ecdpm

Making policies work

Pushing on a string or pulling threads together?
LESSONS LEARNED FOR ANTI-CORRUPTION EFFORTS BY EUROPEAN DONORS

By Martin Ronceray and Katja Sergejeff

September 2020

Progress with international anti-corruption efforts has stalled lately. The fight against corruption is a long-standing sustainable development priority, now made more pressing in a context of global pandemic to ensure the integrity of responses and avoid compounding the economic crisis. Yet there is no consensus on how to inject new dynamism for effective anti-corruption.

This study builds on innovative research on corruption and responses to it, and on bespoke analysis on how the Netherlands, the United Kingdom, Sweden and Germany address international anti-corruption. It draws from some examples of useful practices to improve the overall impact of donor countries on corruption abroad, and offers recommendations for donors willing to overhaul their anti-corruption approach.

Donors support the anti-corruption efforts of developing countries through development projects but also by working on their own impact by changing domestic policies and practices; by consolidating international regulation structures; by building up diplomatic pressures with their peers; and by fostering the demand for improved governance via civil society and the existing coalitions of local drivers of change. Conducting these efforts separately, and without clear traction in the partner country, can amount to 'pushing on a string' – to limited effect. That is: more effective anti-corruption work requires pulling together creatively many different threads that are traditionally handled separately.

Key avenues for improvement reside in efforts to conduct more explicitly political approaches rooted in local dynamics and to improve policy coherence within donor countries themselves. This needs to be based on a sound and critical assessment of different shapes and impacts of corruption, and on humility in recognising that developing countries themselves are in the driver's seat for their own development.

Table of Contents

List of Boxes

List of Figures

Acknowledgements

Acronyms

AC	Anti-corruption
ACA	Anti-Corruption Authority
ACE	Anti-Corruption Evidence Programme
AFAR	Arab Forum on Asset Recovery
AR	Asset Recovery
ARIN-AP	Asset Recovery Inter-Agency Network – Asia Pacific
ARINSA	Asset Recovery Inter-Agency Network for Southern Africa
AU	African Union
BBC	British Broadcasting Corporation
BMZ	German Federal Ministry for Economic Cooperation and Development (*Bundesministerium für wirtschaftliche Zusammenarbeit und Entwicklung*)
CARIN	Camden Asset Recovery Inter-agency Network
CGDEV	Center for Global Development
Com Sec	Commonwealth Secretariat
COVID-19	Coronavirus disease 2019
CRS	Creditor Reporting Standard
CSOs	Civil society organisation
DAC	Development Assistance Committee
Deval	German Institute for Development Evaluation (*Deutsches Evaluierungsinstitut der Entwicklungs Zusammenarbeit*)
DG DEVCO	European Commission's Directorate-General for International Cooperation and Development
DG HOME	European Commission's Directorate-General for Migration and Home Affairs
DG NEAR	European Commission's Directorate-General for Neighbourhood and Enlargement Negotiations
DFID	Department for International Development (UK)
DIE / GDI	*Deutsches Institut für Entwicklungspolitik* – German Development Institute
DW	Germany's International Broadcaster (*Deutsche Welle*, German Wave)
ECDPM	European Centre for Development Policy Management
ECOFEL	Egmont Centre of FIU Excellence and Leadership
EITI	Extractive Industries Transparency Initiative

EU	European Union
FATF	Financial Action Task Force
FCO	Foreign & Commonwealth Office
FIU	Financial Intelligence Unit
FSRB	FATF-Style Regional Bodies
G7	Group of Seven (Canada, France, German, Italy, Japan, UK, USA)
GAC	Governance and Anticorruption Strategy
DGP	Gross domestic product
GFAR	Global Forum on Asset Recovery
GIZ	German Agency for International Cooperation (*Deutsche Gesellschaft für Internationale Zusammenarbeit)*
GOVNET	Government communications agency, UK
GRECO	Group of States against Corruption
HM	Her Majesty's (Government)
HRW	Human Rights Watch
IACA	International Anti-Corruption Academy
IAACA	International Association of Anti-Corruption Authorities
IACCC	International Anti-Corruption Coordination Centre
ICAI	Independent Commission for Aid Impact
ICAR	International Centre for Asset Recovery
IDA	International Development Association
IEG	Independent Evaluation Group
IMF	International Monetary Fund
INT	Integrity Vice Presidency
IOB	Directorate for International Research and Policy Evaluation of the Ministry of Foreign Affairs of the Netherlands (*Directie Internationaal Onderzoek en Beleidsevaluatie*)
ISO	International Organization of Standardization
JACU	Joint Anti-Corruption Unit
KfW	German Credit Institution for Reconstruction (*Kreditanstalt für Wiederaufbau*)
KYP	Know Your Partner
MDB	Multilateral development bank
MeTa	Medicines Transparency Alliance
MFA	Ministry of Foreign Affairs
MLA	Mutual legal assistance
MNE	Multinational Enterprises (guidelines)
NACS	National Anti-corruption Strategy
NUSAF	Northern Uganda Social Action Fund
NGO	Non-governmental organisation
ODA	Official development assistance
OECD	Organisation for Economic Co-operation and Development
OGP	Open Government Partnership
OLAF	European Anti-fraud Office
PEA	Political Economy Analysis
PFM	Public Finance Management
RRAG	Asset Recovery Network of the Financial Action Task Force of Latin America (*Red de Recuperación de Activos del GAFILAT*)
SAI	Supreme Audit Institution
SDC	Swiss Agency for Development and Cooperation

SDG	Sustainable development goal
SIDA	Swedish International Development Cooperation Agency
SOAS	School of Oriental and African Studies
STAAC	Strengthening Action Against Corruption in Ghana
StAR	Stolen Asset Recovery initiative
SUGAR	Strengthening Uganda's Anti-Corruption Response
TI	Transparency International – The Global Coalition against Corruption
ToC	Theory of change
U4	Anti-Corruption Resource Centre (NO)
UFAR	Ukraine Forum on Asset Recovery
UK	United Kingdom
UN	United Nations
UNCAN	United Nations Convention against Corruption
UNODOC	United Nations Office on Drugs and Crime
USD	US Dollar
WB	World Bank
WEF-PACI	World Economic Forum Partnering Against Corruption Initiative
WTO	World Trade Organisation
WTO-GPA	World Trade Organisation - Agreement on Government Procurement

Executive Summary

Why this study?

The international community has dedicated a lot of attention to anti-corruption measures over the last three decades, with highs and lows. Countries have come a long way since the days when bribery of foreign officials by national companies was tax-deductible. But despite investments and new ways of working, the progress of initiatives explicitly aimed at tackling corruption has been limited, and the attention of the international community to the issue has fluctuated. Corruption remains pervasive in countries of both the global North and South, though many developing countries are particularly affected. Development partners, who carry part of the responsibility, aspire to support them in the fight against corruption.

Addressing corruption is demanding, and methods must continuously be updated. Detecting and measuring corruption to assess its changes over time is already a challenge, so reducing it in a reliable and sustainable manner even more so. New research proposes methods to tackle corruption, but these methods often require adjustments and losing old habits. Research shows that while some types of corruption are intractable and with a negative impact, other types can occasionally play a positive role. At times, removing corruption may cause greater harm than the corruption itself. In some authoritarian contexts anti-corruption can be used as a weapon against political opponents. Anti-corruption communication can also be counter-productive at times if it normalises hidden practices. These are but a few of the challenges that make identifying and conducting fruitful anti-corruption a daunting task.

But at the same time, corruption is clearly too important to ignore. With an estimated cost of at least 5% of global gross domestic product (GDP) or 2,6 trillion USD annually (UN 2018) - and significantly more in some places - curbing corruption is considered a priority to achieve sustainable development around the world. The global COVID-19 pandemic, and related demand for debt relief and for increased and more flexible financial support, have triggered renewed concern over corruption around the measures intended to respond to the current health and economic crisis.

In this context, this study reviews **how some donors have been addressing corruption abroad**, and what can be learnt from this experience and from recent research, with insights for anti-corruption policy initiatives and renewed approaches. The focus here is less on how developing countries conduct their own anti-corruption agenda - for which they are in the driver's seat - than on forms and limits of efforts by their development partners to support them.

Comparing country approaches to anti-corruption so far

Anti-corruption abroad is a cross-cutting topic that needs to be addressed in several sectors across a donor government. That is acknowledged by the countries investigated in this study: Sweden, the United Kingdom, the Netherlands and Germany. Thus this review is not centred exclusively on anti-corruption work conducted by development agencies, but also on the overall impact of these countries on corruption abroad, and all the channels through which they can address it, even indirectly. These include work on the international drivers for corruption, such as international initiatives to curb illicit financial flows (a vehicle to move ill-gotten gains) and diplomatic pressures.

The figure below synthesises the main features of the four approaches examined.

Figure 1: The main features of the four approaches to anti-corruption

ecdpm

Sweden
Decentralised approach - no specific anti-corruption strategy, as it is integrated in different strategies.

Long-standing innovative player, 'punches above its weight' in financial commitment

Adaptive, with drive for stepping up efforts from both ministry and development agency

Germany
Work guided by a specific strategy - which applies to development efforts

High financial contribution and strong drive over past years to integrate anti-corruption across development projects and programmes

Ongoing reform of development administration and upcoming new AC strategy

United Kingdom
Guided by dedicated whole of government strategy

Largest donor on direct anti-corruption, innovative projects and programmes in anti-corruption

Relative decline in leadership as political drive reduced in past few years

The Netherlands
Anti-corruption not a standalone work area: covered by different ministries and units but no common vision

Inter-ministerial coordination in anti-corruption happens on an ad-hoc basis, reacting to events & political demands

Relatively few standalone anti-corruption projects - more work in partnership with other organisations and initiatives.

After a lull, interest in anti-corruption approaches seems to have been reignited and political attention as well as numeric financial commitments are again on the rise. This starts from a rather low baseline, around 0.1% of the overall global total of ODA spending dedicated to direct anti-corruption projects, such as support to anti-corruption authorities. This follows a slow and steady increase over the years, with more consistency from the UK and Germany than from the Netherlands and Sweden. But quantitative analysis goes only so far in explaining the different approaches: no data captures the overall picture of what can be qualified as indirect anti-corruption.

Most donor countries have engaged in serious reforms or rethinks of their stance towards corruption, to improve their impact on corruption abroad, especially in recent years. A promising approach is to first rely on pilots, to selectively get involved in sectors and include priority peers, rather than mainstreaming immediately across the board the concern for anti-corruption, which can be perceived as invasive. Coordination mechanisms in anti-corruption strengthen the collaboration, help break silos within and between the organisations and departments and foster policy coherence in anti-corruption.

The international architecture of anti-corruption initiatives is very fragmented, which plays against the coherence of diverse efforts. The countries examined here support various but rather similar initiatives and communities of practice, organisations or initiatives including some initiatives in specific developing countries. An average European country can follow or support at least half a dozen different initiatives, which requires significant resources to be conducted properly. International norms and initiatives to curb illicit financial flows, for instance, require all countries committed to anti-corruption to invest in this area, all the more but not only if they are themselves places of financial secrecy with a major direct responsibility.

There is no evidence that an ambitious sectoral (development-specific) anti-corruption policy such as that of Germany always yields better or worse results than a whole-of-government one as the United Kingdom has, where the concern may be more 'diluted' when political impetus dwindles. However, it is recognised that **a clear statement of intent backed up at the political level guides and legitimises efforts, and empowers officials to do more than business as usual.**

The way forward: from 'pushing on a string' to pulling threads together

A necessary first step is recognising that direct anti-corruption work is a humbling task. The many challenges it faces range from measuring results to identifying actual pathways for change and coordinating with like-minded actors. There is a wealth of academic and policy work in support of this agenda, but it still points to the complexity of the task. There is fairly little that an external actor can hope to do to replicate the few significant historical success stories in anti-corruption: as has been demonstrated in successful cases such as Botswana, Rwanda and Georgia, countries themselves are in the driver's seat and externals can at best support.

While corruption can be a 'cancer' or a 'toxic drug', some types can have a net *positive* impact on development, or at least a sufficiently low impact that prioritising other areas may be advised. Investing in practical research and distinguishing between different forms of corruption is crucial to know which anti-corruption initiatives to pursue, if any, and whether they are likely to be worth the effort.

A promising avenue to advance anti-corruption lies with policy coherence: for donor countries to modify their overall footprint on corruption by addressing international drivers such as international standards on investment, trade, natural resources, finance, and security. This can be undertaken by adopting more holistic approaches to anti-corruption, seeking to harmonise development policies (those with a focus on anti-corruption and those without) and development together with other policies.

Indeed, one-sided anti-corruption efforts can be compared to 'pushing on a string': they lack the necessary 'pull' to achieve results, such as complementary efforts by local actors. An important lesson is to build up complementary pressures for change: through diplomatic engagement – both directly and with coalitions of the willing – and via support to civil society to foster the *demand* for improved governance. This means making the most of the already crowded landscape of initiatives against corruption. It also means pulling together many threads – a real challenge which requires a significant political impetus and a renewed common vision.

The figure below summarises elements to promote policy coherence for anti-corruption at the level of a donor government.

Figure 2: The elements to promote policy coherence for anti-corruption at the level of a donor government

A second promising avenue is to conduct and foster a new generation of initiatives characterised by flexibility and political savviness. There is no single blueprint for this - rather the spirit of such approaches is to do away with excessively rigid 'best practices' models, in favour of iterative approaches informed by analysis and empowered to make the most of the insight acquired. For instance, this means granting project managers with sufficient time, leeway to adjust their approach, and diplomatic backing to build alliances and identify previously invisible pathways for change.

Examples and good practices in this spirit are accumulating - including many projects funded by the UK and/or the EU - and several of them are reviewed in the study. Lessons learned from these approaches point to the fact that sometimes anti-corruption works best 'without the name'; that at times it can be necessary to strategically overlook some forms of corruption; and that at times of adverse change it is important to be able to cancel or dramatically revise projected actions.

The following ten recommendations to donor governments stem from the key takeaways presented in conclusion to the study. Addressing most of these means building on dynamics already present within the country rather than a significant rethinking of the engagement.

- Assume leadership and reinvigorate the international anti-corruption agenda by investing the required resources, empowering agents of change, communicating at a high level and leading by example.
- Rationalise and boost existing international initiatives rather than creating new ones.
- Encourage more explicit research on types of corruption taking place and their development impact.

- Foster explicitly political initiatives that look beyond formal anti-corruption structures to identify the traction by actors and coalitions who seek to address corruption.
- Draw from all relevant types of initiatives - including many with no explicit reference to corruption - and coordinate them for a maximal combined effect.
- Don't expect anti-corruption work across the board to meet rigid quantitative targets, and prioritise multiple sources of qualitative evidence.
- Promote a vision centred around the overall footprint of a country on corruption, so that each part of government is made responsible for its share - it is likely to require official statements at a high level and continuous efforts.
- Adopt and consolidate elements of a policy coherence system that are most promising given your institutional setup and current political context, building on existing expertise and ongoing efforts. Pilot best practices rather than generalising them right away, to sequentially build up momentum and avoid overload.
- Make sure that responsibility for anti-corruption is clarified at government level, within development structures and within structures with an important impact such as justice or trade. Ensure smooth communication and coordination between these focal points.
- Avoid rigid blueprints and remain open to options such as cancelling, modifying or stepping up rapidly an initiative as befits the context.

