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A RAPID ANTI-CORRUPTION ASSESSMENT  
TECHNIQUE FOR USAID/AFRICA  
DEVELOPING A PRACTICAL CHECKLIST FOR USAID MISSIONS IN  
AFRICA

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# **A Rapid Anti-Corruption Assessment Technique for USAID/Africa**

## **Developing a Practical Checklist for USAID Missions in Africa**

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Submitted by:  
Management Systems International  
600 Water Street, SW  
Washington, DC 20024

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# 1. EXECUTIVE SUMMARY

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This report describes the design and piloting of a rapid corruption assessment checklist tool for USAID Missions in Africa that is meant to support field analysts in identifying positive features and deficiencies in current anti-corruption programs.<sup>1</sup> The tool can be applied by Missions to assess the extent to which countries have put in place the appropriate laws, institutions, and programs that are typically required to implement comprehensive anti-corruption strategies. Based on this information, Missions can program for anti-corruption activities appropriately. The tool can also be used by USAID to collect comparative data across countries to identify general patterns regionally.

Using this tool, Management Systems International (MSI) gathered data on 119 questions between September and October 2004 under a support task order for the Africa Anti-Corruption Initiative (USAID Contract No. AEP-I-00-00-00009-00, Order No. 4). Thirty-five responses were obtained from 20 countries – 16 from USG personnel in the field (from US Embassies or USAID Missions) and 19 from civil society groups, academics or other donors in the field. The results presented in this report document the findings of the USG respondents.

This section presents the overall findings of the checklist tool and recommendations for future uses of the rapid assessment tool. Section 2 describes the methodology. Section 3 takes a continent-wide look at the overall trends in the data. Section 4 presents a country-by-country analysis for each of the 16 countries included in the study. Section 5 presents policy implications on how this approach can be applied in a practical fashion to support USAID programming in the anti-corruption field. The Appendix includes the checklist instrument.

## Key Substantive Findings

1. Across the sample of countries, it is clear that many “stroke of the pen” reforms have been accomplished, but more substantive reforms lag. For example, many countries have passed laws making corruption illegal, but enforcement of these laws remains weak. Commissions, oversight agencies, and new institutions have also been created, but their independence and capacity remain limited.

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<sup>1</sup> MSI gratefully acknowledges the support and assistance of many people who contributed to this undertaking. Above all, we thank those who took the time to complete the checklist and return it to us. We also acknowledge the support and input we received from USAID’s Africa Bureau and in particular from Carla Komich. Kevin Bohrer and several other people at USAID/Kenya pretested the instrument and provided invaluable feedback. Finally, we thank Darren Kew for reviewing early drafts of the instrument.

2. Distribution of power between the main branches of government remains problematic. Parliaments and judiciaries generally have limited power to hold the executive office accountable, sanction corrupt practices, or play an oversight function.
3. The capacity of agencies, commissions, and institutions with a mandated role to combat corruption is generally insufficient.
4. Civil society is actively engaged in the effort to reduce corruption. The vast majority of countries reported the presence of civil society organizations that have adopted corruption as part of their mission, and in a significant number of countries, civil society organizations have succeeded in impacting government policy.
5. The media is actively engaged in investigating and reporting on corruption. In most countries, the media is reasonably free from government control and frequently reports on cases of corruption. In several countries, media reporting has led to government investigations of corruption.
6. The availability of budget and expenditure data is limited in most countries. Many reported the existence of an integrated financial management system, but financial data and audit reports are often not made available to oversight agencies or the public.
7. Government will and commitment for reform appears to be inadequate in many places. While most countries have developed national strategies to combat corruption, few have taken significant actions to implement these strategies. Fewer have put in place monitoring mechanisms to measure progress or procedures for routinely reporting on progress. These findings suggest that many governments lack a deep commitment to the substantive reforms necessary to curb corruption.

## **Key Findings about the Checklist Assessment Technique**

This pilot test suggests that the Checklist Assessment instrument can serve as a very useful and practical rapid assessment tool for field Missions. It can help them develop a comprehensive outlook on country anti-corruption programs – what exists, what works, what is missing, and what needs strengthening. Based on this assessment, the weakest links and missing elements will be very apparent and can be developed into programmatic options for future USAID support. In particular, the pilot test has yielded the following conclusions about the checklist technique:

1. The Checklist Assessment tool provides a good and detailed overview of a country's anti-corruption program.
2. The questions asked by the checklist can typically be answered by knowledgeable USG democracy and governance officers in the field. But, the

checklist is best completed by a team of specialists within a field Mission or embassy or by a joint team of USG-host country experts.

3. The checklist responses in this pilot test have been transformed into quantitative indicators, but that is not necessary for practical assessment purposes in the field.
4. If the checklist tool identifies particularly weak or nonexistent institutions or systems that need further analysis, the checklist can serve the useful purpose of pinpointing where additional, more probing assessments are required.

