



Conference of the States Parties to the United Nations Convention against Corruption

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State of implementation of the United Nations

Convention against Corruption

Implementation of chapter II (Preventive measures) of the United Nations Convention against Corruption

Regional supplement

Thematic report prepared by the Secretariat

Summary

The present report complements the thematic report on the implementation of chapter II (Preventive measures) of the United Nations Convention against Corruption ([CAC/COSP/IRG/2023/5](#)). Excluding cross-cutting issues that overlap with chapter V, it provides a regional analysis of the implementation of articles 5 to 13 of the Convention by States parties under review in the second cycle of the Mechanism for the Review of Implementation of the Convention.

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



I. Introduction, scope and structure

1. In accordance with paragraphs 35 and 44 of the terms of reference of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption, the present report contains supplementary information, organized by geographical region, to the thematic report on the implementation of chapter II (Preventive measures) of the Convention ([CAC/COSP/IRG/2023/5](#)). It provides an overview of successes, good practices, challenges and observations in relation to the implementation of articles 5 to 13 of the Convention.¹

2. The structure of the present report follows that of the executive summaries of country review reports by clustering closely related articles and topics. Data on cross-cutting issues of chapter II that overlap with chapter V of the Convention – namely asset declarations, financial disclosure systems and prevention of conflicts of interest (art. 7, para. 4; art. 8, para. 5; and art. 52, paras. 5 and 6); beneficial ownership identification (art. 12, para. 2 (c); art. 14, para. 1 (a); and art. 52, para. 1); and measures to prevent money-laundering, the prevention and detection of transfers of proceeds of crime, and financial intelligence units (arts. 14, 52 and 58) – are included only in the graphics. A detailed analysis of these topics will be provided in another thematic report, which will be submitted to the Implementation Review Group for consideration at its resumed fourteenth session.

3. The present report is based on information contained in the finalized executive summaries of and country review reports on the 67 reviews that had been completed as at 28 February 2023, including 22 reviews completed for the Group of Asia-Pacific States, 20 for the Group of African States, 11 for the Group of Western European and other States, 7 for the Group of Eastern European States and 7 for the Group of Latin American and Caribbean States. In order to provide a basis for the analytical work of the Implementation Review Group, the analysis contained in this report is related to the number of executive summaries finalized in each regional group. Graphs are used to facilitate a visual representation of the data, when suitable. The present report does not purport to be comprehensive, but instead endeavours to provide a summary of the information available in the country reviews completed under the second review cycle.

II. Implementation at the regional level of chapter II (Preventive measures) of the United Nations Convention against Corruption

A. Preventive anti-corruption policies and practices (art. 5) and preventive anti-corruption body or bodies (art. 6)

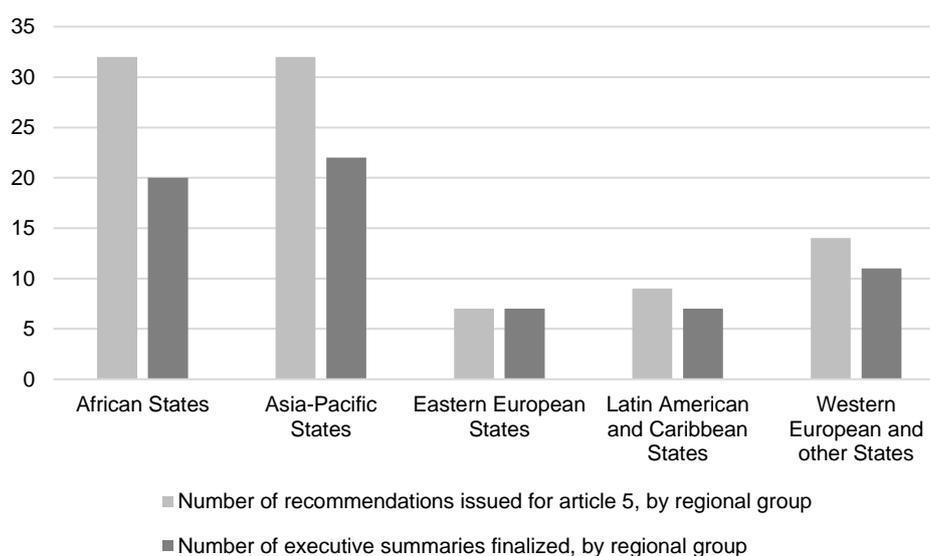
4. A total of 94 recommendations were issued with regard to the implementation of article 5 of the Convention. Information disaggregated by regional group, can be found in table 1 and figure 1 below.

¹ In line with the outcome of the discussions of the Implementation Review Group, thematic reports and reports on implementation at the regional level are no longer anonymized. Countries used as illustrative examples of good practices have therefore been identified in this report.

Table 1
Recommendations issued with regard to the implementation of article 5, of the Convention, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	17	32	85
Asia-Pacific States	22	17	32	77
Eastern European States	7	5	7	71
Latin American and Caribbean States	7	4	9	57
Western European and other States	11	10	14	91

Figure 1
Number of finalized executive summaries and recommendations issued relating to article 5, by regional group



5. Reviewers issued a total of 52 recommendations relating to article 5, paragraph 1, of the Convention (see figure 2). All but one of the Western European and other States covered in the present report received a recommendation. The proportion is lower in the case of African States (16 out of 20), Asia-Pacific States (13 out of 22), Eastern European States (3 out of 7) and the Latin American and Caribbean States (4 out of 7). In terms of the substance of the recommendations, no regional trends can be identified. The majority of recommendations issued related to the need to adopt anti-corruption policies or update existing deficient ones. Reviewers also focused on the required effectiveness and coordination of anti-corruption policies and are issuing an increasing number of recommendations for the participation of civil society in the development of such policies.

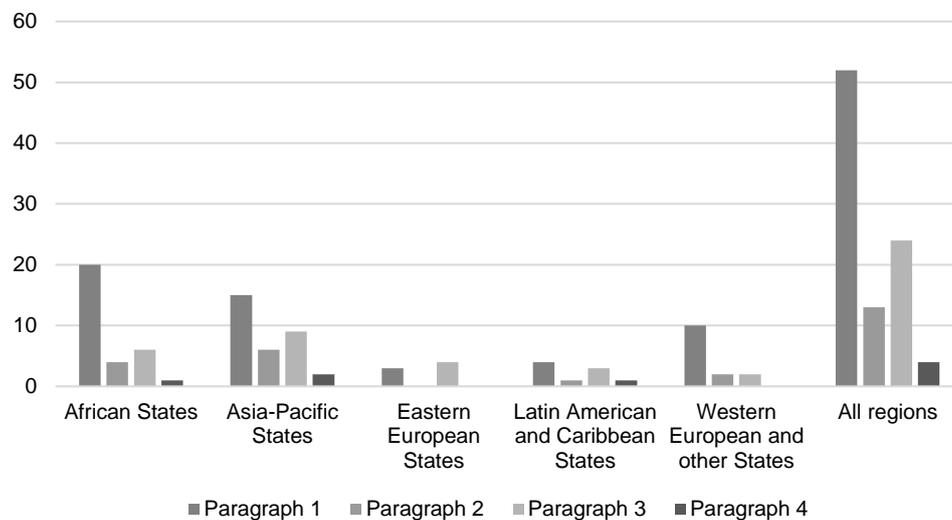
6. With regard to effective practices aimed at the prevention of corruption (art. 5, para. 2), the number of recommendations issued is significantly lower than in the case of paragraph 1 of the same article. Only 13 recommendations were issued: to only four of the States belonging to the Group of African States, six States of the Asia-Pacific Group, one State of the Group of Latin American and Caribbean States and two States of the Western European and other States Group. Reviewers did not find any gaps in the implementation of this provision in the Group of Eastern European States (see figure 2). The difference between the total numbers of recommendations relating to paragraphs 1 and 2 of article 5 would suggest that, while some States may not have established anti-corruption policies or existing policies may have deficiencies, the majority of States have carried out adequate practices aimed at the prevention of corruption.

7. The periodic evaluation of legal instruments and administrative measures as described in article 5, paragraph 3, of the Convention is a challenge in 23 of the 67 States parties analysed. In total, reviewers issued 24 relevant recommendations (see figure 2). In this regard, the majority of States in the Group of African States and the Group of Western European and other States that received such recommendations already had some kind of evaluation mechanism in place and the recommendations focused on further enhancing those mechanisms or considering implementing a more systematic approach. The opposite trend is observed among the other regional groups, where the majority of recommendations dealt with the need to evaluate legal and administrative measures or to establish new mechanisms to that end. For example, one recommendation received by an Asia-Pacific State referred to the evaluation of national legislation by setting up reporting mechanisms and building a national database to collect data and produce statistics related to corruption.

8. The implementation of article 5, paragraph 4, of the Convention, which relates to collaboration among States parties and with relevant international and regional organizations, does not seem to pose a major challenge. Reviewers issued only four recommendations to a total of four States parties belonging to the Group of African States, the Group of Asia-Pacific States and the Group of Latin American and Caribbean States (see figure 2). In all those cases, reviewers recommended strengthening the existing cooperation.

