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**Other matters****Statistical framework to measure corruption****Prepared by the United Nations Office on Drugs and Crime  
November 2023****Abstract**

This document provides a comprehensive statistical framework to measure corruption to support UNCAC State Parties in their efforts to measure the size and trend of corruption. In addition to presenting the framework, the document describes UNODC's mandate to develop the framework together with the mandate to develop global standards to measure different types of crime, the objective of the framework, its development process, and the challenges to measure corruption. The conceptual framework considers the different manifestations of corruption through direct and indirect measures, including outcome indicators and indicators on risks and responses. The paper also provides the metadata that describes and defines each of the indicators listed in the framework.

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\* [CAC/COSP/2023/1](#).



## I. Objective of the document

1. The objective of this paper is to present a statistical framework to measure corruption. The framework proposed in this paper is an ambitious set of indicators that requires a holistic national system of statistical and non-statistical sources that probably does not exist in its entirety in any country, but similarly to the SDG indicators framework, the objective is to offer to countries a reference frame to guide national efforts to develop national information systems on corruption. All indicators may take different characteristics based on the administrative and legal framework of national and subnational entities.

2. The statistical framework presented in this paper is the result of a number of consultations. Two Global Consultations were hosted by UNODC on 8 and 9 December 2022 and on 6–8 November 2023 where experts appointed by Member States exchanged their national experiences on corruption measurement, discussed the dimensions to measure corruption, and finally provided the last review of the framework. More than 200 national experts participated in these consultations. In January 2023, UNODC launched a Written Global Consultation to review the first draft of the Statistical Framework to measure corruption prepared on the basis of the consultation with national experts and an internal consultation with experts from academia and international organizations. In total, 149 entities provided written feedback from 81 Member States, including 25 national statistical offices, 56 anti-corruption authorities, 25 criminal justice authorities, ministries, think tanks, academia, and civil society organizations.

3. Based on the feedback received from this written global consultation, UNODC developed a second draft of the framework that was presented to the 54th session of the United Nations Statistical Commission (E/CN.3/2023/21). The framework was crafted by incorporating suggestions from Member States and other stakeholders to measure various dimensions of corruption, encompassing criminal offences, preventive measures, and the environment for reporting and addressing corruption. The United Nations Statistical Commission welcomed the framework as a statistically robust framework to measure the phenomenon of corruption.

4. Recognizing that measuring corruption is a complex and gradual task that cannot rely on a single indicator, the framework comprises 146 indicators. This extensive set of indicators enables countries to gain a profound understanding of the extent of corruption and to monitor the effectiveness of preventive policies. Throughout consultations, Member States and other stakeholders deliberated on the relevance and feasibility of each indicator. Experts considered both existing data that might not be shared across institutions or disseminated publicly but would prove valuable in measuring corruption. Although indicators within the framework are not exhaustive, collecting and analysing them can help countries in establishing comprehensive baselines to grasp corruption and monitor their ongoing efforts to address it over time. Countries are not anticipated to report data based on this framework; instead, they are encouraged to utilize it as a tool to gradually collect, analyse and use relevant data on corruption at the national and subnational levels to inform and monitor their policies.

## II. Background: past development of global statistical standards on corruption, mandates, and consultation process

5. In 2013 a road map to improve the quality and availability of crime and criminal justice statistics was submitted to the United Nations Statistical Commission (E/CN.3/2013/11) that prioritized activities structured around three main pillars:

- (a) Development of new methodological tools;
- (b) Promotion of capacity-building activities;

## (c) Strengthening of international data collection and analysis.

6. The 2013 road map acknowledged corruption among those emerging and difficult-to-measure crimes that demanded additional methodological development since its measurement presented major weaknesses often based on indirect or perception-based methodology without a consolidated approach to produce reliable and standardized measurements, and a lack of commonly agreed statistical concepts, methods, tools, and indicators.

7. In 2017, the United Nations General Assembly adopted the global indicator framework to measure progress on the SDGs. This framework included two indicators<sup>1</sup> to measure progress on target 16.5 Substantially reduce corruption and bribery in all their forms. In order to support countries to regularly produce data for these two SDG indicators, UNODC and UNDP produced the *Manual on Corruption Surveys: Methodological Guidelines on the Measurement of Bribery and Other Forms of Corruption through Sample Surveys*. This Manual was welcomed by the Statistical Commission in 2019 at its fiftieth session. The Manual provides technical guidance to measure types of corruption that can be measured through population or business surveys including bribery (and therefore SDG indicators 16.5.1 and 16.5.2), as well as other forms of corruption such as nepotism and vote buying. By using this manual, Member states can measure perception and prevalence of corruption which are two indicators contained in this statistical framework as direct measures of bribery.

8. The importance of corruption measurement is embedded in Article 61 of the United Nations Convention against Corruption, which calls on Member States to “consider analysing, in consultation with experts, trends in corruption in their territory, as well as the circumstances in which corruption offences are committed”; and “developing and sharing with each other and through international and regional organizations statistics, analytical expertise concerning corruption and information with a view to developing, insofar as possible, common definitions, standards and methodologies, as well as information on best practices to prevent and combat corruption”. The Convention also states that “each State Party shall consider monitoring its policies and actual measures to combat corruption and making assessments of their effectiveness and efficiency.”

9. At its 8th session, in 2019, the Conference of the States Parties (CoSP) to the United Nations Convention against Corruption adopted resolution 8/10 entitled “Measurement of Corruption” and requested UNODC “to continue expert-level consultations on identifying and refining methodologies on the issue of the measurement of corruption in order to develop proposals on a comprehensive, scientifically sound and objective framework for the purpose of assisting States Parties, upon their request, in measuring corruption, consistent with the Convention”.

10. The special session of the General Assembly against corruption (UNGASS), in 2021, adopted the political declaration “Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation”. It encouraged UNODC, in coordination with the United Nations Statistical Commission and in broad cooperation across the United Nations system, to develop and share a comprehensive, scientifically sound and objective statistical framework, grounded in methodological work and reliable data sources, to support States in their efforts to measure corruption, its impact and all relevant aspects of preventing and combating it, in order to inform and strengthen evidence-based anti-corruption policies and strategies, consistent with the Convention against Corruption.