## **Recommendations for Next Steps**

Based on this pilot study, we have several recommendations for next steps.

1. Revise and refine the Checklist tool. Carefully assess the questions against the results to determine if certain questions should be reworded or deleted and if additional questions should be included. Also, review the response values offered for each question and if open-ended questions should be added.
2. Obtain a larger sample. Get additional USAID Missions and US Embassies to complete the Checklist tool. In addition, get one or two appropriate think tanks in each country to complete the checklist. With these new respondents, test a variety of ways to get the checklist completed – by individual respondents, group efforts, facilitated group exercises, and USG-local team efforts. Assess the pros and cons of each approach.
3. Conduct a more detailed analysis across the region. With a larger sample of countries, it will be possible to conduct a more definitive analysis of the state of anti-corruption program in Africa. As well, analyses can be conducted to assess if there is potential and unwarranted optimism or pessimism from USG respondents.
4. Develop a set of toolkits based on the results. From a broad comparative analysis across the region, it is likely that particular deficiencies and weaknesses in existing anti-corruption programs will emerge. These findings can be used to develop some basic toolkits that address common problems that are faced on a country-by-country basis.

## 2. ASSESSMENT CHECKLIST AND STUDY METHODOLOGY

The checklist was designed to collect information that would help USAID Missions, and possibly host governments and international and bilateral donors, develop a clear picture of the current status of efforts to combat corruption in African countries. Specifically, the tool was designed to capture whether countries have adopted and implemented the laws, institutions, and programs that are generally considered necessary components of a comprehensive anti-corruption strategy. In selecting the questions to include in the checklist, we relied heavily on recommendations contained in Transparency International's *Source Book*.<sup>2</sup>

Several existing indices, for example, Transparency International's Corruption Perception Index (CPI) and the World Bank's Governance Indicators, attempt to measure levels of national corruption. Because corruption is difficult to measure objectively, these indicators typically monitor the *perceptions* of governmental abuse from the perspectives of surveyed stakeholders. The approach selected for this study focuses, alternatively, on phenomena that are more easily measurable and on which objective data can be gathered – the extent to which countries have adopted and implemented appropriate *reform initiatives* to combat corruption. The value added of this technique is that it pinpoints where countries are trying to implement corruption control mechanisms and with what effect. It highlights those areas where successes have been achieved and those areas where more reforms are required. Based on these results, it is possible to identify anti-corruption programming options for particular countries and region-wide progress in fighting corruption.

The checklist is divided into five broad categories. Table 1 lists the specific areas that are included in each component. The checklist instrument is presented in the Appendix.

**TABLE 1. CHECKLIST COMPONENTS**

<b>Part 1: Legal Environment</b>	<ul style="list-style-type: none"><li>• Criminal Code</li><li>• Conflict of interest</li><li>• Public hiring / appointments</li><li>• Freedom of Information</li><li>• Sunshine laws</li><li>• Asset Disclosure</li><li>• Codes of Conduct</li><li>• Whistleblower protection</li><li>• International Conventions</li></ul>
<b>Part 2: Enforcement and Prosecution</b>	<ul style="list-style-type: none"><li>• Enforcement</li></ul>

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<sup>2</sup> Pope, Jeremy (2000) *TI Source Book 2000 -- Confronting Corruption: The Elements of a National Integrity System*. Berlin: Transparency International.

	<ul style="list-style-type: none"> <li>• Judiciary</li> <li>• Money laundering</li> <li>• Asset Recovery</li> <li>• Witness protection</li> <li>• Police</li> </ul>
<b>Part 3: Government Oversight Institutions</b>	<ul style="list-style-type: none"> <li>• Anti-Corruption Agency</li> <li>• Ombudsman (public complaints unit)</li> <li>• National Strategy</li> <li>• Parliament</li> <li>• Municipal/regional level</li> <li>• Corruption in public services</li> </ul>
<b>Part 4: Budget and Public Expenditure Process</b>	<ul style="list-style-type: none"> <li>• Financial Management System</li> <li>• Audits</li> <li>• Parliamentary oversight of budget</li> <li>• Procurement</li> </ul>
<b>Part 5: Civil Society, Media, and Business</b>	<ul style="list-style-type: none"> <li>• Civil Society</li> <li>• Media</li> <li>• Corruption Surveys</li> <li>• Public Awareness Campaigns</li> <li>• Business</li> <li>• International Dimensions</li> </ul>

Across the five categories, the checklist assessment tool includes 119 questions on 31 specific areas. The checklist seeks information about the breadth and depth of anti-corruption programs – on paper and in action. The questions are divided between those that asked for factual information (e.g., does a certain laws exist?) and expert judgment (e.g., is the law being effectively enforced?). The tool focuses primarily on public sector corruption - the misuse of public resources for personal gain. By and large, we left aside private sector corruption issues, although we did include questions on local and multinational corporations. Corruption in the electoral processes was not included.

