UNDP

STRATEGIC PROGRAMMING FOR ANTI-CORRUPTION AGENCIES

REGIONAL GUIDANCE NOTE FOR ASEAN

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A Systematic Approach for Anti-Corruption Agencies to Achieve Success

Specialized Anti-Corruption Agencies (ACAs) are a relatively new type of public institution created with the purpose of bundling a government's response to the challenge of fighting corruption. They have often failed to live up to the expectations vested in them (UNDP 2013). Despite this collective international experience, many **ACAs still lack an explicit structured approach to produce and analyze data to monitor and evaluate their success**. And even though by 2020, 114 countries have had one or more such agencies (AFA 2020), little research is available on them as institutions in particular studies that systematically identify success factors (Schöberlein 2020b).

Against this backdrop, the objective of the present note is to provide guidance for addressing this core issue. It proposes a method in four basic steps to **review and strengthen the strategic approach of ACAs in ASEAN** to define and implement a data-based system for evaluating their performance.

UNDP works with partner countries to help strengthening institutional capacities, including the development and distribution of knowledge products on anti-corruption. This guidance note is part of UNDP's FairBiz project aimed at "Promoting a Fair Business Environment in ASEAN" that is funded by the UK Government and the ASEAN Economic Reform Programme. It summarizes the experience gained during a prior project supporting the National Anti-Corruption Commission (NACC) of Thailand.

Based on the generic guidance provided in this note, similar Country Briefs can be developed to provide detailed recommendations considering the country contexts in Indonesia, Malaysia, Philippines, and Vietnam.

The remainder of this document is divided into four parts: Chapter II provides an overview of ACAs, their role in a country's anti-corruption efforts, elements of success. Chapter III presents the recommended program for ACAs to review their strategic approach for achieving success. Chapter IV addresses aspects on how ACAs should (not) integrate international indicators in their work. Finally, Chapter V provides a toolbox with resources for implementing the approach proposed.

This Guidance Note is intended as a **resource for practitioners**. To enhance readability, references are kept to a minimum and quoted only where they are of interest as a source of additional information.

Defining Success: Anti-Corruption Agencies and the Fight against Corruption

A. COUNTRY-LEVEL ANTI-CORRUPTION FRAMEWORKS

i. Corruption is an obstacle to achieving national long-term goals.

It undermines economic and human development, increases inequality and unfairness, erodes trust of citizens in government, impedes the sustainable use of environmental resources, to name but a few examples of its devastating effects. It constitutes an **impediment for achieving the greater good of society, which can be measured by the level of reaching desirable objectives**, such as the Sustainable Development Goals (SDGs) or national goals set by the government, often in form of a development strategy.

ii. Curbing corruption yields great benefits but is hampered by significant challenges.

While the results of anti-corruption activities are highly context-specific, at least three generic challenges apply to the concept in general:

1. There is a **lack of data** inherent in the clandestine nature of the issue. Corrupt actors make great efforts to hide their activities, impeding the collection of data needed to understand both, levels and its drivers of corruption.

2. This weakness in measuring the phenomenon implies **difficulties in establishing causality between anti-corruption efforts and their effectiveness** in reducing corruption. It is difficult to know what measures work, and why. Without a solid understanding of the incidence of corruption it is impossible to assess the effect of countermeasures, such as increased transparency of a process or integrity training of staff for example.

3. Anti-corruption affects **perpetrators who benefit from corruption and will resist reform**, often successfully as they tend to be powerful and well-connected – such as members of the political or business elite.

iii. National anti-corruption efforts require a joint effort of multiple stakeholders.

Corruption is a multi-faceted, cross-cutting topic that affects a variety of institutions, stakeholders, and sectors of society. To counter such a ubiquitous phenomenon, a **framework of anti-corruption activities can be applied at the country level** (as opposed to the international, organizational, or individual levels). The public sector side of the fight against corruption covered in this note consists of the legal and regulatory structure as well as the institutional setup. Complementary parts not treated in detail are the role of stakeholders outside the public sector, such as civil society, private sector, media, and potentially donors.

iv. The bedrock of the country-level framework for the fight against corruption is provided by the United Nations Convention against Corruption (UNCAC).

The **convention stipulates requirements** for both, prevention (chapter II) and enforcement in form of offences that constitute corruption and must be criminalized (chapter III). The translation of these provisions into a set of domestic laws, regulations, policies, and institutions remains the prerogative of the States Parties to the convention. Consequently, national anti-corruption approaches and arrangements vary considerably. And they should, as both manifestation of corruption and effectiveness of anti-corruption efforts highly depend on the country context, i.e., the political, social, economic, and cultural characteristics of its society as well as geographic factors.

v. The approach proposed in this note is geared towards a country setting with a dedicated Anti-Corruption Agency (ACA) and an explicitly formulated National Anti-Corruption Strategy (NACS).

Even though UNCAC does not oblige States Parties to have a specialized ACA or an NACS, many countries around the world have opted for this approach (see Table 1 below for the framework of FairBiz countries). The program provided in this note is intended for such agencies and based on the assumption that the national (preventive) anti-corruption strategy is explicitly defined and documented centrally rather than in form of various coordinated policies.

B. NATIONAL ANTI-CORRUPTION STRATEGIES

i. Combating corruption effectively requires a concerted effort based on coordination and cooperation of different institutions, each bound by their own mandate, objectives, restraints, and interests.

An NACS is a mechanism to organize this cooperation and coordination by defining objectives and activities to prevent and (in some cases) to combat corruption including corresponding action plans as well as implementation and monitoring mechanisms. Such a formalized approach and an explicit document are neither mandatory nor are they a prerequisite for achieving low levels of corruption. UNCAC (Art. 5) obliges States Parties to have in place "coordinated anti-corruption policies", not a formalized strategy. And only three out of the top 26 countries in the 2016 Corruption Perceptions Index (CPI) had published NACS (Pyman/Eastwood 2018).

ii. Many countries, including those covered by the FairBiz project, have adopted the approach of a formalized NACS. Its usefulness depends on the design and implementation.

A commonly accepted **prerequisite for success** is that the entire process from drafting through implementation should be a transparent and inclusive effort that ensures broad ownership rather than producing "just a document". The objectives must be based on sound diagnosis, be achievable instead of a "wish list" (Manandhar 2014: 13) and be translated into realistic implementation plans with clear roles, responsibilities, timelines, and indicators to produce measurable results starting from a baseline scenario toward established targets (UNODC 2015, Manandhar 2014).

iii. Chances of achieving the NACS can be increased by considering the following key factors in its design.

The ACA or other respective institution in charge of the NACS should actively work towards defining a conducive framework for success by considering generally recommended success factors as well as the most common challenges and lessons learned: (i) A wide range of public institutions as well other stakeholders, such as civil society, are included, (ii) it is embedded into the overarching National Development Strategy (NDS) – if it exists, (iii) it is linked to other reforms with tangible objectives, such as improving service delivery, value for money or the quality of infrastructure, and (iv) it constantly produces measurable evidence to track progress.