11. UNODC has undertaken a series of activities to implement the UNGASS political declaration and the CoSP resolution on measurement of corruption with support from the UNODC-INEGI Center of Excellence for Statistical Information on Government, Crime, Victimization and Justice:

(a) Between December 2021 and August 2022, UNODC compiled methodologies and frequently used indicators to measure corruption at international,

regional, and national levels conducted by government and non-governmental institutions;

(b) In October 2022, UNODC conducted an internal consultation with experts from academia and international organizations to review existing research findings and international practices on corruption measurement, assessing validity, relevance, and feasibility;

(c) In December 2022, UNODC organized a global hybrid consultation (in person and online) with 88 national experts appointed by Member States from thirty-nine countries to review existing practices on measuring corruption at the national level. The international consultation involved international experts and national experts from National Statistical Offices, anti-corruption agencies, relevant ministries, and law enforcement agencies;

(d) Based on the activities listed above, in January 2023, UNODC developed a first draft of the Statistical Framework to measure corruption that was submitted for global review through a written consultation;

(e) In February 2023, a second draft of the framework (E/CN.3/2023/21) was developed by UNODC and submitted to the fifty-fourth session of the Statistical Commission;

(f) In March 2023, the United Nations Statistical Commission reviewed the draft submitted by UNODC and: (a) welcomed the report of the United Nations Office on Drugs and Crime (UNODC) on corruption measurement, and expressed its appreciation for the progress achieved in the implementation of the road map to improve the quality and availability of crime and criminal justice statistics at the national and international levels; (b) welcomed the partnership with the Conference of the States Parties to the United Nations Convention against Corruption; (c) welcomed the statistical framework for measuring corruption as a statistically robust framework to measure the phenomenon of corruption; (d) acknowledged the ambitious nature of the framework and the current limited ability of countries to fully implement it due to its wide range of indicators and data sources and the high level of coordination needed among national statistical offices and several governmental institutions; (e) encouraged UNODC to provide technical support to implement the framework, as necessary and subject to the availability of resources, and invited national statistical offices to take an active role and collaborate with other relevant national institutions, civil society and academia in the implementation of the statistical framework for measuring corruption; (f) requested UNODC to report on progress made in the implementation of the framework to the Commission under the agenda item on crime and criminal justice statistics;

(g) After the review by the United Nations Statistical Commission, UNODC conducted a final review with national experts appointed by Member States on 6–8 November. 120 experts participated from anti-corruption agencies, national statistical offices, and criminal justice institutions.

### **III. Objective of the Statistical Framework to measure corruption**

12. The main objective of the comprehensive statistical framework to measure corruption is to provide guidance for national governments to develop national information systems able to detect the presence, measure the magnitude and monitor trends of the different forms of corruption, guided by the United Nations Convention against Corruption. The framework provides a list of indicators as well as guidance on how to analyse the indicators together and on how to collect the needed data. The ultimate goal of the statistical framework is to contribute to the efforts of Member States to build scientific evidence that can underpin the design, implementation, monitoring, and assessment of anti-corruption policies.

13. The Statistical Framework is meant to be used at national level to support countries to develop national statistical systems to measure corruption. Indicators that cut across the different dimensions of corruption can provide sound evidence to address corruption. The framework is comprehensive and includes different types of indicators (direct and indirect indicators).

14. The Statistical Framework does not intend to replace or substitute the Mechanism for the Review of Implementation of UNCAC. To the contrary, the indicators of the Statistical Framework may contribute to have a statistical perspective to the findings of the Mechanism. If a Member State collects data and measures different aspects of corruption or has developed a national statistical system for its measurement based on this statistical framework, the indicators produced may be used to inform the Implementation Review Mechanism and contribute to the assessment of the effectiveness of anti-corruption efforts.

15. The Statistical Framework is intended purely for the domestic use of States as a tool to support States' adoption of knowledge-based anti-corruption measures. It does not aim to create any sort of ranking or compare levels of corruption among States and it will not be used as a tool by the United Nations to assess the implementation of the United Nations Convention against Corruption.

#### **IV. Challenges in measuring corruption**

16. Corruption is a complex phenomenon that is difficult to define as it takes many forms and affects all sectors of society. The first challenge to measure it is to clearly define what should be understood by the word corruption, as well as to clearly define conceptual and analytical blocks that can be useful to capture its dimension and impacts across society.

17. Considering the nature of corruption, as well as the different legal systems and cultural contexts across the globe, a single definition of corruption is inadequate to measure it in a comprehensive way. The United Nations Convention against Corruption lists a set of behaviours that should be criminalized as offences of corruption and related offences, as well as measures to prevent and counter it. These offences and their respective definitions were commonly agreed by Member States and provide a solid base for guiding methodological work and for developing standardized indicators that can measure behaviours that are acknowledged worldwide as constituting or being related to corruption by public and private actors.

18. An additional challenge in measuring corruption is that detecting corrupt behaviours is more difficult than detecting other types of crimes. This is due, *inter alia*, to the secretive and sometimes complex nature of the offence, the absence (for some offences) of an immediate victim that may be willing to report, fear of retaliation by whistle-blowers, as well as limited capacity in some jurisdictions to investigate and prosecute it. The dark figure of corruption – the part of corruption that does not come to the attention of authorities and is not recorded – is arguably higher than most other forms of crime because those who engage in, experience, witness, or identify different types of corruption are less likely to report it to competent authorities than other crimes, due to, e.g. fear of retaliation, or even co-responsibility or direct benefit from corrupt behaviour.

19. International organizations have made attempts to measure corruption by producing information based on perception-based indicators. Indices such as the World Bank's Control of Corruption Indicator or the yearly Transparency International's Corruption Perceptions Index identify perceptions and drivers of corruption and raise awareness of the negative effects that corruption has on sustainable development. However, they have important limitations as they do not provide sound information on the direct occurrence of corruption and on the different types of corruption, the sectors, institutions, or procedures that may be more vulnerable to corruption.

20. Despite the widely recognized limitations of perception-based measures, national systems to monitor corruption are often based on perception surveys, particularly among the general population. Most national systems still lack output measurements that describe the direct experience of corruption among persons that use public services, public officials and professionals within the private sector.

## V. Conceptual statistical framework to measure corruption

21. The approach considers the complexity of corruption by looking at the different dimensions of corruption together with elements that can describe it. The Framework is constructed through a matrix with two dimensions: types of corruption (based on the United Nations Convention against Corruption) and type of measurement: perception, output/direct measures (experience of corruption), and indirect measures (risk and response). The framework matrix describes the two dimensions with corruption types in rows and measurement types in column.

22. Direct/output measures that describe the whole size and direct experience of corruption are best suited to measure levels of corruption and monitor trends because they capture the dark figure of corruption. Alone, these measures could serve as the core of corruption measurement, but they are not available for all types of corruption, and they require substantial resources to be embedded in national statistical and anti-corruption systems. While perception is not an ideal measure, it is included in the framework to indirectly measure corruption and as a form of transitional indicator that countries may use until direct measures are fully operational.