1. Introduction

Corruption is generally perceived as a pervasive, long-standing and entrenched hindrance to development and a sign of a dysfunctional governance system. Corruption is estimated to cost the world economy trillions, in the range of 5% of the global GDP (UN 2018). In some of its forms, corruption impacts development outcomes by undermining accountable and effective institutions, limiting access to basic public services and holding back economic growth. At the same time, certain countries have managed to develop rapidly in spite of widespread corruption (Ang 2020a). That points to the need for a nuanced understanding of the types and effects of corruption, and to draw the implications for anti-corruption strategies.

The international community has dedicated much attention to anti-corruption measures over the last three decades. Development partners have come a long way since the days when bribery of foreign officials by national companies was tax-deductible in many countries. But despite major investments, the progress of initiatives explicitly designed to tackle corruption has been limited. The 2030 Agenda lays out specific globally agreed targets for reducing corruption, but meeting these remains a challenge.[1] Practitioners increasingly refer to Sustainable Development Goal (SDG) "16 plus" due to the cross-cutting relevance of such issues which cannot be tackled thoroughly in isolation from other SDGs.

The attention of the international community to anti-corruption has experienced ups and downs depending on the political priorities of the times. Renewed efforts have followed major political upheavals such as the end of the Cold War, or the 'Arab Spring', while the COVID-19 crisis may also contribute to the recent renewal in attention. Other surges of interest in the international community have followed influential statements: then World Bank president James Wolfensohn singled out the "cancer of corruption" as the foremost development priority in 1996. Renewed interest also followed seminal and often critical publications such as a February 2020 research paper showing how significant amounts of development assistance worldwide are diverted into foreign bank accounts following disbursement (Andersen et al. 2020). Politics and changes in leadership have fostered local surges of interest which in turn provided impetus for international initiatives.

Renewed anti-corruption efforts have resulted in attempts at international coordination of diverse natures, from the global legally-binding UN convention against corruption (UNCAC) to the donor-led OECD's GOVNET anti-corruption task team, through country-based governance facilities and joint action within groups such as the Nordic Plus. These efforts have also fostered a community of practitioners and researchers whose insights are coming of age and progressively being integrated in the policies of a number of donors whose practices have come to inspire others.

At the turn of the decade, the global COVID-19 pandemic and related demand for debt-relief and for increased and more flexible financial support have triggered renewed concern over corruption around the measures and funding intended to respond to the current health and economic crisis (Steingrüber et al. 2020, Ferreira Rubio et al. 2020).

---

[1] SDG 16 was reviewed at the 2019 high level political forum, with the conclusions that "*no substantial advances have been made*" *since the adoption of the 2030 Agenda*. SDG 16 seeks to "promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels". It includes relevant targets on the recovery and return of stolen assets (16.4), the reduction of corruption and bribery in all forms (16.5) the development of effective, accountable, and transparent institutions at all levels (16.6), the establishment of responsive, inclusive, participatory and representative decision-making at all levels (16.7), and public access to information and the protection fundamental freedoms (16.10) (United Nations 2019).

In this context, this study is shaped around the following questions:

- What key lessons have been learned in international and selective academic work to address corruption in developing countries, in development projects and beyond?
- What are the key characteristics of the approaches of a limited number of donor countries and other relevant actors?
- What key lessons are there for donor anti-corruption strategies?

The focus here is less on how developing countries conduct their own anti-corruption agenda - for which they are in the driver's seat - than on forms and limits of efforts by their development partners to support them. The study builds primarily on desk research. Of particular relevance are primary sources such as anti-corruption strategies and commitments embedded in wider policies, development strategies, their reports and evaluations; policy documents such as OECD, World Bank and International Monetary Fund guidelines, as well as internal guidelines of donor administrations. The study draws as well on the few existing meta-studies and comparisons of donor approaches and a number of relevant academic studies, as well as reports from international organisations and resource centres such as the U4 Anti-Corruption Resource Centre. Finally, a half-dozen expert interviews with government staff and policy researchers were an essential part of the research process.

The next section (2) reviews the findings from research on anti-corruption efforts, from the conceptual to the operational level across development work and wider policy coherence. Section 3 summarises the findings from the review of the four development partners examined. Section 4 presents a set of ten key findings and related recommendations.

2. State of the art of anti-corruption in development

"Corruption is a phenomenon which is difficult to tackle, and at the same time a problem we cannot afford to ignore. (...) Member States have, broadly speaking, set up the necessary legal instruments and institutions responsible for prevention and fight against corruption. However, the results they deliver are not satisfactory."

Cecilia Malmström, then EU Commissioner for Home Affairs,
2013 Speech "Fighting corruption: From intentions to results"

Donor governments do not ignore corruption, at home or abroad. In development policies, they address it *directly* with dedicated projects and programmes explicitly addressing corruption, for instance supporting Anti-Corruption Commissions; and *indirectly* by integrating it in projects structured around different development concerns, for example the 'drivers' of corruption such as banking secrecy. Corruption is at times also raised in political dialogue and diplomatic initiatives such as statements condemning corruption cases.

A simple measure of the interest attached to anti-corruption is the amount of official development assistance (ODA) allocated to *direct* anti-corruption projects. Figure 3 uses the OECD's donor assistance committee data declared as disbursed for anti-corruption to show sustained aid for anti-corruption over time (in blue), despite fluctuations of much higher intensity than overall ODA fluctuations (in orange), as political interest and traction of the issue alternates between phases of high and low momentum. **At the turn of the decade in 2020, interest seems to have been reignited** and political attention as well as financial commitments are on the rise, even if starting from a low baseline of around 0.1% of the overall global total of ODA spending (for *direct* anti-corruption only).[2]

---

[2] A caveat: there are disagreements as to what qualifies as direct or indirect anti-corruption - the boundaries are not entirely clear-cut. A more disaggregated picture will be provided in the next section on donor country approaches, as well as complementary figures on relevant spending not included here.

Figure 3: DAC donor financial commitments to anti-corruption and wider ODA over time

Aid Fluctuations in total ODA and ODA to anti-corruption
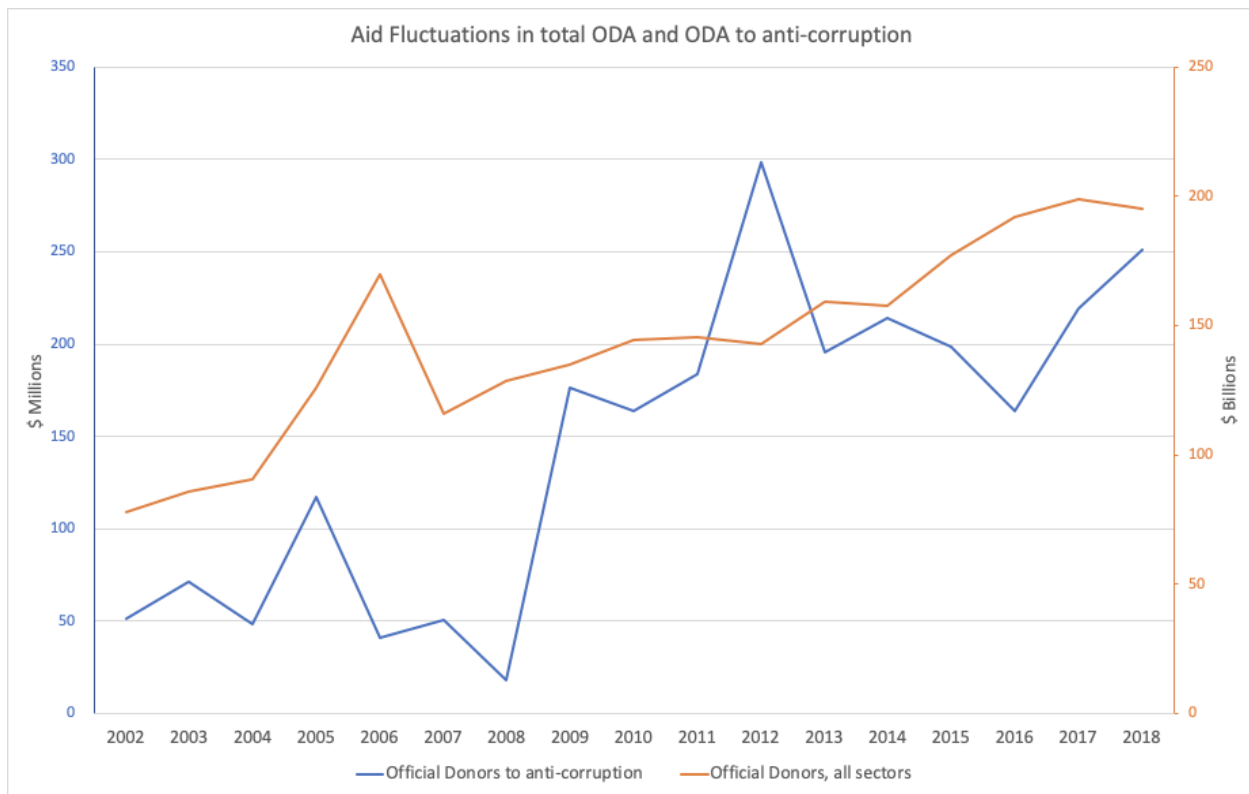
Source: authors' elaboration based on OECD CRS dataset

But perhaps the most striking lesson learned by practitioners and researchers of anti-corruption approaches is one of the need for modesty. Seven years have passed since the speech by European Commissioner Malmström where she deplored the lack of results, but today **there are few examples of direct anti-corruption initiatives that clearly and measurably resulted in reduced corruption**.

2.1. Direct anti-corruption: a humbling task

Historically, countries that have dramatically reduced corruption include Botswana, Rwanda, Hong Kong, Singapore, Georgia, Mauritius and Estonia. However, these **success stories were not externally-driven**. Indeed, many were a matter of structural/momentous reform linked to regime change, a crisis or revolution, or even civil war and genocide - all contextual elements which donors may adapt to but cannot contribute to actively. Alongside such momentous changes, slow changes in mentalities and in economic structures have together led to the emergence of a community of actors with an interest in compliance with anti-corruption rules and an ability to reign in perpetrators by relying on a broadening consensus around integrity values (Mungiu-Pippidi 2017).

From this understanding of what constitutes anti-corruption successes stem four main structural limitations to the ambitions of development partners to directly address corruption:

- **Countries themselves are in the driver's seat for their own development**. This is all the clearer regarding corruption, which is by nature hidden but can amount to a 'rule of the game' well understood by insiders but

less so by external actors.[3] What is more, corruption tends in most cases to play into the hands of the powerful, who can further limit the leeway of external actors, or commit rhetorically to the anti-corruption drive without working on substantial change (Baez et al. 2018). Political events in developing or transition countries are the primary driving forces of anti-corruption there, while donors can at the very most play a small supportive role.

- **Changes in mentalities take more time than development programme timeframes can consider**. At a parliamentary discussion in the United Kingdom (UK) on the best duration for country anti-corruption strategies, the expert opinion was that "expectations that you can have an institutional fix that will have a real payoff in a three-to-five-years timeframe [are] pretty unrealistic." (House of Commons 2016). Anti-corruption efforts must therefore look to the longer term.

- **Corruption is not prone to easy measuring and reporting on results and impact**. Bureaucratic accountability requirements are such that aid agencies and implementing partners are often asked to demonstrate the impossible (Natsios, 2010). This is even more striking for anti-corruption: "measuring the success of anti-corruption programmes is immensely difficult as it is difficult both to measure results and to attribute results to any particular intervention" (House of Commons 2016).

- **International actors and donor agencies operate under rules of the game they don't control.** In part due to the traditional 'rotation' of staff in and out of countries, the institutional memory of organisations is a factor limiting their ability to 'play the game rather than get played' when it comes to anti-corruption. Additional constraints on donors stem from their mandate from home taxpayers. For instance, there is a largely unquestionable principle of *zero tolerance for corruption* in many development agencies and their partners: development assistance must be exemplary. But in operational contexts this requires adaptations such as a phased, context-sensitive reaction to avoid causing harm (Strand 2020).[4]
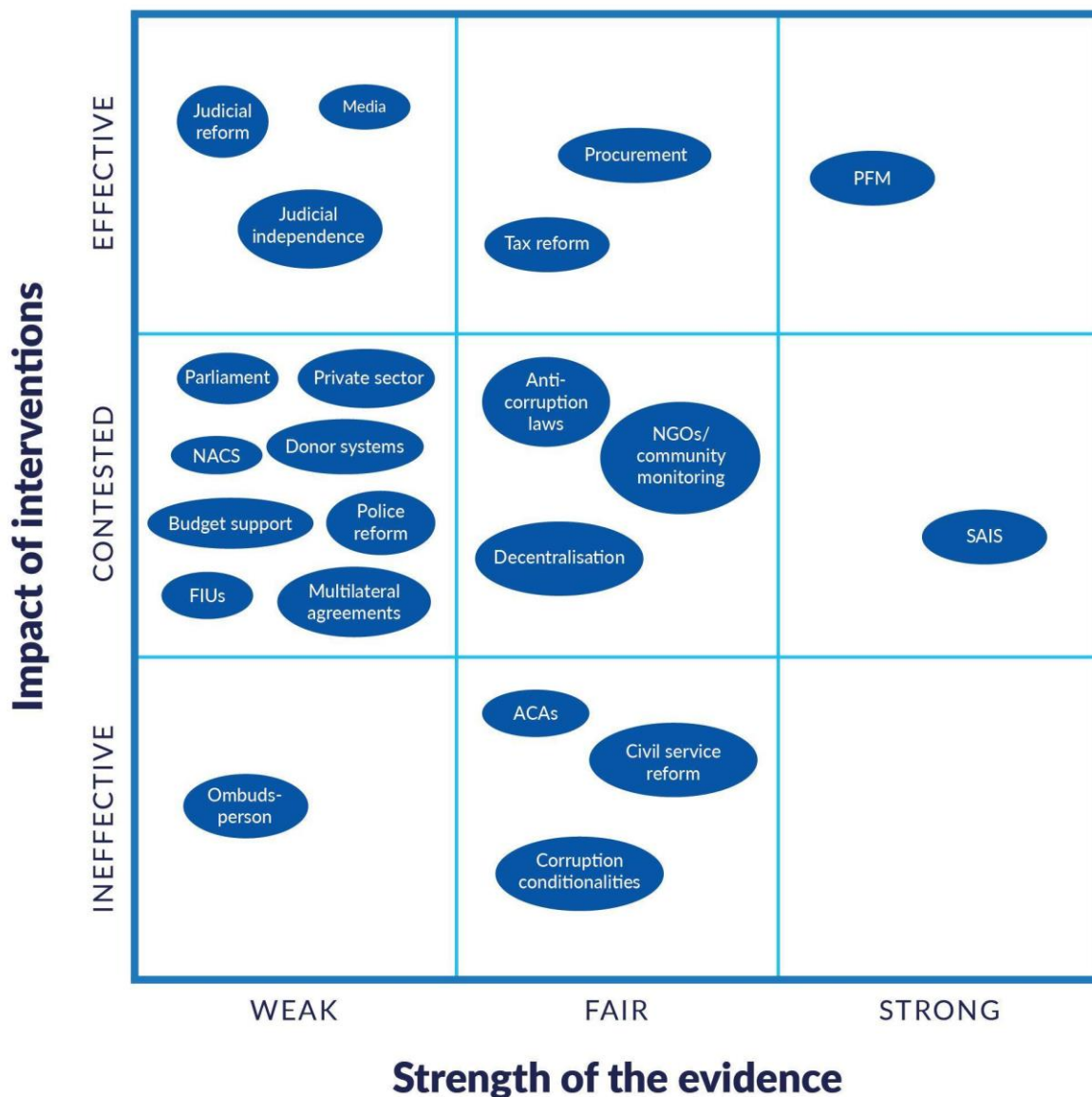
In spite of these limitations, external actors have elaborated an arsenal of interventions to address corruption in developing contexts. Some of these, such as conditionalities in the delivery of aid, Public Finance Management (PFM) reforms and taxation reforms, are work areas and 'industries' in their own right where direct attempts to reduce corruption have been introduced. Direct anti-corruption approaches thus mobilise diverse forces, from law enforcement to accountants, through politicians and civil society specialists.