Under the leadership of UNDP, UNODC and the government of Malaysia, high-level representatives of ACAs from around the world adopted the Kuala Lumpur Statement on Anti-Corruption Strategies in 2013 that provides recommendations for successful NACS. For further guidance, see Chapter V Toolbox, section NACS, in particular Manandhar (2014) and UNODC (2015).

C.   THE ROLE OF ACAS IN COUNTRY-LEVEL ANTI-CORRUPTION EFFORTS

i. Preventing, detecting, and combating corruption involves several public institutions.

Depending on the system, they include the judiciary (courts), attorney general, police (investigations), watchdog agencies (auditor general, comptroller general, ombudsman), and parliament (oversight). ACAs are an optional part of this institutional framework, defined as "publicly funded agencies, setup for a long-term duration, whose sole task is to counter corruption" (Schöberlein 2020b: 3).

ii. Many countries have established ACAs over the past three decades, mostly in the wake of UNCAC.

The convention obliges States Parties to "ensure the existence of a body or bodies, as appropriate, that prevent corruption" (Art. 6) and to "ensure the existence of a body or bodies or persons specialized in combating corruption through law enforcement" (Art. 36). Even though it does not explicitly require the setting up of a specialized agency, many countries have established such ACAs triggered either by UNCAC, as a response to corruption scandal or based on donor pressure. The intention is to institutionalize the fight against corruption in the hope to make it more effective and visible – which has brought about mixed results. Their number has strongly increased recently. The first ACA was set up in 1952 in Singapore, by 1990 there were still less than 20 ACAs worldwide, and a recent mapping identified 171 ACAs in 114 countries (AFA 2020).

iii. Despite their global presence, there is a significant lack of structured analysis and consequently of understanding this new institutional response to corruption.

Most studies available are of qualitative nature and rely on anecdotal evidence that does not allow for international comparison. A review of literature has identified the following initiatives and tools:

1.   There are some standards available that provide guidance on the most important qualities ACAs should have. See chapter V Toolbox, section ACAs, in particular International Conference on Principles for Anti-Corruption Agencies (2012), DeJaegere (2012), and European Partners Against Corruption (2011).

2. Few **tools** for evaluation have been developed, such as Capacity Assessment (UNDP 2011), Evalua¬tion of Performance (Schütte 2017), and an ACA Assessment Methodology (Transparency Inter¬natio¬nal 2018). However, there is minimal evidence of application of these tools and identification of lessons learned.

3. There are some **initiatives** of regional or global networking or grouping of ACAs. Examples include the International Association of Anti-Corruption Authorities (IAACA), which actively contributes in the framework of UNCAC (see the Panama Declaration, for example), the Anti-Corruption Authorities Portal by the World Bank that appears to be discontinued, and the Anti-Corruption Agency Strengthening Initiative by Transparency International that includes the development of the evaluation tool mentioned above, and the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network) that was launched by UNODC in 2021 as a platform to facilitate transnational cooperation among these agencies. For an overview of regional networks, see Schütte (2020). Most of these initiatives have shown little progress so far.

iv. Depending on their scope of work and mandate, ACAs can be grouped into categories.

Transparency International (2018) differentiates institutions with a singular mandate on fighting Corruption ("Type A") from agencies that also fulfill other non-corruption functions ("Type B"). OECD (2013) further categorizes specialized ACAs (i.e., "Type A") according to their mandate into preventive, law-enforcement, or multi-purpose agencies. A country framework may contain none, one, several ACAs with different mandates, for instance, one for prevention and another for enforcement.

v. In most cases, ACAs are a centerpiece of a country's anti-corruption efforts.

Depending on the type and specific mandate, their functions include investigation and prosecution, prevention, education and awareness, coordination, monitoring, and research. As corruption is not a standalone issue to be dealt with by a single agency, they do not replace but work within the country-level anti-corruption framework (Doig/Recanatini 2020).

Globally, 89% of ACAs are involved in the creation and/or execution of the NACS either as contributing (48%) or as the lead agency (52%) (AFA 2020). In theory, the ACA should be designed after the NACS to ensure its mandate is aligned to the strategy. In practice, the ACA is often established before the NACS and in fact charged with drafting the NACS. In such cases it is important to align NACS and the ACA's mandate, strategy, and programs.

vi. Country-level AC frameworks in FairBiz countries

The following table provides an overview of the key components of the anti-corruption framework described in this chapter in the FairBiz countries.

Countries	Strategic Framework	Institutional Framework		
	National Anti-Corruption Strategy	Anti-Corruption Agency*	Type** and Mandate	Role in NACS
Indonesia	Yes: Stranas PK (2012 – 2025, updated in 2018)	Corruption Eradication Commission (KPK) (est. 2002)	Type A: prevention, investigation, prosecution	Lead agency
Malaysia	Yes: National Anti-Corruption Plan (NACP) (2019-2023)	Malaysian Anti-Corruption Commission (MACC) (est. 1967, reorganized in 2009)	Type A: prevention, investigation	Contributor (secretariat for NACP is GIACC)
Philippines	No. Anti-corruption is part of National Philippine Development Plan (Updated PDP) (2017-2022)	Office of the Ombudsman (est. 1979, reorganized 1988)	Type B: investigation, prosecution	There is no NACS. Ombuds¬man con¬tributes to Updated PDP
Thailand	Yes: Master Plan Anti-Corruption (2018-2037)	National Anti-Corruption Commission (NACC) (est. 1999, reorganized 2008)	Type A: prevention, investigation	Lead agency
Vietnam	Yes, but outdated: National Strategy on Anti-Corruption towards 2020 (2009-2020)	Government Inspectorate of Vietnam (est. 2005)	Type: complaints, inspection	Lead agency

* in countries with several ACAs, this refers to the primary agency
** see section iv above for definition of types

D. ELEMENTS OF SUCCESS FOR ACAS

i. The usefulness of an ACA is neither self-evident nor substantiated by research or data.

There is a fundamental lack of clarity what it means for an ACAs to be successful. There are very few performance indicators directly linked to the nature of their work apart from the incidence of bribery (SDG 16.5) – which are also based on survey responses with very little data points available. for which there is little data available and even these are based on survey responses. In contrast, the success of other ministries, such as Health and Education for instance, can be measured more directly through standard data and indicators related to health outcomes, quality of service delivery, and level of education for instance. Corruption is broad and fuzzy concept manifesting across all sectors in a multitude of different forms, from petty corruption in public administration to conflicts of interest in parliament to state capture and grand corruption changing laws to suit their interests. Consequently, it is difficult to assess its drivers and incidence – and effective ways of curbing it. Integrity, transparency, accountability, and participation have been established as commonly acknowledged principles in the fight against corruption.

However, there is still a lack of evidence with regards to measures that do or do not work. The added value of an ACA conducting activities like integrity training for public officials or awareness campaigns in schools is not quantifiable. It will struggle to convince its constituents in an annual report that spending public funds on such activities was a good investment, that the situation has improved, and that the ACA had something to do with that positive change. A precondition for success is therefore for each ACA to define its strategic approach – which requires an explicit effort.