23. The types of corruption considered in the framework are based on the United Nations Convention against Corruption, and include the following concepts:

- (a) Criminal offences under UNCAC;
  - a.1 Bribery of national public officials;
  - a.2 Embezzlement, misappropriation, or other diversion of property by a public official;
  - a.3 Money-laundering;
  - a.4 Illicit enrichment;
  - a.5 Abuse of functions;
- (b) Preventive measures
  - b.1 Public hiring based on merit;
  - b.2 Independence and integrity of the judiciary;
  - b.3 Conflict of interest;
  - b.4 Management of public finances;
  - b.5 Public procurement;
  - b.6 Candidature for and election to public office;
  - b.7 Preventive measures for the private sector;
  - b.8 Preventive measures for the State-owned enterprises;
  - b.9 Training programmes;
- (c) Enabling environment to report and address corruption;
  - c.1 Resources allocated to fight corruption;
  - c.2 Public reporting and access to information;
  - c.3 Protection of reporting persons.

## VI. Statistical framework to measure the different elements and dimensions of corruption.

24. The statistical framework recognizes the multi-faceted complexity of corruption by incorporating a multiplicity of sources that can include, inter alia, administrative records related to public finances and other procedures within public administration (such as public procurement records, asset declaration records, audit records, access to information records, etc.), household and business sample surveys on corruption, other sample surveys, including surveys of public services, expert-based interviews, anonymized records on individual corruption offences, anonymized court casefiles and whistle-blowing data, and administrative records derived from the criminal justice system and civil procedures at all stages of their corresponding processes.

25. The use of the framework requires a cross-sectoral and inter-institutional approach. Given the varied array of indicators and data sources included in the framework, its implementation requires the effective collaboration of multiple relevant stakeholders, who might already have the necessary data to build the proposed indicators, and who might just need methodological guidance to produce standardized and reliable statistics. Another important aspect of the framework is that it recognizes the necessity to incorporate the gender perspective into corruption measurement. Where possible, the framework promotes a nuanced analysis of the gender perspective that goes beyond the sex-disaggregation of the data (see below).

26. The statistical framework to measure corruption is presented in a matrix format to list indicators that relate to different forms of corruption as listed in part V and to distinguish between direct or indirect measures.

27. *Direct measures* are about the prevalence of specific types of corruption, particularly bribery. These indicators can typically be produced through population and business surveys, and they are robust, accurate and representative if statistical designs of the surveys are representative of the whole population. The challenge in the implementation of these surveys is that they are usually expensive and not always easy and sustainable to conduct repeatedly. Measuring corruption directly is often not possible due to the context and the nature of the sector. For example, if a sector is by its nature hidden from the public (like financial transactions, defence or areas involving privacy) direct measurement through a survey would not help to reveal the true scale of corruption because the public would have no direct experience to report.

28. *Indirect measures*: Due to the elusive nature of corruption and the challenge to collect data to measure it directly, indirect measures are included in the framework: while not measuring corruption per se, they can measure elements that may enable or deter corruption. The following indirect measures are considered:

- *Perception indicators*. The measurement of the perception of corruption may include a broad range of attitudes and beliefs (for example regarding conflict of interest, abuse of power, embezzlement of public funds, etc.). Perception indicators may be influenced by a broad range of subjective factors that may not be directly linked to the incidence of corruption, such as culture, mass communication, and values. Therefore, perception-based measures are not suitable to monitor corruption levels and trends. Measuring perception of corruption together with indicators on direct experience of corruption can however provide an understanding of the gap between the perception and the corruption experienced by the surveyed populations as well as their levels of trust in government institutions.
- *Risk indicators*. These measures provide information on possible existing or non-existing infrastructures and procedures that increase or decrease the risk of corruption occurring, rather than the occurrence of corruption itself. They are useful to map the different types of corruption and to understand the context in which these occur. The risk depends on the capacity of a State to prevent public officials, private sector entities and individuals from committing corruption.

Where this capacity is low, corruption risk is high. Risk indicators measure the context that can enable corruption. Measuring opportunities or risks (circumstances that enable corruption) and constraints (circumstances that deter corruption) are also important for policymakers to identify risks as well as best practices for addressing them. A State with moderate to low constraints may still manage to control corruption if opportunities remain low. The opportunities most discussed in literature are administrative discretion resulting from lack of transparency and from red tape, on one hand, and the material opportunities, like natural resources, lack of transparency in public expenditure, on the other hand.

- *Response indicators.* As risk varies across societies (for instance, some countries have resources concentrated in few institutions or lower oversight in certain sectors, which provide higher opportunities for corruption), so does the State response. The response indicators are also indirect measures because they do not measure the occurrence of corruption, but how the State responds to it through legislative initiatives (classified in the framework as *de jure*), and criminal justice actions or other actions that target corruption perpetrators (classified in the framework as *de facto* response). Trends in response indicators measure a mix of trends in the capacity and political will to combat corruption and corruption itself, so they are labelled as indirect rather than direct measures because they don't clearly inform on the level of corruption. The *de jure* category can be further quantified using a benchmark (comprehensiveness of conflict-of-interest regulation, for instance) and the measurement of each country against it. The *de jure* and the *de facto* are separated because the evidence shows that important implementation gaps exist, and the countries with the most comprehensive regulation are not necessarily the least corrupt or the ones that improve the most.

29. Each indicator included in the framework is not to be used in isolation. The matrix format aims at describing each type of corruption in a combination of indicators as alone, each indicator may give partial or biased information. For example, a high level of convictions for corruption may mean a high level of corruption or a high level of State response to corruption. Considering this indicator in combination with indicators on the level of bribery experience by citizens gives a complete picture: high bribery levels with low conviction rates suggest a high level of corruption with a low state response while low a level of bribery with a high level of convictions indicates a low incidence of corruption with a high level of state response. The matrix can be used by columns, by row, or a combination of both.

- *Columns as analytical categories.* Reading the matrix by column captures the analytic building blocks that describe corruption, the factors that enable it and the capacity to deter it. They provide the space to integrate different types of measurement (direct, indirect), while also monitoring the relevant risks based on enabling and mitigating circumstances for corruption, i.e. the opportunities and constraints, as well as the official legal and law enforcement response. The columns related to Risks and Response describe some specific elements of the preventive anti-corruption policies and practices mentioned in chapter II of UNCAC.
- *Rows as analytical categories.* Rows in the matrix use selected offences of corruption that the Convention lists, thus allowing different forms of corruption to be accommodated complementarily into the same framework. One feature or manifestation or type of corruption, say, bribery, is thus monitored by perception, direct measurements and indirect indicators, the latter including also measures for enabling and mitigating context, for legal response and for *de facto* response. A further implementation gap can be calculated between the *de jure* response and the *de facto* one. This allows for a highly adaptable framework that can also be replicated at the sub-national level or for different sectors. When duly filled in, the matrix will provide, in one glance, a better picture of the prevalence of a specific type of corruption (through measurements), as well as an overview of the disabling and enabling circumstances.