Figure 4 below summarises the most comprehensive attempt so far at capturing the impact of direct anti-corruption approaches. Building on extensive analysis of evaluations (which may not preclude a very different picture for a given individual project), the figure shows that **most types of direct anti-corruption initiatives lack a strong evidence base of effectiveness**: only PFM, in the top-right corner has a solid evidence base that also points to its effectiveness. Many types of anti-corruption have a more contested effectiveness (lower in the figure), and a majority of them have a weak evidence base (to the left in the figure), regardless of whether it points to effectiveness or not.

---

[3] "While contemporary anti-corruption reforms are based on a conceptualisation of corruption as a principal-agent problem, in the African context corruption rather seems to resemble a collective action problem, making the short-term costs of fighting corruption outweigh the benefits. Consequently, even if most individuals morally disapprove of corruption and are fully aware of the negative consequences for the society at large, very few actors show a sustained willingness to fight it. This in turn, leads to a breakdown of any anti-corruption reform that builds on the principal-agent framework (...). Insofar as a large enough number of actors are expected to play foul, everyone has something to gain personally from acting corruptly. Consequently, in a context in which corruption is the expected behaviour (...) there will simply be no actors willing to take on the role of controlling corruption." (Persson et al. 2010: 5, quoted in: Booth and Cammack 2013)

[4] As an extreme example, humanitarian aid often needs to include small bribes to ensure that it reaches the populations in need rather than being confiscated altogether.

Figure 4: The evidence base for direct anti-corruption effectiveness

Impact of interventions / Strength of the evidence

EFFECTIVE — WEAK: Judicial reform, Media, Judicial independence
EFFECTIVE — FAIR: Procurement, Tax reform
EFFECTIVE — STRONG: PFM

CONTESTED — WEAK: Parliament, Private sector, NACS, Donor systems, Budget support, Police reform, FIUs, Multilateral agreements
CONTESTED — FAIR: Anti-corruption laws, NGOs/community monitoring, Decentralisation
CONTESTED — STRONG: SAIS

INEFFECTIVE — WEAK: Ombudsperson
INEFFECTIVE — FAIR: ACAs, Civil service reform, Corruption conditionalities

Source: Johnson et al 2012, adapted in Mason, 2020 [5]

The weakness of the evidence base on what works in direct anti-corruption is not only a product of project design but also linked to the nature of **corruption** itself. **The challenge of detecting and measuring corruption in order to assess its changes over time is well-known**[6], and multiple sources of information including targeted surveys as well as

---

[5] Nb: SAIs = Supreme Audit Institutions; ACAs=anti-corruption authorities; NACS=National anti-corruption Strategies; FIUs=financial intelligence units. Based on 2012 data, although Khan et al (2019) and Mason (2020) suggest that there was no substantial change to the overall picture of weak evidence base of effectiveness.

[6] Corruption is pervasive and at the same time largely hidden. This makes it very difficult to measure, or to assess whether anti-corruption programmes have made progress. In order to get an idea of levels of corruption, academics and policy makers tend to fall back to a proxy indicator: perception of corruption. Measuring perceptions of corruption is unsatisfactory as they are by necessity biased, and quantitative estimates of corruption require lumping together different forms of corruption, which often results in comparing pears with apples (Hart 2019). Other methods have been devised to measure corruption through proxies, such as the 'leakage' of funds or the number of corruption cases brought to court, but they face evident shortcomings as well.

political economy analysis are necessary to get a solid picture of corruption (and anti-corruption effectiveness) in a given context.

With this caveat, **the essential lesson is that direct anti-corruption actions on their own are not enough to address the problem of corruption and fulfill the commitment to SDG 16**. Direct *and indirect* anti-corruption approaches in a diversity of projects, work on the drivers for corruption and diplomatic channels are equally important. Further, to maximise their impact in **largely** adverse circumstances, international actors require a nuanced understanding of the roles and shapes of corruption in the often vastly different contexts in which they operate.

2.2. Unpacking corruption for impactful interventions

Comparing all corruption to cancer glosses over the diversity of forms it takes and roles it plays. For China in the past two decades, some corruption has rather been dubbed 'the steroids of capitalism', allowing companies to shape their policy environment and obtain facilities from politicians which permitted self-enrichment but also sustained growth (Ang 2020a). Not all corruption is a poison that attacks the socio-economic fabric: some can be assimilated to 'steroids' and others to 'painkillers' that help overcome problems without solving their root causes (Ang 2020a). As different types of corruption play such different roles in regard to development, **understanding the type of corruption in question has major implications for the impact of anti-corruption measures**.

At a practical level, the key question is 'how bad' corruption is, for instance whether it undermines policy outcomes and public goods, or only captures rents (as an informal 'tax') along the way. As Mushtaq Khan (2016) shows, corruption causes significantly less developmental harm if it takes the **form** of bribes that increase the price of a bridge to recompense local actors who may otherwise obstruct the project (*painkiller* in Ang's framework) than if it takes the form of procuring sub-standard material which results in a bridge built at the predicted price but which collapses (*toxic drug*).

Different typologies of corruption stress the extent to which corruption can shape the distribution of resources in a given context. They show that 'predatory' corruption at the highest levels of sovereign states can hardly be prevented in any way by external actors such as development partners. An example is the massive embezzlement in Tunisia by the ruling Ben Ali 'clan' -the president and parts of his family- in the last few years before the 2011 revolution (Rijkers et al. 2014). This explains the limited effectiveness of approaches (see figure 4) such as budget support conditionalities which aim to externally address corruption at the top only. More decentralised corruption (that takes place among mid-level actors) may be somewhat easier to address, especially if it goes counter to the interest of specific groups. So **distinguishing between different forms of corruption is also crucial to know which anti-corruption initiatives to pursue, if any, and whether they are likely to be worth the effort**. A selective summary of the main lines of such corruption typologies is presented in Figure 5.

Figure 5: Some implications of corruption typologies

| Type	a.k.a	Metaphor	Main impact	Example of likely feasible response - if any
Predatory corruption	Grand corruption	*Toxic drug*	Deprives the state/structures of resources	Foster demand for integrity (if sufficiently low-level)
Policy- distorting corruption	Policy capture	*Toxic drug*	Skews the rules of the game	Regulate policy making & push for productiveness of arrangements (turning into access money)
Market restriction driven corruption	Speed money	*Painkiller*	Shortens delays but imposes a cost	Remove/transform market regulations, potentially overlook 'symptoms' to focus on root causes
Some political corruption	Access money	*Steroid*	Stimulates growth, generates inequalities	Regulate, enforce integrity regulations or overlook strategically

Source: Authors based on Khan et al. (2019), and Ang (2020a/b) [7]

A common form of 'painkiller' is **market restriction-driven corruption,** also dubbed 'speed money' (Ang, *ibidem*). When states deliberately or inadvertently create market distortions - through unnecessary red tape, barriers to entry or regulations that they cannot enforce - businesses and individuals evade this by paying a bribe. In a superficial sense, such *greasing the wheels* enhances efficiency and leads to better outcomes than strict enforcement would. Typically, however, it also generates incentives for the distortions to persist, affecting the overall efficiency of the economy. Anti-corruption approaches then cannot **simply be about directly attacking the corruption without addressing the market distortions at the heart of it** (Khan 2019)**.** For instance, the successful anti-corruption trajectory of Georgia in the mid-2000s following the 'Rose revolution' involved the removal of most regulations: regulatory bodies even had to demonstrate their own contribution to development, failing which most were shut down (World Bank 2012).

With **policy-distorting corruption**, the state policies at stake can be socially useful but corruption may prevent them from serving development goals such as advancing health or education. In developing countries, the failure to develop appropriate sector policies and regulations that are not undermined by corruption can be a major constraint for development. Yet, the impact can vary across sectors and across countries – with sometimes only "mild distortionary effects, mainly redistributing the benefits of policy between businesses and public officials" (Khan et al. 2016: 15).

---

[7] For figures 5 and 6, an important caveat is that these are broad categories that overlap, and there can be significant exceptions and outliers. The figures show the extent of the issues at stake but do not amount to a blueprint for responses.

Figure 6: Comparing types of corruption by development impact and feasibility of anti-corruption
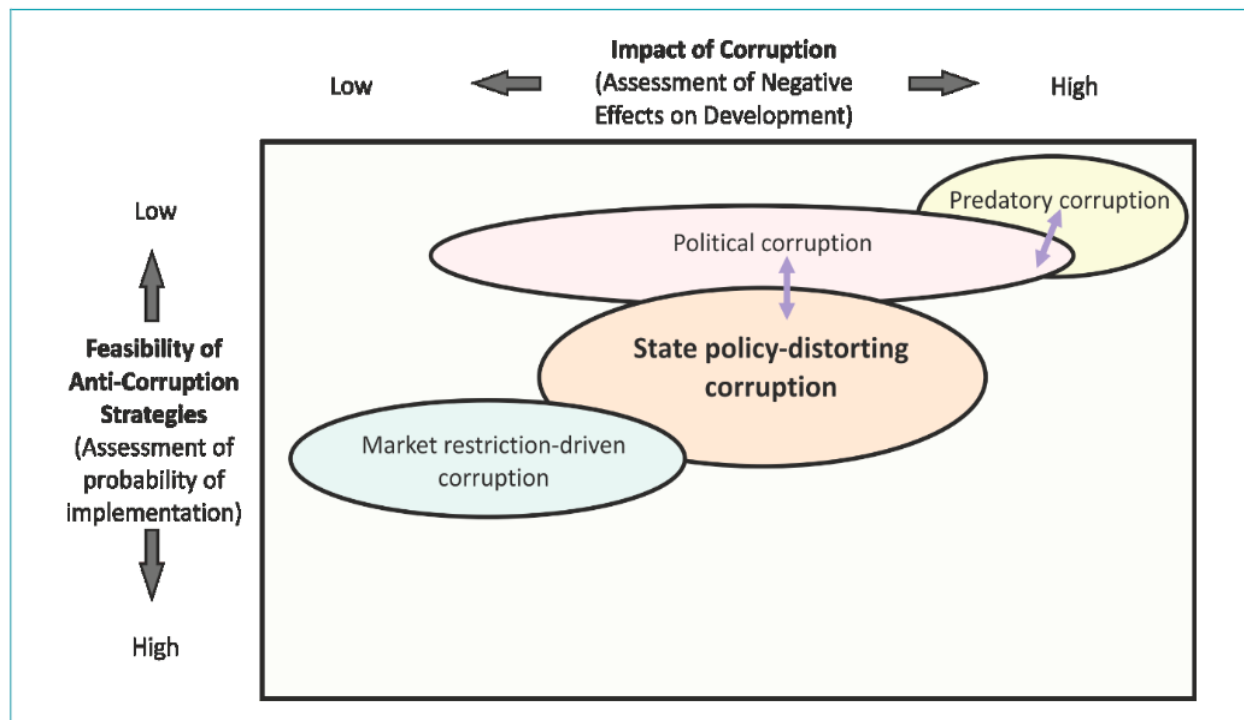
Source: Khan et al. 2019

Essential research findings on **which types of corruption can realistically be tackled, and with what development impact,** are summarised in figure 6. Unfortunately, types of corruption with an important negative impact on development (towards the right) are also harder to address from a donor perspective (higher up vertically).

Understanding the types of corruption means understanding the context where they take place. Here are three types of contexts that have major bearings for anti-corruption choices:

- In *fragile states*, corruption can be a stabilising factor and a 'de facto rule of the game' when formal rules (impersonal, legal procedures) do not have precedence. In fragile states therefore direct anti-corruption approaches can be destabilising and cause more harm than good by leading to insecurity, undermined livelihoods and violent competition for resources (Johnsøn 2016). A rule of thumb in such contexts is to seek state consolidation first and anti-corruption later.[8]
- The oft-described '*resource curse*' which sees well-endowed countries struggle with governance issues, takes a variety of shapes of corruption. Sierra Leone's infamous 'blood diamonds' are easily smuggled and allowed mobile armed groups to wage a bloody civil war. Heavy minerals in the Democratic Republic of Congo require investments to process and transport them, so they have rather favoured grand corruption through flawed procurement processes. Fossil fuels in Libya require even more investments and have resulted in elite groups dominating the political landscape and buying off dissenting groups with the proceeds of oil exports. In all cases, generating rents from the extractives sector allows leaders to affirm their power without the 'social contract' that - in a nutshell - exchanges broad-based taxation in return for public goods. When it organises

---

[8] A set of criteria for prioritising anti-corruption over stability is presented in guidelines by the Swiss Agency for Development and Cooperation (SDC 2008) that warn against the tendency to prioritise governance (and democracy) in the most fragile countries, in the absence of (1) sufficient level of economic and education development; (2) sufficient level of achieved state and democracy consolidation; (3) small proportion of non-earned revenues; and/or (4) favourable geopolitical conditions.

social relations this way, **corruption may not only be too hard to root out, but attempting to do so may trigger instability** and violence so that anti-corruption causes harm if it achieves anything (*ibidem*).

- In contexts of *autocratic consolidation*, it is not only corruption but anti-corruption **that can be used as a weapon against political opponents**. In such contexts, approaches such as technical assistance to law enforcement agencies risks "making the camouflage façade thicker by providing proof of a commitment to anti-corruption that may not be entirely genuine" and give regimes weapons to crack down opposition on charges of corruption (Baez et al. 2018).

In sum, analysis is crucial in assessing and reflecting on the nature or scope of the impact of the corruption in question and the feasibility of responses. **While corruption can be a 'cancer' or a 'toxic drug', some of it can have a net positive impact on** development**, or at least a sufficiently low impact that prioritising other areas may be advised.** The example of regulation removal as a way to tackle corruption shows another essential finding: that of all the levers to address corruption, many are not about development projects. Further, *direct* attempts to address corruption may have negative impacts, implying a need to seek indirect and different ways of working in many contexts.

