measurement. Only with a clear definition it is possible to provide reliable and consistent measures of corruption. For this reason the International Crime Classification for Statistical Purposes (ICCS) is a concrete step towards measurement and consequently international statistics comparability²³.

²² For a detailed analysis of differences between data gathered from police statistics and victimization survey, refer to the UNODC-UNECE, Manual on Victimization survey. <https://www.unodc.org/unodc/en/data-and-analysis/Manual-on-victim-surveys.html>

²³ The ICCS provides a framework for comparison of statistical data across different crime justice institution and jurisdictions, and allows for the comparison between registered based data and crime victimization data, since it is an event-based classification.

The ICCS (UNODC, March 2015)²⁴ includes the following conducts in the description of corruption: bribery, embezzlement, abuse of functions, trading in influence, illicit enrichment and other acts, as conflict of interest and dishonest appropriation.

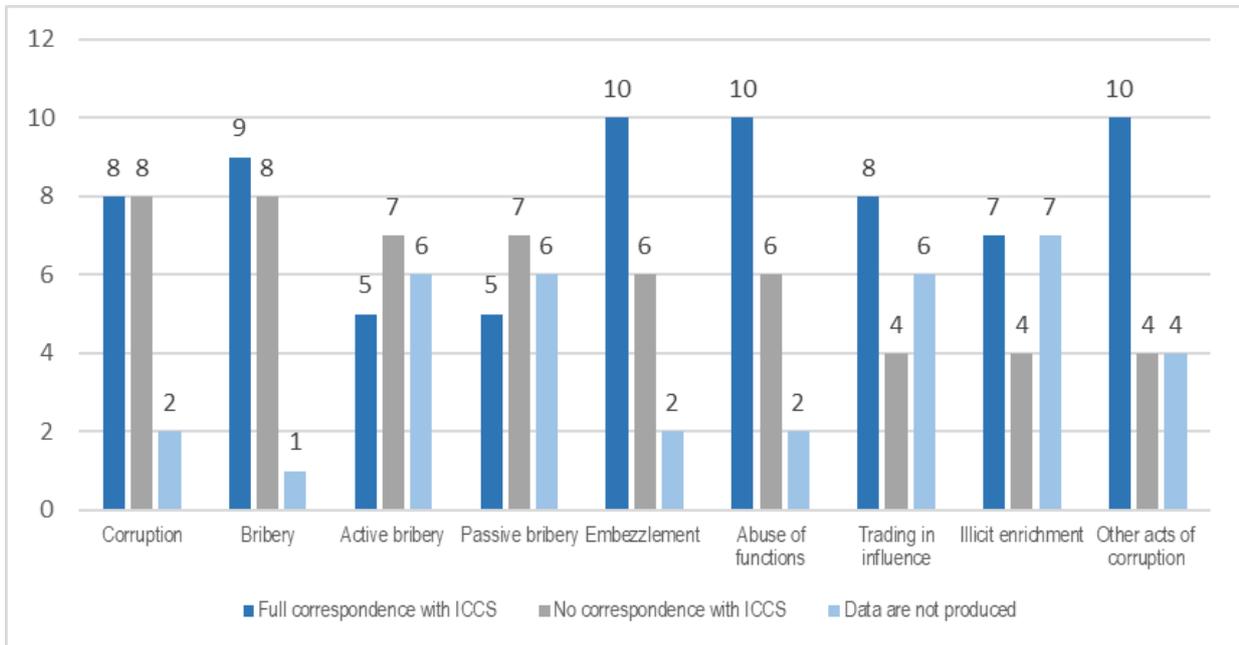
Other classifications consider a wider range of conducts, from fraud to extortion, favouritism, gift-giving, nepotism, cronyism, patronage.

Considering ICCS as a common starting point, when asking G20 countries the outcome was that 8 out of 18 collect and produce data on corruption (07.03.) according to the ICCS definition. Even if the highest correspondence is about embezzlement (07.03.2.), abuse of function (07.03.3.) and other acts of Corruption (07.03.9.). As for bribery (07.03.1.), the ICCS classification defines this conduct as “Promising, offering, giving, soliciting, or accepting an undue advantage to or from a public official or a person who directs or works in a private sector entity, directly or indirectly, in order that the person act or refrain from acting in the exercise of his or her official duties”, is used in almost half of the countries (9), but the distinction between active and passive bribery is the less accomplished. This aspect is accentuated by the fact that countries whose penal code is derived from the Roman Law do not have this distinction.

Sometimes differences from the ICCS definition regard the public versus private nature of corruption, while other countries underline the overlapping of some crimes in their penal code with others, and the difficulties of matching, because in their penal legislation several paragraph and articles are combined into one criminal offence code, so that these offences cannot be identified in as much detail as according to the ICCS definition. It is really appreciable in this perspective also the effort to study commonalities and differences, because it already seems a good way towards harmonization.

Figure 4.1 Number of Countries that produce statistical data in compliance with the International Classification of Crime for Statistical Purposes (ICCS), year 2021 (absolute value)

²⁴ UNODC, International classification of crime for statistical purposes (iccs), 2015. https://www.unodc.org/documents/data-and-analysis/statistics/crime/ICCS/ICCS_English_2016_web.pdf



FRANCE

It is very interesting the work done by **France** in the ICCS implementation. The penal code has been transposed in the ICCS definition and code in order to measure corruption crimes.

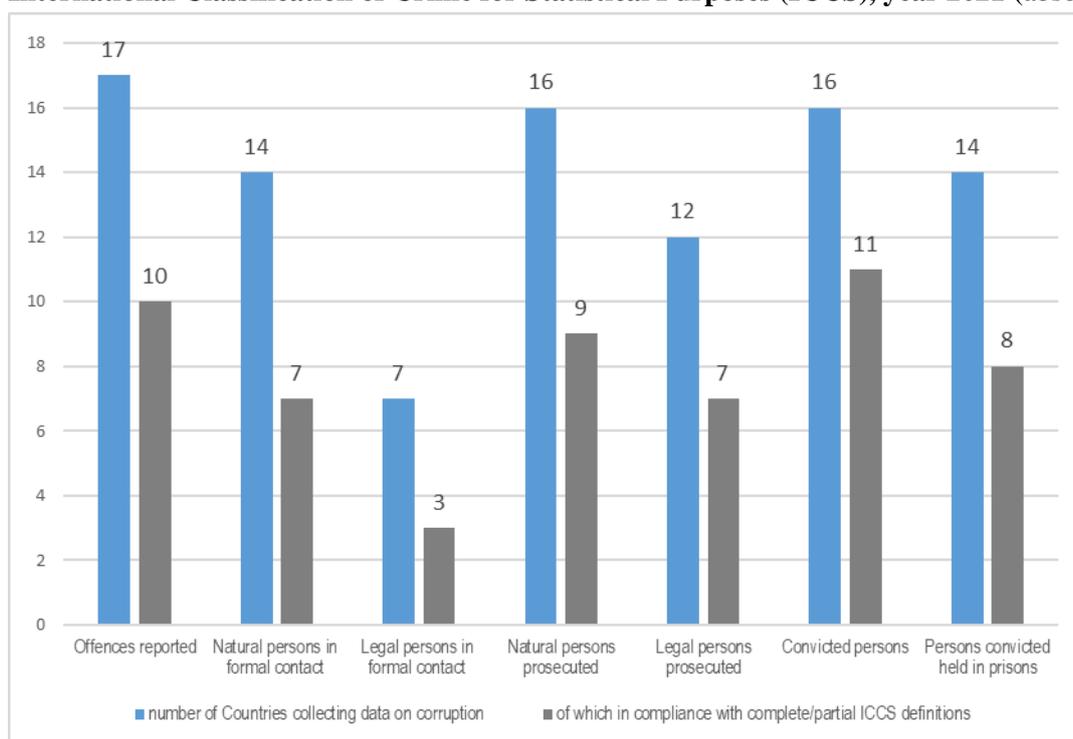
Now France is able, in fact, to produce all kind of administrative data according to the ICCS: offences reported to the law enforcement authorities, natural and legal persons brought in formal contact to authorities, prosecuted persons, convicted persons, persons held in prison.

Another positive aspect is the involvement of more than one institutions in the data production. Several institutions are involved on corruption measurement at different steps, from the data gathering to the analysis and dissemination phase, creating in this way a good synergy.

Almost all countries collect data on corruption offences reported to law enforcement authorities, persons convicted, persons prosecuted and in detention. Statistics on legal persons are produced

only by few countries. Not so much information is collected completely in compliance with ICCS; data on reported offences and convicted persons are compliant with the ICCS definitions more often. In other situations, ICCS is implemented only for some crimes, as bribery, embezzlement and corruption in general.

Figure 4.2 Number of countries by type of administrative data collection and in compliance with the International Classification of Crime for Statistical Purposes (ICCS), year 2021 (absolute value)



Data collection on **offences reported to law enforcement authorities** are carried out by a plurality of institutions, mainly from law enforcement authorities (10 countries), more specifically the police or the Federal Police, followed by the Ministries of Interior, the Ministries of Justice/or other judicial authority and anti-corruption agencies, respectively in 5 cases, the National Statistical Offices (NSO) in 4 cases and also by other agencies in 3 cases. In 50% of countries data are managed by more than one institutions.

Data are collected regularly; in 8 cases yearly, in 5 cases monthly or quarterly and in 6 cases there is a continuous data collection.