Even though this is both trivial and fundamental, there are few ACAs attributing considerable value and resources to this requirement. Additionally, the public image of ACAs is often poor. In many cases, they receive a lot of attention going through a cycle from high hopes based on unrealistic expectations when they are set up to severe criticism for the seemingly minor impact achieved compared to the resources they receive (Doig/ Recanatini 2020, Schütte 2017).

ii. To be successful, an ACA must prove its worth to higher authorities and to the public.

Relevant for the appraisal of an ACA's Relevant for the appraisal of an ACA's performance are both, complementary institutions of the country-level anti-corruption framework mentioned above as well as citizens whom they should serve as public institution. In other words, vertical accountability for ACAs is made up of two components.

1. It must render accountability by credibly demonstrating to its supervising authorities (parliament, head of state, auditor general for instance) the accomplishment of its mandate, successful dis¬charge of its duties and appropriate use of public funds.

2. It needs to gather public support by demonstrating how it adds value to society. This task is a major challenge, not a minor matter that can be dealt with in form of a year-end project by the planning department. It should be – but in most cases is still not – a core function of ACAs.

iii. Basis for success is an institutional setup of the ACA commensurate with its purpose.

ACAs require (i) a mandate and support from higher authorities to fulfill their role that may include coordination of and cooperation with other more established ministries and (ii) organizational, functional, and operational independence,

including sufficient and adequate human and financial resources especially concerning appointment and dismissal of its leadership (OECD 2013).

Due to the case-specific and context-driven differences between ACAs, defining generic conditions for success is a challenge. There are pertinent resources, most notably the Jakarta Statement on Principles for Anti-Corruption Agencies that were defined by heads of ACAs in a 2012 under the leadership of the Indonesian KPK, UNDP and UNODC. For additional resources, see Chapter V. Toolbox, section ACAs.

iv. Building a strong brand helps the ACA to overcome resistance.

ACAs should actively work towards building a convincing public image. Some of the key components are (i) strong leadership with high levels of integrity, (ii) boldness, impartiality, and competence in its approach, (iii) sound internal control systems to avoid issues inside the agency (Kuris 2014), (iv) strong partnerships and alliances with other stakeholders, especially the public.

SUCCESSFULLY RALLYING PUBLIC SUPPORT – THE CASE OF THE INDONESIAN KPK

The Indonesian Corruption Eradication Commission (KPK) was set up in 2002 modeled loosely after the ICAC of Hong Kong. Endowed with a strong mandate, it became one of the internationally recognized success stories of ACAs due to its rigorous approach of combatting corruption. In addition to its convincing track record of putting behind bars many high-ranking perpetrators and its 100% conviction rate after a long period of kleptocracy in the country, its success in rallying public support is notable.

"The KPK has won public trust, not just because it has put behind bars hundreds who have abused their powerful positions and who previously were considered untouchable, but also because it has undoubted¬¬ly portrayed a vision of an Indonesia where things can get done without corruption." (Schütte 2017).

Over the years, this caused constant backlash in form of cases made against high-ranking KPK officials and attempts to curtail its powers or budget. In several instances, the public took to the streets – and later to social media – to protest against such attacks, providing strong public support for the country's "most trusted institution". In 2019, the 2002 law establishing the KPK was revised, limiting its independence, again causing mass protests around the country.

Basis for such strong public support are a reputation of boldness, impartiality, and competence combined with investigative successes and strong communications and public relations on behalf of the agency (Kuris 2014).

v. The country context strongly impacts an ACA's chances of success.

Irrespective of its mandate, resources and ambitions, an ACA cannot compensate for systemic weaknesses that are outside its sphere of control.

1. A dysfunctional accountability system, e.g., corrupt or incapable enforcement institutions in the form of courts that fail to send perpetrators to jail, or a police force that lacks the capacity or commitment to conduct adequate investigations that produce evidence. A lack of political will to design and implement reforms, force other line ministries to contribute their parts and to protect the ACA from attacks by political opponents or from being abused as "attack dog" (Quah 2017:3) by leaders against their political enemies.

2. Political change, elections, or a crisis that, depending on the case, may disrupt the agency's work or create new momentum (Manandhar 2014).

3. Other challenges, such as natural disasters or (post)- conflict situations that significantly prevent the ACA from achieving its task (Quah 2017).

vi. Conversely, outside factors may offer opportunities that an ACA can use to its advantage.

1. International commitments can provide strong external support for the fight against corruption. Especially the SDGs and the UNCAC implementation review process offer excellent opportunities to incorporate the ACA's work into a superior framework of objectives and even legal obligations the country has entered.

ACTIVELY USING UNCAC TO CREATE MOMENTUM – THE CASE OF THE PHILIPPINES

The Philippines signed UNCAC in 2003 and ratified it in 2006. Due to the importance of the convention for the country a number of domestic activities were executed in addition to the official reviews of implementation in 2012 and 2019 (see Statement to the Implementation Review Group in 2016).

First, in 2013, December was declared **anti-corruption month** obliging all public institutions and corporations owned or controlled by the government to conduct awareness campaigns by Republic Act No. 10589. Second, a **Presidential UNCAC inter-agency committee** was created by Executive Order No. 171 of 2014. The institution in charge is the President's Office, and its function is to oversee the review and implementation of the UNCAC in the Philippines. Third, an **annual UNCAC state conference** is to be held each year in December to assess compliance with the Convention – the first and second events were held in 2013 and 2014, respectively.

Actively using the convention can help generate momentum for reform – unfortunately, it is unclear what happened to these activities after 2015 as no public information was identified.

2. External research and studies by international organizations constitute independent assessments an ACA can integrate in its efforts of creating support for its work, such as for example OECD Integrity Reviews or TI National Integrity System Assessments.

vii. In many cases, the success of an ACA is measured directly by or strongly impacted by perceptions rather than facts or data.

A core challenge is the difficulty of collecting relevant data that is inherent in the obscure nature of corruption. This lack of information hampers the establishment of causal relationships between anti-corruption activities, reduced levels of corruption, and tangible improvements to people's lives. In the absence of such evidence, the level of corruption, achievements in the fight against it, and thus ultimately the success of the ACA are often measured in form of perceptions rather than data. This applies on different levels:

1. **Governments** rely on perceptions-based indicators, such as the CPI, the Worldwide Governance Indicators (WGI), or others to assess progress in the fight against corruption – often even as performance indicators of their NACS.

2. **Public support by citizens** is influenced by the same indicators as well as by media reports and high-profile cases more than by the work of the ACA.

3. **Foreign companies** rely on perceptions-based indicators for making investment decisions.

viii. The ACA should establish a framework for assessing its success that is based on terms it can control to the extent possible.

Aware of the challenges mentioned above, it is key for the **ACA to define the yardstick it uses to measure its own success.** A convincing narrative supported by strong data that is shared widely will positively impact perceptions. As the introduction and implementation of such an endeavor requires time and effort, ACAs should consider a **two-pronged approach** as follows.

ix. In the **short term,** prudent planning and prioritizing of programs can help an ACA foster success and avoid failure.

Taking into account the dynamic of anti-corruption activities and perceptions of corruption as well the need to achieve both effectively, ACAs should consider the following general points for guidance.