2.3. Gearing development work for anti-corruption

Development projects and initiatives with anti-corruption as a starting point or an important component are increasingly attempting to factor in political economy analysis to better understand the context. The World Bank provided guidance in these efforts, and its key principles on anti-corruption are helpful across development work (see Box 1). Donor countries are progressively taking inspiration not only in projects but also upstream in devising sectoral and country strategies.

Box 1: The World Bank and anti-corruption: key principles

The World Bank released evaluations of its anti-corruption strategies and of the use of political economy analysis in anti-corruption work. Problem-based approaches that are 'fit for purpose' are deemed preferable to 'best practices'. Every context is unique, so political economy diagnostics are a necessity.

In terms of governance analysis and anti-corruption work, the World Bank's documents suggest donors should consider:

- the balance of power among stakeholders;
- the interest in reform which can be shared by stakeholders of any kind, and which allow to build anti-corruption coalitions;
- the role of discretionary authority of certain stakeholders in allowing corruption to flourish, and the extent to which information access can offer a response;
- the fact that donors by their interventions influence the balance of power;
- the fact that no 'champion' needs to 'win' in order for governance to improve: stalemate situations can be fruitful too;
- the need for continuity in governance work, e.g. with strong donor coordination, field presence and institutional memory;
- the need to bridge the gap between political economy specialists and anti-corruption practitioners; and
- the need to ensure that research focuses on areas where it is needed for practice.

Sources: World Bank 2012, 2017, 2019

Because of the wide diversity of forms and impacts of corruption, depending on the context - which can also change dramatically following political events or the current health crisis, for instance - research and experience point to the **need for agile approaches that draw on analysis and adapt to changes in context**. This is not specific to anti-corruption work but all the more important for it, as corruption amounts to a complex set of problems where very little exists by way of a ready-to-use or 'off the shelf' solution.

As practitioners report, even in times when anti-corruption enjoys clear ministerial backing or the direct support of the head of government, most groundwork is still incumbent on donor agency technical staff (Mason 2020a). It is therefore crucial to **integrate corruption analysis and lessons learned across development work** as this is still where much of the action happens - from support to civil society organisations such as Transparency International to anti-corruption projects covering for instance PFM, all the way to sectoral projects in which corruption turns out to be a decisive factor. All these activities, provided they address the problems at stake or some their root causes, can be considered as indirect anti-corruption.

In this spirit, the research programme on Anti-Corruption Evidence (ACE) concludes that 'indirect' **projects with no official reference to corruption can have the best anti-corruption impact**. This relates to the typology of categories of corruption, where 'speed money' (or in technical terms, market-restriction-driven corruption) is not a problem per se but a sub-optimal solution to unproductive and unenforceable regulations. Sectoral approaches that aim for simpler regulations that are enforced, as opposed to complex ones that can (or need to) be bypassed through corruption, offer promising indirect anti-corruption potential. Indirect, less explicit anti-corruption approaches are thus promising, but also raises concerns about accountability, since development work must be transparent. Box 2 illustrates the added value of indirect approaches for a given sector where direct anti-corruption often fails: border customs.

Box 2: Lessons learned from customs sector reform and anti-corruption

Customs has been singled out as one of the sectors where corruption is often prevalent and difficult to curb, but where indirect anti-corruption can be fruitful. Lessons learned from World Bank projects on customs reform not concerned primarily with corruption, in Madagascar and Cameroon, offer insights into how sectoral indirect anti-corruption can work.

In Madagascar, a project introducing performance-based pay for customs inspectors showed promising results on a number of counts such as reducing the duration of immobilisation of goods and the number of fraud cases examined while increasing customs duties collected and the proportion of fraud cases that got investigated. Many of these results may suggest an improvement in the shape of a reduction in extortion attempts (Raballand et al. 2017).

Previously, an 'accidental experiment' took place in Cameroon when a large-scale PFM reform project worth 15 million and a smaller-scale customs reform of technical scope took place simultaneously. Evaluating these projects seems to evidence that indirect anti-corruption can deliver palpable results where direct anti-corruption hits a wall (Raballand and Rajaram 2013).

Whether direct or indirect, anti-corruption development work stands to benefit from understanding the shortcomings of traditional development work. The previous sub-section discussed the importance of analysis in order to adjust to the type(s) of corruption at stake and the nature of the context. Further, **projects and initiatives need to be flexible enough to adapt to the changes in circumstances that occur and that on-the-run analysis may detect**. For instance, a change of government resulting from elections can change dramatically the prospects of anti-corruption work, making previous plans way too ambitious or way too modest - in short, obsolete. This has implications for funding schemes which then need to provide grantees the flexibility to change the approach, relocate or cancel activities if needed. This remains very challenging as it goes counter to the accountability requirements to deliver on a work plan agreed ex ante that are usual in development work.

A recent piece on *Adaptive approaches as a 'helping hand' for anti-corruption* (Jackson and Dolve 2020) examines **two recent anti-corruption** projects **that were designed to encourage flexibility**:

- *Strengthening Action Against Corruption in Ghana (STAAC)* is a five-year public sector anti-corruption programme started in 2016 and funded by the UK. It operates with an adjustable logframe that has encouraged 'learning on the go' and experimentation. In a first phase, the programme emphasised small grants and activity-

focused support, as opposed to larger and more official calls for proposals with pre-specified results and limited flexibility.

- *Strengthening Uganda's Anti-Corruption Response (SUGAR)*, also a five-year programme, is funded by the EU and the UK and has used adaptive approaches to immerse itself in the political context. The programme, which runs 2015–20, adopted an unusually long one-year inception phase which enabled it to better understand Uganda's patronage system and identify institutions to promote change.

Alongside flexibility, the essential added value of these projects has been their 'chain' approach – both projects seek to join up actions and build synergies with other projects and actors ranging from civil society to law enforcement and the judicial system. Importantly, **anti-corruption projects need to be political**: they need to find support and champions, and to leverage (or support) coalitions of international and especially local actors to overcome unavoidable resistances (Mungiu-Pippidi 2017). In other words, they need to identify the existing traction, to avoid simply 'pushing on a string' to no avail.

To be political requires in turn to have some leeway to engage with a diversity of actors and to make hard choices that may create 'winners' and 'losers'.[9] This also goes counter to some of the practices of traditional development work, which tends to consider problems as primarily technical and to steer clear from controversial issues and politics. In being political, projects need to adopt a broad view, to avoid unintended consequences or encompass methods to mitigate them.[10]

The ACE programme investigates **4 broad categories of pathways for anti-corruption work** (Khan et al. 2019) that all require - and illustrate - political savviness and a heavy reliance on existing dynamics and traction, that are currently being tested:

- *Aligning incentives*, as in the case of the Nigerian energy sector and the promotion of (mostly solar) off-grid electricity as an alternative to traditional on-grid supply to limit corruption.
- *Designing for differences*, as in the case of Tanzanian export promotion zones where eligibility criteria for companies with different models plays a role in corruption.
- *Building coalitions*, as in the case of sugar quotas and smuggling in East Africa examined in section 2.2.
- *Resolving rights*, as in the case of land rights in Bangladesh, where conflicting norms result in numerous conflicts, court arbitrations and opportunities for corruption.

Reflecting the reality that anti-corruption interventions are sometimes not feasible (in the short-term) for a diversity of practical or ethical reasons, the ACE programme also developed a work stream on "***Mitigation strategies when corruption is intractable but has high welfare costs***". These strategies aim to alleviate the burden on the poorest and, in so doing, to build support for possible anti-corruption if significant contextual changes make it viable later (Khan et al. 2019).

To summarise, stepping up anti-corruption work requires donor countries to integrate the perspective of corruption beyond direct anti-corruption projects. This can go through the adoption of adaptive, political approaches rooted in thorough context analysis. It can be a matter of *mainstreaming* anti-corruption horizontally (Boehm, 2014) or selectively *contaminating* the sectors most concerned. This requires important work from development

---

[9] For instance, a project by the ACE programme in Tanzania found that the trade of sugar had been traditionally riddled by corruption to obtain trading rights from public servants. But top leadership also had an interest in ensuring a steady. In 2017, a coalition of domestic producers managed to change the rules of the game by leveraging sufficient influence to outweigh the interests of corrupters (Khan et al. 2019).

[10] For instance, in the case of a hospital unable to pay its employees, and where repressing corruption without setting up a reliable payroll would deprive employees of livelihood and likely lead to a major degradation of services.

administrations but also from the rest of donor countries' governments, up to a complete rethink of their approach to corruption.

2.4. Wider anti-corruption channels: in search of policy coherence

"This is not only a development issue. It is not only an economic issue. It's a full-on national security issue – and, for me, one of the defining issues of our time."
David Cameron, former UK Prime Minister, 2017 speech "*Corruption: more than a cancer*"

This speech came at a time when the United Kingdom was at the forefront of international anti-corruption efforts, before the country's attention got diverted by Brexit. It sheds light on the major development implications of corruption as captured by SDG '16 plus', but also on the diversity of angles, and international means, through which it can be tackled. **Policy coherence to tackle corruption is the objective of coordinating these, and reconciling them** in order to maximise a donor country's overall impact on the issue. This section presents lessons learned in efforts to improve OECD countries' footprint on corruption in developing countries by tackling the drivers for corruption and seeking policy coherence.

There is ample evidence that corruption in developing countries does not operate in isolation from international dynamics.[11] The OECD's seminal framework of the *Drivers for corruption* (2012) captures seven avenues through which countries can impact corruption in developing countries through their own policies, namely:

1. Sources of rents and unearned income;
2. Opportunities and constraints to conceal and move illicit assets;
3. Foreign investment;
4. Global and regional security threats and responses;
5. International legal measures and sanctions against domestic elites;
6. Reputational pressures on political elites from regional and international actors;
7. External ideas and skills.

An overview of the channels through which OECD countries and others can deal with these drivers is provided by Figure 7 below. **The figure shows the diversity of scope and shapes of anti-corruption initiatives. Development assistance (in the top-right box) is just a small part of this effort.** The initiatives range from the legally-binding treaty of the United Nations Convention against Corruption (UNCAC) and multilaterally agreed best practices in the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, all the way to police efforts under Interpol, sectoral initiatives such as the Extractives Industries Transparency Initiative (EITI) and initiatives to facilitate the repatriation of assets stolen in particular by rulers of developing countries during their period in office (StAR). Trade work under the World Trade Organisation (WTO), taxation (of multinational companies in particular) as discussed at the 2017 G7 summit, anti-money laundering and anti-terrorism (for instance through the Financial Action Task Force - FATF) complement the picture of international efforts that structure the environment for corruption.

---

[11] Notorious historical examples include the Swiss banking secrecy that allowed storing proceeds of corruption, as well as German tax policy which allowed until the end of the 20th century to deduct from taxes amounts spent to bribe foreign officials.

Figure 7: The international anti-corruption architecture in 2020

International anti-corruption architecture
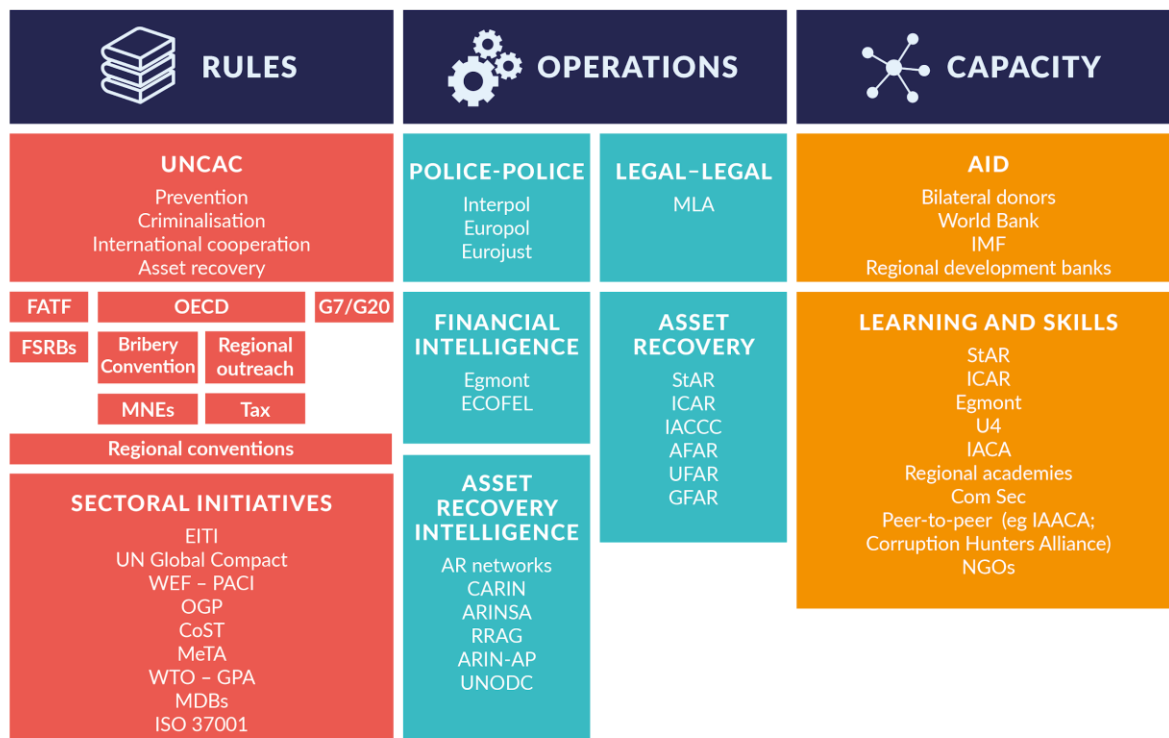
Source: Mason 2020c

Considering the diversity of initiatives,[12] it is unsurprising that political commitment has been uneven over time and between (even like-minded) countries. A typical European country can report and be asked to follow at least half a dozen of these initiatives, which requires significant resources to be conducted properly. Hence, a great deal of caution should be taken in **understanding the full added value and opportunity costs before launching any new international anti-corruption initiative** given the many existing worthy initiatives in this crowded landscape. The way forward is to implement and consolidate existing initiatives, and possibly to prioritise some and rationalise others. As it is often essentially a diplomatic endeavour with bearing on a diversity of national interests, engagement in these initiatives requires a government to be committed beyond its development or even foreign affairs circles (Mason 2020b).