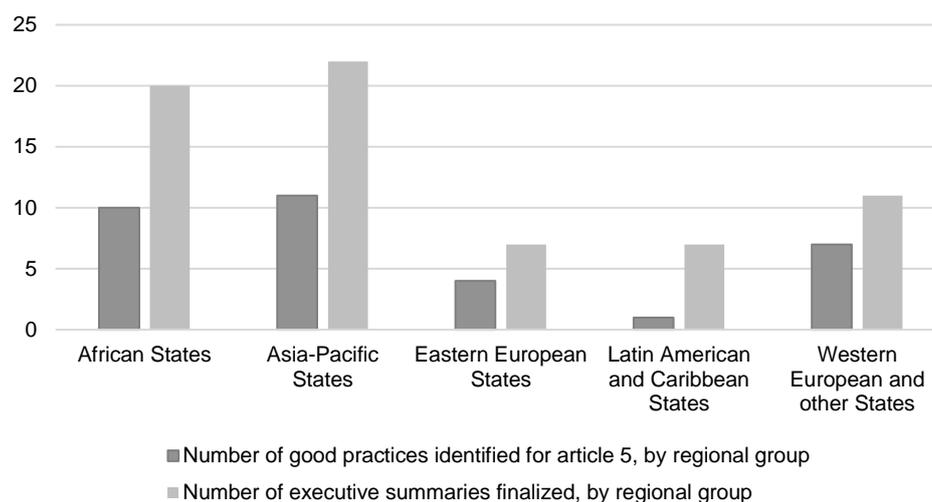
Figure 2

Number of recommendations issued with regard to the implementation of each paragraph of article 5, by regional group and in total



9. With regard to the identification of good practices in the implementation of article 5 of the Convention, reviewers identified such practices in States parties from all regional groups (see figure 3). A total of 33 good practices were identified, with paragraph 1 of article 5 being the provision for which reviewers identified the highest number of good practices (16).

Figure 3
Number of finalized executive summaries and good practices identified for article 5, by regional group

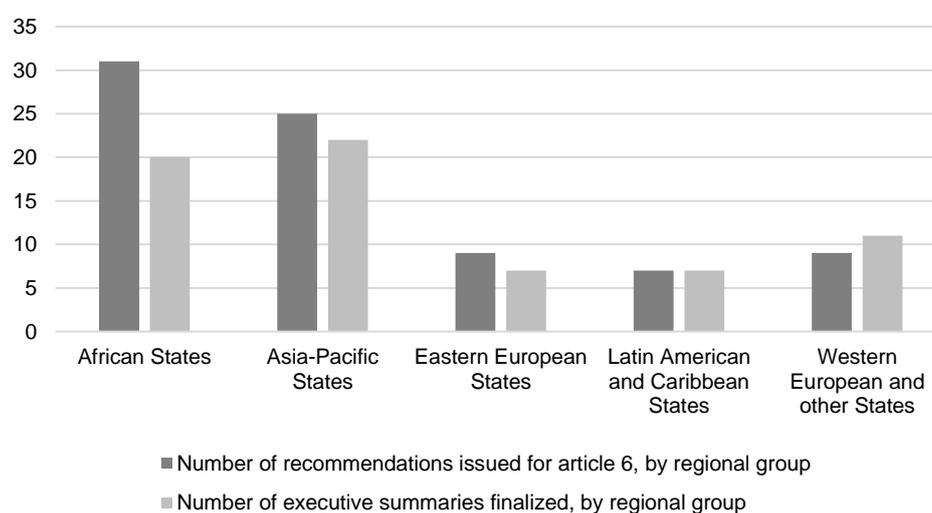


10. With regard to the preventive anti-corruption body or bodies (article 6 of the Convention), a total of 81 recommendations were issued. Relevant data, disaggregated by regional group, can be found in table 2 and figure 4 below.

Table 2
Recommendations issued with regard to the implementation of article 6, of the Convention, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	17	31	85
Asia-Pacific States	22	17	25	77
Eastern European States	7	6	9	86
Latin American and Caribbean States	7	6	7	86
Western European and other States	11	6	9	55

Figure 4
Number of finalized executive summaries and recommendations issued for article 6, by regional group



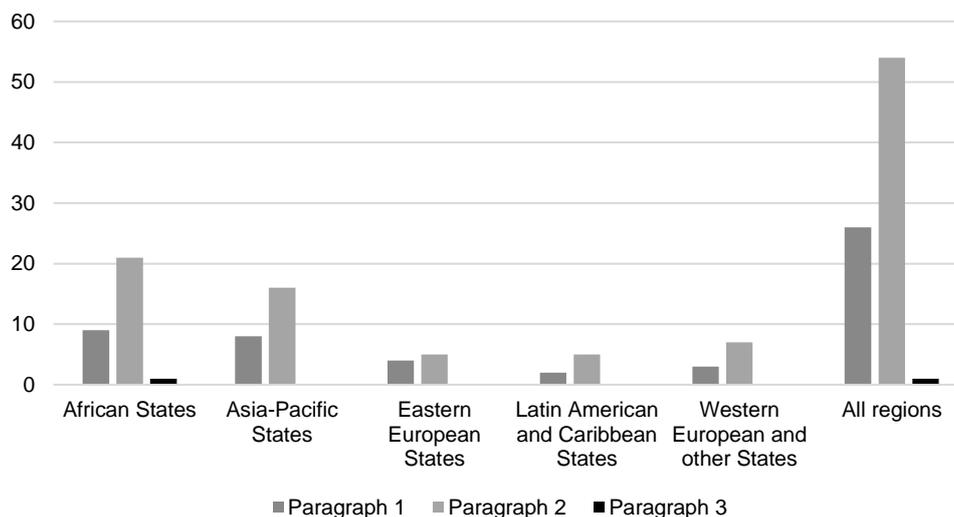
11. The Group of Eastern European States has the highest relative number of States parties receiving recommendations (3 out of 7) related to article 6, paragraph 1, of the Convention, closely followed by the Group of African States (8 out of 20). Reviewers found gaps in the implementation of that provision in approximately 40 per cent of the African States covered in this report, the proportion being similar for Asia-Pacific States. In terms of the number of recommendations per regional group, reviewers issued nine to African States, eight to Asia-Pacific States, four to Eastern European States, two to Latin American and Caribbean States and three to Western European and other States.

12. Insufficient resources and the need to establish coordination mechanisms in order to avoid the overlapping of functions among preventive anti-corruption bodies were challenges commonly identified in all regional groups except for the Group of Latin American and Caribbean States. Nevertheless, the low number of executive summaries finalized and recommendations issued for certain regional groups does not allow for the identification of meaningful trends in that regard.

13. As can be seen in figure 5, the total number of recommendations issued in relation to article 6, paragraph 2, of the Convention (54) is more than twice the number issued in relation to the first paragraph of the same article (26). Reviewers issued a total of 54 recommendations related to the independence of preventive anti-corruption bodies. More than half of the States parties analysed in this report (46 out of 67) have received recommendations in this regard. Therefore, it may be inferred that, while States have generally established preventive anti-corruption bodies, their independence and provision of adequate resources remain a common challenge. In addition to providing the preventive anti-corruption bodies with the necessary material resources, the provision of specialized staff and training were mentioned in the recommendations made to States parties in all regional groups. In the case of the Group of African States and the Group of Asia-Pacific States, reviewers emphasized the need to amend the rules related to the appointment and removal of the heads of such institutions. In one State from the African Group, reviewers issued a recommendation to adopt a decree establishing the terms of recruitment of the Comptroller-General. Similar recommendations were issued to States in other regional groups. For one State in the Group of Western European and other States, reviewers issued a recommendation to consider the advantages of staggering the appointment of the members of the preventive anti-corruption body to avoid its complete replacement at the end of the term. Clarifying the mandates of such bodies was also mentioned in several cases.

Figure 5

Number of recommendations issued with regard to the implementation of each paragraph of article 6, by regional group and in total

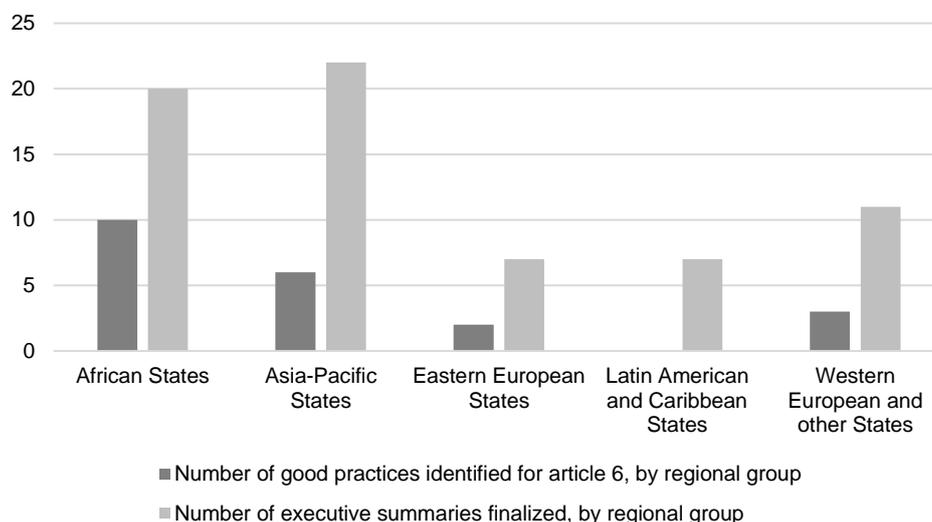


14. Reviewers identified good practices in all regional groups except for the Group of Latin American and Caribbean States, though it is important to note the low number of executive summaries finalized for that regional group (see figure 6).

15. In total, only 21 good practices related to preventive anti-corruption bodies have been identified in 18 States parties. In the case of an Asia-Pacific State, for example, reviewers commended the various forms of continuous professional and specialized training to counter corruption and strengthen integrity that are provided to public sector institutions.