1. **Identify high risk areas or topics of particular interest to the public.** Projects in sectors that most directly affect livelihood (Health, Education, Water) help to effectively gather support.

2. **Focus on petty corruption.** It is a more predictable phenomenon that allows for a structured approach and easier achievable progress, and it impacts people's perceptions over-proportionally as it affects them more directly than grand corruption they hear about in the news.

3. **Prioritize prevention over enforcement.** It creates less pushback (Kuris 2014) and helps to avoid failure especially as increased case numbers may have the counterproductive effect of being misinterpreted to be caused by higher levels of corruption rather than increased activity or effectiveness of the ACA.

4. **Carefully and proactively manage expectations by setting realistic goals.** A zero-tolerance approach is a setup for failure, and so are overly ambitious objectives that are not achieved – such as unrealistic improve¬ments in the CPI for instance. This includes making sensible decisions on the approach taken towards investigations. ACAs should consider the fine line between being seen as inactive versus aggressive and especially the negative effect on perceptions of high-profile cases that that fail to lead to convictions.

x. In the long term, the ACA should apply a framework for assessment grounded in the production and exhibition of data-based evidence with a supporting narrative that allows for linking its activities with the achievement of strategic goals.

Such a structured approach is centered around consistently producing evidence in form of data that constitutes measurable results, and by ensuring that they are perceived as such by relevant stakeholders. Tackling this in a systematic method is based on clear answers to the following four elementary concepts and questions:

Elements of Success: a four-step approach for ACAs

1. Objectives are clear, explicit, and attainable: "What are we trying to achieve?"

2. Path to success is defined, realistic and appropriate: "How are we going to achieve it?"

3. Activities produce results and evidence (data): "Are our programs and projects implemented as planned and do they yield the intended results?"

4. Improvement is visible and attributed to the ACA's work: "Are relevant stakeholders aware of improvements and do they consider them a result of our activities?"

This central idea of the approach presented is discussed in detail in the next chapter.

Achieving Success: Anti-Corruption Agencies Programming in Four Steps

STEP 1: DEFINE CLEAR, EXPLICIT, AND ATTAINABLE OBJECTIVES

i. A hierarchy of objectives provides an answer to the first question: "What are we trying to achieve?"

In the country context, several institutions produce strategic and legal documents that define goals on various levels. Depending on the case, they may include a National Development Strategy (NDS), an NACS, the mandate and/or strategy of the ACA, and as last layer its programs and projects.

In sum, these documents should provide a hierarchy of objectives that mutually reinforce each other.

Ideally, they are designed top-down, starting with the overarching document. Depending on the country context, this would be the NDS. The second level, the NACS, may be a single document or consist of more layers, for example a long-term (e.g., 10 year-) master plan that is then broken down into shorter periods (e.g., 2-year or 5-year-) plans. This NACS level should inform the design of the ACA and its mandate, mission, and organizational strategy (Doig/Recanatini 2020). However, in many countries, ACAs were established before or independently of the ACA. The second-best option is therefore to align the different levels of this hierarchy – ensuring that the resulting system of objectives feed into each other, i.e., achieving objectives on a lower level will contribute to the achievement of objectives on higher levels.

A major challenge in many countries is the fact that different bodies and institutions are responsible for strategies and objectives on different levels. This often leads to a lack of clarity and of coordination or alignment of these documents and their respective goals including the distribution of roles for achievement. However, such coordination is not within the mandate of the ACA.

As a minimum requirement, the **agency should ensure that the objectives within its sphere of influence are clear and aligned with those on higher levels**.

ii. The objectives constitute the yardstick for assessing the ACA's performance. They should be ambitious to rally support, but achievable to avoid failure.

An adequate definition of objectives is based on an assessment of the country context and corruption risks and take into consideration the capacity of the ACA and the anti-corruption framework. As ACAs do not work in isolation but require other parts of the system to perform properly, sound diagnosis and data to understand the country context and corresponding definition of objectives is important. The guidance of the previous section for short term planning and prioritizing applies here as well.

STRATEGIC FRAMEWORK FOR ANTI-CORRUPTION IN THAILAND

The hierarchy of documents defining the fight against corruption by the government of Thailand consists of four levels. The first three levels were defined based on a cabinet resolution of December 2017, and the fourth level consists of the implementation plans of contributing agencies.

Figure 1: National Anti-Corruption Framework Thailand

1. National Strategy (2018-2037)
Visions and key goals

2. Masterplan for Anti-Corruption (2018-2037)
Subplans for prevention and suppression of corruption

3. Implementation Plan of Anti-corruption and Misconduct (2020-2022)
Framework for related state agencies to implement Masterplan

4. Operational plans of NACC and other agencies
Annual and/or multi-year implementation of activities

The first level (National Strategy 2018-2037) was presented by the Prime Minister and received Royal Assent. It establishes the vision 2037 "*Thailand becomes a developed country with security, prosperity and sustainability in accordance with the Sufficiency Economy Philosophy*" and defines six key goals to achieve it.

The second level (20-year Masterplan for Anti-Corruption and Misconduct 2018-2037) is one of 23 Masterplans. It was drafted by the National Strategy Plan Committee and approved by the cabinet. It is divided into two Subplans (Prevention of Corruption and Misconduct; Suppression of Corruption) to achieve the general objective "*Thailand is free from corruption and misconduct*". Under leadership of NACC and contribution of other concerned agencies, the Steering Committee of this Masterplan develops an implementation plan.

The third level (Implementation Plan of Anti-corruption and Misconduct 2020-2022) is the tool to translate the Masterplan into implementation and as a framework to request budget allocations. Drafted by the Steering Committee for the Masterplan, it is approved by cabinet.

The fourth and last level (operational plans) are the annual plans of activities by NACC and other concerned state institutions to conduct the activities of the Implementation Plan.

iii. A "wish list" of unrealistic goals is a common mistake that sets the ACA up for failure.

The most prominent example is the objective of achieving a certain score or rank on the CPI (or other indicators) within a given period that would require a globally unprecedented improvement, without an implementation plan specifying how to achieve it. Focusing on prevention and petty corruption are the lower hanging fruit. Preventive programs involve less risk of failure and levels of petty corruption have a higher impact on international indicators. Conversely, successful enforcement is a key component of internationally recognized effective ACAs like the ICAC of Hong Kong. Sending perpetrators to jail sends a strong message, but so do low conviction rates. Additionally, an increase in corruption cases may have a counterproductive as mentioned above.

iv. An integrated or comprehensive approach increases achievability of objectives.

Connecting the objectives within the sphere of influence of the ACA to other goals outside this sphere enhances chances of success. For instance, achieving the goals of the NACS is facilitated when embedding them (vertically) in the NDS or linking them (horizontally) to other reforms, such as civil service, public sector, or financial management (Doig/Recanatini 2020). The option of using international frameworks like UNCAC and the SDG have already been mentioned as additional opportunities.

v. Tangible improvements that affect people's lives directly are most effective in gathering public support.

ACAs should try to define goals they pursue and value they add to society not only in the form of abstract concepts such as lower levels of corruption or increased transparency but link their work to concrete results and desired impact that people experience, such as better service delivery or higher quality of schools and quality of infrastructure (Pyman/Eastwood 2018).