Similarly to the data collection on offences persons reported to the police, the information about **natural and legal persons brought in formal contact with the police and the justice system** are carried out more or less by the same institutions. Of 14 data collection on natural persons, 5 are carried out respectively by law enforcement authorities and by the Ministry of Justice/ judicial authority, 3 by the Ministry of Interior or the NSO, 2 by the anti-corruption agency/authority.

SPAIN

Spain presents an interesting framework for administrative data collection about the corruption topic. Even if some definitions have not been fully aligned with or standardized to those from ICCS, a consistent association with the ICCS codes is possible.

Spain presents several data collection points, both at national and subnational level, that involve many institutions: Law enforcement authorities, the Ministry of Interior, the General Council for the Judiciary, the Prosecution Office and the Ministry of Justice through the Asset Recovery and Management Office. Their focus includes the reported offences and the natural and legal persons in formal contact with the authorities. In addition, the General Council is also in charge of all the judicial data collection for statistical purposes, and data collected in some registries is used to support Courts and Law enforcement authorities. The produced data is publically available and, at the same time, some other reports are produced for internal use.

The judicial authority in some countries is the prosecutorial office, in other the attorney general's office, the supreme court or the general council for the judiciary affairs. For instance, is remarkable in Japan the role of not only Ministry of Justice but also their Supreme Court in collecting data on persons convicted and confiscations in numbers.

Also in this case the data collections are annually repeated (6 cases) and ongoing surveys (5); only 2 are monthly or quarterly.

Only 8 countries collect data on legal persons, which are managed by the Ministry of Justice in 4 cases and the law enforcement in 3, 2 by the Ministry of Interior and only in 1 case by the Financial Crimes Investigation Board (FIU).

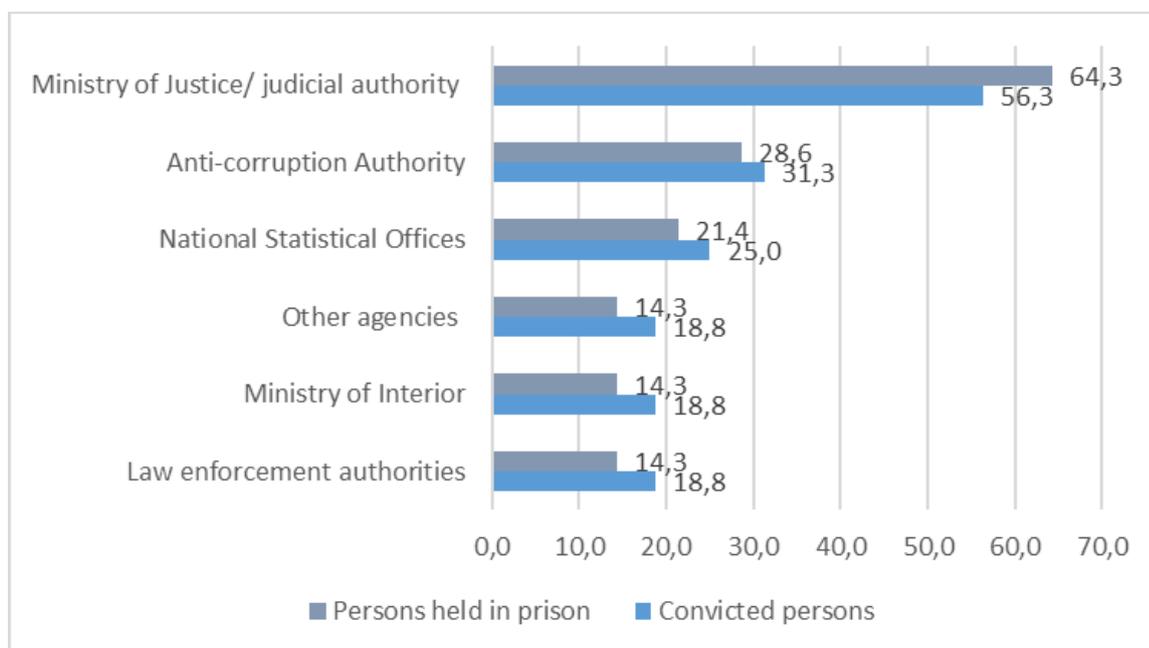
Data collections on **natural persons prosecuted** are carried out by 16 countries, and in particular, 11 of these by Ministries of Justice or other judicial authorities; in 4 cases it is respectively the National Statistical Office or the anti-corruption agencies that are in charge of it. Data are regularly gathered, mainly yearly in half of the cases (8), 4 are monthly/quarterly collected and only 3 are ongoing surveys.

A similar picture can be observed concerning data on **legal prosecuted persons**, but in this case 66,7% (12) of countries collect these data. Prosecutor offices are involved in 75% (9) of the cases,

while the anti-corruption agency is responsible for other 25% (3). 50% (6) of these data are compiled yearly, while 4 are ongoing collections.

Continuing the steps in the justice system, data collections on convicted persons are carried out in 16 cases and on people in detention in 14 cases. Also for these surveys the judicial authority is the main responsible institution, followed by the anti-corruption authority. More agencies can be in charge of the data in the same country. The data are gathered yearly in 6 out of 16 (for convictions) and of 14 countries (for persons held in detention), the remaining are ongoing processes or monthly or quarterly collected.

Figure 4.3 - Countries that collect data on convicted persons and people in detention by type of responsible institution, year 2021 (value in percentage)



BRAZIL

Considering justice statistics, **Brazil** represents a very good practice, with its several data collections about prosecuted, convicted persons and people in detention.

Several judicial authorities (Office of the Attorney General, Federal Prosecution Service, the Office of the Comptroller General) are in charge of data production and data delivering.

The produced information does not perfectly match the ICCS definitions; nevertheless, some data are adjusted with the aim to have comparable data. Moreover, the Office of the Attorney General currently considers that the provisions on non-criminal offences set forth by the legislation encompass all the definitions established in ICCS, in an aggregate perspective. Such proceedings become relevant when it is considered that legal persons are not subject to criminal sanctions as a rule.

What is really fascinating are the ways of disseminating and sharing data: tools to query the database of judgements, to have information on convictions and proceedings in a transparent and interactive way. Also the adopted strategy to share graphics and maps to represent corruption is very interesting, as well the construction of a dedicated informative system on corruption.

Data about the **number of confiscations** and the **value of seized or confiscated assets** are collected by 10 countries and more than one institutions is involved in this exercise in three countries.

These data are gathered mainly by the judicial authorities, followed by the anti-corruption agencies, law enforcement authorities, but also some specialized agencies are responsible for the topic. The data collections are carried out regularly, in some countries they are ongoing, or repeated yearly or monthly/quarterly.

In general, administrative data are produced by a national authority (10 cases) alone or with other subnational authorities (in 7 cases). While only in one country data are gathered by a subnational authority. Furthermore, Federal States collect data throughout federal agencies, like the federal police or the federal prosecution offices.

The message that came out from this analysis is that when data are collected, they are provided with sound methodologies and attention to the quality of data; many institutions are involved and data are regularly produced and delivered. Nevertheless, international comparability is still far

away, as evident in the few number of Countries that have implemented the ICCS, just to name the problem of definition.

17 out of 18 countries in fact deliver reports on corruption for the general public; more than half of the countries (10) produce internal reports to parliamentary bodies and 7 countries internal reports for concerned institutions.

AUSTRALIA

Looking at crime and justice statistics, **Australia** offers a complete framework for measuring corruption in administrative statistics. Corruption is characterized by a wide range of crimes in Australia, but data are provided accomplishing the ICCS request and the international standard of UNCTS.

Everything is provided at federal level, even if other statistics are produced by single States.

All statistical data collections are in charge of the law enforcement authorities (the Australian Federal Police), even if statistics on prosecutions, convictions and prisons are in cooperation with the judicial authority (the Commonwealth Director of Public Prosecutions).

All data collections are ongoing, but data can answer to specific requests too, with different reference time.

What is very stressed is the strong attention to inter-institutional cooperation.

The Commonwealth Director of Public Prosecutions often publishes media releases or case reports upon the conviction of individuals/legal entities, and may do so in conjunction with other law enforcement authorities such as the Australian Federal Police. The Commonwealth Director of Public Prosecutions' annual report will contain brief descriptions of corruption offences, investigations and individuals/legal entities prosecuted. Also, the Australian Commission for Law Enforcement Integrity publishes investigation reports on its website.

TURKEY

Turkey is still in the implementation process of the ICCS; at the moment, in fact, only for the 07.03.01 Bribery code has a complete correspondence between the Turkish penal code and the ICCS. Nevertheless, important steps are already undertaken to improve the situation, like the “Technical Assistance for Increasing the Capacity and Quality of Judicial Statistics” and two important workshops as the “Mapping Study of the International Classification of Crime for Statistical Purposes (ICCS)” and the “Workshop on Classification of Types of Lawsuits” with a view to align Turkish legislation with the ICCS.

Statistical data are produced on offences, on natural and legal persons in formal contact with the police, on natural and legal persons prosecuted, on persons convicted and held in detection, mainly by the Directorate General for Criminal Records and Statistics (Ministry of Justice). But very active in producing and analysing data is also the Financial Crimes Investigation Board (FIU) – the MASAK – that, even if specialized in money laundering, collects data on criminal offences and natural and legal persons brought in formal contact with the police, when they find money laundering cases predicated from corruption crimes.