Figure 6

Number of finalized executive summaries and good practices identified for article 6, by regional group



B. Public sector (art. 7), codes of conduct for public officials (art. 8)² and measures relating to the judiciary and prosecution services (art. 11)

16. A total of 194 recommendations were issued to 65 States parties with respect to the implementation of article 7 of the Convention. Relevant data, disaggregated by regional group, can be found in table 3 and figure 7 below.

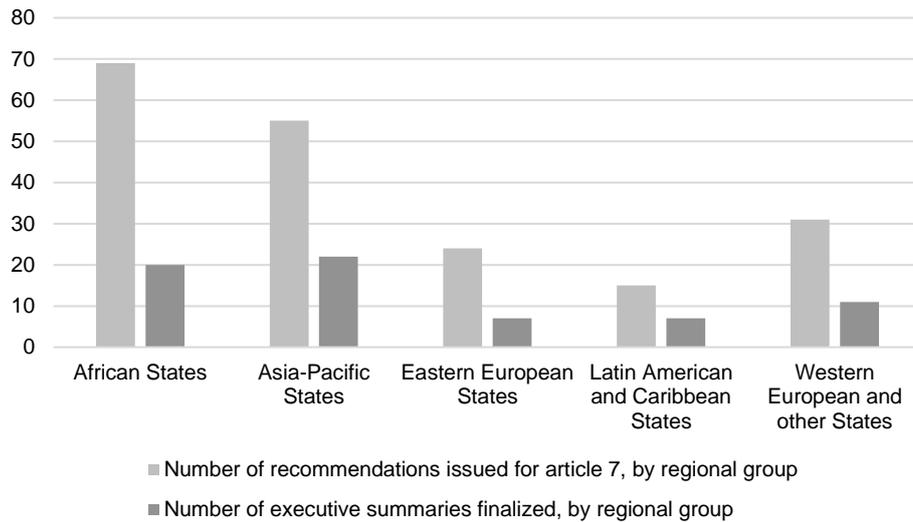
Table 3

Recommendations issued with regard to the implementation of article 7, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	19	69	95
Asia-Pacific States	22	21	55	95
Eastern European States	7	7	24	100
Latin American and Caribbean States	7	7	15	100
Western European and other States	11	11	31	100

² As mentioned above, paragraph 4 of article 7 and paragraph 5 of article 8 pertain to the cross-cutting issues and are not analysed on this report.

Figure 7
Number of finalized executive summaries and recommendations issued for article 7, by regional group



17. Regarding the distribution per thematic area, 31 recommendations were issued to States of the African Group on systems for the recruitment, hiring, retention, promotion and retirement of civil servants (para. 1), while the Asia-Pacific Group had 26 recommendations and the Western European and other States Group had 10 recommendations, and the Group of Latin American and Caribbean States and the Group of Eastern European States had, respectively, 8 and 10 recommendations on the public service. In this context, some prevailing trends could be identified on the thematic focus of recommendations issued on this paragraph, by region. While recommendations for States in the Group of Asia-Pacific States, the Group of Western European and other States and the Group of Latin American and Caribbean States focused on the inadequate procedures for the selection, training and rotation of individuals holding public positions considered especially vulnerable to corruption, recommendations for the Group of African States focused on insufficient transparency in the recruitment of public officials, the need for training and rotation in the civil service, and the need to revise remuneration. The right to appeal appointment and promotion decisions was another common challenge in the Asia-Pacific Group.

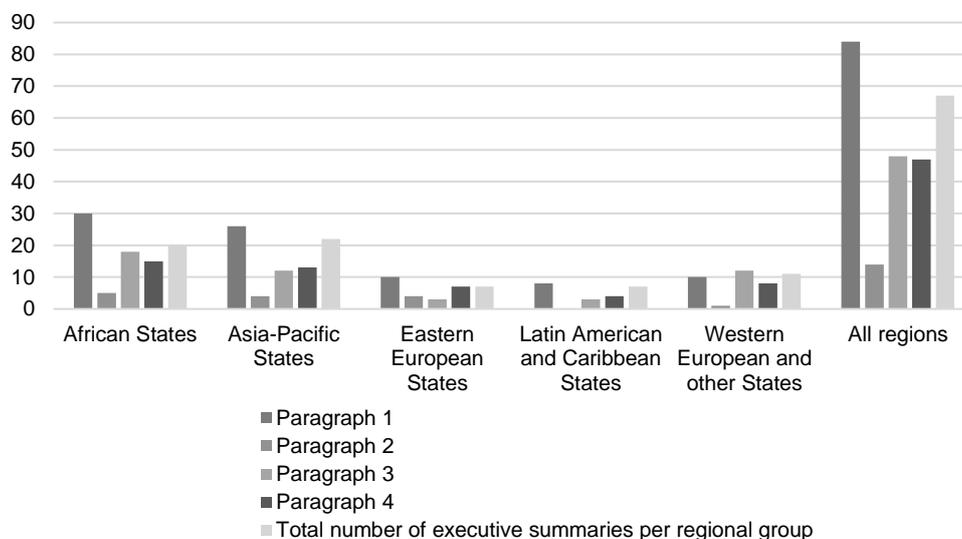
18. Regarding the criteria concerning candidature for and election to public office (art. 7, para. 2), the number of recommendations was almost evenly distributed among all regional groups except for the Group of Latin American and Caribbean States, which did not receive any recommendation on this paragraph (see figure 8). The issues covered by these recommendations ranged from the need for legislative reform to address inadequate criteria concerning candidatures for and election to public office; to the implementation of electoral measures in practice. The recommendations for the Eastern European Group focused mainly on restrictions on professional activities, while those for Asia-Pacific States and African States dealt with a range of topics, including the need to consider strengthening existing legislative and administrative measures regarding candidature for and election to public office and the need to consider measures to prevent conflicts of interest for persons who are candidates for election to public office.

19. With regard to the funding of candidatures for elected public office and the funding of political parties (art. 7, para. 3), 18 recommendations were issued to the African Group, followed by the Group of Western European and other States (12) and the Asia-Pacific Group (12). The Eastern European Group and the Latin American and Caribbean Group had less than six recommendations combined. The most recommended action was on legislative reform due to the lack of comprehensive legislation or administrative measures to regulate the funding of candidates for elected office and the funding of political parties with a view to enhancing

transparency in the funding of candidatures for elected public office in the vast majority of States parties in each regional group. In some cases, it was advised to adopt a comprehensive law or to consider taking appropriate legislative and administrative measures to this end.

Figure 8

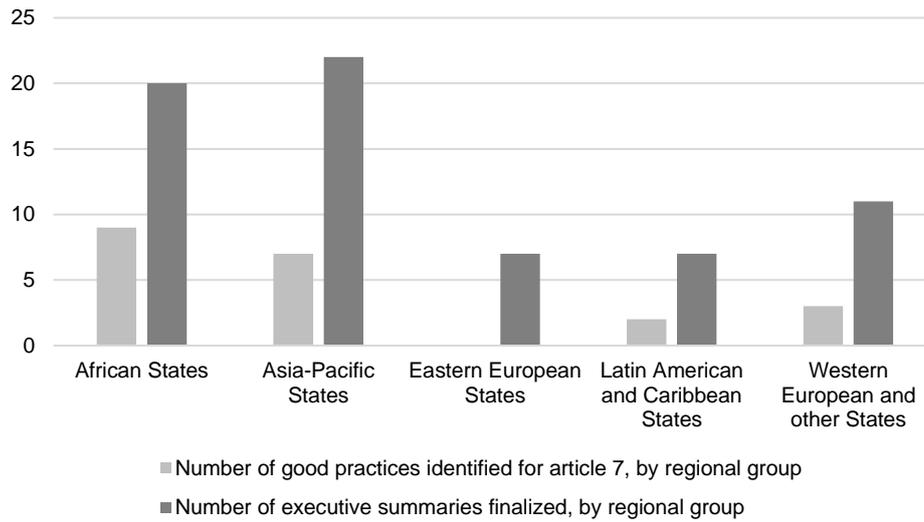
Number of recommendations issued regarding each paragraph of article 7, by regional group and in total



20. On the implementation of article 7 of the Convention, a total of 21 good practices regarding the public sector have been identified in 17 State parties for the second cycle. Similar to the trend identified for recommendations, 45 per cent of good practices were found in the Group of African States, followed by the Group of Asia-Pacific States (31 per cent), while less than 28 per cent were related to the Group of Western European and other States and the Group of Latin American and Caribbean States. There were no specific good practices identified in the Eastern European Group.

21. In the review of implementation of article 7 of the Convention, only one of the good practices identified was related to the conflict of interest (para. 4), while the other 20 were distributed between paragraphs 1 and 3. The review teams did not find good practices on criteria concerning candidature for and election to public office (para. 2). Regarding examples of successes in each regional group, it was observed that most African and Asia-Pacific States had good practices relating to adequate laws and measures for the recruitment, hiring, retention, promotion and retirement of civil servants. Good practices were identified in a range of States members of the African Group, including a system for publishing all public agent posts available at the ministerial level; the completion of a mapping exercise conducted to identify public positions considered especially vulnerable to corruption and the implementation of targeted training modules, for future managers and leaders, on the prevention of corruption; and the establishment of a training advisory board to continuously review training for civil servants.