STEP 2: DESIGN A REALISTIC AND APPROPRIATE PATH TO ACHIEVE OBJECTIVES

i. A narrative describes the ACA's approach, programs, and activities laying out a path to success that answers the second question: "How are we going to achieve it?"

A Theory of Change (ToC) is the basis of establishing the causal relationship between the ACA's activities and achieved results by providing an explanation of how and why change is happening. Such demonstration how its projects lead to results allows the ACA to substantiate the value of its work with evidence. It is based on a chronological sequence of what is supposed to happen (results chain), adding internal and external assumptions (preconditions) that affect the achievement of results. The following simplified example illustrates the approach:

Its logic runs chronologically from left to right as follows:

- IF we use **Inputs** (financial and human resources) to undertake the **Activities** (procurement fraud workshops) AND our assumptions hold true (high quality training will improve the capacity of motivated participants), THEN we will create the **Outputs** (better trained public procurement officials).

- IF we deliver the **Outputs** (increased capacity of public officials) AND the assumptions hold true (qualified officials are able and willing to detect more fraud cases), THEN we will achieve the **Outcome** (improved quality of public tenders).

Resources used	Activities performed	Deliverables produced	Changes achieved	Long-term result
Inputs	**Activities**	**Outputs**	**Outcomes**	**Impact**
Money, Human Resources	Trainings, Workshops on Procurement fraud	Public Officials trained in Public Procurement	Less Fraud: Improved Quality of Public Tenders	Less Corruption in Public Procurement

- IF we achieve the **Outcome** (improved quality of public tenders) AND the assumptions hold true (undetected fraud was indeed a problem before and is not replaced by other forms of corruption like collusion), THEN this program will contribute to the desired **Impact** (lower levels of corruption in public procurement).

In addition to the move along the chronologic sequence, the ToC runs from components within the sphere of influence of the ACA (Inputs, Activities, Outputs) to components outside this sphere (Outcomes, Impacts). Analogously the agency can control the "programmatic" preconditions (quality of the training, selection of motivated participants), but it cannot influence the "non-programmatic" preconditions (fraud being a problem and not being substituted by other forms of corruption). A real-life ToC of a project or program is not one-dimensional as this illustration. See Johnsøn et. al. (2011) for a more details.

STEP 3: ENSURE THAT ACTIVITIES PRODUCE RESULTS AND EVIDENCE

i. An indicator framework defines the data used for measuring the components of the ToC, enabling the ACA to answer the third question: "Are our programs and projects implemented as planned and do they yield the intended results?"

The importance of indicator selection cannot be overestimated. A set of **Key Performance Indicators** (KPIs) allows the collection of information needed to control the work of the ACA and to assess its performance. High quality indicators and especially their suitability for the purpose are a key component to an ACA's success: they are the evidence that the agency's work is on track, that it spends its resources reasonably and that it achieves its objectives.

Like the ToC, the framework consists of different types of indicators and should include **mixed methods** i.e., contain quantitative and qualitative data, as well as a variety of approaches for measuring levels of corruption, including perceptions, experience, proxies, as well as data and statistics (Schütte 2017).

Data for **components within the sphere of influence** of the ACA (Inputs, Activities, Outputs) is retrieved from the ACA's internal records – in the example above this could be the amount of money and staff days required for the training (Inputs), the number of workshops conducted (Activities), and the number of participants including their self-perceived improvement in skills using an end-of-training questionnaire (Outputs).

Data for **components outside the sphere of influence** could be statistics of detected fraud cases or surveys of companies in the construction sector measuring their experience with or perception of procurement fraud (Outcome), and similar surveys measuring perceptions of corruption in public procurement (Impact).

The suitability of indicators depends on the project context. They should be mapped to the questions they are intended to answer (Hart 2019). Therefore, only general guidance is provided here. To be **fit for M&E purposes**, indicators should (i) describe what is to be measured, (ii) be specific and relevant, (iii) allow assessment of progress against objectives, (iv) allow to attribute changes to the project, and (v) not include targets or set direction for progress.

As any other institution, an ACA must choose between **existing international indicators or the collection of own data**. While the former requires less resources, the latter allows the agency to meaningfully evaluate its work. It is vital that the indicators fit the project, not the other way around (many ACAs try to identify projects suitable to improve certain indicator scores). Compared to international indicators that are collected by independent institutions, the reliability and value attributed to own data collection depends on their methodology. Data based on self-assessment of institutions may be seen as critical due to the risk of bias. A sound survey methodology, recurring data collection and especially a renowned independent institution like a university in charge of conducting the project increase the credibility of an ACA's own data collection.

ii. The data collected should allow monitoring of operations and evaluation of results.

The value of KPIs and data depends on their suitability to provide evidence of the ACA's success, proving that operations are implemented as planned (monitoring) and yield intended results (evaluation), as summarized in the table in the next page.

	Monitoring	Evaluation
Timing	**Ongoing** continuous examination via data collection	**One time** after conclusion of the project (and potentially mid-term)
Objective	**Is the program on track – are we doing what we planned to do?** Take action to improve performance	**Did we achieve our goal?** Provide evidence for and understanding of success or failure and learn from it
ToC level, data source	**Inputs, Activities, Outputs** Internal ACA data	**Outcomes, Impact** Surveys, national and international quantitative and qualitative indicators, data, statistics

Understanding success or failure requires collecting data prior to the project start, establishing a baseline to which the situation after the project completion can be compared. In the example above, this could be the number of fraud cases in public tenders (Outcome level) or the level of corruption in Public Procurement (Impact level). KPIs must therefore be defined prior to the start of a program.

There are two forms of results evaluation. First, program evaluation assesses effectiveness on the Outcome level ("Was the program effective in achieving objectives?"). Second, impact evaluation establishes cause-and-effect on the Impact level. This is a more complex approach that requires a counterfactual ("What would have happened in the absence of the program") – allowing the attribution of change achieved to program activities.

M&E is still the weakest part of AC programming. Given the inherent challenges of ACAs and the difficulty of establishing causality between anti-corruption efforts in general and their effect on lowering levels of corruption (both mentioned above), they merit ACAs' full attention and devotion of resources. As a minimum requirement, ACAs should have dedicated M&E units (Schütte 2017).

STEP 4: MAKE ACHIEVEMENTS VISIBLE AND ATTRIBUTED TO THE ACA'S WORK

i. Frequent, transparent, and understandable publication of data-based evidence is key to providing a positive answer to the fourth question: "Are relevant stakeholders aware of improvements and do they consider them a result of our activities?"

To take charge by telling its own positive story, the ACA must convincingly demonstrate that its work creates value by rendering accountability, both upwards and downwards.

As institutions financed by public funds, ACAs are required to render account upwards to public institutions charged with supervising them. Data-based evidence is the strongest foundation for demonstrating that the agency spent its funds wisely and according to plan (monitoring data), and that it effectively achieved objectives (evaluation data).