Furthermore, the Council of Ethics for Public Official collects information on prosecuted persons. The MASAK and the Council of Ethics collect data yearly, while the Ministry of Justice data collection are on-going and are yearly delivered to the open public.

Interesting the reference of Turkey to the Official Statistics Programme (OSP): the collected data on corruption form in fact the basis of judicial statistics, within the framework of the Official Statistics Programme (OSP).

More specifically, information from the judicial units in the Chief Public Prosecutor's Offices, criminal and civil courts, regional courts of justice/regional administrative courts, administrative courts, tax courts, enforcement offices and executive judgeships are instantly obtained from the Judicial Data Bank.

While information is obtained annually from the Constitutional Court, Court of Cassation, Council of State, Court of Jurisdictional Disputes, Supreme Arbitration Board, Council of Judges and Prosecutors, Forensic Medicine Institute, Union of Turkish Bar Associations and Notaries Union of Turkey.

5. Population surveys on corruption ²⁵

5.1 General overview of G20 countries²⁶

Administrative based statistics are the most common sources to study corruption and the measure adopted to combat this crime, however, data on reported cases of corruption suffer from a very high “dark figure”. Only a small portion of corruption cases, in fact, are reported to or detected by the police and subsequently recorded as crimes. In this context the use of sample surveys based on solid and transparent methodologies can produce important indicators on the extent and prevalence on corruption.²⁷ Victim surveys, indeed, capture both criminal incidents reported to the police and those not reported. For this reason official crime statistics and population surveys on corruption should be seen as complementary²⁸.

At the G20 level, eleven out of eighteen countries that answered the questionnaire on corruption measurement declare to conduct population surveys on corruption. In most cases, these are experience-based surveys, but in some cases perception of levels of corruption is included and in three countries the surveys only ask about people perceptions and opinions about corruption.

Six countries have conducted more than one survey and eight countries have conducted at least one survey in the last five years.

Six countries carry out dedicated surveys, while in the other countries the survey is carried out with an integrated module (Mexico, Italy, and South Africa), or with just few questions as a part of another main survey (Saudi Arabia and Spain).

These surveys are mostly carried out by the NSOs, on large samples with national and in some cases even regional (Indonesia, Italy, Mexico, Russia, Spain) and sub-regional (Indonesia) representativeness.

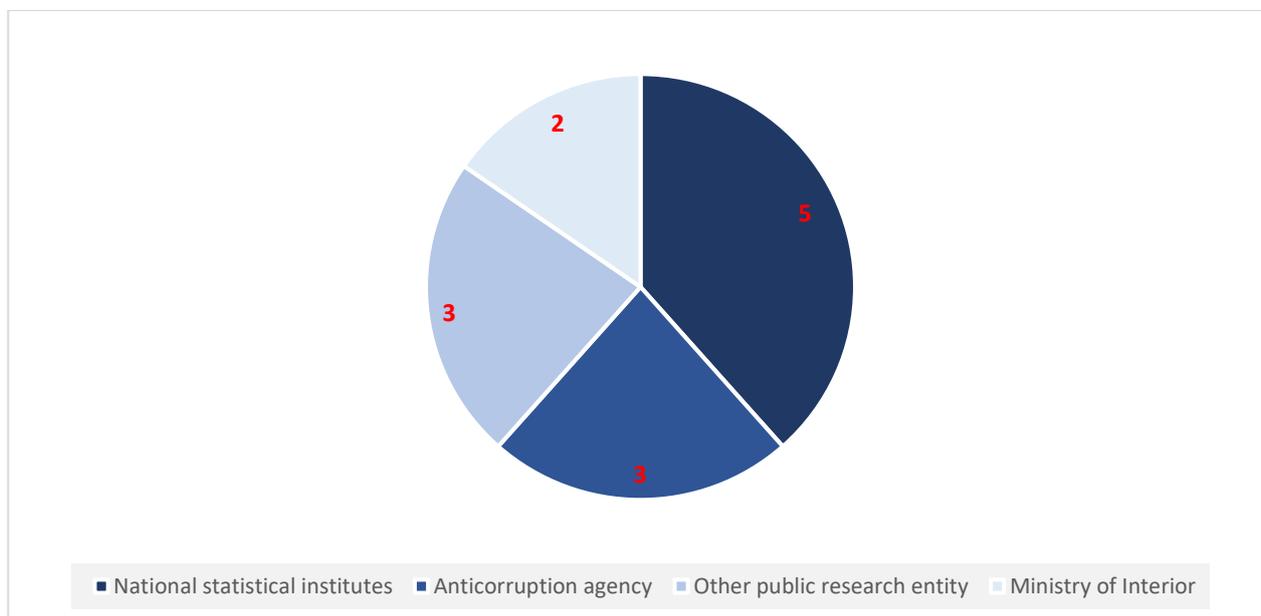
²⁵ Population surveys are just one of the different approaches useful to deepen corruption phenomenon. There is no a standard, neither a best unique way in this regard, and to choose the corruption measurement tools it is necessary considering the features of a specific country and of contexts in order to select the more appropriate and useful.

²⁶ All the information and data in this chapter refer to the eleven G20 countries which have stated in the questionnaire they conduct population surveys on corruption

²⁷ UNODC, 2018. *Manual on corruption Surveys*. Vienna

²⁸ UNODC, Unece. 2010. *Manual on victimization Surveys*. Geneva

Fig 5.1 Population surveys by type of Institutions collecting data, year 2021 (absolute value)



The target population is represented by individuals or households, nevertheless three countries included in the target population civil servants and also stakeholders such as external parties who obtain services or deal with an institution (customers, providers etc.).

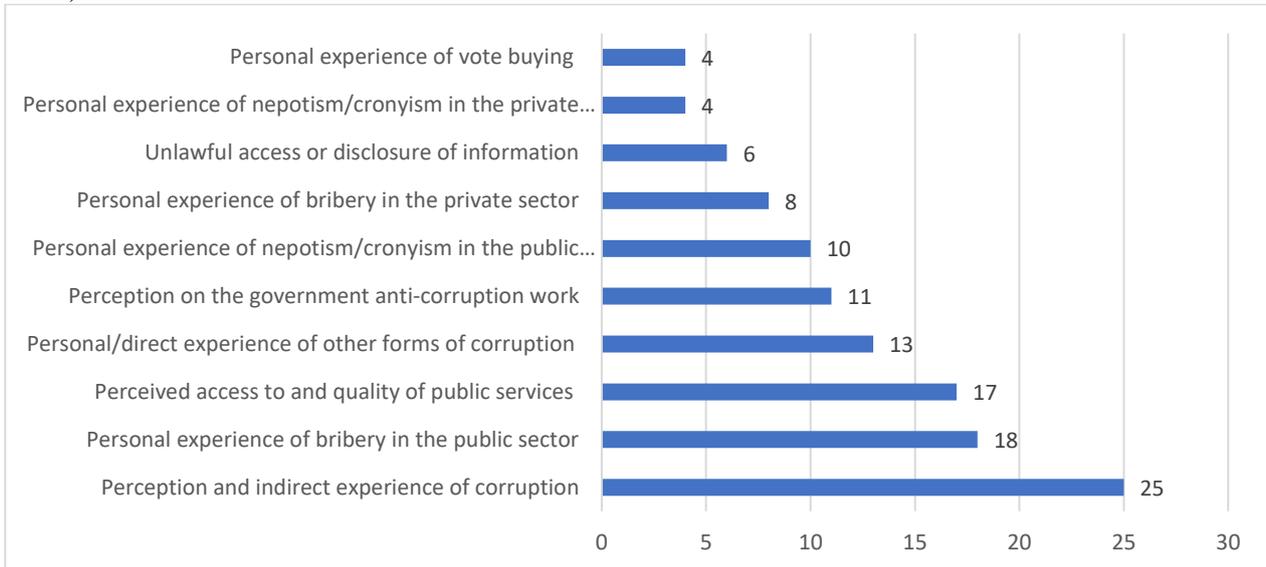
In ten out of eleven countries that conduct sample surveys on corruption these surveys include elements of confidentiality that grant anonymity of respondents and promote honest and reliable responses. In each country, indeed, data are collected under national data protection laws and only aggregated data are disseminated, with no reference to personal data.

Only for six countries data of the surveys allow calculation of indicator 16.5.1 of the SDGs²⁹ and in few countries data produced also comply with the definition provided by the metadata published on the official SDG indicators website.

As shown in the figure below, perception and indirect experience of corruption, personal experience of bribery in the public sector and perceived access to and quality of public services are the topics most frequently addressed by population surveys on corruption.

²⁹ The United Nations Department of Economic and Social Affairs, in the 2030 Agenda, established goals and targets and recommended the development of comparable indicators across countries - the Sustainable Development Goal Indicators (SDG indicators). Indicator 16.5.1- Proportion of persons who had at least one contact with a public official and who paid a bribe to a public official, or were asked for a bribe by those public officials, during the previous 12 months – is one of the indicators proposed for target 16.5: Substantially reduce corruption and bribery in all their forms.