Figure 9
Number of finalized executive summaries and good practices identified for article 7, by regional group

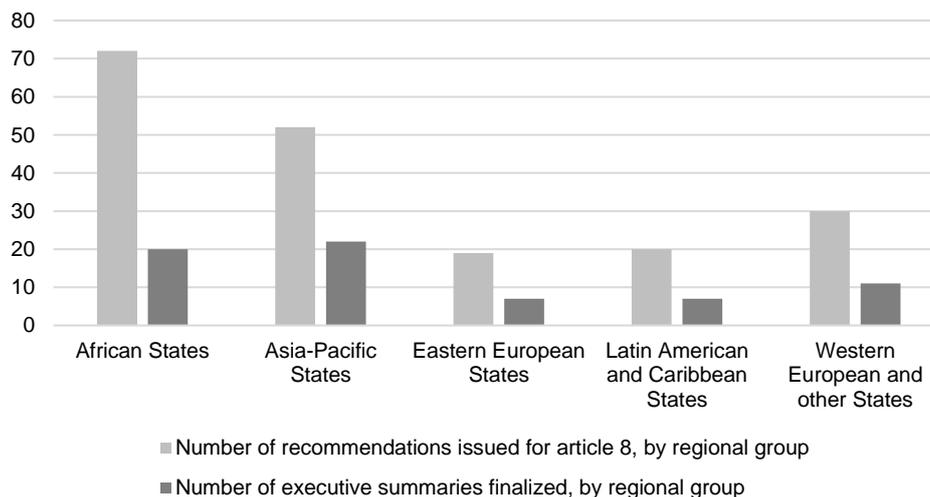


22. In terms of the total number of recommendations on article 8, similar to the findings for article 7, 193 recommendations across all regional groups were issued. Disaggregated information by regional groups can be found in table 4 and figure 10 below.

Table 4
Recommendations issued with regard to the implementation of article 8, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	19	72	95
Asia-Pacific States	22	21	52	95
Eastern European States	7	6	19	86
Latin American and Caribbean States	7	7	20	100
Western European and other States	11	9	30	82

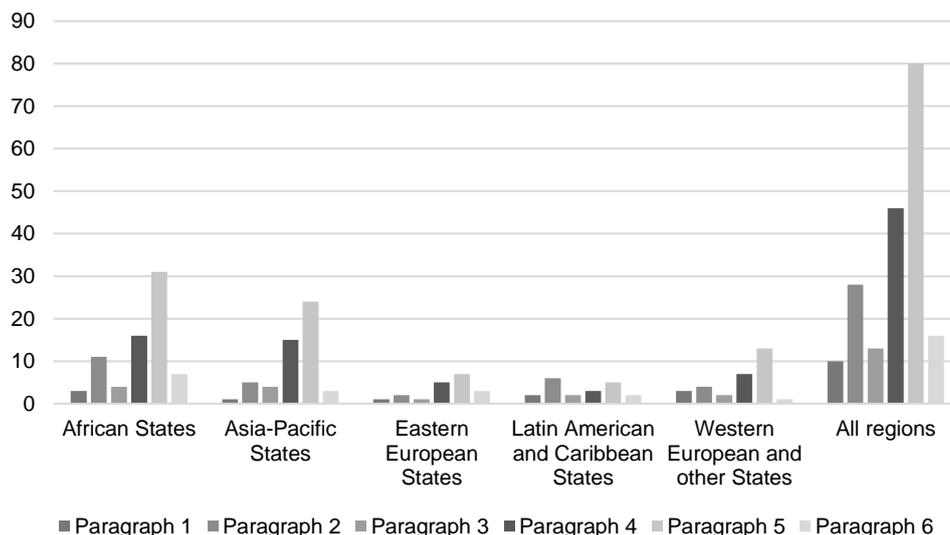
Figure 10
Number of finalized executive summaries and recommendations issued for article 8, by regional group



23. The main challenges addressed by these recommendations included the need to adopt and implement amendments to legislation to ensure that they are in line with the requirements of the Convention (art. 8, para. 1); the lack of any codes of conduct for public officials or the need to adopt codes of conduct for all public officials (highlighting the limited application of such codes to certain groups of public officials) and to disseminate the content of those codes and consider undertaking further activities to promote the application of codes of conduct (art. 8, para. 2); and limited reporting channels and protection measures for public officials reporting acts of corruption (art. 8, para. 4) (see figure 11).

Figure 11

Number of recommendations issued regarding each paragraph of article 8, per regional group and total for all regions



24. Although the number of good practices identified in relation to article 8 of the Convention is not significant (20 from 67 States parties analysed), that total number is almost equal to the number of good practices for article 7 (21). The good practices identified were unevenly distributed among the regional groups; for the Group of Latin American and Caribbean States, no good practices were identified in this regard (see figure 12).

25. Regarding the promotion of integrity, honesty and responsibility among public officials (art. 8, para. 1), no good practices were identified in the Group of Eastern European States or the Group of Latin American and Caribbean States. As with the findings on successes related to article 7 as a whole, the African Group and the Asia-Pacific Group had the highest number of good practices (albeit just five for each regional group). The most common good practice was the adoption of measures to promote integrity and ethics and prevent corruption in the public service. Examples of such measures were the launching of an incentive awards programme for public officials in an Asia-Pacific State and the establishment of a national anti-corruption academy in an African State.

26. In relation to the existence of codes of ethics forming an integral part of the employment contract of public officials (art. 8, para. 2), only four good practices were identified. One of these was the initiative to publish and display A4-size posters with the code of conduct for public officials in the administration's offices in Nauru.

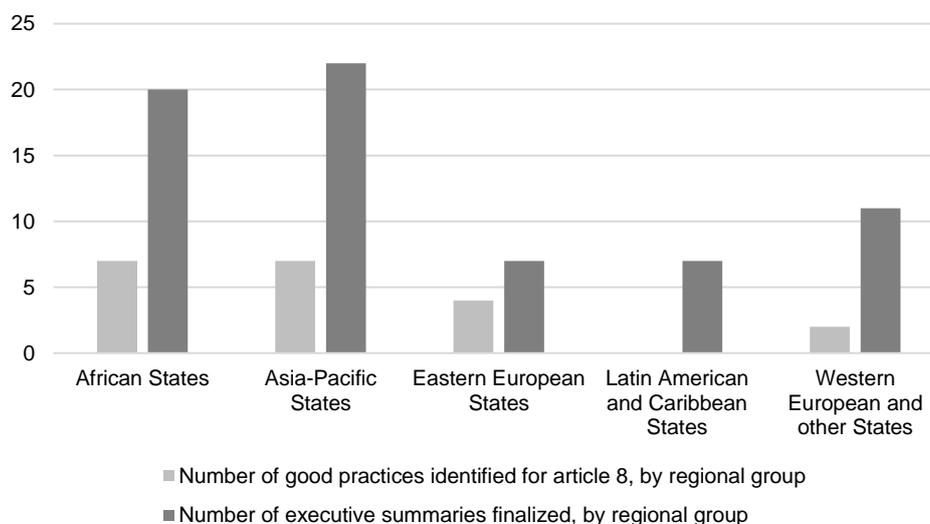
27. As for participation in initiatives of regional, interregional and multilateral organizations for the implementation of article 8 of the Convention (art. 8, para. 3), no good practices were identified among any of the regional groups. It is worth noting that there were few recommendations with regard to the implementation of this paragraph of article 8 of the Convention (just 13 for all the regional groups combined). The same observation could be made regarding the good practices on the measures

against public officials who violate the codes or standards established in accordance with this article (art. 8, para. 6), for which there was a slight increase in the number of challenges identified (16) among all regional groups.

28. Regarding the measures and systems to facilitate the reporting by public officials of acts of corruption (art. 8, para. 4), only seven good practices were identified across States parties from all regional groups, and 46 recommendations were issued. Specific examples of good practices were the adoption of a comprehensive law on the protection of whistle-blowers in a State belonging to the Asia-Pacific Group; the introduction by an Eastern European State of regulations and guidance for employers on how to deal with reports of corruption made by employees, including guidelines on the requirements for employers to provide protection for reporting persons, if necessary; the decision to consider the motivation of whistle-blowers to be irrelevant in a State party from the Group of Western European and other States; and the establishment of integrity management committees in all ministries, departments and agencies to facilitate reporting by public officials in an African State.

Figure 12

Number of finalized executive summaries and good practices identified for article 8, by regional group



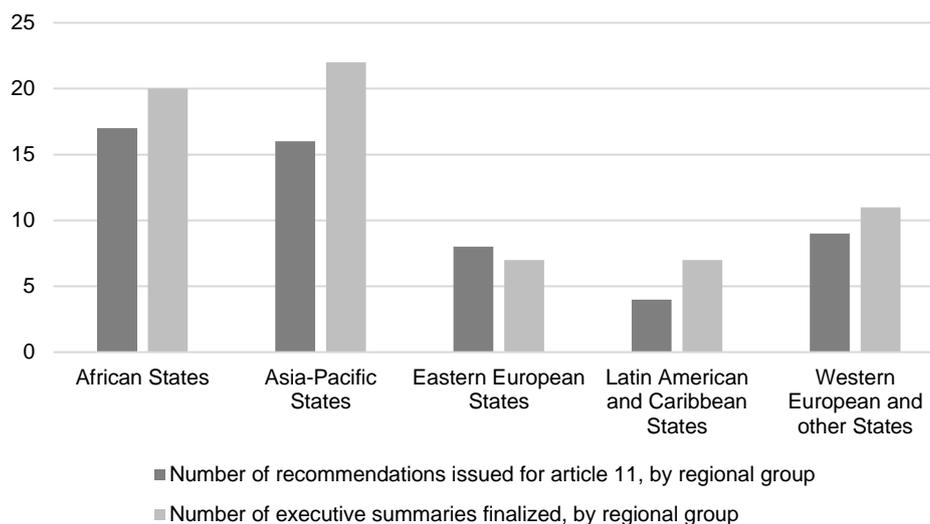
29. At least half of the States parties in all the regional groups but one have received recommendations on the implementation of article 11 of the Convention. A total of 54 recommendations were issued in relation to that article. Relevant data, disaggregated by regional group, can be found in table 5 and figure 13 below.