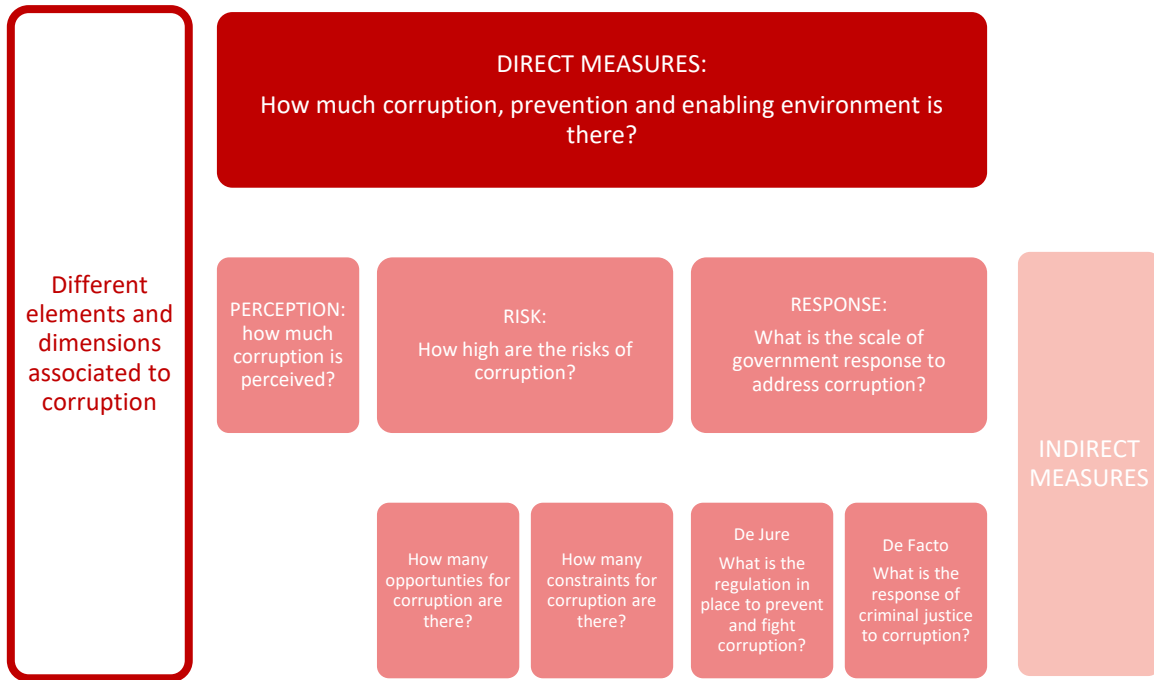
30. The ensemble of the framework indicators and enabling and disabling factors for corruption can be measured at national, subnational and sector level, as each sector adds its own specificity and risks. However, the national context and legal framework remains present in each and every sector, as it is the national level which shapes the legal and policy formulation. Differences may be found at geographical level, e.g. types of corruption or corruption risks may vary between cities, and sector.

## **VII. The gender dimension in measuring corruption**

31. The relationship between corruption and gender has increasingly been explored since the early days of the millennium. Initial research looked into the impact of women's political participation on the prevalence of corruption and found that countries with higher representation of women in public administration and in the labour market show lower levels of corruption. However, since then, findings indicate that women are not necessarily less prone to corruption but have less agency and access to positions of decision-making and power where opportunities of corruption are generally more present. A quarter of a century later, anti-corruption and gender equality measures are considered to be mutually reinforcing, as diversity tends to act as a corruption prevention measure as it can break up collusive networks. Bringing a gender perspective in corruption measurement is therefore important.

32. This Statistical framework mainstreams the gender dimension across all indicators where this is relevant together with other demographic and social characteristics such as age and ethnicity that can help to better understand sub-population groups that may be more vulnerable to corruption and require specific policy responses.

Figure 1  
Dimensions of the statistical framework to measure corruption



## Annex 1

## Statistical Framework to measure corruption

Components of the statistical framework to measure corruption<sup>2</sup>

a. CRIMINAL OFFENCES UNDER <sup>3</sup> UNCAC						
ELEMENTS/ DIMENSIONS	DIRECT MEASURES	INDIRECT MEASURES				
		PERCEPTION	RISK		RESPONSE	
			OPPORTUNITIES (Circumstances that enable corruption)	CONSTRAINTS (Circumstances that may deter corruption)	DE JURE (Regulation)	DE FACTO (Implementation)
<b>a.1 Bribery of national public officials<sup>4</sup></b> (UNCAC Art. 15)	<b>a.1.1 Prevalence of bribery in dealings with public officials<sup>5</sup> among the population</b> Proportion of persons who had at least one contact with a public official and who paid a bribe (gave a public official money, a gift or counter favour) to a public official or were asked for a bribe by those public officials, during the previous 12 months <sup>6</sup> Disaggregated by function of public official, sex of the person and the public official.  <b>a.1.2 Prevalence of bribery in dealings with public officials among businesses</b>	<b>a.1.4 Perception of corruption in the public sector<sup>7</sup></b> Proportion of persons who perceive that the public sector is corrupt <sup>8</sup> Disaggregated by age, sex and by government branches (e.g. executive, legislative and judiciary) and also by government level (e.g. national, and local) and sector	N/A	<b>a.1.5 E-Government<sup>9</sup> coverage</b> Proportion of persons who engaged in at least one public service delivery and who did so using a digital platform. Disaggregated by sex, age and type of procedure.  <b>a.1.6 Reporting bribery in dealings with public officials among the population/business</b> Proportion of people/business who reported the case to competent authorities in the last 12 months.	<b>a.1.7 Criminalization of bribery</b> Comprehensive criminalization of bribery or related conduct in the national legislation as per Article 15 of UNCAC  <b>a.1.8 Comprehensive definition of public official</b> Are all public officials covered by national legislation, in line with Article 2 of UNCAC	<b>a.1.9 Bribery detection</b> Total number of actual or suspected bribes brought to the attention of relevant authorities in the last 12 months.  <b>a.1.10 Bribery investigation<sup>10</sup></b> Total number of persons under criminal investigation for bribery recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.  <b>a.1.11 Bribery prosecution<sup>11</sup></b> Total number of persons prosecuted for bribery recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex