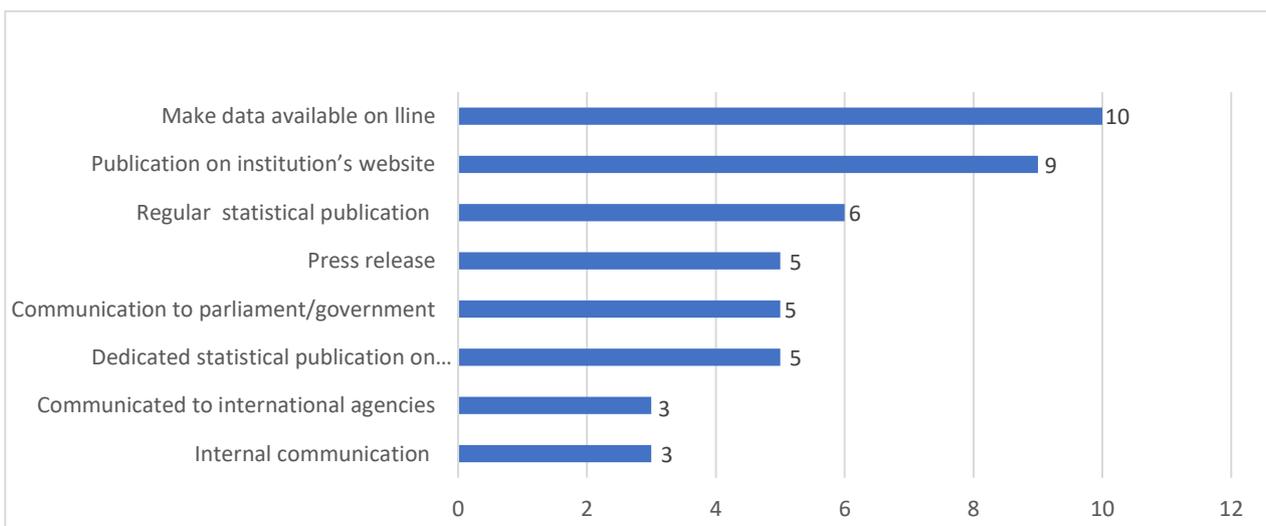
Fig 5.2 Topics addressed in the population surveys by type of addressed topic, year 2021 (absolute value)



Data produced are disaggregated and analysed by gender and age of respondents in almost all the countries (nine out eleven).

About data dissemination strategies, ten out of eleven countries make data available online, and almost all countries publish data on institutions' websites. Additionally, in one country, the organizations assessed are legally required to disclose the survey results for one month on their website.

Fig 5.3 Population surveys by dissemination strategies (absolute value)



5.2 Selection of national practices

Below, some examples of good practices in population surveys on corruption from Indonesia, Russia, and Mexico.

INDONESIA

The **Indonesian** Corruption Eradication Commission (KPK) and the Central Agency on Statistics conduct the “Survey on Integrity Assessment” on an annual basis. Six editions of the survey have been conducted until now. The last edition in 2020 has been carried out by the KPK alone using an online platform.

The survey assesses the integrity of many public institutions, Ministries, provincial and district governments. The measurement of integrity is based on interviews with employees and officials in the institutions (internal point of view), external parties who obtain services or otherwise deal with the institution (external point of view), and other stakeholders deemed to be expert in corruption prevalence in the institution. The external respondents include the business sector (e.g. employees of companies and entrepreneurs) as the users of the public service.

Different topics are addressed: personal/direct experience of bribery, nepotism/cronyism and other forms of corruption in the public sector, but also perception and indirect experience of corruption, perceived access to and quality of public services and unlawful access or disclosure of information.

This survey requires information on corruption in specific sectors such as labor, health, judiciary, tax, land use and urban planning, social services, social housing and social care, infrastructure, extractives, central and local government and in many other public sectors such as: the Special Task Force for Upstream Oil and Gas Business Activities, the Indonesian Institute of Sciences, the Capital Investment Coordinating Board, Ministry of Marine and Fisheries, Ministry of Transportation, Ministry of Trade, Ministry of Religious Affairs.

Data produced are representative at national, regional and sub-regional level and are disaggregated and analysed by gender and age of respondents. Data also allow for the calculation of indicator 16.5.1 of the SDGs.

Data are extensively disseminated through many different strategies - internal communications, regular and dedicated publications on corruption, press releases, communication to parliament and government and to international agencies – and are made available online on the KPK’s website:

- <https://www.kpk.go.id/id/publikasi/kajian-dan-penelitian/kajian-dan-penelitian-2/1491-survei-penilaian-integritas-spi-2020>
- <https://jaga.id/klspi/?vnk=f8b39f1b>

RUSSIA

Surveys on corruption in **Russia** are conducted regularly by a number of authorities, public entities and research institutions, including the Prosecutor General's Office, the Ministry of the Interior, the Federal Guard Service, the Federal Security Service, the Chamber of Industry and Commerce and the National Statistical Institute.

One of the latest surveys, "Corruption at the federal level and in the 85 Russian regions" was conducted in 2020. It was a dedicated survey with a sample of over 36.000 citizens.

Surveys collect data on personal/direct experience of bribery and other forms of corruption in the public and private sectors, perception of corruption, access to and quality of public services and anticorruption law enforcement, including progress and setbacks. Such surveys include questions on corruption in labor, health, judiciary, law enforcement, social services, social housing and social care, public utilities and central and local government. In most cases the data produced are representative at the national and regional levels and disaggregated and analyzed by gender and age of respondents.

Data may allow for the calculation of SDG indicator 16.5.1 and are disseminated through regular and dedicated publications on corruption, communications to parliament and the government, and press releases. They are also made available online on institutional websites:

- <https://epp.genproc.gov.ru/web/gprf/activity/statistics/office/result>
- <http://crimestat.ru>
- <https://wciom.ru/tematicheskii-katalog/corruption>
- <https://fom.ru/Bezopasnost-i-pravo/14187>

MEXICO

The **Mexican** Institute of Statistics (INEGI) has conducted two surveys on corruption in 2020 and 2019. Both surveys are carried out with a module in another survey on a target population of people aged 18 and over.

In the survey carried out in 2020 – Encuesta Nacional de Seguridad Publica Urbana (ENSU) - the sample was of 25.500 dwellings (300 quarterly households per 85 city of interest). The 85 cities of interest present at least one city for each federal entity and include the 16 territorial demarcations of Mexico City.

The 2019 survey – Encuesta Nacional de Calidad e Impacto Gubernamental (ENCIG) – was carried out on a sample of 46.000 households in cities with more than 100.000 inhabitants nationwide, by federal state and metropolitan areas.

The surveys collect data on personal/direct experience of bribery in the public sector, on perception and indirect experience of corruption and also on perceived access to and quality of public services.

For both the surveys, data produced are representative at national and regional level and are disaggregated and analysed by gender and age of respondents.

Data allow for the calculation of indicator 16.5.1 of the SDG and comply with the definition provided by the metadata published on the official SDG indicators website.

Data are extensively disseminated through different strategies: regular statistical publications on corruption, press releases and communication to parliament and government.

Data are also made available online on the INEGI website:

- <https://www.inegi.org.mx/programas/ensu/>
- <https://www.inegi.org.mx/programas/encig/2019/>

6. Corruption surveys in the business sector³⁰

6.1 General overview of G20 countries³¹

Sample surveys on bribery among business as well as population surveys are aimed at producing estimates of the “dark figure” of corruption. These surveys can identify economic sectors particularly vulnerable to bribery and can help to better understand context and mechanism of corruption, drivers and risk factors³².

Unfortunately, surveys on corruption in the business sector are not widespread among G20 countries: only nine out of eighteen countries declare to conduct this kind of survey. Among these nine countries, one gave incomplete and unclear information in the G20 ACWG questionnaire and another country is planning a survey on corruption in the business sector for the next year.

Six out seven countries show some experiences in this field since they have conducted more than one survey on corruption in the business sector - two, three, five, up to ten surveys - and five countries have conducted at least one survey in the last five years.

These surveys are mostly carried out by public research entities and by anti-corruption agencies or authorities on samples of economic units or of business population representative at national and in some cases even regional and sub-regional level. In three countries the NSOs conduct these surveys³³.

Some countries have conducted dedicated surveys; other countries have an integrated module or just few questions on corruption as a part of another main survey.

With only one exception the surveys cover the entire country’s territory. Four countries in their surveys cover all business sizes - from one to more than 250 employees.

As shown in the figure 6.1, the topics most frequently surveyed are personal experience of bribery in the public sector and perception and indirect experience of corruption.

Three countries address the topic of corruption with reference to all economic sectors; the other countries’ surveys, instead, refer to selected sectors. In particular:

- manufacturing
- construction
- transport and storage

³⁰ As stated for population surveys, also business surveys are just one of the different approaches useful to deepen corruption phenomenon. In fact to choose the corruption measurement tools it is necessary considering the features of a specific country and of contexts in order to select the more appropriate and useful.