Strong public support is a key success factor for ACAs. Given the **lack of understanding and data** on corruption and anti-corruption (including measurement of levels of corruption and understanding how and why they change over time), *downwards accountability* requires effort. Public opinion is shaped at least partially by media, corruption scandals, and international indicators, making publicity "one of the bases for survival" for ACAs (Kuris 2014: 10).

Most **international indicators are based on perceptions**, either by those surveyed or by experts providing an assessment. Therefore, this task of ACAs requires two steps. First, they must conduct successful programs and, second, make sure relevant stakeholders notice – especially the public and higher authorities. If the ACA strives for better scores in indicators (as most do), those whose perceptions determine such scores also need to be aware of the ACA's success. The respective experts and survey participants are struggling with the same problem as anyone else: the lack of hard data allowing an objective judgment, such as number of cases and conviction rates for instance. Providing data-based evidence is the best method of shaping their perceptions – which, in turn, is the only (!) way of improving a country's performance in perceptions-based indicators, like the CPI.

In sum, strategic goals, a narrative in the form of a ToC, supported by M&E data that shows improvement from the baseline to the situation after the ACA's intervention make a convincing case that can be supported by anecdotal evidence in form of case studies as well as outreach activities and training.

Considering the benefits of a systematic approach to produce and utilize such data, it is highly surprising that these activities continue to play a minor role in many ACAs. Instead, they run the risk of foreign institutions assessing their work with all the challenges such an approach entails (see chapter IV).

ii. ACAs should actively work on engaging stakeholders, in particular Civil Society to create a strong basis of support.

CSOs can actively contribute to anti-corruption efforts by conducting monitoring activities, for instance of public procurement. Partnerships with such organizations are promising for two main reasons. A strong and active Civil Society is an asset in the fight against corruption. It can **create upward pressure** at the local and national level and generate support for public institutions and programs. Additionally, their monitoring activities are an independent source of confirming the success of anti-corruption measures.

ACA should therefore actively strive to opening pathways and creating structures for an inclusive approach that facilitates the contribution of Civil Society, e.g., transparency and availability of infor-mation to conduct monitoring activities or by installing and using trustworthy whistleblowing channels.

It is important to be aware of the **pitfalls** of working with CSOs. They cannot be controlled by the agency. Their interests, priorities, and affiliations may change, turning them into a source of criticism and resistance rather than support.

iii. An informed public can be another strong ally for ACAs.

Information technology and the spread of cell phones have contributed to increasingly well-informed citizens willing and capable of monitoring the performance of public institutions and demanding information to hold them accountable. Under such circumstances, ACAs can generate trust by proactively sharing data and information in a timely, understandable, and transparent fashion. An open approach to engaging citizens and communities directly may be an additional step worth exploring, depending on the national circumstances (see Burai 2020).

iv. Defining and implementing a communications strategy helps engaging with stakeholders.

Publishing the annual report once a year is not enough to gather support and make allies. Instead, a structured communications approach, using various channels, including social media, providing regular updates is recommended. This includes being transparent by timely sharing monitoring results publicly and engaging with stakeholders where possible.

The private sector has a vested interest in a clean business environment and can therefore be another powerful ally for ACAs that is often not sufficiently included in its activities (Pyman/Eastwood 2018). Especially work on the CPI can strongly benefit from engaging with the private sector, as it is largely based on perceptions of businesspeople. Considering the value of these activities for the ACA, it is recommended to formalize them in a document, e.g., a communications plan or strategy, and to have a dedicated unit or at least selected staff in charge of it.

Measuring Success: Anti-Corruption Agencies and International Governance Indicators

INTERNATIONAL INDICATORS STRONGLY AFFECT ACAS.

Even though the concept of measuring corruption is relatively young, the number of indicators has significantly increased over the past two decades. A wide range are now available and can be used to describe and analyze the situation in a country. They receive high levels of media coverage and attention from the public, government institutions, and politicians. And they have tangible consequences, as the level of corruption is a parameter in companies' decision whether to invest in a country. Producing and selling such indicators has become an entire industry with private companies, donors, international CSOs, universities, political foundations, and think tanks engaged in it. Given their prominence in the media and the public discourse and the fact that they are used to assess the country's success in the fight against corruption, ACAs have a legitimate interest in using them, especially in working towards achieving improvement.

ACAS SHOULD USE INTERNATIONAL INDICATORS ONLY FOR PURPOSES THEY ARE SUITABLE FOR.

Working with international indicators must be based on a thorough understanding of their methodology and the information the data provides. This seemingly obvious basic recommendation is often not followed in practice, even though most indicator methodologies are not very technical or complex.

It is important to note that indicators differ in focus, methodology, target audience, own agenda, cycle, and content – and are based on different underlying concepts and definitions of corruption. In short, they are not different pieces of a puzzle that can be assembled to provide a single clear picture. Instead, they are overlapping and potentially contradictory in content and substance, or their results can simply not be compared. Consequently, they should be treated as different and independent perspectives of corruption and related concepts.

ACAS CAN USE INTERNATIONAL INDICATORS FOR EXPLORATORY PURPOSES.

Qualitative data are most useful in a first step to gain an understanding of the underlying problem, for setting priorities, and for identifying gaps and challenges. In a second step, quantitative data can be reviewed to get more specific information and to measure certain aspects or concepts. For purposes of a broader analysis, information from different indicators can be combined and compared – with the caveat just mentioned. Only indicators with original data should be used. This means that composite indicators that rely on other data sources, like the CPI and the Worldwide Governance Indicators (WGI) should not be included in such an exercise. They have a very wide perspective, and they are overlapping as they rely on the same sources (i.e., other indicators with original data).

To be specific, information extracted from international indicators should be at the level of questions or topics, not the entire indicator that in most cases lumps together different issues or topics. The most widely used international indicators for ASEAN countries are available online including their methodologies. ACAs can use them to extract information on the level of individual questions that can then be arranged according to pillars of integrity to provide a basis (see Hart 2019, Fink 2019 & 2021).

USING INTERNATIONAL INDICATORS FOR PURPOSES OF EVALUATION IS AN OFTEN PRACTICED, BUT COMMONLY DISCOURAGED APPROACH.

Relying on data collected by international institutions leaves the ACA in a situation where it can neither ensure the quality nor control the methodology used to appraise its performance.

Additionally, the organizations producing indicators often have different underlying concepts of corruption as well own agendas. There is a risk of political interests (democracy as preferred political system) or business interests leading to skewed assessments, changes in methodology, or discontinuation of data collection. Most importantly, the content, i.e., concepts measured by international indicators, rarely coincides with the KPIs the ACA needs to meaningfully evaluate its work – as laid out above.

The least recommendable – and most common – approach is to interpret international as scores in a global (or regional) competition for being the best country in different disciplines. Governments are looking for ways to improve in these rankings instead of addressing the actual problems. Resources are spent on efforts chasing after better indicator scores, guided by their methodology rather than the actual situation in the country.