	<p>Proportion of businesses 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 (gave a public official money, a gift or counter favour) by those public officials, during the previous 12 months.</p> <p>a.1.3 Total monetary value (US dollars) of bribes paid by all people during the previous 12 months. Disaggregated by public official function</p>					<p><b>a.1.12 Bribery conviction</b><sup>12</sup> Total number of persons convicted for bribery recorded in a given year divided by the total population in the same year, multiplied by 100,000. Disaggregated by sex.</p> <p><b>a.1.13 Assets recovered from bribery</b> Total amount of assets recovered<sup>13</sup> from bribery convictions</p> <p><b>a.1.14 Total number of administrative sanctions</b> (such as disciplinary measures for public officials or debarment of companies) recorded in a given year disaggregated by sex.</p>
<p><b>a.2 Embezzlement,<sup>14</sup> misappropriation, or diversion<sup>15</sup> of property or public funds (UNCAC art. 17)</b></p>	N/A	N/A	<p><b>a.2.1 Discretionary allocation</b> Proportion of total government budget that can be allocated outside the formal budget approval process</p>	<p><b>a.2.2 Misused public funds identified</b> Monetary value of irregularities ruled by the Supreme Audit Institution as a share of the total audited<sup>16</sup> public budget</p> <p><b>a.2.3 Frequency of audits</b> Number of planned and ad hoc audits conducted in the last 12 months</p>	<p><b>a.2.4 Criminalization of embezzlement, misappropriation or diversion of property or public funds</b> Criminalization of embezzlement, misappropriation or diversion of property or public funds or related conduct in the national legislation as per Articles 17 and 22 of UNCAC</p> <p><b>a.2.5 Regulations on management of resources</b> Regulatory framework with a clear separation of duties and responsibilities</p>	<p><b>a.2.6 Embezzlement, misappropriation, or diversion investigation</b> Total number of persons under investigation for engaging in embezzlement, misappropriation, or diversion recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.</p> <p><b>a.2.7 Embezzlement, misappropriation, or diversion prosecution</b> Total number of persons prosecuted for</p>

					of public officials in charge of managing resources	<p>embezzlement, misappropriation, or diversion recorded in a given year divided by the total population in the same year, multiplied by 100,000 by sex.</p> <p><b>a.2.8 Embezzlement, misappropriation, or diversion conviction</b> Rate of persons convicted engaging in embezzlement, misappropriation, or diversion recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.</p> <p><b>a.2.9 Assets recovered from embezzlement, misappropriation, or diversion</b> Total amount of assets recovered from embezzlement, misappropriation, or diversion convictions</p> <p><b>a.2.10 Total number of administrative sanctions</b> for embezzlement, misappropriation, or diversion recorded in a given year disaggregated by sex.</p>
<b>a.3 Money-laundering (UNCAC arts. 14 &amp; 23)</b>		<b>a.3.1 Perception of corruption in the financial system</b> Proportion of persons who perceive that the	N/A	<b>a.3.2 Addressing risk gaps</b> Number of gaps that have been addressed since the last evaluation by	<b>a.3.5 Criminalization of money-laundering and predicate offences</b> in the national legislation as per Article 14	<b>a.3.10 Suspicious transactions</b> Number of suspicious transactions registered by the

		<p>financial system is corrupt. Disaggregated by banking system, real estate, customs</p>		<p>international peer review body or since national risk assessment.</p> <p><b>a.3.3 Supervision on AML regulatory framework</b> Number of supervisory activities conducted regarding institutions obliged under AML framework.</p> <p><b>a.3.4 Freezing transactions</b> Number of transactions frozen</p>	<p><b>a.3.6 Beneficial ownership transparency</b> Access by financial institutions to accurate and up-to-date information on the ultimate beneficial owner</p> <p><b>a.3.7 Regulation on anonymous cash transactions</b></p> <p><b>a.3.8 Regulation on virtual assets</b> Virtual asset service providers are licensed, registered and subject and supervision</p> <p><b>a.3.9 Information sharing mechanisms</b> Existing of information sharing mechanisms to exchange information across relevant institutions</p>	<p>financial intelligence unit in a calendar year</p> <p><b>a.3.11 Money-laundering investigation</b> Total number of persons under investigation for engaging in money-laundering recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.</p> <p><b>a.3.12 Money-laundering investigation</b> Total number of legal persons under investigation for engaging in money-laundering</p> <p><b>a.3.13 Money-laundering prosecution</b> Total number of persons prosecuted for money-laundering recorded in a given year divided by the total population in the same year, multiplied by 100,000 by sex.</p> <p><b>a.3.14 Money-laundering conviction</b> Rate of persons convicted engaging in money-laundering recorded in a given year divided by the total population in the same year, multiplied by</p>
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						<p>100,000 disaggregated by sex.</p> <p><b>a.3.15 Money-laundering sanctions</b> Number of legal entities sanctioned for engaging in money-laundering recorded in a given year</p> <p><b>a.3.16 Assets recovered from money-laundering</b> Total amount of assets recovered from money-laundering convictions</p>
<p><b>a.4 Illicit enrichment<sup>17</sup> (UNCAC art. 20)</b></p>	<p><b>a.4.1 Income declaration</b> Proportion of public officials whose assets cannot be explained<sup>18</sup></p>	N/A	N/A	<p><b>a.4.2 Existence of a control body</b> to monitor, validate and enforce disclosures of public officials.</p> <p><b>a.4.3 Asset and interest disclosure of public officials</b> Existence of accessible and up-to-date registries on bank accounts, and expensive assets (including real estate and vehicles)</p>	<p><b>a.4.4 Financial disclosure regime</b> Existence of regulation on wealth disclosure for public officials (including real state and vehicles)</p>	<p><b>a.4.5 Illicit enrichment inquiries</b> Total number of inquiries by control bodies regarding public officials potentially engaging in illicit enrichment</p> <p><b>a.4.6 Illicit enrichment investigation</b> Total number of persons under investigation for engaging in illicit enrichment recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.</p> <p><b>a.4.7 Illicit enrichment prosecution</b> Total number of persons prosecuted for Illicit enrichment recorded in a given year divided by the total population in the same year, multiplied by 100,000.</p>