This need to align government efforts was recognised already fifteen years ago when Switzerland assigned the responsibility for anti-corruption to the Swiss Agency for Development and Cooperation (SDC) while acknowledging that **important parts of the anti-corruption efforts take place outside of a development agency**. The country's anti-corruption strategy clarifies that SDC "shall work in close cooperation to improve policy coherence with other Federal administration departments dealing with corruption and money laundering issues" and that it should in particular "advocate" and "support" international initiatives and Swiss international commitments [to be taken by other state administrations] in order to address corruption and its root causes such as capital mobility (SDC 2006: 13-19)." Other countries have adopted this understanding of a shared responsibility for anti-corruption efforts, up to the extreme of

---

[12] Amongst the 'rules' lie global ones but also a number of important local and regional ones, not least those spearheaded by developing countries. These include the African Union's *Convention on Preventing and Combating Corruption* and its continental 'Anti-Corruption champion' (currently the Nigerian president Muhammadu Buhari). Aligning behind and supporting effective continental and regional approaches to anti-corruption originating from developing countries themselves carries a different weight than simply supporting Western donor initiatives.

a 'whole of government' strategy for which the whole executive is accountable, as is the case in the UK (HM Government 2017).

How to promote this alignment - policy coherence in favour of the development objective of reducing corruption as per the sustainable development goals - is a matter of national context. **While there is no one-size-fits-all approach, a number of interdependent mechanisms can be adopted to promote this policy priority across governmen**t. These are summarised in Figure 8.

Figure 8: Elements of an institutional system to promote anti-corruption across government

POLICY COHERENCE FOR ANTI-CORRUPTION — *ecdpm*

FRAMEWORK	Clear legal and/or political statement of intent – to provide guidance and legitimise efforts in thematic areas and to coordinate Designated political leader(s) – to have a clear locus for responsibility, decision and arbitration trade-offs	*German strategy for anti-corruption & integrity in development policy* *United Kingdom whole of government anti-corruption policy 2017-2022*
MECHANISMS	Mandated sector champions spearheading policy coherence as a group and within their own institutions Consultation, coordination and consensus-building structures between policy sectors, communities and interest groups Policy making processes ensuring transparency of policy options and trade-offs, and empowering sector champions	*Swiss Development cooperation agency responsible for Switzerland* *Swedish anti-corruption coordination network*
KNOWLEDGE SYSTEMS	Analytical capacity to assess policy options and conduct ex-ante impact assessments (within and outside government) Monitoring processes with measurable indicators that check policy coherence, and ex-post evaluations Knowledge management feeding back lessons learned into decision making and ensuring institutional memory	*European Union ex ante impact assessments as part of Better Regulations toolbox* *U4 Anti-corruption resource centre briefings for its partner countries*
ACCOUNTABILITY	Strategies rooted in the existing political economy of decision making to incentivise maximised contributions Regular open reporting encouraging public scrutiny and peer review and pressure	*Dutch Parliament questions to government requiring concerted responses on anti-corruption* *OECD DAC peer reviews*

Source: Authors' elaboration, adapted from Mackie et al. 2017

Through mechanisms such as coordination committees, reporting to parliament and the adoption of dedicated policy documents, countries can involve different parts of government in the fight against corruption. This in turn allows them to tackle the drivers for corruption and conduct anti-corruption more efficiently. It also allows them to channel the energy and resources of other sectors than development for anti-corruption. This is visible in the case of Germany whose 'Marshall plan for Africa' - an example of a policy statement not dedicated to anti-corruption but covering it - makes a priority of corruption as an obstacle to, among other things, German investment in the continent (BMZ 2017). So **industrial policy and investment promotion bodies are not just counterparts that need to be convinced to play along for anti-corruption, but drivers of it in their own right**.[13]

---

[13] By contrast, a framework or statement that fails to integrate anti-corruption or frames it in a negative way (for instance as a concern solely for development administration or for the judiciary) may be more than a missed occasion: it can send wrong signals and curtail progress on anti-corruption.

Mason (2020 #10) identifies the potential for a "**combination effect" when donor administrations manage to work across government** in support to anti-corruption aid programming. More impactful than the sum of its parts, such an effect is achieved when donors manage to coordinate momentum on the drivers with:

- pressures 'from below' via CSOs and the demand for integrity;[14]
- pressures 'from the side' via the reinforcement of checks and balances; and
- pressures 'from the top' via formal and informal diplomatic channels.

These 'pressures for change' which can brush off the status quo and reduce corruption are summarised in Figure 9 below, where they are represented with blue arrows.

Figure 9: Strengthening the donor approach - policy coherence for anti-corruption

Strengthening the donor approach – policy coherence for anti-corruption
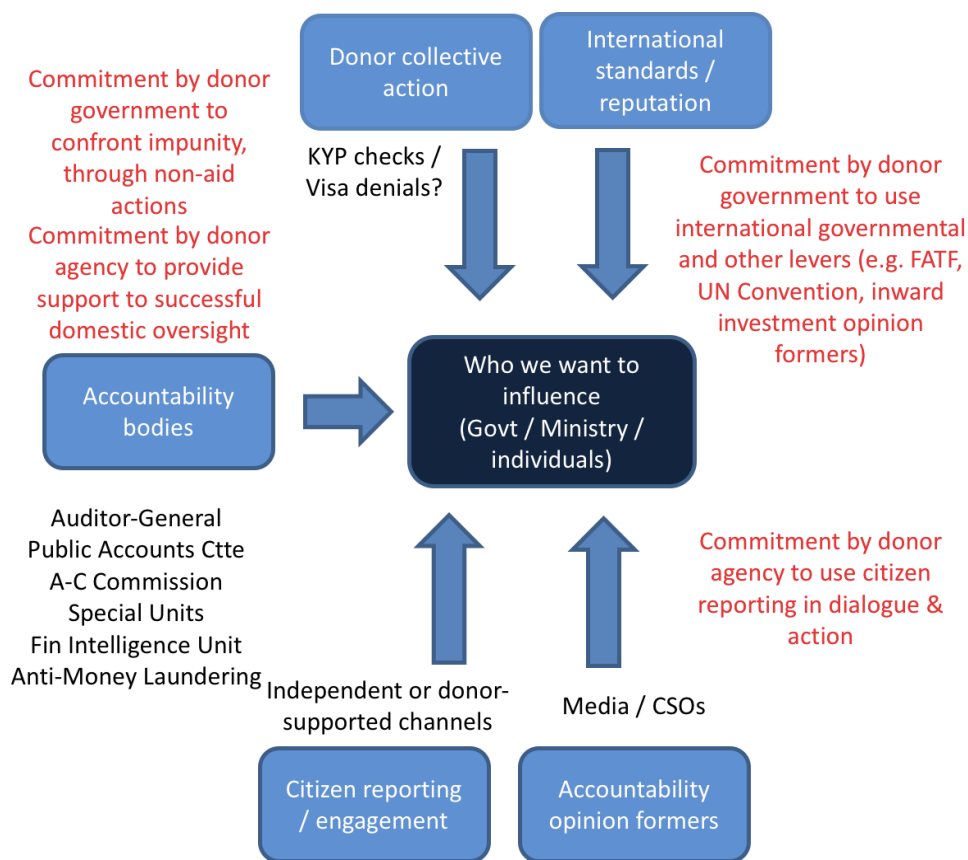
Source: Mason, forthcoming 2020 (building on Mason 2018)

The figure shows that **pressures from all sides - not only donor agencies but also diplomacy and wider work on the drivers for** corruption **across government - contribute to pushing anti-corruption forward in the partner country**. Reacting and politicising corruption incidents by the use of the diplomatic channels based in international standards (the two blue boxes 'from the top') can be risky. It requires sound analysis and coordination with like-minded diplomatic actors, for which there is space for the EU to play a leading role alongside the most committed donors because of how uncomfortable it can be for a country to take a stance alone. This can take ad hoc shapes through

---

[14] Development partners have an important role to play in support to CSOs and in wider measures to ensure that the civic space is protected and conducive to such pressures, which also requires a degree of policy coherence (Bossuyt & Ronceray, 2020).

joint statements, or result in operational structures such as the Democratic Governance Facility established in Uganda to combine the efforts of Austria, Denmark, Ireland, the Netherlands, Norway, Sweden, and the EU.[15] Such initiatives have the effect of pooling and rationalising funding but also of increasing donor countries' leeway to engage on governance issues e.g. through joint communiqués responding to violations. In the spirit of the pressures for change, they can support civil society movements (bottom-up pressure) and institutional accountability bodies (pressures from the side).

Foremost, diplomatic engagement in support to anti-corruption requires the foreign affairs hierarchy to be on-board, to accept the degree of risk involved and to encourage it through high-level public statements, internal directives and even career incentives. **The essential ingredient for all this - as with all policy coherence efforts - is political backing and dynamism**. Who is responsible for anti-corruption ultimately (Figure 8 row 1) and to what extent they are held accountable (row 4) and well-supported (row 2) can play an important role in fostering this political traction. But at the end of the day, personal commitment and leadership of the political level is the fuel of this machinery to move the anti-corruption agenda forward and deliver on SDG 16.

In sum, overhauling anti-corruption work from a donor perspective starts with development administrations but must expand to other branches of the government with a decisive impact, such as those working on taxation, banking, anti-terrorism, trade, justice and judicial cooperation, and by all means diplomatic hierarchy all the way to centre of government. This is an ambitious agenda that reaches far beyond direct anti-corruption projects whose limits are known by now. It is an agenda that requires changing some of the ways different parts of government function together, in particular but not exclusively development administrations, and a qualitative jump in policy coherence that requires political impetus. **The question that determines the possibility to get out of the current stalemate of international anti-corruption is not whether this is all done, but to what extent - and by whom.**

3. Anti-corruption approaches: a selective mapping

3.1. Methodology

Building on the finding that anti-corruption measures extend beyond development practice to many other parts of government action, this section investigates current overall donor country approaches to anti-corruption, on all these counts relevant to corruption among partner countries. Countries covered are the United Kingdom (UK), Sweden, the Netherlands, and Germany as these all have had strong commitment or interesting approaches to promoting anti-corruption in partner countries. Also the European Commission and the World Bank were included, but the main focus of this paper is on the four countries.

---

[15]   https://www.dgf.ug/page/what-dgf;   https://www.norway.no/en/uganda/norway-uganda/news-events/news2/dgf-committed-to-strengthened-partnerships-for-a-democratic-uganda--without-corruption/

The mapping assesses the following elements for each country:

- **Strategic approach and guiding principles:** key characteristics of the main strategies and policies in terms of anti-corruption in development context.[16]
- **Resources for anti-corruption (direct, indirect)** estimates and puts in perspective the ODA amounts directed to anti-corruption and topics relevant to it.
- **Initiatives and communities of practice** that the country is funding and / or a member of, such as EITI or U4.
- **Examples of anti-corruption projects** with an example value or remarkable features.
- **Examples of work on drivers for corruption** through projects and international initiatives.
- **External feedback** from evaluations and commentaries shedding light on the countries' approaches.

More detailed analysis of each of the actors can be found in annexes. The remainder of this section presents the highlights from the mapping [17]

## 3.2. Comparing international approaches

Overall approaches

Though ostensibly addressing the same issues, our mapping reveals some differences in strategic approaches to anti-corruption. All mapped countries have a clear political mandate to work on anti-corruption, which is illustrated either in strategies or political statements. Though anti-corruption is approached in various ways, a **common denominator for all the approaches however was the acknowledgement of anti-corruption as a cross-cutting topic, that needs to be addressed in several sectors across the government.** Because corruption is not a separate sector, explicitly 'whole-of-government' approaches to anti-corruption like the UK's seem to hold promise in terms of facilitating policy coherence.

The figure 10 below summarises some of the main characteristics and differences between the country approaches discussed in the next subsections.

---

[16] This covers anti-corruption related strategies and policies both in the level of ministries as well as implementing agencies as relevant. However, we do not focus on domestic anti-corruption in the donor countries, for instance in reducing corruption in the UK itself. We focus on the posture of mapped countries towards corruption in partner countries, mostly in the context of delivering ODA. We also pay only limited attention to anti-corruption from a risk perspective and therefore to internal anti-corruption rules and investigation procedures. This section also includes more general guiding principles found in the strategies and policy commitments, such as human rights perspective or zero tolerance to corruption.

[17] The drafts of country approaches have been sent to the contact persons of Sweden, Germany and the Netherlands. Germany and Sweden have sent their comments, which have been integrated. However, in the case of the UK, and the Netherlands, the comments will be included only in the final version. The approaches of the EU and World bank are based solely on desk research and have not been verified by the institutions.

Figure 10: Key features of the anti-corruption approaches by selected donor countries
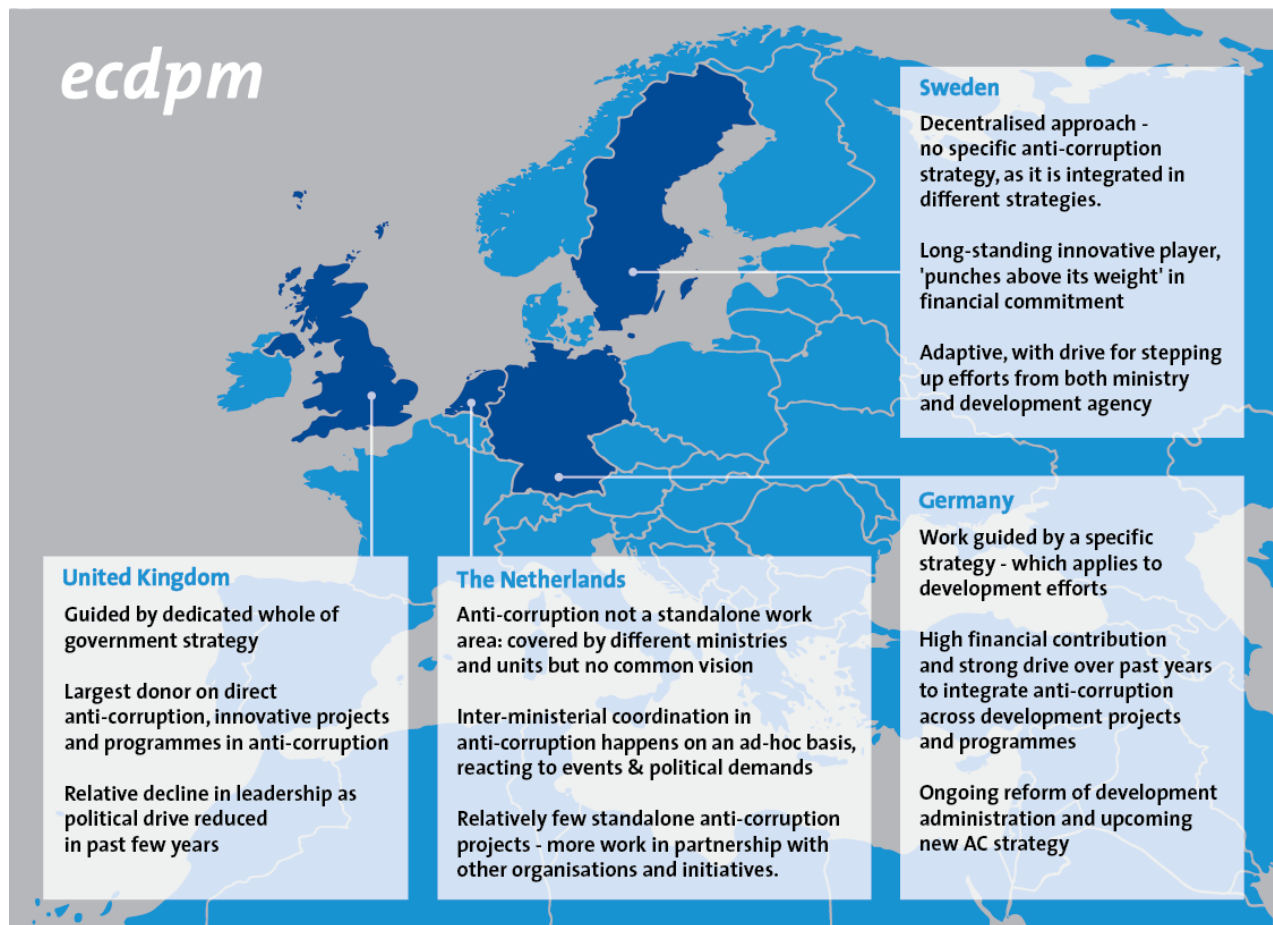
As summarised, each of the countries have a different approach to anti-corruption. The UK has a clearly stated whole-of-government approach to anti-corruption activities. The German work on anti-corruption is guided by a standalone strategy, though it applies more narrowly to the development context. The World Bank has also expressed its commitment by a strategic document, which also details the Bank's anti-corruption initiatives. Conversely, Sweden and the Netherlands have not made policy documents or specific strategies on anti-corruption. The Netherlands did not make anti-corruption a self-standing topic guided by a specific vision, although they do tackle corruption in projects and programmatic funding to relevant structures. Sweden has included anti-corruption as a goal or a subgoal in several strategies that primarily concern other sectors thus taking a decentralised approach. **There is no evidence that an ambitious sectoral anti-corruption policy always yields better or worse results than a whole-of-government where the concern may be more 'diluted'. However, it is recognised that having clear statements of intent backed up at the political level guides and legitimises efforts across the board.**