To be clear, the approach recommended in this guidance note is the opposite of such practices. There may, however, be value in an ACA dedicating resources to identifying indicators with low-hanging fruit for improvement. Some indicator methodologies are straightforward, for instance, attributing scores according to defined requirements of publishing certain documents or information. Making changes accordingly will improve a country's score directly (i.e., without the need to change the perception of experts or survey participants). Such an approach requires few resources and may create momentum suggesting things are improving that can, in turn, affect perceptions-based indicators. Opportunities for such low-hanging fruit are very limited. If an ACA decides to pursue them, these efforts should be bundled in a single project or unit to make sure the remaining programs of the ACA are not affected by considerations relevant to international indicators.

USING THE CPI – BUT FOR PUBLICITY, NOT FOR MEASURING PERFORMANCE!

Transparency International's Corruption Perceptions Index (CPI) is the most widely regarded international corruption indicator. It receives exceptional levels of attention from governments, media and the public when it is published annually, usually at the end of January. In many countries, it is used as a Key Performance Indicator to assess the success in fighting corruption or to set strategic objectives, such as improvement in score or rank over a period.

The CPI measures the perceptions of businesspeople and country experts of the level of corruption in the public sector. Calculation is done in four steps:

1. selection of data sources, as the CPI is a composite indicator that does not collect own data, 13 sources were used for the for CPI 2021 (released in January 2022) to score 180 countries,

2. standardization of those data sources to a scale from 0 (worst) to 100 (best),

3. calculation of the average of these standardized scores for a particular country and then rounding to the whole number,

4. reporting a measure of uncertainty in form of standard error and confidence interval resulting from variation in scores of the data sources.

The country score is the only relevant result with the standard error providing information on its accuracy. Rank should not be referred to, as it is a mere function of the score: countries are ranked according to their score. Countries being added or dropped in different years result in changes of rank that do not reflect any change in the score. The CPI methodology was changed in 2012 – time series are valid only starting with 2012.

Given its methodology and time lags, the CPI does not meet the requirements for suitable indicators described in this chapter.

The CPI is not suitable as KPI or for defining targets or objectives of a project, program, ACA, NACS, or NDS – and neither are other composite indicators. ACAs should use the CPI for publicity purposes only, as its release draws attention to the topic of corruption.

Toolbox

The ideas, analysis, and recommendations in this document are taken in large parts from the resources below. They are recommended as starting point for more detailed research and guidance.

GENERAL RESOURCES

Fink, H. (2021), Improving Thailand's Prevention Measures on Corruption. UNDP, Office of the National Anti-Corruption Commission (NACC). Report of the pilot project that this Guidance Note is based on.

Schöberlein J. (2020a), Corruption in ASEAN: Regional trends from the 2020 Global Corruption Barometer and country spotlights. Transparency International Anti-Corruption Helpdesk Answer. Provides regional trends from TI's Global Corruption Barometer (GCB) and provides country overviews and analysis of ASEAN countries, including all five FairBiz countries.

UNODC (2003), United Nations Convention against Corruption (UNCAC). Provides the framework for country level anti-corruption efforts. In addition to the convention itself, UNODC provides a host of useful resources, such as the

- Technical Guide. Provides options and considerations for States Parties to implement the convention domestically – including on Article 5 (Preventive policies, including strategy, pp. 3-5), Article 6 (preventive bodies p. 7 ff) and Art. 36 (Specialized Authorities, pp. 113-117).

- Legislative Guide. Provides legislative requirements, issues arising from those requirements and various options available to States for developing domestic legislation.

- Country Profiles. Provides the results of the Implementation Review for each country.

- Legal Library. Database with legislation and information on the implementation of the Convention from over 175 States worldwide.

ANTI-CORRUPTION AGENCIES (ACAS)

AFA (Agence Française Anticorruption) (2020). Global mapping of anti-corruption authorities: Analysis Report. In partnership with OECD and GRECO. Provides an overview of ACAs around the world.

De Jaegere, Samuel (2012), Principles for anti-corruption agencies: A game changer. In: Jindal Journal of Public Policy, Volume 1, Issue 1, August 2012. Provides history of ACAs, principles of success including a framework for assessing ACAs.

Department for International Development (DFID) (2015), Why corruption matters: understanding causes, effects and how to address them: Evidence paper on corruption. Review of literature with the objective to understand the conditions that facilitate corruption, its costs, and the most effective ways to combat it – rating ACAs and NACS as ineffective (p. 84).

Doig A. and F. Recanatini (2020), Can Anti-Corruption Agencies be Successful in Combating Corruption? In: Bajpai, R. and B. Myers (2020), Enhancing Government Effectiveness and Transparency: The Fight Against Corruption, pp. 290-303. World Bank Group. Provides different models for setting up an ACA.

European Partners Against Corruption (EPAC) (2012), Setting Standards for Europe Handbook: Anti-Corruption Authority Standards and Police Oversight Principles. Provides standards for ACAs, linking them to international instruments like UNCAC and OECD Convention against Bribery, and others.

Hussmann, K., Hechler H. and M. Peñailillo (2009), Institutional arrangements for corruption prevention: Considerations for the implementation of the UNCAC Article 6. U4 Issue 2009:4. Provides information on the relation between UNCAC article 6 and the requirement of setting up an ACA.

Hussman, K. (2007), Anti-corruption policy making in practice: What can be learned for implementing Article 5 of UNCAC? Synthesis report of six country case studies: Georgia, Indonesia, Nicaragua, Pakistan, Tanzania, and Zambia. U4 report 2007:1. Reviews the experience implementation of policies or strategies to implement Art. 5 of UNCAC in six countries.

International Conference on Principles for Anti-Corruption Agencies (2012), Jakarta Statement on Principles for Anti-Corruption Agencies. Key resource defining requirements for ACAs.

Kuris G. (2014), From Underdogs to Watchdogs: How Anti-Corruption Agencies Can Hold Off Potent Adversaries. Innovations for Successful Societies ISS. Provides lessons from eight countries on how ACAs can accomplish to overcome opposition.

OECD (2013, 2nd edition) Specialised Anti-Corruption Institutions: Review of Model. Comprehensive resource providing information on different models of ACAs, both in theory and case studies.

Transparency International, Anti-Corruption Agencies Strengthening Initiative. One of the few initiatives providing a methodology for assessing the performance of ACAs, three relevant publications:

• Transparency International, Anti-Corruption Agencies Strengthening Initiative: Revised Implementation Guide. Revised methodology for assessing ACAs, including the types of ACAs referred to in this note (original methodology was published in 2015)

• Aminuzzaman S. and S. Khair (2017) Strengthening Anti-Corruption Agencies in Asia Pacific: Regional Synthesis Report. Provides the major findings of country-level studies by TI on ACAs in Asia Pacific, including Indonesia.

• Quah J. (2017), Anti-Corruption Agencies in Asia Pacific Countries: An Evaluation of their Performance and Challenges. Assessment of ACAs in Asia Pacific based on the TI methodology.

UNDP (2010), Guidance Note: UNCAC Self-Assessments: Going Beyond the Minimum. Methodology for conducting a country-level self-assessment of compliance with the convention. Gaps identified can be used to inform definition of the NACS.

UNDP (2011), Practitioner's Guide to Capacity Assessment of Anti-Corruption Agencies. Provides a methodology for assessing an ACA'S capacity – which is a first step in efforts to strengthening it.