³¹ All the information and data in this chapter refer to the seven G20 countries which have stated in the questionnaire they conduct corruption surveys in the businesses sector

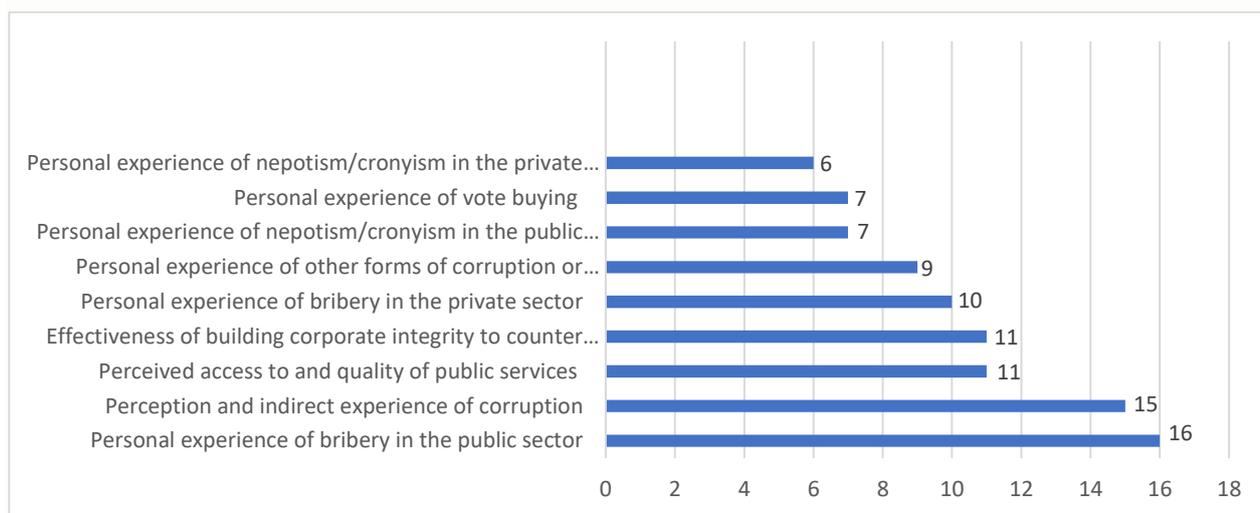
³² UNODC, 2018. *Manual on corruption Surveys*. Vienna

³³ Also international organizations (OECD, UNODC, World Bank) carried out business surveys. An example is those conducted by the OECD in Latin-American countries. This surveys collect data on personal/direct experience of bribery in the public and in the private sectors and about other forms of corruption or related crimes such as cybercrime, money-laundering, about human rights, environment, social responsibility, due diligence, risk assessment and about experience in the effectiveness of building corporate integrity to counter bribe solicitation.

- electricity, gas, steam and air conditioning supply
- water supply, sewerage, waste management and remediation activity
- financial services, banking and investment.

Only one country covers also the informal sector.

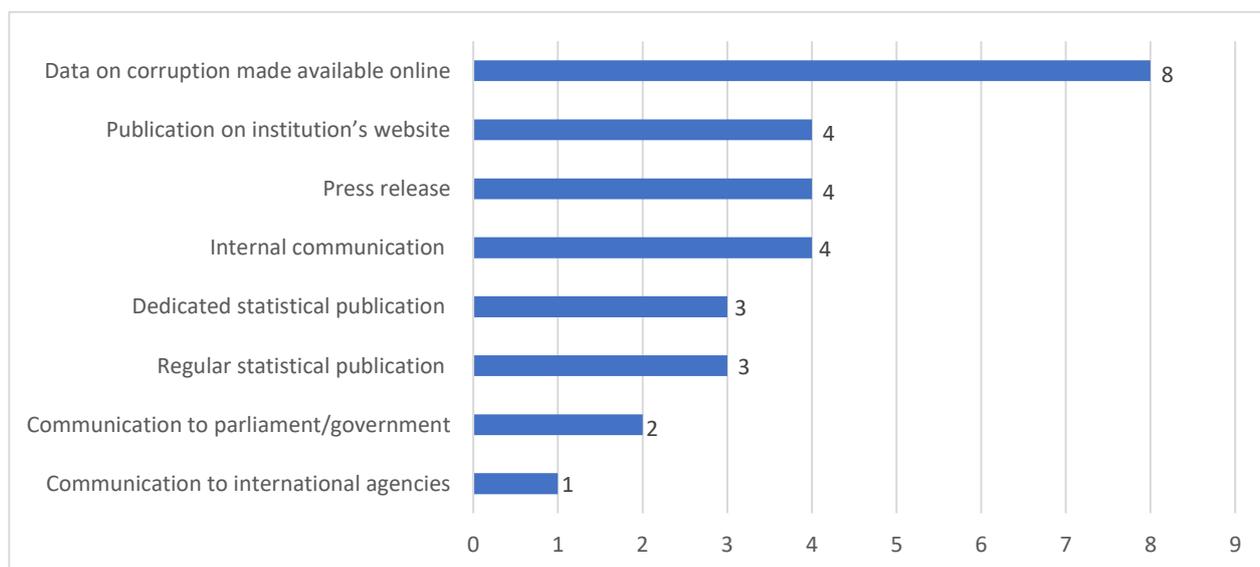
Fig 6.1 Topics addressed in the business surveys (absolute value)



In all countries, data are collected under national data protection laws that grant anonymity of respondents and confidentiality.

About data dissemination strategies, all countries except one, make their data available online, or plan to do it as soon as they will end the data collection phase.

Fig 6.2 Business surveys by dissemination strategies (absolute value)



6.2 Selection of national practices

Below, some examples of different surveys on corruption among the business sector from Saudi Arabia, Mexico, Korea, China.

SAUDI ARABIA

The **Saudi Arabia** corruption survey among businesses is conducted by the Saudi Oversight and Anti-Corruption Authority (Nazaha) since 2018. Three editions of the survey have been conducted in 2018, 2019 and 2020.

The sample size is from 308 to /416 businesses in the private sector with 250 employees and more. The survey covers the entire territory and all economic sectors.

The Saudi Arabia experience is interesting and relevant because it declares to collect data on all the topics listed: personal/direct experience of bribery, nepotism/cronyism in the public and in the private sector, personal/direct experience of other forms of corruption, of vote buying, and also perception and indirect experience of corruption perceived access to and quality of public services and experience in the effectiveness of building corporate integrity to counter bribe solicitation.

Data produced are representative at national level and are largely disseminated through many different strategies: internal communications, regular and dedicated publications on corruption, press releases, communication to parliament and government and to international agencies.

Data are also made available online on the anti-corruption authority website:

- https://www.nazaha.gov.sa/enus/Documents/G20/Statistics_of_Reports_Received_by_Nazaha_for_the_Fiscal_Year_2019.pdf

MEXICO

Mexico experience is relevant because several surveys on corruption among businesses have been conducted until 2020.

The OECD survey (2020) include other Latin-American countries and ask about personal/direct experience of bribery in the public and in the private sectors, about other forms of corruption or related crimes such as cybercrime, money laundering, about human rights, environment, social responsibility, due diligence, risk assessment and about experience in the effectiveness of building corporate integrity to counter bribe solicitation.

The National institute of statistics (Instituto Nacional de Estadística, Geografía e Informática –Inegi) has conducted three surveys. The last one, in 2020, on a sample of over 33.000 economic units (with the exception of activities related to agriculture and those of public sector and government) at national level and by federal state, business size and large economic sector. The previous one in 2019 on a sample of 5.001 economic units of the private sector at the level of Mexico City and for its 16 territorial demarcations, and the one earlier in 2016 on over 34.000 businesses in private sector at the national level and by federal state business size and large economic sector. Informal sector is also included.

The large integrated activity sectors considered are:

- Industry (mining, electricity, water and gas supply, construction and manufacturing activities).
- Commerce (wholesale and retail trade activities)
- Services (all private services, including transportation).

The surveys collect data on personal/direct experience of bribery in the public sector, perception and indirect experience of corruption and perceived access to and quality of public services.

The surveys cover business size from one to more than 250 employees. Data produced are representative at national, regional and sub-regional level and disseminated through communication to parliament and government, regular statistical publication and press release. Data are also made available online on Inegi website:

- Encuesta Nacional de Victimización de Empresas (ENVE) 2020, <https://www.inegi.org.mx/programas/enve/2020/>
- Encuesta de Calidad Regulatoria e Impacto Gubernamental en Empresas de la Ciudad de México 2019 (ECRIGE-CDMX 2019) <https://www.inegi.org.mx/programas/encrige/2019/>
- Encuesta Nacional de Calidad Regulatoria e Impacto Gubernamental en Empresas (ENCRIGE) 2016, <https://www.inegi.org.mx/programas/encrige/2016/>

KOREA

The **Korea** Institute of Criminology in 2019 conducted the Industry-based Integrity survey.

3.000 workers in ten industry sectors were asked about their perception about the corruption status and anti-corruption system in their industry.

It is a dedicated survey with the scope of assessing corruption and in particular:

- corruption in business relation
- corruption in management
- violation of fair trade
- undermining social/ public interest values
- power abuse

And with the scope of assessing the prevention of corruption:

- transparent corporate disclosure and accounting
- responsible management
- protection of shareholder rights
- prevention of corruption and anti-corruption acts.

Data from this survey are elaborated in the Corruption Status Index and the Corruption Prevention Index and made available online:

- Industry-based Integrity Index: National Knowledge Information System homepage (www.nkis.re.kr)

CHINA

In the last years, **China** carried out ten surveys on corruption among businesses. These surveys are conducted thanks to a synergy between many Institutions, included the National Statistical Office. The surveys address many topics, from the personal/direct experience of bribery in the public and private sector, the personal/direct experience of nepotism/cronyism, the personal/direct experience of vote buying, till the perception and indirect experience of corruption issues. Also the perception about the access to and the quality of public services is investigated, as well as the experience in the effectiveness of building corporate integrity to counter bribe solicitation. The surveys are not representative of all the territory, but the samples cover business belonging to many kind of sectors and of all sizes, with the only exclusion of the smaller companies till 5 employees.

Information received by businesses is confidentially treated and businesses are reassured about the anonymity of the answers they provide because of the protection of the Law of Statistics of the People's Republic of China.