Further integrating anti-corruption across the board - mainstreaming it - can take place either in a decentralised way or guided by a central initiative. Although integrating anti-corruption across sectors is essential for effectiveness of the work, there are some issues to consider. For instance, government staff can experience fatigue when procedures force them to tackle a concern that is not at the core of their job. Applying the anti-corruption perspective means additional work. It often requires practitioners to increase their efforts, go beyond daily routine and acquire new knowledge, and can thus be seen as a burden. Efforts to mainstream anti-corruption, for instance within the Swedish development agency, are thus advancing cautiously to avoid overburdening staff. The challenge is to develop smooth ways to integrate anti-corruption efforts in wider projects and sectors in a way that adds value to their core mandate

(Boehm, 2014). **A promising approach is to rely on pilots and selective inclusion of priority peers and involvement in sectors rather than mainstreaming across the board**.

ODA allocations to anti-corruption

As a part of the mapping, we review the resourcing to anti-corruption.[18] The direct spending on anti-corruption alone does not give a full picture of the resources allocated to anti-corruption, due to the different classifications and to the fact that much anti-corruption is 'more or less indirect', with no clear-cut boundary. For instance, mapped countries have indirect anti-corruption projects in education and health services that aren't captured by this data.

Figures 11 and 12 show that from the reviewed donors, the UK spends the most ODA on direct anti-corruption, both in absolute terms and in relative terms as a percentage from total aid to government and civil society. In 2018, according to OECD CRS data, the UK spent 4,5% of its total ODA to the government and civil society sector on anti-corruption, whereas EU institutions spent 1,15%, Sweden 1,25%, Germany 0,48% and the Netherlands 0,43%. **During the last years, the UK, EU institutions and Germany have systematically increased their ODA allocations categorised as direct anti-corruption, while in Sweden and the Netherlands the development has been slightly more uneven.**

Figure 11: ODA Spending to anti-corruption organisations and institutions 2014-2018
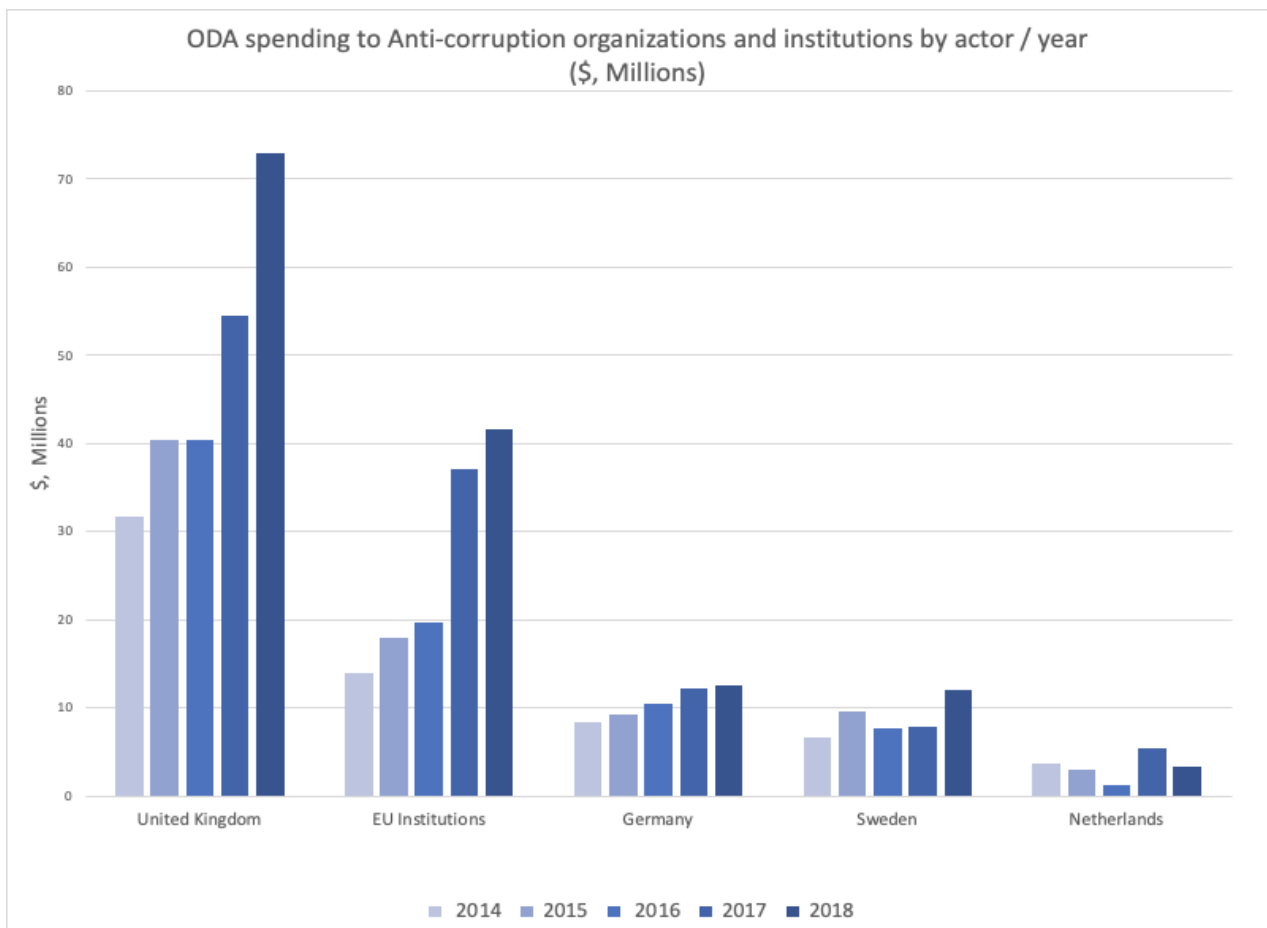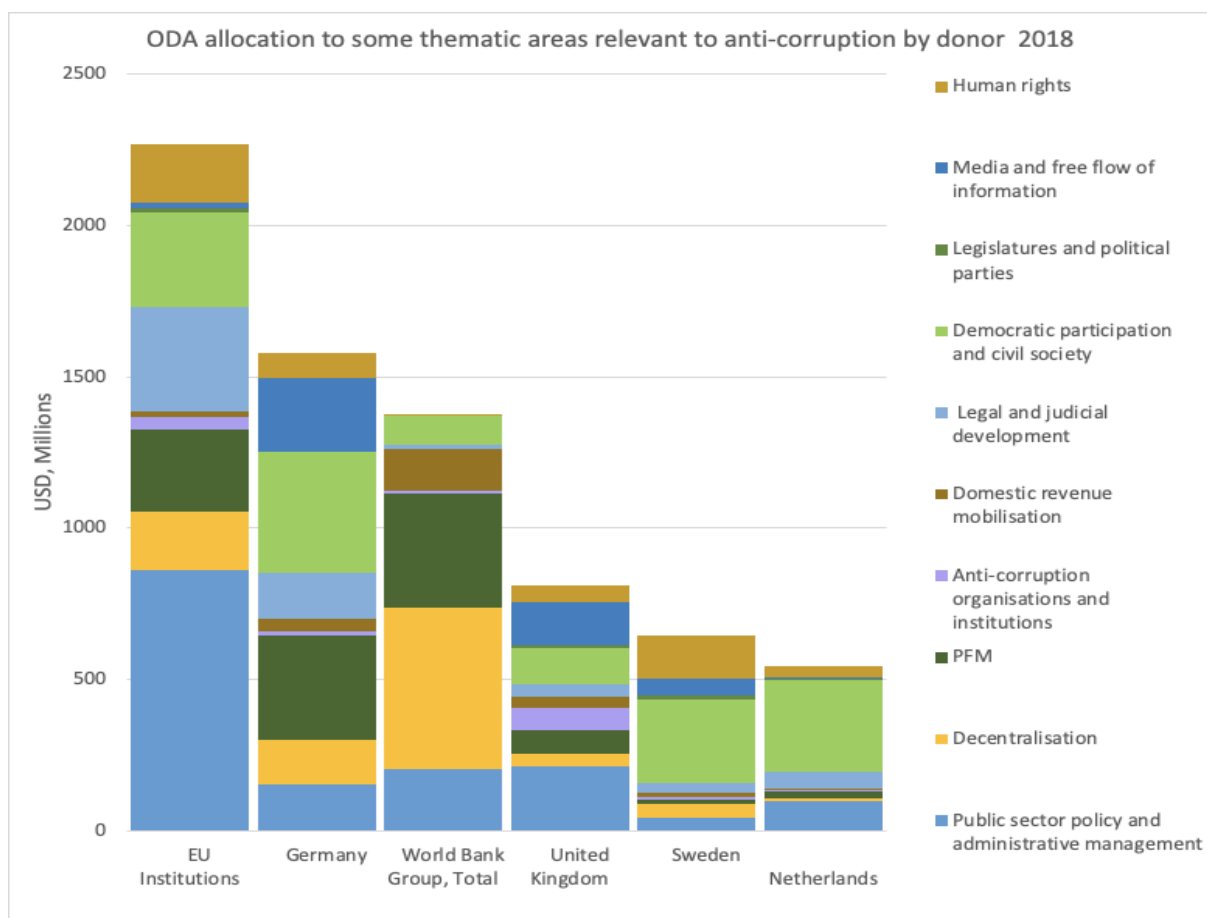

Source: Authors from OECD 2020c

---

[18] As an indication of spending on anti-corruption, this study utilises the Creditor Reporting Standard (CRS) Dataset maintained by the OECD. In this study we only discuss the sector-allocable ODA, which is only a part of the total ODA and excludes for instance budget support and humanitarian aid. (OECD 2019b).

For the World Bank, ODA to direct anti-corruption has decreased dramatically since 2015, overall aid to anti-corruption institutions and organisations being a fraction of what it has been. This arguably stems from a broader systems approach that the Bank has adopted seeing indirect support to systems strengthening as a route to successful anti-corruption measures given the weaknesses of direct approaches discussed in the previous section (OECD 2020c; The World Bank 2019a).

When reviewing ODA to other sectors relevant to anti-corruption, some other differences between the countries are visible. First, both the Netherlands and Sweden allocate a large share of their ODA to democratic participation and civil society, which also reflects the strategic priorities of these countries. Secondly, especially EU institutions, the World Bank and Germany allocate high levels of resources to PFM and Decentralisation.

Figure 12: ODA Allocations to some thematic areas relevant to anti-corruption

Implementation of anti-corruption efforts

The countries have adopted multiple ways of working on anti-corruption, and developed a wide array of tools and projects, mobilising diverse actors both in direct and indirect anti-corruption work. The UK has carried out some innovative approaches, such as SUGAR and STAAC projects (see 2.3), as well as UK aid-funded police units that tackle money laundering and illicit flows into the UK. These have been assessed as agile approaches building on some of the

[19] This figure combines spending to some governance sectors relevant to anti-corruption. However, it is impossible to know to what extent the funds used in these sectors actually combat corruption. At the same time, for instance many countries conduct anti-corruption efforts in projects across all sectors. Therefore, this graph is only indicative.

best practice for achieving sustainable anti-corruption outcomes. However, it is possible to support anti-corruption work more indirectly, for instance through substantial funding to key initiatives such as Extractive Industries Transparency Initiative (EITI) and organisations such as Transparency International, as the Netherlands has done. Several countries also co-fund and partner with other donors, such as the UN or the EU, in anti-corruption work. For instance, the SUGAR project was funded by DFID and the EU. Germany has adopted good practices in terms of indirect anti-corruption projects. Since 2018, all technical and financial cooperation projects include a mapping of relevant corruption risks that could interfere with the respective project goals. In cases where corruption risks are estimated high and can be controlled, measures to mitigate corruption risks are reflected in the project design and monitored.

The countries have also chosen several ways to coordinate anti-corruption work. The UK has named a specific high-level anti-corruption champion, who is responsible for helping drive delivery of the strategy as well as representing the government's anti-corruption agenda in the UK and internationally. The UK also has a coordination unit on anti-corruption across the government. In Germany, BMZ has had an annual review and discussion of the Anti-corruption Strategy with relevant stakeholders, which improves the collaboration and fosters policy coherence. These types of **coordination mechanisms in anti-corruption strengthen the collaboration, break silos within and between the organisations and departments and foster policy coherence in anti-corruption**.

This is not always smooth sailing as cross-cutting planning runs counter to long histories of task divisions in governments. Sharing information may be perceived as difficult due to the sensitiveness of corruption. In some cases, there may not be interest to strengthen coordination, especially if anti-corruption is not a strong priority. Partially for these reasons, in the Netherlands relevant ministries (foreign affairs, finance and justice) collaborate on an ad hoc basis, more often driven by specific requests such as parliament questions than by a perception of a common endeavour to tackle corruption.

As discussed in section 2.4, the diversity of anti-corruption initiatives and communities can be overwhelming. The **countries in this study support various but rather similar initiatives and communities of practice, organisations or initiatives in international anti-corruption architecture.** For instance, all the mapped countries were sponsoring Transparency International in one way or another, and are members of the Open Government Partnership (OGP). However, there is divergence in terms of allocating aid through these initiatives and organisations. In particular, The Netherlands funds anti-corruption work in priority through Transparency international and Extractive Industries Transparency Initiative (EITI) whereas the World Bank runs StAR.