						<p>disaggregated by sex.</p> <p><b>a.4.8 Illicit enrichment conviction</b> Total number of public officials convicted for engaging in illicit enrichment divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.</p> <p><b>a.4.9 Assets recovered from illicit enrichment</b> Total amount of assets recovered from illicit enrichment convictions.</p> <p><b>a.4.10 Total number of administrative sanctions</b> for illicit enrichment recorded in a given year disaggregated by sex.</p>
<b>a.5 Abuse of functions<sup>19</sup> (UNCAC art. 19)</b>	N/A	N/A	N/A	<p><b>a.5.1 Mechanism to assess risk of corruption in vulnerable positions</b> Existence of a mechanism to assess risk of corruption in vulnerable positions</p> <p><b>a.5.2 Mandatory training.</b> Percentage of public officials that have received mandatory training on integrity &amp; ethics in relation of the total numbers of public officials in the last 12 months</p>	<b>a.5.3 Effective sanctions</b> Existence of effective criminal or administrative sanctions for abuse of functions	<p><b>a.5.4 Abuse of functions investigation</b> Total number of persons under investigation for abuse of functions recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex</p> <p><b>a.5.5 Abuse of functions prosecution</b> Total number of persons prosecuted for abuse of functions recorded in a given year divided by the total population in the same year, multiplied by</p>



						<p>100,000 disaggregated by sex.</p> <p><b>a.5.6 Abuse of functions conviction</b> Total number of persons convicted for abuse of functions recorded in a given year divided by the total population in the same year, multiplied by 100,000 disaggregated by sex.</p> <p><b>a.5.7 Assets recovered from abuse of functions</b> Total amount of assets recovered from abuse of functions convictions</p> <p><b>a.5.8 Total number of administrative sanctions</b> for abuse of functions recorded in a given year disaggregated by sex.</p>
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**b. PREVENTIVE MEASURES**

ELEMENTS/ DIMENSIONS	DIRECT MEASURES	INDIRECT MEASURES				
		PERCEPTION	RISK		RESPONSE	
			OPPORTUNITIES (Circumstances that enable corruption)	CONSTRAINTS (Circumstances that may deter corruption)	DE JURE (Regulation)	DE FACTO (Implementation)
<b>b.1 Public hiring based on merit (UNCAC Art 7.1a, 7.2)</b>	<b>b.1.1 Open recruitment</b> Proportion of public sector employees appointed without an open and competitive recruitment process	<b>b.1.3 Use of personal connections to obtain public employment</b> Percentage of public officials that perceive	<b>b.1.4 Non-competitive recruitment</b> Proportion of public recruitments for public sector positions with just one candidate	<b>b.1.5 Existence of a complaint mechanism</b> for rejected candidates.  <b>b.1.6 Positions vulnerable to corruption</b> Number of recruitments of positions vulnerable to	<b>b.1.7 Public service<sup>20</sup> regime</b> Existence of laws and guidelines for merit-based recruitment in the public sector based on pre-set criteria  <b>b.1.8 Transparency in recruitment procedures.</b>	<b>b.1.9 Irregular hiring processes.</b> Number of public sector appointments reverted due to irregularities in the hiring process per 1,000 recruitments in the last 12 months

	<p>in the past 12 months</p> <p><b>b.1.2 Number of complaints to appeal mechanisms</b> regarding recruitment in the last 12 months</p>	<p>that public officials influence the hiring of friends or relatives in the public sector</p>		<p>corruption that followed a risk assessment criterion in the last 12 months</p>	<p>Publicly available procedures around hiring, promotion, retirement and dismissal, as well as salary scales</p>	
<p><b>b.2 Independence and integrity<sup>21</sup> of the judiciary (UNCAC Art. 11:1)</b></p>	<p><b>b.2.1 Judicial ethics<sup>22</sup></b> Number of admonishments for magistrates on ethical grounds in the past 12 months</p> <p><b>b.2.2 Number of successful motions</b> against a judge's refusal to recuse from a case in the last 12 months</p>	<p><b>b.2.3 Perception of corruption in the judiciary</b> Proportion of persons who perceive that the judiciary is corrupt.</p> <p><b>b.2.4 Perception of corruption in public prosecution offices</b> Proportion of persons who perceive that prosecutors are corrupt</p>	N/A	<p><b>b.2.5 Transparency</b> Proportion of court proceedings that are public in the past 12 months</p> <p><b>b.2.6 Randomization</b> Proportion of case files that were randomly assigned in the past 12 months</p> <p><b>b.2.7 Mandatory training</b> Percentage of judges and prosecutors that have received training on ethics &amp; integrity in relation of the total numbers of public officials in the last 12 months</p>	<p><b>b.2.8 Institutional reporting</b> Existence of annual public report on integrity problems in the judiciary</p>	<p><b>b.2.9 Ethical and integrity-related dismissal</b> Proportion of judges and prosecutors dismissed for corruption offences or integrity breaches</p> <p><b>b.2.10 Number of investigations</b> of judges and prosecutors for corruption offences in the last 12 years</p> <p><b>b.2.11 Number of prosecutions</b> of judges and prosecutors for corruption offences in the last 12 years</p> <p><b>b.2.12 Number of convictions</b> of judges and prosecutors for corruption offences in the last 12 years</p>
<p><b>b.3 Conflict of interest (UNCAC art. 7)</b></p>	<p><b>b.3.1 Numbers of detected conflicts of interests that were not declared by public officials</b></p>	N/A	N/A	<p><b>b.3.2 Control body to monitor</b> and manage COI disclosures.</p> <p><b>b.3.3 Asset and conflict of interest disclosure regimes in place</b></p>	<p><b>b.3.5 Existence of COI regulation</b> (including clear guidance on what and how to report COI and the consequences)</p> <p><b>b.3.6 Existence of lobbying regulation</b> including clear</p>	<p><b>b.3.7 Share of public officials sanctioned for not disclosing COI</b> in the previous year according to national legislation.</p>

				<b>b.3.4 Employment cooling off periods in place</b>	guidance on what, how to report lobbying activities	
<b>b.4 Management of public finances (UNCAC art. 9)</b>	N/A	N/A	N/A	<p><b>b.4.1 Accessibility of budgetary information</b> Percentage of total government budget not subject to public disclosure due to confidentiality</p> <p><b>b.4.2 Frequency of audits</b> Number of planned and ad hoc audits conducted on public expenditures in the last 12 months</p> <p><b>b.4.3 Public participation in budgeting process.</b> Existence of mechanisms to foster participation of citizens in budgetary processes</p>	<p><b>b.4.4 Comprehensiveness of budget disclosure requirements.</b> The extent to which national laws, regulations, policies, and guidelines provide a basis for collecting and publishing data on public finances.</p> <p><b>b.4.5 Bottom-up approach in budgeting process.</b> Existence of mechanisms to foster participation of authorities and their administrative units in the budgetary processes</p>	<b>b.4.6 Sanctions<sup>23</sup> against public officials for financial misconduct<sup>24</sup>.</b> Number of public officials and civil servants fined, sanctioned, or imprisoned for financial mismanagement
<b>b.5 Public Procurement (UNCAC art. 9)</b>	<b>b.5.1 Percentage of public contracts awarded without competition</b> (without another bidder) in numbers and % volume total.	N/A	N/A	<p><b>b.5.2 Percentage of public tenders for which information was published</b> (open call/invitation, selection criteria, selection process, award information, appeal process).</p> <p><b>b.5.3 Existence of an effective remedy</b> for competitors in bidding processes</p> <p><b>b.5.4 Blacklist and/or whitelist of suppliers in place</b> Systems in place to pre-vet suppliers that participate in tenders and/or to keep track of suppliers barred from tendering</p>	<p><b>b.5.5 Compliance of public procurement regulation</b> with UNCAC article 9.</p> <p><b>b.5.6 Rules on public procurement in times of crisis/emergencies</b> Exceptions from usual procedures for emergency situations</p>	<p><b>b.5.7 Ratio of criminal convictions<sup>25</sup></b> related to irregularities in procurement processes.</p> <p><b>b.5.8 Number of administrative sanctions</b> against companies for participating in irregular procurement, e.g. debarment</p>