About dissemination, surveys' deliverable concerns both internal reports and press release.

7. Data, studies, methods exploring corruption and related issues

This section is dedicated to investigate issues and vulnerabilities related to corruption, i.e. behaviours, acts and procedures that can detect misconduct and corruption. Previous chapters in fact describe existing experiences and some good practices related to corruption measurement using administrative data from law enforcement/criminal justice and, since the corruption volume is higher than corruption reported in criminal registers, in order to complete the picture, also describing implementation of population surveys and surveys among the business sector on corruption. But, since the objective of the questionnaire was taking the broadest possible picture on existing practices and approaches used in G20 countries to measure corruption, another specific focus is related to other data and studies/methods exploring corruption and related issues in each country, with a view to compiling them into a compendium in line with the “leading by example” principle that qualifies the action of the global forum. Section IV of the questionnaire is related to a various range of information categories, and in particular to 12 typologies of data potentially useful for the corruption measurement perspective too:

1. public procurements,
2. reports/data on public administration transparency,
3. proceedings by courts of auditors,
4. standard costs for goods and services,
5. disciplinary sanctions for illicit/abusive conducts by civil servants,
6. asset declarations,
7. gifts and benefits registers,
8. related parties/conflicts of interest registers,
9. political donations,
10. beneficial ownership of companies,
11. denial of entry,
12. financial intelligence exchanges.

Feedback sent by countries allowed to collect a number of sources, methodologies, and tools and to capitalize the diversity of existing approaches in G20 countries to measure corruption and related vulnerabilities.

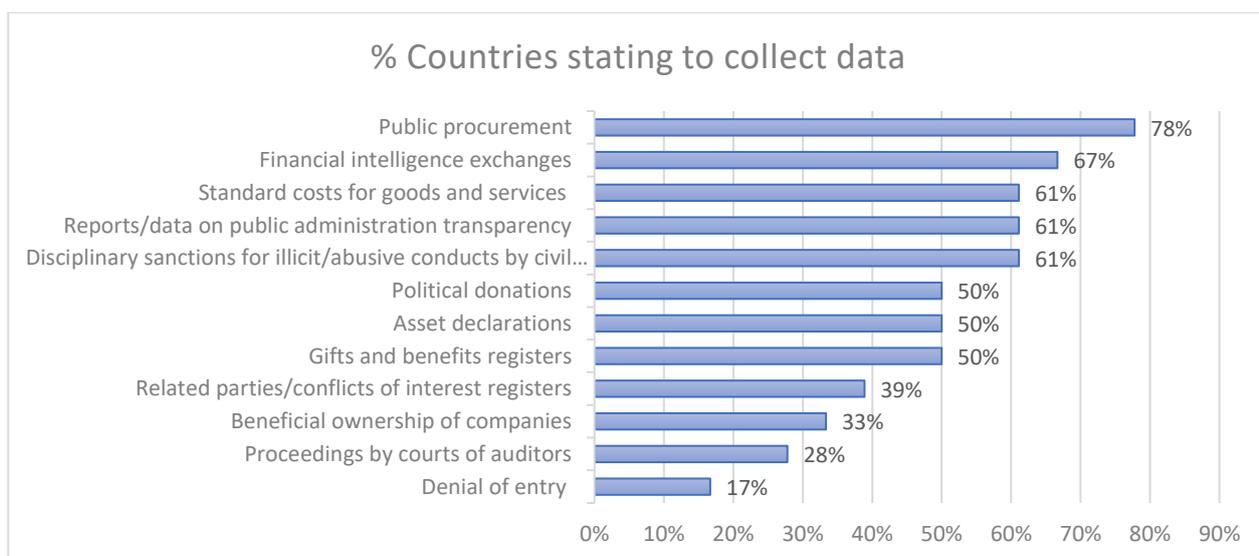
Before starting deepening each topic investigated in section IV, it is worth to clarify that the level of accuracy and completeness of the feedback received varies. From this point of view not receiving feedback for a specific item (e.g. “public procurement”) does not mean necessarily that a country does not produce or collect data related to it. In other words, in a collecting exercise like the one presented as follows, it will not be possible compiling statistics and making considerations about if one typology of data is used in order to measure corruption in a specific country, but just if this country “declared” or not declared to do it. For the same reasons, all the synthetic and aggregate data elaborated as follows should be read as referred to what countries communicate in this exercise and not to what potentially is in use but not included in the questionnaire feedback.

The information collected is both enough to have a general overview of the sources of data most used in different G20 countries to assess or measure corruption, and a good starting point to share existing experiences and some good practices in the field, to be further deepened and improved in the future.

General overview

Among the 12 typologies listed above (each country could indicate multiple sources), public procurement (78% of respondents, 14 over 18 respondent countries), and the related theme of standard costs (61% of respondents), appears to be the main scope of activities of public administration deepened also (but obviously not only) in an anti-corruption perspective. Following, the topic of financial intelligence exchange³⁴, also because structured international cooperation in the field, where data are collected and elaborated by almost two thirds of G20 countries. Very widespread also policies and practices of data gathering concerning public administration transparency and disciplinary sanctions for illicit/abusive conducts by civil servants (around 60% of respondents). While about half of the respondents to the questionnaire declared to elaborate data about political donations, asset declaration and gifts and benefits, less than 50% of countries reported to gather data about conflict of interest, beneficial ownership of companies and denial of entry.

Fig 7.1 Countries declaring data gathering on topics related to corruption, by type of measure. Year 2021 (value in percentage)



³⁴ It refers to the exchange of information between FIUs and also with domestic competent authorities on corruption related issues.

G20 countries declared to use different ways to share and communicate data produced on topics identified in the questionnaire and potentially useful from a corruption measurement perspective. It is remarkable that the majority of countries declared that, when appropriate and applicable, data and elaboration are released online, a good practice of pro-active transparency. Of course, depending on the kind of sources and data, communication for some data and statistics is restricted and/or addressed to the corresponding oversight body (parliament, government branch, etc.) of the institution managing them.

Concerning the dissemination strategy for each item, that is to whom data produced are made available, table 7.1 shows and compares the distribution of absolute frequencies among themes, that is the number of countries responding to the questionnaire that declared to use a specific dissemination strategy related to the typology of data (item of the questionnaire).

Table 7.1 Countries declaring data gathering on topics related to corruption, by topic and type of dissemination strategy. Year 2021 (absolute value)

	Internal communication	Communication to parliament/ government	Regular statistical publication	Dedicated statistical publication on corruption	Communicated to international organizations	Press release	Publication on institution's website
Public procurement	4	8	8	3	5	4	10
Reports/data on public administration transparency	3	5	6	3	1	2	6
Proceedings by courts of auditors	0	2	2	1	0	1	2
Standard costs for goods and services	2	5	4	3	2	2	6
Disciplinary sanctions	5	5	5	2	0	4	6
Asset declarations	3	3	2	2	1	1	5
Gifts and benefits registers	5	4	3	1	1	2	3
Conflicts of interest registers	2	3	1	0	0	0	4
Political donations	1	1	0	0	0	0	5
Beneficial ownership of companies	3	1	0	0	0	0	2
Denial of entry	2	0	0	0	0	0	0
Financial intelligence exchanges	3	5	4	1	2	2	2
Total	33	42	35	16	12	18	51

Public procurement

14 (78%) out of 18 respondents declared to collect and use data related to public procurement, also from a corruption measurement perspective.

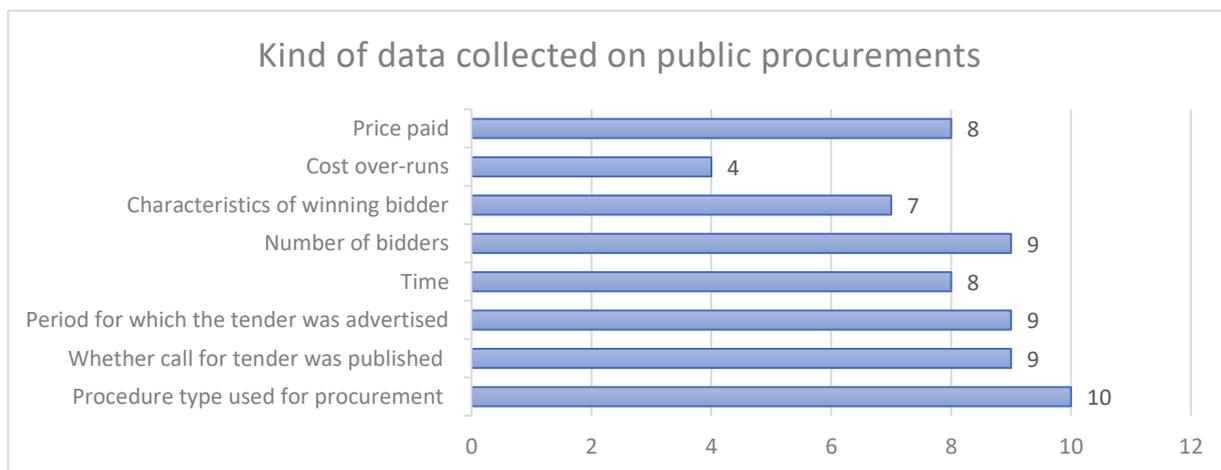
Among the typology of data potentially useful to measure corruption, public procurement is the most widespread among G20 countries.