The case study countries have varying approaches to address illicit financial flows as a key international driver for corruption. The UK and Germany have carried out high profile initiatives on the topic, and their development agencies have been investing in close coordination with other government bodies. In Germany, the coordination between GIZ and several ministries has ensured the adoption of a common position in combating IFFs, and giving the programme a position to advise other ministries. In the case of DFID, aid was used domestically to support law enforcement to tackle illicit financial flows into the UK. Both Germany and the UK were between 1980 and 2018 in the top 10 of the destination countries of illicit flows from Africa in terms of volume, and the realisation of their role in the problem may have been one factor behind the response (Signé et al. 2020). In the Netherlands there is also collaboration between ministries on tackling illicit financial flows. For instance, the Ministries of Justice and Finance together with the Public Ministry and their Tax and Customs Administration combat illicit financial flows, for instance through continuous work on the implementation of the EU's anti-money laundering directive. Yet, there seems to have been somewhat less emphasis on this issue in the Netherlands, despite the country's visible role as an international finance centre that allows a number of tax schemes (see e.g. Langerock & Hietland, 2019). The similarly low focus on IFF in Sweden is compounded by its relatively lower role as facilitator of them so far. However, **international norms and initiatives to curb IFFs at the global level require support and leadership from all countries so there is space for all countries committed to anti-corruption to invest in this area**.

In sum, comparing the country cases and approaches it is clear that the political prioritisation of anti-corruption varies from country to country. Nevertheless, each actor has adopted a wide array of tools to tackle corruption. All actors work on anti-corruption on multiple fronts, addressing corruption both directly and indirectly, although Sweden and Netherlands seem to favour a more 'mainstreamed' approach. They also support similar initiatives. There are however some divergences in terms of spending to anti-corruption or to related sectors, which can reflect the political priorities in general.

4. Key takeaways of relevance for an updated approach

Based on the research summarised above, the following findings may contribute to ongoing discussions on an updated approach. Addressing most of these means may often mean building on dynamics already present rather than a significant rethinking of the engagement. The central lesson however is that there is benefit in approaching anti-corruption as **an issue of shared responsibility**: corruption is a problem everywhere; many developing countries are among the worst-off and their development partners, who carry part of the responsibility, ambition to support them in their fight against corruption, which requires pulling together many threads.

The complex links between development and corruption

1. *Not all corruption plays out the same in regards to its impact on development*

The prominence of addressing corruption in the 2030 agenda and related targets of the cross-cutting "SDG 16 Plus" reflect the consensus on a crucial development importance of corruption. But not all corruption affects development in the same way - some forms are more damaging than others. Typologies of corruption point to extreme differences. At one end of the spectrum are the most damaging types of corruption, such as those that siphon resources and distort policies to the benefit of the few to the detriment of the many. At the other end, comparatively less damaging types of corruption act as 'grease in the wheels' of economies that would otherwise grind to a halt due to problematic regulation or allow businesses to shape the policy environment to foster growth, such as that of China over the last two decades. **It is important to encourage more explicit research on, and identification of, types of corruption taking place and their development impact before designing strategies to address these.**

2. *Major anti-corruption success comes gradually and through endogenous change*

Historically, countries that have managed to dramatically reduce corruption include Botswana, Rwanda, Hong Kong, Singapore, Georgia, Mauritius and Estonia. These success stories were not externally-driven, and they have relied on a mix of momentous change (initiated for instance through revolutions) and slow evolutions of mentalities. Therefore there is fairly little that an external actor can hope to replicate as a whole, and international anti-corruption efforts should be seen as primarily a complement to promising existing dynamics - a push to complement the existing pull on the string of anti-corruption. **Initiatives need to look beyond formal anti-corruption structures to identify actors and coalitions who seek to address corruption.**

Assessing the impact of direct and indirect anti-corruption in development

3. *Anti-corruption: with or without the name*

A number of initiatives are framed as anti-corruption efforts, and reported as such in OECD DAC data. This *direct* anti-corruption ranges from support to dedicated authorities to support to organisations like Transparency International, through customs modernisation projects and many more. A wide diversity of initiatives can be understood as *indirect* anti-corruption: any project such as sectoral reform which factors in the concern for addressing corruption and integrates it, as well as activities and initiatives that lead to addressing the *drivers for corruption*, a set of structural factors identified by the OECD that shape corruption outcomes, such as the possibility of transferring the proceeds of corruption abroad and keeping them in tax havens. The boundary between direct and indirect anti-corruption is

sometimes blurry, but it is important in showing the diversity of angles through which corruption can be tackled and to emphasise the research finding that anti-corruption can be most effective *without the name*. **The lesson here is to draw from all relevant types of initiatives - including many with no explicit reference to corruption - and coordinate them for a maximal combined effect.**

4. *Weak evidence base in direct anti-corruption*

In most cases, it is impossible to pinpoint a significant measurable reduction of corruption due to direct anti-corruption initiatives. That is largely due to how hidden and how difficult to measure corruption is in the first place. There is thus a lack of evidence base when it comes to the impact of direct anti-corruption efforts. The mapped countries have reacted to this challenge in different ways. For instance, the UK has supported an ACE (Anti-Corruption Evidence) programme to create evidence-based research on what works in anti-corruption. Research suggests that indirect approaches may overall work better, although by nature their results are difficult to capture and compare, and that with a few exceptions the overall effectiveness of internationally supported anti-corruption efforts is likely to be limited. **Anti-corruption work shouldn't be expected across the board to meet rigid quantitative targets, and it is often important to prioritise multiple sources of qualitative evidence.**

How donors approach anti-corruption

5. *Sustained interest, renewed commitments and international initiatives*

There has been sustained development assistance for direct anti-corruption over time, despite fluctuations of higher intensity than overall ODA fluctuations. At the turn of the decade in 2020, interest seems to have been reignited and political attention as well as numeric financial commitments are on the rise, although this starts from a rather low baseline as far as *direct* anti-corruption is concerned (ranging in the area of 1% of the overall global total of ODA spending). The UK, EU institutions and Germany have gradually increased their ODA allocation to anti-corruption, while in Sweden and the Netherlands the development has been more uneven. These figures do not capture *indirect* anti-corruption spending but significant energy has been dedicated to curb the drivers for corruption, starting with countries like the UK and Switzerland which acknowledged their own problematic impact as financial centres. There may be more promise to significantly reduce corruption through such indirect avenues than via direct anti-corruption projects. **The international landscape of initiatives to tackle corruption is already crowded, so advancing substantially existing ones is a more likely way forward than creating new ones.**

6. *There is no single way - yet approaching corruption in a cross-cutting manner is favoured*

How donor countries conduct these efforts is a matter of national choice, although some commonalities stand out. All mapped country approaches had either a strategy or a clear political mandate to work on anti-corruption illustrated in political statements. A common denominator for all the approaches analysed was the acknowledgement of anti-corruption as a cross-cutting topic, that needs to be addressed in several sectors across the government, directly and indirectly. Because corruption is not a separate sector, the whole-of-government approaches to anti-corruption seem to hold promise in terms of facilitating policy coherence and potentially greater impact. **It may help to conceptualise anti-corruption in terms of the overall footprint of a donor country, so that each part of government and of development work is responsible to the extent that it has an impact on corruption. Promoting such a vision is likely to require official statements at a high level, and continuous efforts, to 'pull together' all the relevant threads.**

Emerging best practice: mobilising all the levers across donor government

7. *Coherence across government to mobilise forces for anti-corruption*

A number of methods allow to promote the concern for corruption in developing and transition countries across donor governments, to improve their footprint and to 'lead by example' by addressing their own shortcomings. Four broad categories of elements are present in all donor countries covered, though the shapes in which they materialise differ. These are the *institutional framework* (including strategies and who is responsible for them); *mechanisms* such as anti-corruption coordination groups and sectoral 'champions'; *knowledge systems* to improve the analysis and feedback loops that inform efforts; and *accountability* for instance through reporting to the legislative or external evaluations.

The fuel to set these cogs in motion is political commitment and leadership. There is no single model that applies for any context, but **it is advisable to adopt elements of a policy coherence system that are most promising given the existing institutional setup and political context.**

8. *Political backing as the cornerstone for leverage and international coordination*

Political commitment is as necessary externally as it is internally. Direct diplomatic dialogue remains an essential avenue to promote anti-corruption, although it is unlikely to be enough on its own bilaterally. Continuous dialogue on corruption as well as reacting to incidents by the use of the diplomatic channels requires political backing in addition to solid analysis. Political backing is also essential to leverage coalitions of like-minded partners to reinforce messages and multiply their respective weights. Together, this allows at a minimum to share analysis and at best to coordinate to avoid sending incoherent messages to partners, and to maximise the 'pressures for change' on institutions, regimes and persons involved in corruption. Political backing and resulting resources (starting with human resources) are crucial to ensure that a country is represented and able to exert leadership in the wide diversity of international coordination and regulation initiatives that shape the contexts in which corruption takes place or does not. Many administrations are stretched thin when it comes to representation in all the fora relevant to anti-corruption, and there is a relative leadership vacuum since Brexit diverted away some of the UK's energy for anti-corruption. So **there is a space and a demand for a single or a few donors to assume leadership and reinvigorate the international anti-corruption agenda, but this requires resources.**

Emerging best practice: informed and agile development efforts

9. *A differentiated approach informed by analysis, for impact and to 'do no harm'*

Some forms of corruption are too entrenched in existing power relations for external actors to address, and after thorough analysis donors may be better advised to work on mitigating their impact on the poor and wider sustainable development, while awaiting structural changes that may offer them a leeway further down the line. When and where it is an essential channel for rents and incomes, corruption may not only be too hard to root out, but attempting to do so may trigger instability and violence so that anti-corruption may cause more harm than good. In contexts of autocratic consolidation, anti-corruption that can be used as a weapon against political opponents. In such contexts, approaches such as technical assistance to law enforcement agencies risk offering a varnish of legitimacy to regimes conducting repression or even high-level corruption, but also providing them with weapons to crack down opposition on charges of corruption. By contrast, in a diversity of situations there *is* a role for donors provided they invest in analysis to identify it, whether through direct anti-corruption, indirect one and/or work on the drivers. In anti-corruption, **it is important to avoid rigid blueprints and to remain open to options such as cancelling, modifying or stepping up rapidly an initiative as befits the context.**

10. *Juggling between accountability constraints and adaptability needs*

Development work in anti-corruption and beyond is increasingly trying to factor in the political economy approaches that are so crucial in tackling corruption, and to embed a measure of flexibility to be able to build on the analysis and adapt to context. This holds promising potential for targeting the right types of corruption through the right direct and indirect means, in a way that makes the most out of decisive changes. This remains an uphill battle but with significant advances.

- Somehow measuring results in light of a baseline agreed *ex ante* remains a key rule of the game that is problematic for anti-corruption, but the time frames for anti-corruption projects are expanding and flexibility is being introduced.
- The tools involved such as capacity building and funding do not allow a donor to play a leading role in momentous changes that can lead to faster anti-corruption results, but they can contribute, e.g. by fostering coalitions like through the Dutch Dialogue & Dissent programme.
- Donors are coordinating more and their direct anti-corruption projects are building in a longer inception phase to immerse themselves in the political context, generate synergies with other projects and maximising pressures for change, as is the case of the UK- and EU-funded SUGAR project.

- Programmes such as the ACE programme are providing indirect strategies for anti-corruption intervention that rely for instance on removing problematic regulation to remove the reason for corruption.
- There is a largely unquestionable principle of *zero tolerance for corruption* in most development agencies and their partners, but also a recognition that this needs to be applied on a differentiated and phased basis, again building on context analysis.

It is essential to listen to all actors concerned nationally and internationally to further understand the emerging best practices, adapt **them to one's country context, pilot them and/or generalise them as useful in a sequential way to build up momentum.**

Bibliography

Andersen, J., Johannesen, N. and Rijkers, B. 2020. *Elite Capture of Foreign Aid: Evidence from Offshore Bank Accounts*. Working Paper. Washington, DC: World Bank.

Andrews, M., Pritchett, L. and Woolcock, M. 2017. *Building State Capability. Evidence, Analysis, Action*. Oxford University Press. DOI:10.1093/acprof:oso/9780198747482.001.0001

Ang, Y. Y., 2020a. *China's Gilded Age: The Paradox of Economic Boom and Vast Corruption*. Cambridge University Press.

Ang, Y. Y., 2020b. *Unbundling Corruption: Revisiting Six Questions on Corruption*. 1 (1): 12036. Global Perspectives.

Anti-Corruption Summit - London 2016. *The Netherlands Country Statement*.

Baez, C. and Passas, N. 2018. *Hidden agendas, social norms and why we need to re-think anti-corruption*. Working paper series 22. Basel Institute on Governance.

Barma, N., Kaiser, K., Minh Le, T. and Vinuela, L. 2011. *Rents to riches?: The political economy of natural resource-led development*. Washington, DC: World Bank Group.

Barnard-Webster, K. 2020. *What Worked: Fighting Corruption Through Collective Action*. LEIR Institute, The Fletcher School-TUFTS University.

BBC. June 2020. *International development and Foreign Office to merge*.

BBC. September 2018. *Zambia aid: UK suspends funding over corruption fears*.

BMZ. 2017. *Doing business honestly without corruption*. The Ministry of Foreign Affairs, the Ministry of Security and Justice, the Ministry of Economic Affairs, the International Chamber of Commerce Netherlands, the Confederation of Netherlands Industry and Employers, and the Royal Association MKB-Nederland.

BMZ. 2012. *Anti-Corruption and Integrity in German Development Policy: A Strategy*. Strategy Paper 4 2012e. Bonn: BMZ.

Boehm, F. 2014. *Mainstreaming anti-corruption into sectors: Practices in U4 partner agencies*. U4 Brief 2014:3.

Booth, D., (ed.). 2016. *Politically smart support to economic development. DFID experiences*. Report. ODI.

Booth, D. and Cammack, D. 2013. *Governance for Development in Africa. Solving Collective Action Problems*. London and New York: Zed Books.

Bonvin, B., Bächtiger, A., Linder, W. and Lutz, G. (eds.). 2008. *Challenging Common Assumptions on Corruption and Democratisation. Key Recommendations and Guiding Principles*, 20. Bern: Swiss Agency for Development and Cooperation (SDC).

Bossuyt, J., Shaxson, L. and Datta, A. 2014. *Assessing the uptake of strategic evaluations in EU development cooperation. Study on the uptake of learning from EuropeAid's strategic evaluations into development policy and practice*. Final report. European Union.

Bossuyt, J. and Ronceray, M. 2020. *Claiming back civic space: Towards approaches fit for the 2020s?* ECDPM paper. Maastricht: ECDPM.

DAC. 2017. *OECD Development Co-operation Peer Reviews: The Netherlands 2017*.

Desai, R. 2011. *An Evaluation of Political-Economic Analysis in Support of the World Bank's Governance and Anticorruption Strategy*. Working Paper 2011/4. Independent Evaluation Group. Washington, DC: World Bank.

DEval and AidData. 2016. *German Aid from a Partner Perspective. Experience-based Perception from AidData's 2014 Reform Efforts Survey*. Bonn: DEval.