Table 5

Recommendations issued with regard to the implementation of article 11, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	10	17	50
Asia-Pacific States	22	11	16	50
Eastern European States	7	4	8	57
Latin American and Caribbean States	7	3	4	43
Western European and other States	11	6	9	55

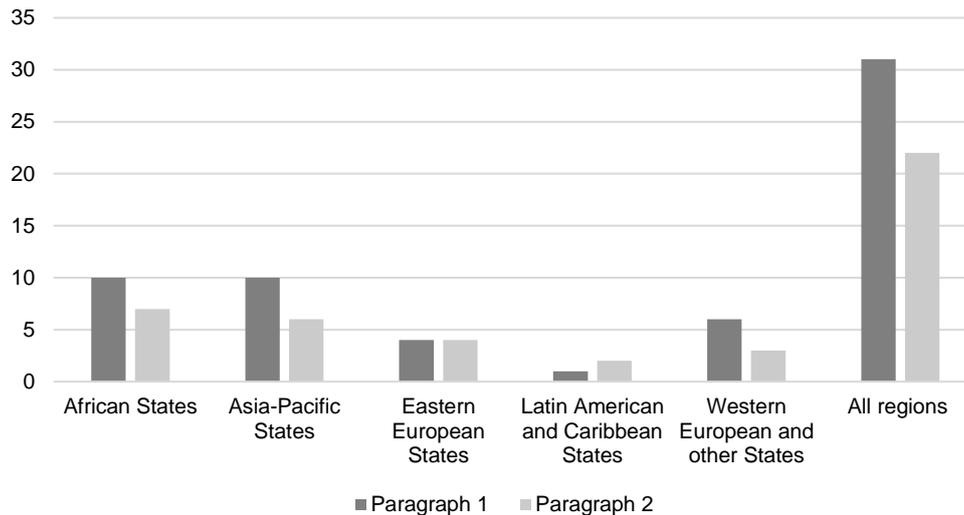
Figure 13
Number of finalized executive summaries and recommendations issued for article 11, by regional group



30. Relative to the total number of completed executive summaries in each regional group, the Eastern European States (8 recommendations) received the most recommendations, followed by African States (17 recommendations), Western European and other States (9), Asia-Pacific States (16) and Latin American and Caribbean States (4) (see figure 13). The recommendations for Western European and other States focused on a broad range of issues, including gaps in the process of judicial and prosecutorial appointments, in the management of conflicts of interest and in the enforcement of disciplinary sanctions. For the African States covered in this report, recommendations focused mainly on the independence of members of the judiciary and prosecutors, the adoption of specialized codes of conduct and asset declaration systems, and additional training on anti-corruption efforts and asset recovery for judges and prosecutors. For the Eastern European States, recommendations focused on the adoption of adequate measures to address conflicts of interest in the judiciary and on providing access to ethics counselling and training for judges and prosecutors. Recommendations concerning the appointment and removal processes for judges and prosecutors, the adoption of specialized codes of conduct and tools to manage conflicts of interest, and the enforcement of administrative sanctions were received by States parties from almost all regional groups.

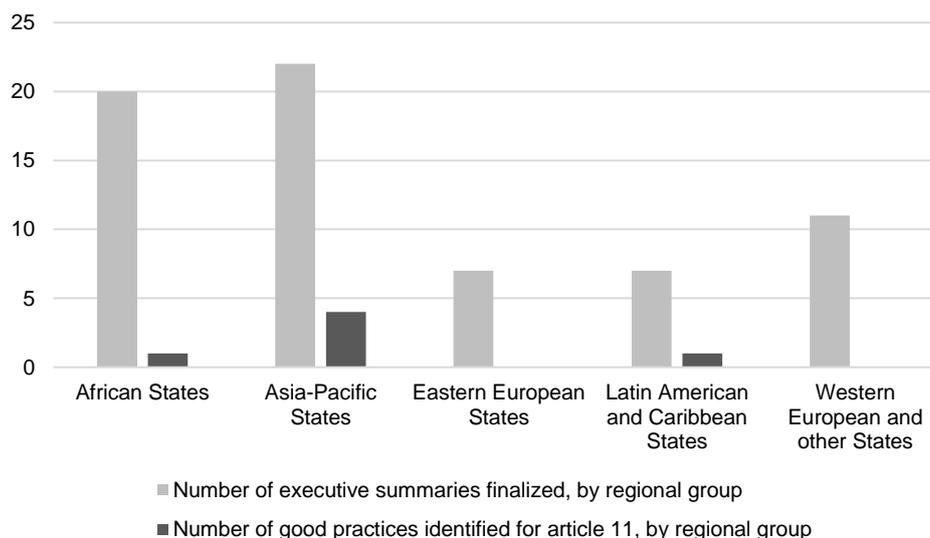
31. As may be seen in figure 14, the focus of recommendations for the Group of Western European and other States (6 out of 9 recommendations), the Group of African States (10 out of 17) and the Group of Asia-Pacific States (10 out of 16) was on the implementation of article 11, paragraph 1, of the Convention as opposed to paragraph 2 of that article. The aforementioned finding highlights that issues related to integrity may be more prevalent in the judiciary in States parties from the above-mentioned regional groups than in those States' prosecution services. There were no other notable regional patterns related to recommendations on article 11.

Figure 14
Number of recommendations issued regarding each paragraph of article 11, per regional group and in total



32. Good practices in relation to article 11 were identified in only six States parties (see figure 15), and were mainly related to the establishment of case management systems. Other examples of good practices related to the judiciary and prosecution services include the adoption of a code of conduct for court staff by one State in the Group of Asia-Pacific States and the establishment of a dedicated prosecution section within the Attorney General's Office to combat corruption by one State in the Group of Latin American and Caribbean States.

Figure 15
Number of finalized executive summaries and good practices identified for article 11, by regional group



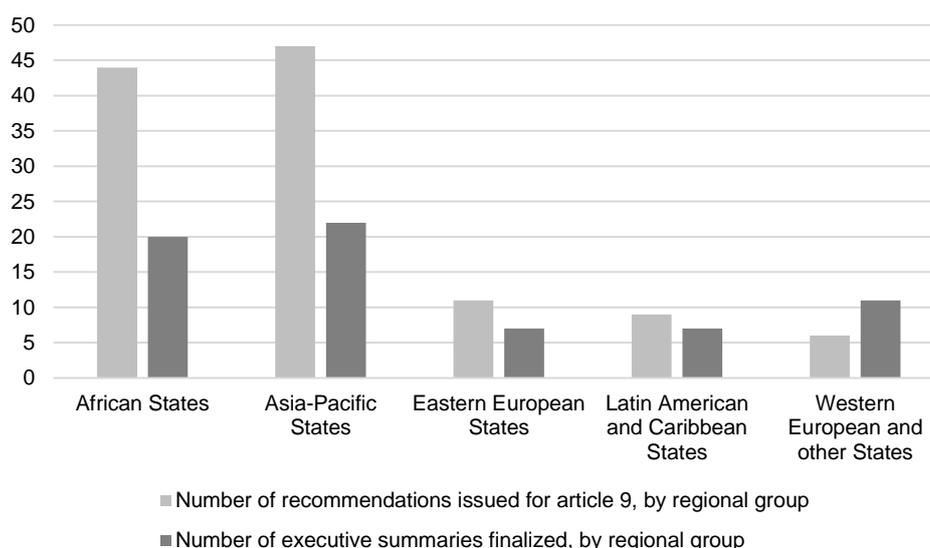
C. Public procurement and management of public finances (art. 9)

33. A total of 117 recommendations were issued to 54 States parties with respect to the implementation of article 9 of the Convention. Relevant data, disaggregated by regional group, can be found in table 6 and figure 16 below.

Table 6
Recommendations issued with regard to the implementation of article 9, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	18	44	90
Asia-Pacific States	22	20	47	91
Eastern European States	7	5	11	71
Latin American and Caribbean States	7	7	9	100
Western European and other States	11	4	6	36

Figure 16
Number of finalized executive summaries and recommendations issued for article 9, by regional group



34. With regard to the implementation of article 9, paragraph 1, of the Convention, on effective systems of procurement, 80 recommendations were issued to 48 States parties (see figure 17). All the Eastern European States analysed in this report, all but three of the African States, around three quarters of the Asia-Pacific States, just over half of the Latin American and Caribbean States and under one third of the Western European and other States received recommendations on that provision. These recommendations reflect the breadth of topics covered by the five subparagraphs of article 9, paragraph 1, including the public distribution of information relating to procurement procedures; the establishment, in advance, of conditions for participation in bidding procedures; the application of these conditions; domestic review and appeal systems; electronic procurement; and measures regulating procurement personnel.