Generally, the structure in charge within each country to collect and elaborate this typology of data is a specific public procurement office. In other cases, ministry of economics/treasure (e.g., Australia, South Africa) and in some cases the anti-corruption authority (e. g. Italy, Brazil).

Data on public procurement are collected and compiled in the form of aggregated statistics most “ongoing” (as declared by 6 countries) and/or “yearly” (as declared by 6 countries). Only 2 countries declared a not regular frequency in collecting and elaborating this kind of data.

Concerning the kind of data collected on public procurement there is a great variety of variables taken into account by countries. Above all are collected data about “procedure type used for procurement (e.g. competitive or not)” (10 out of 14 countries), “whether call for tender was published”, “period for which the tender was advertised”, “number of bidders” (9 out of 13), “time” (8 out of 14 countries), and “characteristics of winning bidder” (for example age of company, track record), “price paid” (7 out 14). Less used it seems the “cost over-runs” data (4 of 14).

Fig 7.2 Countries declaring data gathering on public procurement, by item collected. Year 2021 (absolute value)



Concerning the dissemination strategy, that is to whom data on public procurement are made available, 10 out of 14 countries declared “publication on institution’s websites”, in other words it seems that G20 countries mostly adopt this form of transparency to stakeholders and citizens for public procurement information and data. Other forms of communications rely also on the features of the specific legislative framework of each country. Very common is the “communication to parliament/government” (8 out of 14) and “regular statistical publication (8 out 14).

Standard costs for goods and services

In continuity with the previous topic, 11 (61%) countries out of 18 declared to collect and elaborate data about standard costs for good and services.

This kind of data is closely related to the scope of public procurement, and in fact generally speaking the same organizations are in charge of collecting and elaborating procurement and standard costs data.

3 countries declared to collect and elaborate standard costs data in “real time”, while the most common frequencies declared are monthly/quarterly and yearly.

Concerning dissemination strategy, the most common measures adopted are publication on institution’s website and regular statistical publication (6+3), and in addition the communication to parliament/government (5).

Reports and data on public administration transparency

11 (61%) out of 18 countries declared to produce and collect data on public administration transparency (as generally intended and defined in the questionnaire) also from a corruption measurement perspective.

For example, in some countries, there is a central repository of publicly available corporate information for all government bodies, or an annual report on financial and not-financial data in compliance or not with the national law or a report about the open government.

In some cases (e.g. China, Brazil, Korea), this kind of data are collected and processed by anti-corruption bodies or other central bodies (specific transparency/public data organization, administrative department of governments, etc.). In some cases, these data are gathered, treated and disseminated at the level of each public administration (Italy).

The main form of dissemination is represented by the publication of data related to transparency on institutions’ websites, and aggregated elaboration through specific statistical publications (6+6). Only in 3 cases out of 11, countries declared a restricted and internal communication and treatment of this kind of data.

Financial intelligence exchanges

Together with the item of public procurement, the one related to financial intelligence exchanges highlights the efforts of G20 countries to collect and process this typology of data, also from an anti-corruption perspective, and promoting international cooperation on the subject. 12 (67%) out of 18 countries declared to collect data and produce statistics on the topic. This is a field in which international cooperation is strong and structured. The exchange of financial intelligence occurs through Financial Intelligence Units - that serve as a national centre for the receipt and analysis of: (a) suspicious transaction reports; and (b) other information relevant to money laundering,

associated predicate offences (including corruption) and financing of terrorism, and for the dissemination of the results of that analysis. Data are collected ongoing or monthly, and statistics are usually produced and released annually.

Detailed data and statistics are mainly object of restricted communication or disclosure to parliaments/governments, while aggregated elaboration could be released by Internet publication and/or press releases.

Disciplinary sanctions for illicit/abusive conducts by civil servants

Concerning this kind of data, 11 (61%) out of 18 responding countries declared to gather and elaborate it.

Generally, it seems that this kind of data is collected by an individual administration and then sent to be aggregated and elaborated by central bodies such as public administration ministries/departments/bodies, as in the case of Japan. Considering this flow of information between local/individual and central bodies, accordingly aggregated data and statistics are usually published yearly.

These sanctions in general are not, or not necessarily, linked to criminalized behaviours, even if in some cases, there can be some overlap.

A dissemination strategy is expressed both by publication of data and statistics on the Internet (5+4) and by communication to government/parliament for relevant purposes not only related to corruption (5).

Asset declarations

9 (50%) countries out of 18 stated to collect data about asset declarations. Such kind of data is elaborated mainly by public administration ministries and/or finance central bodies. Other countries have specialized agencies for asset declarations, or anti-corruption authorities are in charge. Indonesia declared that the Corruption Eradication Commission (KPK) collects yearly asset declaration data, recognizing the importance of it in the anti-corruption scope of activities. G20 countries normally elaborate and release this data annually.

The most common strategy to disseminate statistics and elaboration about the scope of asset declarations is the publication on institutions' websites (6).

Gifts and benefits registers

Half of the countries that sent feedback on the questionnaire declared to update a gifts and benefits register. Usually data are collected ongoing by each and all government departments. Japan, Korea

and the United States provide annually also elaboration of these data at a central level by public administration oversight bodies, while Indonesia provides it by the anti-corruption national body.

Reports about the elaboration of this data are mainly shared internally and/or communicated to parliament/government (5+4). More frequently, gifts and benefits registers are not only managed but also made public by each public organization. The most common model adopted by G20 countries is the one consisting in registering gifts and benefits above a certain threshold as for example of in the case of Australia, where public reporting on the gifts and benefits received by public sector agency heads is done on an agency by agency basis in line with the Guidance for Agency Heads on Gifts and Benefits. All agency heads in the Australian Public Service, including departmental secretaries, must register, and publish, the gifts and benefits they accept which exceed the threshold of \$AUD100 (excluding Goods and Services Tax) at the end of each financial quarter: 31 March, 30 June, 30 September and 31 December.

Related parties/conflicts of interest registers

7 (39%) out of 18 countries declared to compile on a regular basis the related parties/conflicts of interest. Data and information are collected and registered by central public administration bodies as the most common approach, and released periodically. South Africa declared the availability and release in real time of this data.

The most widespread form of disclosure of the related parties/conflicts of interest registers is by publication on the institutions websites (4).

Political donations

Among the 18 countries that sent replies to the questionnaire, 9 (50%) reported producing data on political donations. Mainly there are specific electoral bodies/commissions in charge to collect this kind of data, and in some cases they are established within national/local parliament/legislative assemblies.

The most common way to make public data collected and statistics about political donation is through publication on the institutions' websites (5).

Beneficial ownership of companies

6 (33%) countries out of 18 stated to produce data and elaborations about the beneficial ownership of companies. Usually data are collected on an ongoing basis by the Chamber of Commerce or Companies House Register or Minister of Finance.

It seems that the communication of this kind of data and statistics is mainly restricted and only 2 countries declared online publication.

Proceedings by courts of auditors/supreme audit institutions

Few countries, 5 (28%) out of 18 responding countries, declared to collect and treat on a regular basis data and information about proceedings by courts of auditors from an anti-corruption perspective. This is one of the example concerning the difference from what was declared by countries in the context of this exercise (which is probably underestimated) and what is the real framework within each national system.

This kind of data are collected mainly by national (or regional/local where applicable) Courts of Auditors, and are disseminated in aggregated form via the Internet and in some cases only communicated to parliaments/governments.

Denial of entry

This is the item for which countries declared the lowest data production coverage. It seems that only 3 (17%) respondents to the questionnaire out of 18 manage this information. Data are managed by border police (Spain), federal police (Brazil) and Department of State (United States).

Due to the intrinsic security characteristic, data and statistics are not disclosed and object only of internal restricted communication.

Below, some examples of good practices in population surveys on corruption from India, Indonesia, Italy and Korea.

ITALY

From the feedback to section IV of the questionnaire emerged that **Italy** regularly produces, collects and elaborates almost all items indicated, that is public procurements, data on public administration transparency, proceedings by courts of auditors, standard costs for goods and services, asset declarations, related parties/conflicts of interest, political donations, beneficial ownership of companies, financial intelligence exchanges. Data and statistics production and release are, when applicable, in “real time” with high standards of transparency and with publication on the institutions websites.

In Italy is ongoing a large investment on public procurement data and on the measurement of corruption through various sources (data related to socioeconomic context: education, labor market, criminality, environment, social capital, etc.).

The National Database of Public Contracts (BDNCP), managed by the Italian Anticorruption Authority (ANAC), collects and integrates data concerning public procurement procedures. Data are provided by contracting authorities through a digitalized system open to interoperability between public administration. The recent publication of the contents of the BDNCP in “open data” is an important result in itself, as it enables the public use of a strategic database. The BDNCP can be used both to obtain timely information on single procurement procedures, and to obtain a series of useful statistics, reported in dashboards, concerning aggregated data.

The project “Corruption risk management and promotion of transparency” - financed by European Union funds under the PON Governance 2014 – 2020 - is coordinated by ANAC and involves several Italian institutions and experts. 13 risk indicators based on public procurement have already been calculated and will be further developed using the open data contained in the BDNCP. Another innovative aspect of the project is the approach used for data processing. An open source (and free) software is used to calculate the indicators, which includes a wide range of statistical data analysis tools also with the support of the use of so-called artificial intelligence techniques.