DEVCO. 2018a. *The New European Consensus on Development. Our World, Our Dignity, Our Future. Joint statement by the Council and the representatives of the governments of the member states meeting within the Council, the European Parliament, and the European Commission*. Luxembourg: Publications Office of the European Union. doi:10.2841/741554.

DEVCO. 2018b. *Independent Evaluation of the European Cooperation with Afghanistan (2007-2016).* Evaluation. On behalf of the European Commission. Luxemburg: Publication office of the European Union.

DEVCO. 2017. *Budget Support. Guidelines*. Tools and Methods Series. Unit A4. European Commission. Luxemburg: Publication office of the European Union. doi: 10.2841/59418.

DEVCO. 2015. *Collect More - Spend Better. Achieving development in an inclusive and sustainable way*. Staff working document. European Commission. Luxemburg: Publication office of the European Union.

DFID. 2019. *Annual report and Accounts 2018-2019*. London: The House of Commons.

DFID. 2018. *International aid support to corrupt countries*.

Dolve M., Mullard, S. 2019. *Addressing illicit financial flows for anti-corruption at country level. A primer for development practitioners.* U4 Issue 2019:8. U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute.

Donor Tracker. 2020. *Anti-Corruption plays leading role in German development strategy*. Press release, Minister Gerd Müller, 23.01.2020.

DW Made for Minds. May 2020. *Development aid: Less is sometimes more*. Top Stories, World, Africa.

DW Made for Minds. 2019. *Germany withholds aid money from Uganda over 'lost' funds*. The East African.

Elliott, L. *2019. Billions of UK aid failing to reduce poverty, report finds. Shortfall in standards casts doubt on transparency of Britain's aid spending*. The Guardia. 4 Feb 2019.

Eriksson, P. 2019. *Opinion piece by Peter Eriksson, Minister for International Development Cooperation*. Government Offices of Sweden, Ministry of Foreign Affairs.

European Commission. 2020. *EU Action Plan on Human Rights and Democracy 2020-2024*. Joint Communication to the European Parliament and the Council. JOIN/2020/5 final.

European Commission. 2019. *Communication from the commission to the European Parliament and the Council. Towards better implementation of the EU's anti-money laundering and countering the financing of terrorism framework*.

European Commission. 2011. *Fighting Corruption in the EU*. Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee.

European Parliament. 2019. *Towards a common EU Strategy to fight corruption and organised crime*. LIBE. 3 Dec 2019.

European Parliament. 2017. *Corruption and human rights in third countries*. European Parliament resolution of 13 September 2017 on corruption and human rights in third countries.

Ferreira Rubio, D., Ganesan, A. and Taylor, S. 2020. *Letter to IMF Executive Board Re: Urgent Need for Anti-Corruption Measures in IMF Response to COVID-19 Crisis*. Human Rights Watch, 8 April 2020.

GIZ. 2017. *Making the SDGs work: Why and how to address corruption in sectors*. Bonn and Eschborn: GIZ (on behalf of BMZ).

GIZ. 2016. *Germany/supraregional: Anti-Corruption and Integrity Programme.* Project evaluation: summary report. Bonn and Eschborn: GIZ, 2017.01.

Golub, S. 2020. *Legal Empowerment, Civil Society and Corruption: Rethinking Governance-oriented Aid in Today's Challenging International Contexts*. Knowledge Management Fund. Dhaka: BRAC University.

Government of Sweden. 2018a. *Strategy for Sweden's development cooperation in the areas of human rights, democracy and the rule of law 2018–2022*.

Government of Sweden. 2018b. *Strategy for Sustainable Peace 2017–2022*.

Government of Sweden. 2016. *Policy framework for Swedish development cooperation and humanitarian assistance*. Government Communication 2016/17:60.

Hart, E. 2019 *Guide to using corruption measurements and analysis tools for development programming*. U4-Guide 2019:1. U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute.

HM Government. 2017. _United Kingdom Anti-Corruption Strategy 2017-2022._ London.

House of Commons, International Development Committee. 2016. _Tackling corruption overseas. Fourth Report of Session 2016-17_. House of Commons.

ICAI. 2020a. _Mapping the UK's approach to tackling corruption and illicit financial flows_. Information note. London: ICAI.

ICAI. 2020b. _The changing nature of UK aid in Ghana_. Report. Country Portfolio Review, 12 Feb 2020. London: ICAI.

ICAI 2019. _Department for International Development single departmental plan_. Corporate report. London: ICAI.

ICAI. 2014. _DFID's Approach to Anti-Corruption and its Impact on the Poor_. Report 37. London: ICAI.

ICAI. 2011. _DFID's Approach to Anti-Corruption_. Report 2. London: ICAI.

IDA. 2020. _IDA19: Ten Years to 2030: Growth, People, Resilience_. Report from the Executive Directors of the International Development Association to the Board of Governors Additions to IDA Resources. Nineteenth Replenishment. Washington, DC: World Bank.

IEG. 2010. _Country-Level Engagement on Governance and Anticorruption. An Evaluation of the 2007 Strategy and Implementation Plan_. Washington, DC: World Bank.

IEG. 2008. _Public Sector Reform: What Works and Why?_ Evaluation Report. Chr. Michelsen Institute. Washington, DC: World Bank.

International Anti-Corruption Conference, 2018a, Copenhagen. _Anti-corruption statement_. Sida.

International Anti-Corruption Conference, 2018b, Copenhagen. _National anti-corruption statement in the field of development cooperation (Sweden)_. Sida.

IOB. 2019. _Mind the governance gap, map the chain. Evaluation of the Dutch government's policy on international responsible business conduct (2012–2018)._ Ministry of Foreign Affairs of the Netherlands.

ITAD, LDP. 2011. _Joint Evaluation of Support to Anti-Corruption Efforts 2002-2009._ Report 6/2011 – Synthesis. Norad.

Jackson, D. and Dolve, M. 2020. _Adaptive approaches as a 'helping hand' for anti-corruption_. U4 Anti-Corruption Resource Centre. Medium.

Johnsøn, J. 2016. _Anti-corruption strategies in fragile states: Theory and practice in aid agencies_. Edward Elgar Publishing.

Johnsøn, J., Taxell, N. and Zaum, D. 2012. _Mapping evidence gaps in anti-corruption Assessing the state of the operationally relevant evidence on donors' actions and approaches to reducing corruption._ U4 ISSUE October 2012 No 7. Chr. Michelsen Institute.

Kelsall, T. 2013. _Business, Politics and the State in Africa_. London: Zed Press

Khan, M., Andreoni, A. and Roy, P. 2019. _Anti-corruption in adverse contexts: strategies for improving implementation_. Working Paper 013. Department of Economics. London: SOAS University of London.

Khan, M., Andreoni, A. and P. Roy. 2016. _Anti-corruption in adverse contexts: a strategic approach_. London: SOAS University of London.

Kossow, N. 2020. _The potential of distributed ledger technologies in the fight against corruption_. Bonn and Eschborn: GIZ (on behalf of BMZ).

Langerock, J., Hietland, M. 2019. _How the Netherlands Built One of the World's Worst Tax Havens. And How to Shut It Down_. Foreign Affairs. November 2019.

Levy, B. 2014. _Working with the grain: integrating governance and growth in development strategies_. Oxford University Press.

Mackie, J., Ronceray, M. and Spierings, E. 2017. _Policy coherence and the 2030 Agenda: Building on the PCD experience_. Discussion Paper 210. Maastricht: ECDPM.

Marquette, H. and Peiffer, C. 2018. *What 'hidden' success stories tell us about anti-corruption policy and practice*. Public Administration Review.

Marshall Plan Project Group, BMZ (ed.). 2017. *Africa and Europe. A new partnership for development, peace and a better future. Cornerstones of a Marshall Plan with Africa*. Bonn: BMZ.

Mason, P. 2020a. *Twenty years with anti-corruption. Part 1 Old issue, new concern - anti-corruption takes off*. U4 Practitioner Experience Note. U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute.

Mason, P. 2020b. *Twenty years with anti-corruption. Part 2. Fighting the 'seven deadly things' – starting the DFID journey*. U4 Practitioner Experience Note 2020:2. U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute.

Mason, P. 2020c. *Twenty years with anti-corruption. Part 3. The international journey – from ambition to ambivalence*. U4 Practitioner Experience Note 2020:3. U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute.

Mason, P. 2018. *Pressure to change: a new donor approach to anti-corruption?* London: Department for International Development.

Mason, R. 2017. *Tory MP hits back at rightwing foreign aid critics. Nick Herbert's report challenges tabloid headlines that claim aid to poor countries is wasted*. The Guardian**.** 1 Dec 2017.

Masri-Pedersen, N. 2019. *Evaluation of Sida's Support to Peacebuilding in Conflict and Post-Conflict Contexts. Guatemala country report*. Sida Evaluation 2019:3. Sida.

Menocal, A. 2015. *Why corruption matters: understanding causes, effects, and how to address them*. DFID Evidence Paper. London: DFID.

Migliorisi, S. and Wescott, C. 2011. *Review of World Bank Support for Accountability Institutions in the Context of Governance and Anticorruption*. IEG Working Paper 2011/5. Washington, DC: World Bank.

Moore, M. 2011. *The Practical Political Economy of Illicit Capital Flows*. Institute of Development Studies.

Moore, M. and Lundstøl O. 2016. *What Have We Learned About Mining Taxation in Africa?* Summary Brief 1. Brighton: ICTD.

Mungiu-Pippidi, A. 2017. *Transitions to Good Governance. Creating Virtuous Circles of Anti-Corruption*. UK and USA: Edward Elgar Publishing.

Natsios, Andrew. *The Clash of the Counter-bureaucracy and Development*. Center for Global Development, 2011.

Niras. 2018. *Guidance Tool For Addressing Corruption In Education*. Uppsala Universiteit.

OECD. 2020a. *Policy measures to avoid corruption and bribery in the COVID-19 response and recovery*.

OECD. 2020b. *DAC Official Development Assistance to Governance: An Overview (2009-2018)*. DCD/DAC/GOVNET 2020: 7. (Document not available publicly).

OECD. 2020c. *Creditor Reporting System (CRS)*. OECD.Stat.

OECD. 2019a. *OECD Development Co-operation Peer Reviews: Sweden 2019.*

OECD. 2019b. *DAC Glossary of Key Terms and Concepts*.

OECD. 2018. *OECD Development Co-operation Peer Reviews: European Union 2018.*

OECD. 2017. *Implementation of multiple purpose codes in the CRS*. DCD/DAC/STAT 2017: 5.

OECD. 2015. *OECD Development Co-operation Peer Reviews: Germany 2015*.

OECD. 2012. *International Drivers of Corruption: A Tool for Analysis*. OECD Publishing.

OLAF. 2020. *What we do*. European Commission, European Anti-Fraud Office.

OpenaidNl. *Projects*.

Persson. A., Rothstein, B. and Teorell, J. 2010. *The failure of anti-corruption policies: a theoretical mischaracterization of the problem*. QoG Working Paper. Gothenburg: Quality of Government Institute.

Raballand, G., Chalendard,C., Fernandes, A., Mattoo, A. and Rijkers, B. 2017. *Customs reform and performance contracts: early results from Madagascar*. Governance notes, no. 2. Washington, DC: World Bank Group.

Raballand, G., Rajaram, A. 2013. *Behavioral economics and public sector reform: an accidental experiment and lessons from Cameroon.* Policy Research working paper, no. WPS 6595. Washington, DC: World Bank Group.

Rijkers, B., Freund, C., and Nucifora, A. 2014. *All in the family: State capture in Tunisia.* Washington, DC: The World Bank.

Riley-Smith, B. and Allen, N. 2018. *David Cameron suggests stripping corrupt countries of aid money to better protect taxpayer.* The Telegraph. 13 March 2018.

Sida. 2019. *Anti-Corruption: It's time for action! Guidance for enhancing Sida's work against corruption*. Uppsala Universiteit.

Sida. 2016. *Anti corruption rule.*

Signé, L., Sow, M., Madden, P. 2020. *Illicit financial flows in Africa Drivers, destinations, and policy options.* Policy Brief. March 2020. Africa Growth Initiative at Brookings.

Steingrüber, S., Kirya, M., Jackson D. and Mullard, S. 2020. *Corruption in the time of COVID: A double threat for low income countries.* U4 Brief 2020: 6. Chr. Michelsen Institute.

Strand, A. 2020. *Zero Tolerance of corruption in international aid*. Chr. Michelsen Institute.

SDC. 2006. *Fighting Corruption. SDC Strategy*. Bern: SDC.

The Ministry of Foreign Affairs. 2018. *Investing in Global Prospects. For the world, for the Netherlands.* Policy Documents on Foreign Trade and Development Cooperation. 3.

The Ministry of Foreign Affairs. 2017. *Doing business honestly without corruption*. The Ministry of Foreign Affairs, the Ministry of Security and Justice, the Ministry of Economic Affairs, the International Chamber of Commerce Netherlands, the Confederation of Netherlands Industry and Employers, and the Royal Association MKB-Nederland.

The Netherlands Country Statement. Anti-Corruption Summit, London, 2016. Publishing Service of UK Government site.

United Nations. 2019. *The Sustainable Development Goals Report 2019.*

United Nations. 2018. Press release: *Global Cost of Corruption at Least 5 Per Cent of World Gross Domestic Product, Secretary-General Tells Security Council, Citing World Economic Forum Data.*

Van Gelder, L. 2012. *Achieving Better Results from Public Sector Institutions*. World Bank Blogs. World Bank.

World Bank 2019a. *ANTI-CORRUPTION INITIATIVES Reaffirming Commitment to a Development Priority*. December 2019.

World Bank 2019b. *World Bank Group Sanctions System Annual Report FY19.*

World Bank. 2017. *World development report 2017. Governance and the Law*. Washington, DC: World Bank. DOI: 10.1596/978-1-4648-0950-7 / DOI: 10.1596/978-1-4648-0952-1

World Bank. 2012a. *Fighting corruption in public services: chronicling Georgia's reforms*. Directions in development: public sector governance. Washington, DC: World Bank.

World Bank. 2012b. *Strengthening Governance: Tackling Corruption*. The World Bank Group's Updated Strategy And Implementation Plan. Washington, DC: World Bank.

About ECDPM

The European Centre for Development Policy Management (ECDPM) is an independent 'think and do tank' working on international cooperation and development policy in Europe and Africa.

Since 1986 our staff members provide research and analysis, advice and practical support to policymakers and practitioners across Europe and Africa – to make policies work for sustainable and inclusive global development.

Our main areas of work include:

- European external affairs
- African institutions
- Security and resilience
- Migration
- Sustainable food systems
- Finance, trade and investment
- Regional integration
- Private sector engagement

For more information please visit www.ecdpm.org

In addition to structural support by ECDPM's institutional partners: The Netherlands, Belgium, Estonia, Finland, Ireland, Luxembourg, Sweden, Switzerland, Denmark and Austria, this publication benefits from specific funding by the Swedish Ministry of Foreign Affairs.

ecdpm

Making policies work