<p><b>b.6 Candidature for and election to public office (UNCAC art 7.2 and 7.3)</b></p>	<p><b>b.6.1 Total campaign spending per candidate</b> vs. total campaign funds allocated per candidate.</p> <p><b>b.6.2 Total campaign spending per political party</b> vs. total campaign funds allocated per political party.</p> <p><b>b.6.3 Percentage of population who experienced vote buying</b> during the past election</p>	<p><b>b.6.4 Percentage of citizens who perceived corruption in the processes of elections to public office</b></p>	<p><b>b.6.5 Anonymous donations</b> Percentage of anonymous donations to political campaigns in relation to the total campaign funds</p>	<p><b>b.6.6 Existence of an autonomous electoral body</b></p> <p><b>b.6.7 Existence of regulatory body to monitor financing of political campaigns and electoral processes</b></p>	<p><b>b.6.8 Regulatory measures that sanction acts of corruption in elections</b></p> <p><b>b.6.9 Regulatory measures on transparent and timely political parties financing</b></p>	<p><b>b.6.10 Percentage of political parties who were sanctioned</b> for failing to disclose required information on campaign public financing</p> <p><b>b.6.11 Percentage of candidates who were sanctioned</b> for failing to disclose required information on campaign public financing</p>
<p><b>b.7 Preventive measures for the private sector</b></p>		<p><b>b.7.1 Perception of corruption in the private sector</b> Proportion of persons who perceive that the private sector is corrupt<sup>26</sup></p>		<p><b>b.7.2 Proportion of medium and large private enterprises with a compliance/integrity unit or regime</b><sup>27</sup></p> <p><b>b.7.3 Existence of check and balances</b> such as policies and processes aimed at detecting and preventing corruption</p>	<p><b>b.7.4 Existence of legislation/regulation or guidance regarding corporate compliance</b></p> <p><b>b.7.5 Regulatory framework regarding the involvement of intermediaries in money-laundering</b></p> <p><b>b.7.6 Restrictions on professional activities of former public officials</b> (as per article 12)</p>	<p><b>b.7.7 Number of sanctions or measures imposed</b><sup>28</sup> because of investigation or auditing process where irregularities were found.</p> <p><b>b.7.8 Number of dismissals</b> because of investigation or auditing process where irregularities were found.</p> <p><b>b.7.9 Number of reports to law enforcement authorities</b> because of irregularities found.</p>
<p><b>b.8 Preventive measures for the state-owned enterprises</b></p>		<p><b>b.8.1 Perception of corruption in State-owned enterprises</b> Proportion of persons who perceive those</p>		<p><b>b.8.2 Audits</b> Number of internal and external audits performed in processes vulnerable to corruption</p>	<p><b>b.8.3 Existence of a comprehensive regulatory framework</b> on finance, funding, operations and oversight</p> <p><b>b.8.4 Disclosure and transparency requirements</b> as</p>	

		State-owned enterprises (public companies such as electricity, oil, tele-communications) are corrupt			per the OECD Guidelines on Corporate Governance of State-Owned Enterprises	
<b>b.9 Training programmes (UNCAC art. 7)</b>	b.9.1 Proportion of public officials that completed anti-corruption training programmes				b.9.2 Existence of compulsory anti-corruption/training education for public officials	

c. ENABLING ENVIRONMENT TO REPORT AND ADDRESS CORRUPTION						
ELEMENTS /DIMENSIONS	DIRECT MEASURES	INDIRECT MEASURES				
		PERCEPTION	RISK		RESPONSE	
			OPPORTUNITIES (Circumstances that enable corruption)	CONSTRAINTS (Circumstances that may deter corruption)	DE JURE (Regulation)	DE FACTO (Implementation)
<b>c.1 Resources allocated to fight corruption</b>	<b>c.1.1 Percentage of funds</b> in the annual budget allocated for specialized body/bodies to fight corruption	N/A	N/A	N/A	<b>c.1.2 Existence of adequate legal framework</b> ensuring regular funding for specialized bodies to fight corruption  <b>c.1.3 Existence of a body/bodies</b> focused on the fight against corruption with the necessary independence	<b>c.1.4 Percentage of filled positions divided by envisaged positions</b> in specialized bodies to fight corruption x 100
<b>c.2 Public reporting and access to information (UNCAC art. 10)</b>	<b>c.2.1 Access to Information Requests</b> Proportion of requests for access to information that were denied		<b>c.2.2 Existence of summary proceedings</b> Percentage of laws that were adopted through summary proceedings in relation to the total number of laws adopted in the last 12 months	<b>c.2.4 Existence of a regulatory body</b> responsible for addressing complaints  <b>c.2.5 Civil Society Activities</b> Number of activities by civil society organization regarding preventing & tackling corruption  <b>c.2.6 Media</b>	<b>c.2.7 Regulatory framework in place on access to information</b> to ensure public access to information and protect fundamental freedoms  <b>c.2.8 Appeal mechanism</b> Existence of an appeal mechanism for requests not being granted	<b>c.2.9 Proactive publication of information on risks of corruption</b>

			<b>c.2.3 Exemptions</b> Number of exemptions allow the withholding of certain categories of information.	Number of media reports regarding potential corruption cases		
<b>c.3 Protection of reporting persons (UNCAC art. 33)</b>	<b>c.3.1 Whistle-blower<sup>29</sup> reporting</b> Number of proceedings opened due to whistle-blower reporting. Disaggregated by sex of the reporting person, sex of the alleged perpetrator and type of crime/conduct	<b>c.3.2 Proportion of public officials who would not report for fear of retaliation</b>	N/A	<b>c.3.3 Existence of internal and external reporting channels</b>	<b>c.3.4 Mechanisms for protecting whistle-blowers</b> Number of mechanisms against potential retaliation or intimidation for whistle-blowers who report corruption.	<b>c.3.5 Number of reports received</b> <b>c.3.6 Number of reports addressed</b> <b>c.5.7 Number of whistle-blowers that have received protection</b>

<sup>1</sup> 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 and indicator 16.5.2 Proportion of businesses that had at least one contact with a public official and that paid a bribe to a public official, or were asked for a bribe by those public officials during the previous 12 months. See Global SDG Indicator Framework adopted by the General Assembly in A/RES/71/313 available at: SDG Indicators — SDG Indicators (un.org).