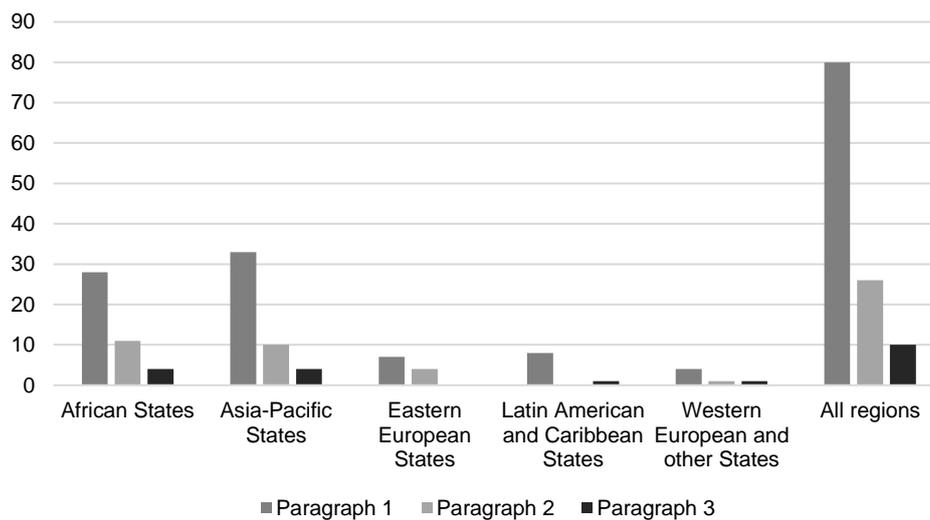
35. A total of 26 recommendations were issued to 21 States parties on the management of public finances (art. 9, para. 2), with 42 per cent of these issued to African States, more specifically to almost half of the States in that group. Just under half of the Eastern European States received recommendations, as did over one third of the Asia-Pacific States. None of the seven Latin American and Caribbean States analysed in this report received any recommendations, and only one of the 11 Western European and other States did. As may be seen in figure 17, States from all regional groups had significantly fewer challenges identified with regard to the management of public finances than in relation to their public procurement systems. Common recommendations on the management of public finances included addressing limited

transparency in the process for the adoption of the budget and the absence of or limited systems of risk management and internal control.

36. Only 10 recommendations were issued to 10 States parties on civil and administrative measures aimed at preserving the integrity of accounting books (art. 9, para. 3). Four of these were African States, and another four were Asia-Pacific States, with around one fifth of the States in both these groups receiving such recommendations. None of the seven Eastern European States analysed in this report was found to face challenges in the implementation of that provision (see figure 17). Recommendations included the establishment of an appropriate record retention period to preserve the integrity of accounting books, records, financial statements or other documents related to public expenditure and revenue; and the imposition of administrative and criminal penalties for the failure to preserve accounting books and records.

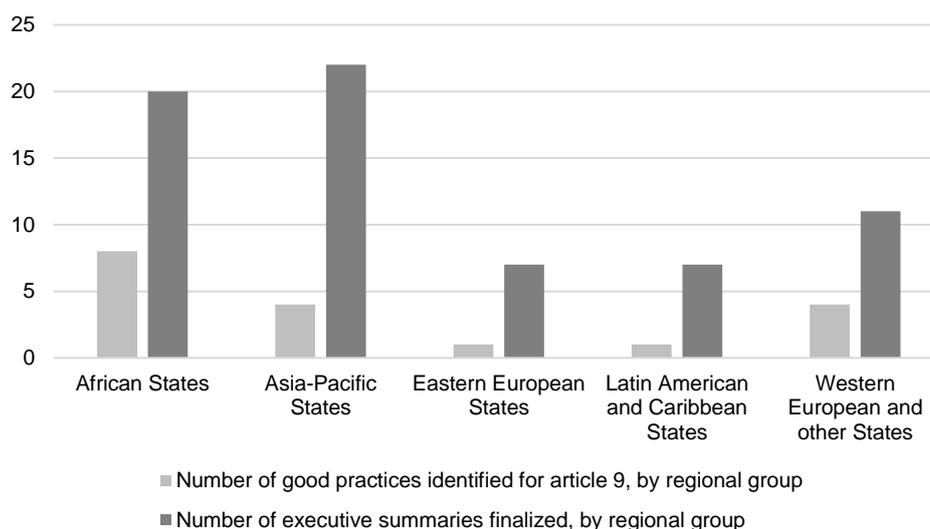
Figure 17

Number of recommendations issued regarding each paragraph of article 9, per regional group and in total



37. Good practices in relation to article 9 were identified in 18 instances among 17 States parties (see figure 18). Four of the good practices in African States were related to paragraph 1 of article 9 and mostly had to do with the establishment of an electronic public procurement system, while three good practices dealt with paragraph 2 and included the establishment of an integrated financial management information system in Kenya; the development and implementation of a methodological guide by the Court of Auditors in Algeria to assess transparency and accountability in budget management; and the participation of civil society in the adoption of the national budget within the National Assembly in Nigeria. The good practices identified among Western European and other States similarly included making use of electronic systems for public procurement and the management of public finances, diverse measures to ensure transparency in public tendering and measures to promote transparency in the budget process.

Figure 18
Number of finalized executive summaries and good practices identified for article 9, by regional group



D. Public reporting (art. 10) and participation of society (art. 13)

38. A total of 88 recommendations were issued to 39 States parties with respect to the implementation of article 10 of the Convention, on public reporting. Relevant data, disaggregated by regional group, can be found in table 7 and figure 19 below. With regard to the implementation of article 13 of the Convention, on the participation of society, 58 recommendations were addressed to 36 States parties. Relevant data, disaggregated by regional group, can be found in table 8 and figure 20 below.

Table 7

Recommendations issued with regard to the implementation of article 10, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	18	35	90
Asia-Pacific States	22	19	31	86
Eastern European States	7	4	6	57
Latin American and Caribbean States	7	6	10	86
Western European and other States	11	5	6	45

Figure 19
Number of finalized executive summaries and recommendations issued for article 10, by regional group

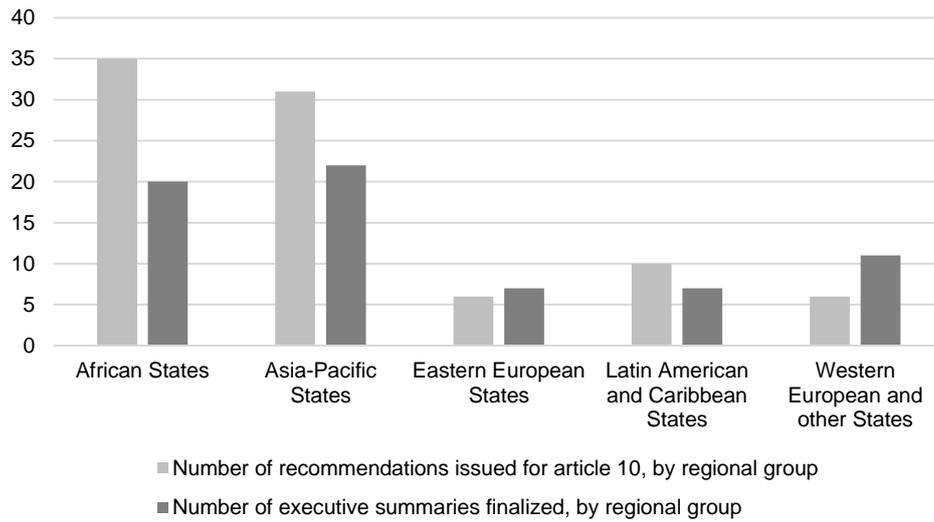
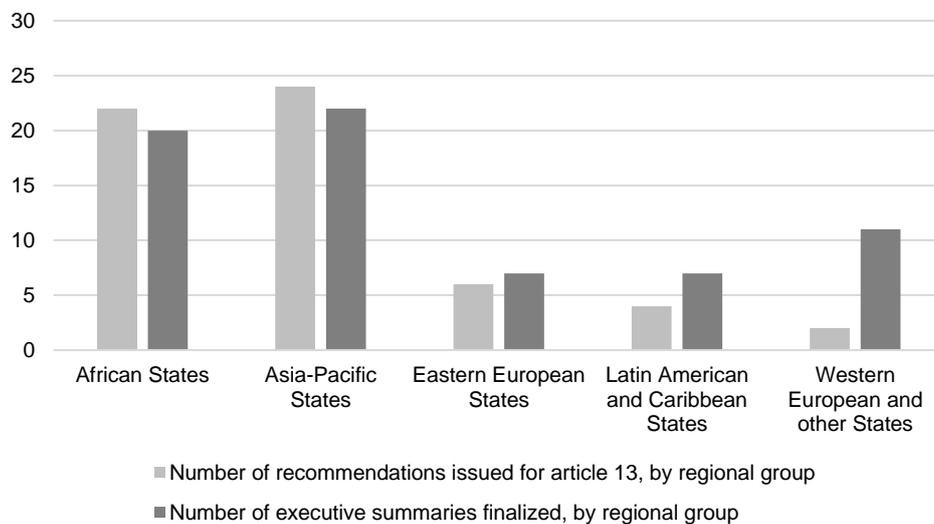


Table 8
Recommendations issued with regard to the implementation of article 13, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	13	22	65
Asia-Pacific States	22	15	24	68
Eastern European States	7	4	6	57
Latin American and Caribbean States	7	2	4	29
Western European and other States	11	2	2	18

Figure 20
Number of finalized executive summaries and recommendations issued for article 13, by regional group



39. Recommendations on access to information (covering both art. 10 (a) and art. 13, para. 1 (b)) were issued in 78 instances to 46 States parties. All but three of the 20 African States analysed in this report and approximately three quarters of the

22 Asia-Pacific States received such recommendations. In contrast, recommendations were issued to fewer than half of the States parties in the other three regional groups. Recommendations included the adoption of laws on access to information and ensuring their implementation by monitoring the enforcement of such legislation.

40. Only 15 States parties received recommendations on article 10, paragraph (b), of the Convention, on the simplification of administrative procedures: six African States, four Asia-Pacific States, two Eastern European States, two Latin American and Caribbean States and one from the Group of Western European and other States (see figure 21). They included general recommendations on continuing efforts to facilitate public access to information and government services, and a more specific one encouraging the State in question to develop and implement various e-government initiatives.