The ongoing project provides:

- the use of several information systems and databases managed by different Italian institutions and the creation of structured forms of interoperability, with the view of feeding a business intelligence system capable of providing dashboards of indicators and red flags on various aspects related to corruption and maladministration;
- the release in open format not only of data collected and produced, but also of the software developed, allowing free consultation and re-use by other stakeholders;
- the promotion of civic participation and investment in forms of dissemination of data on corruption risks in order to foster the “cultural” practices that are fundamental for combating corruption and complementary to regulatory ones.

KOREA

The case of **Korea** is interesting and very relevant also from an international perspective in the anti-corruption field for many features of the national system, some of which could be considered best practice potentially useful also in other contexts.

The first element of interest is the managing of corruption cases that are detected through criminal complaints or anonymous reports filed with the ACRC (Anti-Corruption and Civil Rights Commission) or the OPM (Office of Prime Minister). A corruption report system is established to prevent public officials from abusing their authority or violating laws and regulations, and thereby effectively prohibit acts of corruption specified in the Act on Corruption Prevention and Establishment of the ACRC, and ultimately protect citizens' basic rights, secure appropriateness of administration and build a clean society. The legal ground for the corruption reporting system, which is the Act on Corruption Prevention and Establishment of the ACRC, was implemented on 24 July 2001 and took effect on 25 January 2002. So Korea established a comprehensive anti-corruption system and structured mechanism of inter-agency coordination in the field very early on.

Another point of great interest is that Korea collects and analyses almost all typologies of additional data potentially linked to corruption phenomenon and useful to measure it to some extent: public procurement, public administration transparency, standard costs for goods and services, disciplinary sanctions for illicit/abusive conducts by civil servants, asset declarations, gifts and benefits registers, political donations, financial intelligence exchanges.

Furthermore, historical data series in some cases cover almost 50 years, being an added value to construct robust indicators and for measuring corruption too, especially with reference to red flags, early warnings etc.

Another remarkable initiative is developed in the integrity field, thanks to the use of several sources of information. The ACRC developed a nationwide integrity assessment model which was used to assess the national integrity level of both the public and private sector for the past two years between 2019 and 2020 and could be applicable to other countries (the integrity assessment was piloted for other countries to increase the validity of the assessment method).

The assessment is constructed into various criteria related to 12 areas which are divided into two sectors of corruption status and anti-corruption system. To enhance data trustworthiness and measurability, the assessment uses existing national and international assessment indices (two national indices and seven international indices). In cases where the national indices are used in another country, if there is no index corresponding thereto in the country, the assessment is developed in ways that survey questionnaires applicable are created and the countries themselves could conduct the survey and use the results.

INDONESIA

Indonesia is one of the G20 countries declaring the widest coverage of the items reported in section IV of the questionnaire. In fact, Indonesia produces, collects and elaborates data concerning all the topics potentially linked to corruption and useful to measure it, except proceedings by courts of auditors and denial of entry.

This is also particularly relevant considering the institutions in charge of collecting and elaborating data, e.g. the public procurement agency (LKPP) and the Corruption Eradication Commission (KPK) with the role of national coordination on topics such as procurement, standard cost for goods and services, asset declarations, gifts and benefits. Aggregated statistics are mostly produced annually and in addition to the form of communication provided by the respective legislative framework (to parliament, government and/or oversight bodies). Data are released in all cases where it is possible with publication on the institutions' websites.

INDIA

In **India**, data production and collection related to the themes indicated in section IV of the questionnaire are closely related to the huge investment of the country in transparency.

India stated to consider transparency as a pre-condition to detect and investigate corruption cases. To ensure transparency, the country promotes several initiatives related to open data, e-governance, assets and conflict of interest management.

But transparency is not just a general value driving the administrative action. The principle, in fact, is translated in structures and procedures thanks to very important information technologies (IT) investments. System improvements for simplification of procedures coupled with modern IT tools can be leveraged to address corruption in the delivery of public services. Therefore, the use of technology and e-governance to minimize discretion and human intervention in India is considered as the most effective means of preventing corruption in the delivery of public services. For this reason, in the country, organizations are persuaded to adopt e-governance measures and computerize as a priority all those activities which are vulnerable to corruption.

Improving vigilance administration by leveraging technology, which was advocated by the Central Vigilance Commission, has been reported as a best practice by the Organisation for Economic Co-operation and Development (OECD) in 2009. Today, almost all procurement procedures are made through an e-procurement portal, which has brought high standards of transparency and also reduced the cost of procurement.

8. Selected bibliography of studies regarding corruption indicators and measurement

The questionnaire - sent to countries as part of the ACWG G20 exercise regarding the classification and in-depth analysis of the sources of official statistics, administrative sources and other databases on corruption and related phenomena - also contains a section dedicated to the collection of information on the presence / absence of other data and studies / methods exploring corruption and related issues.

The objective of this section of the survey is to identify and to select the studies or research papers promoted in recent years in G20 countries, alongside the most important scientific studies on corruption, including those outlining approaches and methodologies used for measuring corruption.

These studies may refer to analyses carried out on vulnerability or corruption risk factors, and can include inter-agency programmes (e.g. analysis of public procurement processes, asset declaration analysis, financing of political parties or electoral campaigns, etc.), indirect estimates of figures related to corruption offences and/or the relative monetary value, qualitative studies on specific sectors or procedures, or other surveys conducted using transparent methods.

The responses given by the various countries allowed to gather interesting examples of studies, reports, and papers that have been published by a broad scope of stakeholders, including anti-corruption entities, public / private research institutes, academic institutions, individual academics / researchers, NGOs, business entities or international organizations. A total of 57 studies and research papers were collected, which were categorized as follows:

1. 30 studies providing a quantitative analysis of certain procedures/activities of the public sector aimed at identifying vulnerabilities to or risk factors of corrupt behaviours or practices;
2. 12 studies using quantitative methods to produce indirect estimates of corruption, both with reference to the total amount spent on corrupt practices or involved in one case of corruption, both overall and for certain sectors or practices;
3. 15 studies providing a quantitative analysis of corporate anti-corruption ethics and compliance programmes aimed at identifying factors for effective compliance.

Feedback provided by countries allowed collecting not only the basic bibliographic elements of each study (i.e. title, author, publisher, year), but also a short but significant in-depth factsheet for each one, providing readers with additional knowledge. For this reason, this bibliography can be used as a highly useful source integrating other sources of information on corruption that are already accessible on the Internet.

In fact, over time, various bibliographies on corruption have been compiled and many are also publicly accessible on the Internet. In this regard, there are for sure already meritorious examples. Nonetheless, the bibliography compiled as part of this G20 exercise (especially if it were completed and updated periodically) potentially has two characteristics that distinguish it from the others: it

is compiled on the basis of proposals by member countries, on the basis of selection processes by relevance internal to each; in addition to the bibliographic elements, it also provides short but significant in-depth factsheets that immediately provide the reader with knowledge on the type of data used, methodology, and main findings. In this regard, the bibliography attached as annex 1 is a ACWG G20 best practice in its own.

9. Conclusion

This Compendium has clearly illustrated many existing and good practices on data gathering related directly or indirectly to corruption and on measurement of corruption amongst G20 countries. In general, however, no country can be said to have developed a comprehensive framework for accurate measures of different types of corruption, integrity breaches, or the strength of its anti-corruption systems.

Overall, more work lies ahead to produce more valid, reliable, and actionable data on corruption, on the measurement of the level of corruption risk and of the effectiveness of anti-corruption policies.

The following positive developments can be observed from the answers to the questionnaire:

- The importance of governance statistics and statistics on corruption is increasingly recognized as a necessity to develop more risk-based approaches and therefore more effective anti-corruption policies;
- Surveys are increasingly being used to measure both experiences with frontline corruption, perceptions of corruption in general and satisfaction with governments' anti-corruption efforts;
- Administrative data and big data is increasingly available because of the digitalization of society in general, and several public registries, such as public procurement, have already proven to be a useful data sources for corruption risk assessments;
- First steps have been taken at the international level towards harmonization of definitions and approaches to promote cross-country comparability.

However, a series of challenges persist to advancing reliable data on corruption:

- ICCS remains largely unimplemented, which reduces the international comparability of law enforcement data;
- Surveys to measure corrupt behaviours have advanced both in terms of methodology and uptake, but national statistics offices still do not produce internationally comparable data and not regularly;
- Efforts to measure SDG 16.5 – bribery by persons and businesses – have not yet been successful – as the uptake of the standard methodology is very slow;
- Government practices vary considerable concerning the level of open access to data, depending on the data source. In general, survey data is often publically available, but for register-based statistics (administrative data) only procurement data is widely accessible;
- Standardized and internationally comparable indicators on the effectiveness of anti-corruption policies have so far been methodologically weak and not produced valid nor actionable evidence.

Governments and international actors can do more to produce better evidence on corruption, anti-corruption and integrity and to prepare the field to convergence initiatives based on best practices. In this regard, the ACWG could play a role of pivot to further deepen the activities declared by countries in the questionnaire and to expand the exercise by exploring in greater detail the methodological aspects of different approaches to measuring corruption (surveys, administrative data, composite indices, expert assessments). For instance, with regard to the surveys, further information on how they are compiled, what questions are asked, how they are formulated, what are the target groups, who collects these data can be useful. As for the other types of data (procurement, asset disclosure, etc.) it would be useful trying to identify standards on how they should be collected and analysed to get relevant and correct information about corrupt practices.

The G20 can lead by example and initiate a robust international effort to transform national anti-corruption and integrity bodies from passive data consumers to active data producers.