UNDP (2013), Highlights of the Key Achievements in 2013: Global Thematic Programme on Anti-Corruption for Development Effectiveness (PACDE). Includes experience and lessons learned of UNDP on strengthening 17 ACAs.

UNODC (2013a), Panama Declaration. CAC/COSP/2013/CRP.9. IAACA declaration submitted by Panama at the UNCAC CoSP 2013 by Panama regarding ACAs and the Jakarta Principles.

Schöberlein J. (2020b), Anti-corruption agencies in Europe: Typology and case studies. TI Anti-Corruption Helpdesk Answer. Provides an overview of types of ACAs and success factors as well case studies from Europe (France, Latvia, Italy, Ukraine, and the UK).

Indonesian Corruption Eradication Commission (sources for the boxed text in section II.d.iv)

- Bolongaita, Emil P. (2010). An Exception to the Rule? Why Indonesia's Anti-Corruption Commission Succeeds Where Others Don't. U4 Issue, August, No. 4.

- Choi, Jin-Wook (2011a). Measuring the Performance of an Anti-Corruption Agency: The Case of the KPK in Indonesia. In: International Review of Public Administration, 16 (3), pp. 45-63.

- Schütte S. (2017) Why fix KPK when it's not broken?,U4 Opinion Piece.

MONITORING AND EVALUATION (M&E) OF ANTI-CORRUPTION

Hart E. (2019) Guide to using corruption measurements and analysis tools for development programming. U4 Guide 2019:1. Provides an overview the application of measurement for design, implementation, monitoring, evaluation, and learning of anticorruption programs.

Johnsøn J. et. al. (2011), How to monitor and evaluate anti-corruption agencies: Guidelines for agencies, donors, and evaluators. U4 Issue 2011: 8. Provides the groundwork on M&E of anti-corruption work that this Note draws upon in large parts.

Johnsøn J. (2012) Theories of change in anti-corruption work: A tool for programme design and evaluation. U4 Issue 2012: 6. Provides an overview and step by step guidance for designing ToCs, in anti-corruption work, supported by three case studies.

Johnsøn J. and T. Søreide (2013), Methods for Learning What Works and Why in Anti-Corruption: An introduction to evaluation methods for practitioners. U4 Issue 2013: 8. Provides an overview of the basics of evaluation in anti-corruption.

Schütte S. (2017), Bespoke monitoring and evaluation of anti-corruption agencies. U4 Brief May 2017:2. Based on previous U4 issue (Johnsøn et al. 2011). Provides the same basic idea as this Guidance Note of monitoring and evaluating the work of ACAs.

Schütte S. (2020), Networks of anti-corruption authorities: Living up to their aspirations? U4 Brief 2020:2. Review of ACA regional and global networks

UNDP (undated), Anti-Corruption Measurement and Monitoring. Website with a collection of tools on measuring corruption including on the national level, development of corruption surveys

NATIONAL ANTI-CORRUPTION STRATEGY (NACS)

Burai P. (2020), Overcoming the pitfalls of engaging communities in anti-corruption programmes. U4 Issue 2020:3. Provides tools, strategies, benefits, and challenges of engaging communities directly in anti-corruption work.

Jenkins M. and G. Camacho (2022), Core principles for the development of anti-corruption strategies. Practices from around the world. U4 Helpdesk Answer 2022:4. Very recent publication that provides an overview of the most important issues for developing, implementing and monitoring anti-corruption strategies illustrated by international practice examples.

Manandhar N. (2014), Anti-corruption Strategies: Understanding What Works, What doesn't and Why? Lessons learned from the Asia-Pacific region. UNDP. Provides an overview of NACS in AP, development of evidence-based anti-corruption strategies and lessons learned.

OECD (2021), Integrity Review of Thailand 2021: Achieving Effective Integrity Policies and Sustained Reform. Provides a recent example of an external framework applied that can be used for guidance and generating support.

Pyman M. and S. Eastwood (2018), Countries curbing corruption: Analysing the anti-corruption approaches of the 26 top-ranked countries – An opportunity for a new generation of strategies. Norton Rose Fulbright. Provides analysis of NACS of the 26 top-ranked countries in the CPI 2016, drawing lessons to guide governments in the fight against corruption.

UNDP, UNODC (2013), Kuala Lumpur Statement on Anti-Corruption Strategies. Key resource defining recommendations for NACS development, design and content, as well as monitoring and evaluation.

UNODC (2013b), Follow-up to the Marrakech declaration on the prevention of corruption. CAC/COSP/2013/L.5/Rev.1. Declaration noting the Kuala Lumpur statement, requesting dissemination of additional good practices.

UNODC (2015), National Anti-Corruption Strategies: A Practical Guide for Development and Implementation. Provides detailed guidance on NACS, including the drafting process itself, diagnosis, formulation, implementation, as well as monitoring, evaluation and reporting.

MEASURING CORRUPTION

Anheier H., Haber M. and M. Kayser (eds.) (2018), Governance Indicators: Approaches, Progress, Promise. Provides stocktaking of governance indices and indicator frameworks, challenges in measuring and analyzing governance, and ways how to overcome them.

Fink, H. (2019), State of play of the business environment in ASEAN: Baseline Study for the regional project Promoting a Fair Business Environment in ASEAN. UNDP Bangkok Regional Hub. Provides an overview of corruption-related indicators in FairBiz countries that relate to the business environment.

Malito D., Umbach G. and N. Bhuta (eds.) (2018), The Palgrave Handbook of Indicators in Global Governance. Provides extensive information on production, use and contestation of indicators in global governance.

Martinez Kukutschka R. (2016), Latest trends in corruption measurement and analysis. Transparency International Helpdesk Answer. Provides an overview of the trends in corruption measurement including challenges, data types including their (dis-)advantages.

Marquette H. (2014), Communication in anti-corruption work: Articulating messages to structure a communication plan. OECD. Chapter 3 (p. 12f) provides ideas related to the reason for the CPI being used inappropriately (chapter IV).

McDevitt A. (2016, 2nd edition), How-to guide for corruption assessment tools. Provides an overview of corruption measurements, including their application, strengths, and limitations.

Messick R. (2022), Has Nigeria Found A Way to Make Release of the CPI Useful? Global Anti-Corruption Blog: 12th January 2022. Addresses wrong use of the CPI, includes links to other blog entries on the same topic.

Transparency International (undated),

- TI Knowledge Hub: Measuring Corruption. Collection of corruption measurement tools by TI that can be downloaded.

- Corruption Perceptions Index. Complete information material on the CPI including results and methodology for all years can be downloaded here.

Trapnell S. (2015), User's Guide to measuring corruption and anti-corruption. Global Integrity, UNDP. Provides different series of methodologies, tools and practices for measuring corruption that have been used and validated by the anti-corruption community.

UNODC E4J (2019), Measuring corruption. Online resource providing an overview of the topic.

UNODC, UNDP (2018) Manual on Corruption Surveys: Methodological guidelines on the measurement of bribery and other forms of corruption through sample surveys. Technical guide for developing and implementing surveys at the country level.