41. A total of 27 recommendations were related to article 10, paragraph (c), of the Convention, on the publication of information, including information on the risks of corruption. Whereas six out of the seven Latin American and Caribbean States covered in this report and half of all the African and Asia-Pacific States had challenges identified in the implementation of this paragraph, only one State party from the Group of Western European and other States and one from the Eastern European Group received recommendations (see figure 21). All recommendations related to the need to periodically develop and publish reports on the risks of corruption in the public administration.

42. Recommendations on article 13, paragraph 1, of the Convention, on measures aimed at enabling the participation of society in decision-making processes were issued to 30 States parties in 40 instances. More than half of the States parties in the Group of African States (11 out of 20), the Asia-Pacific Group (13 out of 22) and the Eastern European Group (4 out of 7) but fewer than a third of the States parties in the Latin American and Caribbean Group (2 out of 7) received recommendations on at least one of the four subparagraphs of that paragraph, while no State party from the Group of Western European and other States received any such recommendation (see figure 22).

43. With regard to article 13, paragraph 1 (a), of the Convention, on the contribution of the public to decision-making processes, only two recommendations were issued. They referred to continued efforts to engage in consultations with civil society on the development of new laws, and the possibility of regulating by law the practice of publishing draft legislation to allow the public to express their views. Given the low number of recommendations, no regional trends could be identified. For article 13, paragraph 1 (c), of the Convention, covering public information activities and public education programmes, one State from the Eastern European Group received a recommendation to ensure that ethics and anti-corruption programmes continue to be included in school and university curricula. On article 13, paragraph 1 (d), of the Convention, a recommendation was issued with regard to strengthening the measures to seek, receive, publish and disseminate information concerning corruption.

44. As for article 13, paragraph 2, of the Convention, on ensuring that the preventive anti-corruption bodies are known to the public and allow for the reporting, including anonymously, of any incidents that may be considered to constitute an offence established in accordance with the Convention, recommendations were issued in 17 instances to 16 States parties. Seven of these were Asia-Pacific States, where, as in the other regional groups, fewer than a third of the analysed States received such recommendations. None of the seven Eastern European States covered in this report were found to face any challenges in the implementation of that provision (see figure 22). In the case of one Asia-Pacific State, the recommendation concerned the establishment of measures or systems, including through legislation, to facilitate the reporting of suspected and other acts of corruption to appropriate authorities through hotlines and anonymous online reporting tools.

Figure 21
Number of recommendations issued regarding each paragraph of article 10, per regional group and in total

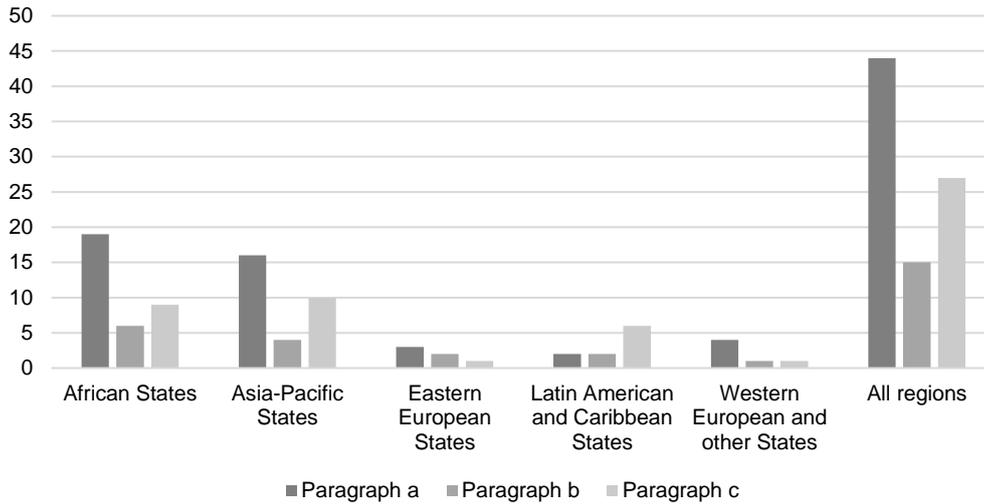
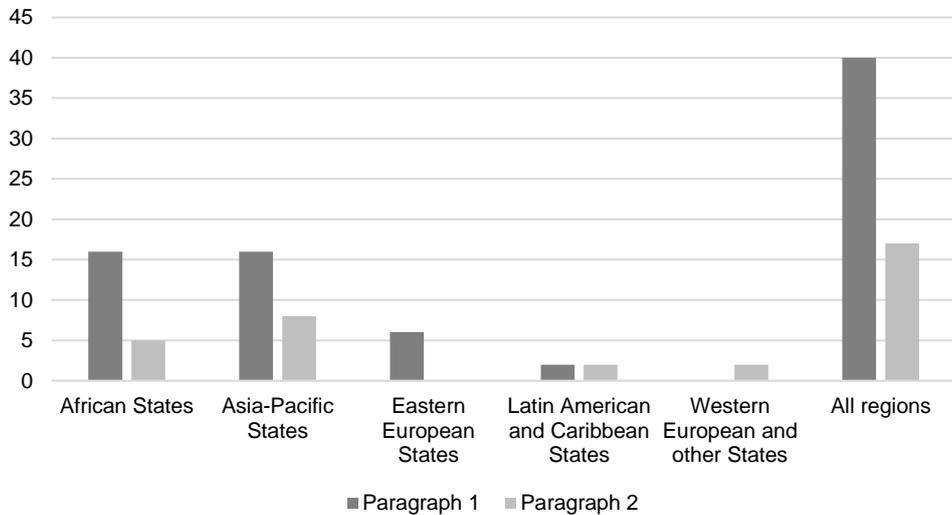


Figure 22
Number of recommendations issued regarding each paragraph of article 13, per regional group and in total



45. A total of 61 good practices were identified for 43 States parties in relation to articles 10 and 13 of the Convention (see figures 23 and 24), including awareness-raising efforts; training for the personnel responsible for providing information and managing online platforms; the simplification of administrative procedures through the use of electronic means; measures to promote public participation and broad consultations, including e-platforms that make publicly available information to facilitate feedback from non-State actors; facilitation of the reporting of corrupt conduct to anti-corruption bodies through multiple channels; and broad access to public documents and open data. Among the African States covered in this report, most of the good practices were related to measures facilitating the participation of society, such as the launching of activities in schools aimed at preventing corruption, including the establishment of anti-corruption centres, the organization of contests, the production of a children’s book, efforts to include anti-corruption content into curricula, and the training of teachers. In one African State, a mobile application was developed to foster and facilitate the reporting of acts of corruption. Good practices among the Asia-Pacific States included the adoption of a budget transparency law aiming to provide the public with an easy and transparent way of monitoring how and by whom public funds are spent. With regard to the Eastern European Group, all State

bodies in Armenia are required to publish draft laws using an “e-draft platform” to ensure transparency and the participation of society.

Figure 23

Number of finalized executive summaries and good practices identified for article 10, by regional group

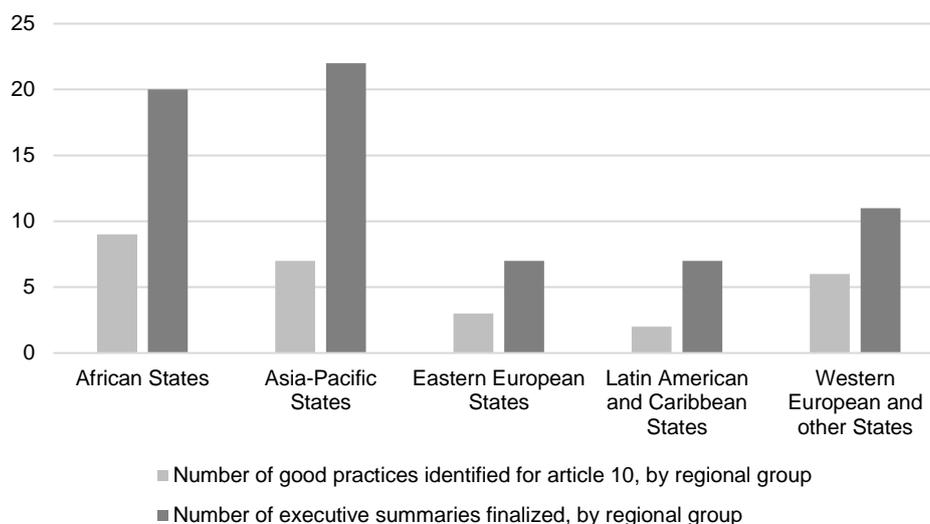
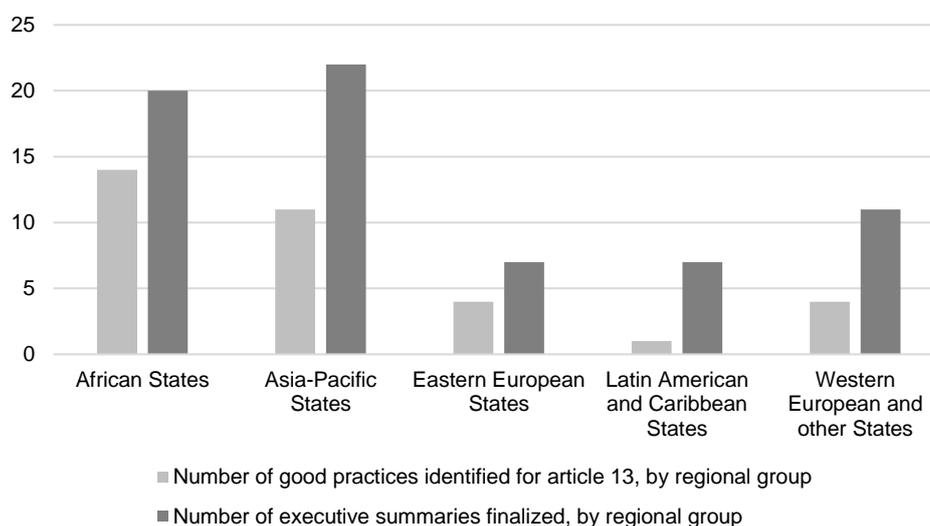