<sup>2</sup> All definitions presented in the framework are for statistical purposes, they are not legal definitions.

<sup>3</sup> Criminalization: is an act or determination of a ruler about certain acts which by the society or members of the society considered as acts which can be penalized as a criminal act or making an act to become a criminal act and therefore can be penalized by the government by and on behalf of the government.

<sup>4</sup> Bribery: the promise, offering or giving to a public official, directly or indirectly, of an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties. Or the solicitation or acceptance by a public official, directly or indirectly, of an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties. It can include public or foreign public officials.

<sup>5</sup> Public official: (i) any person holding a legislative, executive, administrative or judicial office of a State party, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority; (ii) any other person who performs a public function, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the State party and

- as applied in the pertinent area of law of that State party; (iii) any other person defined as a “public official” in the domestic law of a State party.
- <sup>6</sup> International standards to use population and business surveys to measure the experience of bribery by public officials can be found at: [Microsoft Word - CorruptionManual\\_2018-10-10\\_final\\_printing-Clean\\_for printshop\\_final\\_18oct2018 \(unodc.org\)](#).
- <sup>7</sup> Public Sector: Set of administrative bodies through which the State fulfills or enforces the policy and will expressed in the fundamental laws of the country. It includes all administrative bodies of the federal legislative, executive, and judicial branches and autonomous public agencies. It therefore includes the Central Sector and the Parastatal Sector, and all local levels.
- <sup>8</sup> This indicator is a better measure than the perception recorded among public officials because it overcomes the reporting bias of those who may be corrupted themselves or those who fear retaliation if they report corruption. International standards to use population and business surveys to measure the perception of bribery can be found at: [Microsoft Word - CorruptionManual\\_2018-10-10\\_final\\_printing-Clean\\_for printshop\\_final\\_18oct2018 \(unodc.org\)](#).
- <sup>9</sup> E-government: It can be defined as the use of ICT by government agencies for the purpose of increasing and improving accessibility, effectiveness, and accountability. The principal goals of e-government should be efficient and improved service to customers, increased transparency, empowerment through access to information, efficient government purchasing and efficient administration.
- <sup>10</sup> Investigation: investigation is understood as the gathering of evidence about the detected case of corruption, including information about its extent, nature, effects, and the parties involved, to decide whether and which measures need to be taken. Investigations may be carried out internally within the organization concerned or through law enforcement agencies or other external actors, such as anti-corruption agencies, the police, or prosecutors.
- <sup>11</sup> Prosecution: to bring legal action against for redress or punishment of a crime or violation of law.
- <sup>12</sup> Sentencing: The punishment the competent authority decides should be given to someone who has been convicted of a crime.
- <sup>13</sup> Asset recovery: the return of illicitly obtained goods and assets for the purpose of redressing the impact of corruption. For further reference on asset recovery, see the United Nations Convention against Corruption Chapter V.
- <sup>14</sup> Embezzlement: misappropriation or other diversion by a public official for his or her benefit or for the benefit of another person or entity, of any property, public or private funds or securities or any other thing of value entrusted to the public official by virtue of his or her position.
- <sup>15</sup> Diversion of public resources: the authorization, request, or performance of acts for the allocation or diversion of public resources, whether material, human or financial, without legal basis or contrary to the applicable rules.
- <sup>16</sup> Audit: a formal investigation of the accounts or financial situation of an organization or individual and a methodical examination and review. Audits can be internal, meaning they are performed by the organization itself; or external, meaning they are performed by an independent outside entity.
- <sup>17</sup> Statistical measure of Illicit enrichment: The significant increase in the assets of a public official with respect to his or her legitimate income that cannot be reasonably justified, nor is of legitimate origin.
- <sup>18</sup> This can be applied only in jurisdictions where there is a system for public officials to declare their income.
- <sup>19</sup> Abuse of functions: the performance of or failure to perform an act, in violation of laws, by a public official in the discharge of his or her functions, for the purpose of obtaining an undue advantage for himself or herself or for another person or entity.
- <sup>20</sup> Public service: comprises persons employed by public authorities at central, regional, and local levels and include both civil servants and public employees.
- <sup>21</sup> Integrity: behaviors and actions consistent with a series of moral or ethical standards and principles, adopted by individuals as well as institutions, which operate as a barrier against corruption and in favor of the Rule of Law. Strict adherence to a moral code, reflected in honesty, transparency, and complete harmony in what one thinks, says and does.
- <sup>22</sup> Ethics: the attempt to understand the nature of human values, of how we ought to live and of what constitutes the right conduct

- <sup>23</sup> Sanction: UNCAC Article 30 para. 1 provides that “each State Party shall make the commission of [corruption] offences [...] liable to sanctions that take into account the gravity of that offence.” Moreover, The OSCE Handbook on Combating Corruption issues the following recommendation regarding sanctions: “The level of sentencing must take into account the gravity of the offence and be ‘effective, proportionate and dissuasive’; the sanctions must address the natural and legal person and the range of sentencing options should include imprisonment, monetary and non-monetary penalties, confiscation, suspension, removal or disqualification from public office and debarment as well as disciplinary measures.”
- <sup>24</sup> Misconduct: Contravention of the provisions of the law, which might be classified at least as: serious, non-serious.
- <sup>25</sup> Conviction: Adjudication of a criminal defendant’s guilt.
- <sup>26</sup> Current survey tools measure perception of bribery in the private sector.
- <sup>27</sup> Compliance: procedures, systems or departments within public agencies or companies that ensure that all legal, operational, and financial activities comply with applicable laws, rules, norms, regulations, and standards.
- <sup>28</sup> Sanctions are intended to be effective, proportionate and dissuasive. These aim to improve performance and are financial and non-financial. Non-financial sanction may encompass private notices requiring abstaining from repetition of the observed conduct; a public notice for the same effect; order to take action; temporary ban to perform its functions; permanent ban from functions.
- <sup>29</sup> Whistle-blower: Person who reports in good faith and on reasonable grounds to the competent authorities any facts concerning offences established in accordance with the UNCAC.