Figure 24

Number of finalized executive summaries and good practices identified for article 13, by regional group



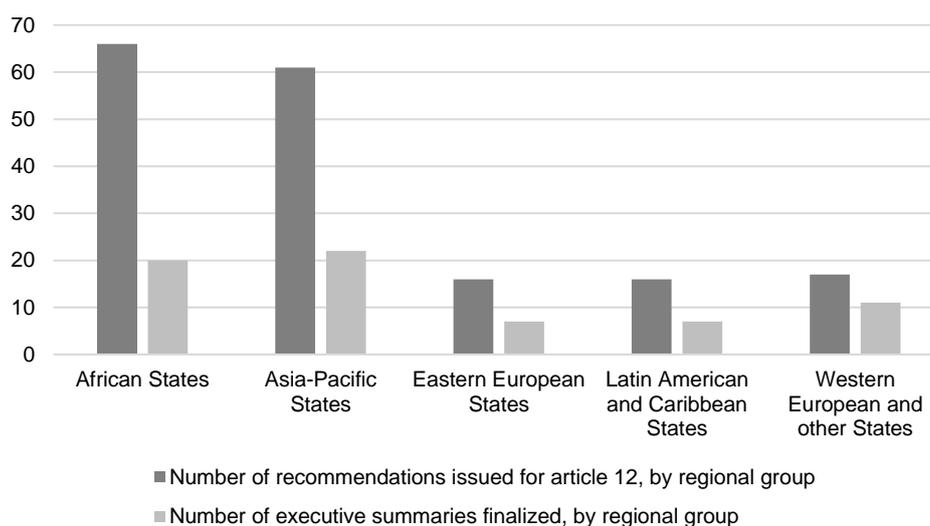
E. Private sector (art. 12)

46. A total of 175 recommendations were issued to 72 States parties with regard to the implementation of article 12 of the Convention. Relevant data, disaggregated by regional group, can be found in table 9 and figure 25 below. The Group of Asia-Pacific States and the Group of African States received the highest number of recommendations, highlighting substantive gaps in the legislative and policy frameworks designed to prevent corruption in the private sector in those regions.

Table 9
Recommendations issued with regard to the implementation of article 12, by regional group

	<i>Number of States with completed reviews</i>	<i>Number of States that received recommendations</i>	<i>Total number of recommendations received</i>	<i>Percentage of States in the group that received recommendations</i>
African States	20	19	65	95
Asia-Pacific States	22	21	61	95
Eastern European States	7	7	16	100
Latin American and Caribbean States	7	6	16	86
Western European and other States	11	9	17	82

Figure 25
Number of finalized executive summaries and recommendations issued for article 12 of the Convention, by regional group



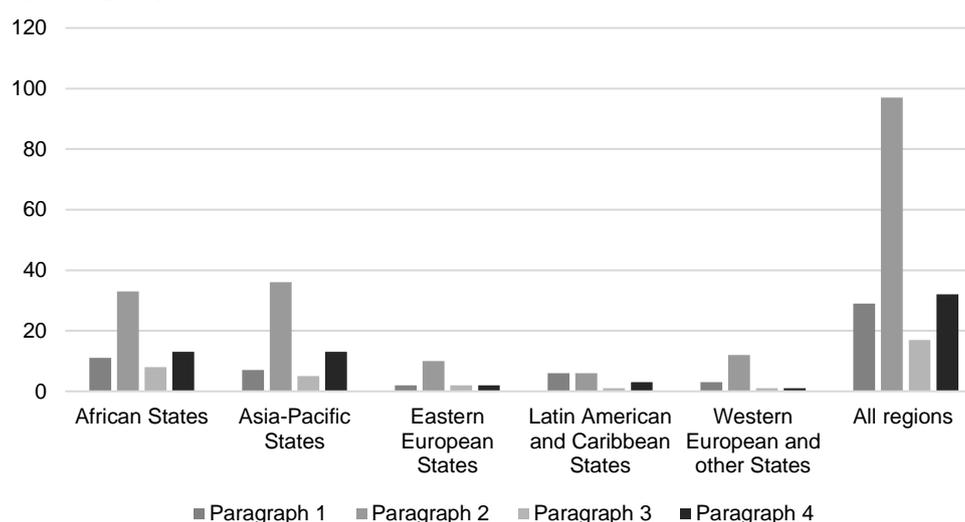
47. As can be seen in figure 26, most of the recommendations received by States parties in the Group of African States (33 out of 66 recommendations) and the Group of Asia-Pacific States (36 out of 61) focused on the implementation of article 12, paragraph 2, of the Convention. Specifically, a significant number of gaps were identified in relation to the management of conflicts of interest involving former public officials transitioning into the private sector (art. 12, para. 2 (e)). Other recommendations on article 12, paragraph 2 of the Convention also addressed, inter alia, gaps in relation to the adoption of codes of conduct for the correct, honourable and proper performance of business activities; insufficient channels for cooperation between law enforcement agencies and the private sector; inadequate measures to prevent the misuse of procedures regarding subsidies and licences granted by public authorities for commercial activities; and limited standards and procedures to safeguard the integrity of private entities. Significant gaps were also identified in the context of legislative frameworks prohibiting the tax deductibility of expenses that constitute bribes, with both the Group of Asia-Pacific States and the Group of African States receiving 13 recommendations each (art. 12, para. 4). These findings highlight that greater attention needs to be paid to legislative and policy frameworks governing private sector transparency and integrity in the above-mentioned regional groups.

48. The majority of the recommendations for States parties in all the other regional groups also focused on the implementation of article 12, paragraph 2, of the Convention, specifically on post-employment restrictions for public servants transitioning into the private sector (art. 12, para. 2 (e)). In particular, the Group of Western European and other States received five recommendations related to that

provision. Other recommendations for Western European and other States, Latin American and Caribbean States and Eastern European States dealt with a broad range of issues, including accounting and auditing standards in the private sector, law enforcement cooperation, and codes of conduct for the correct, honourable and proper performance of business activities. Among the Latin American and Caribbean Group (three recommendations) and the Eastern European Group (two recommendations), several challenges were also identified in relation to the prohibition of the tax deductibility of expenses that constitute bribes. Furthermore, in all regional groups, except the Group of African States (eight recommendations) and the Group of Asia-Pacific States (five recommendations), very few recommendations were issued on article 12, paragraph 3 (see figure 26). This highlights that the implementation of that provision does not pose a major challenge in most regions.

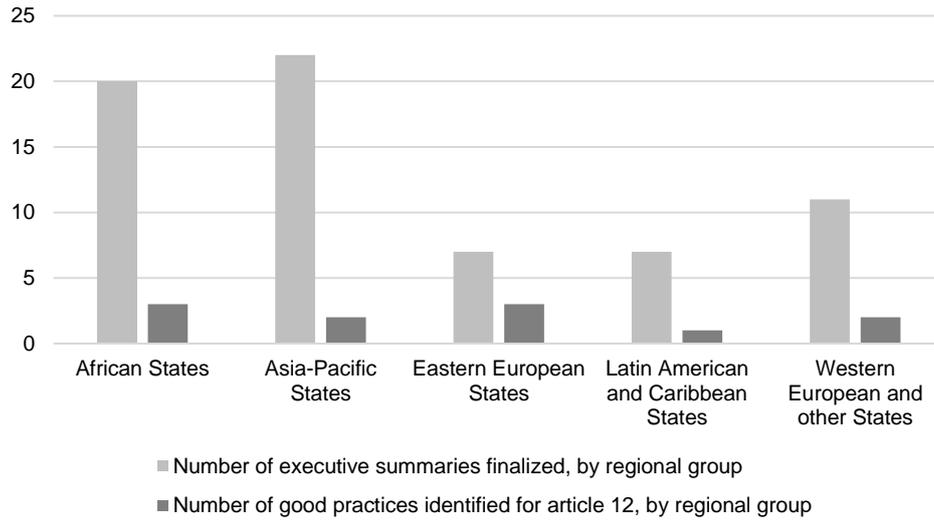
Figure 26

Number of recommendations issued regarding each paragraph of article 12, per regional group and in total



49. Good practices in relation to article 12 of the Convention have been identified in a total of 11 States parties across all regional groups (see figure 27). They were primarily related to broad participation of the private sector in the development of anti-corruption policies and to the establishment and maintenance of beneficial ownership registers in the Group of Eastern European States, the Group of Western European and other States, the Group of African States and the Group of Asia-Pacific States. Other good practices included broad cooperation of the public sector with the private sector and civil society organizations in the Group of Western European and other States (one good practice) and the Group of Eastern European States (one good practice). Further, one State in the Group of African States adopted additional transparency measures for licensed companies obligating them to provide information to the public on request.

Figure 27
Number of finalized executive summaries and good practices identified for article 12, by regional group



F. Outlook

50. The present report reflects the analysis of 67 completed executive summaries and more detailed information provided in the public country review reports. As more data become available from completed country reviews, more comprehensive trends and analysis will be presented in future regional supplements and will be used to keep the Implementation Review Group informed of successes and challenges identified in the course of the reviews.