**Pilot Study Methodology**

The checklist was transmitted by email between June and August 2004 to approximately 300 individuals in USAID Missions and US Embassies in Africa, African governments, host country institutions, international NGOs, host country NGOs, and local academics in each country. Completed surveys were received from 35 respondents from 20 countries.

Sixteen respondents (one each from 16 countries) were USG officials in either US Embassies or USAID Missions. This small, but targeted, sample serves as the basis for the analysis that follows. As a pilot test of a new assessment methodology, focusing on this limited sample enables us to:

- Analyze the extent to which USG personnel in the field have the information to answer the questions in the checklist
- Evaluate the degree to which USG personnel respond differently from host country respondents (in a small number of cases)
- Obtain feedback from USG respondents on the ease or difficulty of using the checklist and drawing implications for programming from it.

In most cases, individuals responded to the checklist tool on their own. In a few cases, we were told that a team of people was gathered together to answer the questions – each drawing on their areas of specialization and knowledge. In general, feedback from USG respondents was very positive; several respondents indicated that the very act of completing the checklist helped them consider anti-corruption programming anew by integrating the various dimensions of anti-corruption activities and demonstrating the areas of accomplishment and deficiency in controlling corruption. Several respondents indicated that some of the yes/no questions were too constraining; the answers they wanted to provide were somewhere in between a yes and a no.

For each country, a score was calculated for each of the five areas of the checklist (Legal Environment; Enforcement and Prosecution; Government Oversight Agencies; Budget and Public Expenditure Process; and Civil Society, Media, and Business). The score for each component is a simple average of all questions within that section. The scale runs from 1 to 5, where a score of 5 indicates that a country has implemented all reform programs and a score of 1 indicates that none of the reform programs are implemented. An overall country score was also calculated by averaging these five component scores.

### 3. AFRICA-WIDE RESULTS

This section of the report compares anti-corruption scores from the checklist tool across 16 African countries. First, the overall scores for all countries are presented and analyzed. Then, the scores are correlated with other existing indices of corruption, to shed light on the dimensions of anti-corruption activity that the checklist scores are actually measuring. Lastly, key findings in each of the five components of the checklist are discussed, looking at trends across the region.

Table 2 presents the country and component scores for the sample. The countries are ordered in relation to their overall country score, from highest to lowest. There is wide variance in aggregate scores across the sample of countries. At the top end of the spectrum, South Africa received a rating of 4.13. At the bottom end of the spectrum, Liberia received a score of 2.15.

**TABLE 2. CHECKLIST COUNTRY SCORES (USG RESPONDENTS) COMPARED WITH TI AND WORLD BANK INDICATORS**

	<b>Overall Country Score</b>	<b>1. Legal Environment</b>	<b>2. Enforcement and Prosecution</b>	<b>3. Government Oversight Institutions</b>	<b>4. Budget and Public Expenditure</b>	<b>5. Civil Society, Media and Business</b>	<b>TI CPI (2004)</b>	<b>WB Control of Corruption (2002)</b>
South Africa	<b>4.13</b>	3.96	4.42	3.63	4.52	4.11	4.6	67.5
Mali	<b>3.94</b>	4.13	4.23	3.28	4.14	3.93	3.2	46.4
Benin	<b>3.80</b>	3.80	3.41	3.72	3.71	4.37	3.2	34.0
Cameroon	<b>3.62</b>	3.24	3.80	3.81	3.75	3.53	2.1	8.8
Nigeria	<b>3.55</b>	3.55	3.83	3.58	3.05	3.75	1.6	3.1
Senegal	<b>3.50</b>	3.73	3.53	3.04	3.13	4.06	3.0	53.1
Rwanda	<b>3.43</b>	3.65	3.80	2.63	3.67	3.43		35.1
Kenya	<b>3.29</b>	3.25	3.25	2.55	3.18	4.23	2.1	11.3
Zambia	<b>3.22</b>	2.75	3.67	3.17	3.17	3.37		17.0
Uganda	<b>3.09</b>	3.29	2.47	3.38	3.35	2.95	2.6	19.1
Madagascar	<b>2.94</b>	3.22	2.50	3.14	2.63	3.21	3.1	61.9
Burkina Faso	<b>2.63</b>	2.73	1.45	2.22	3.83	2.89		57.7

Tanzania	<b>2.59</b>	2.11	2.26	2.62	3.22	2.74	2.8	15.5
Mozambique	<b>2.53</b>	2.14	2.50	2.78	2.27	2.95	2.8	14.9
Sierra Leone	<b>2.50</b>	1.87	2.41	2.86	2.27	3.11		25.8
Liberia	<b>2.15</b>	1.56	1.83	1.17	2.95	3.24		16.5

Is this the ranking of countries that we would anticipate in terms of country attempts and successes at fighting corruption? It is encouraging to find that South Africa received the highest ranking. But it is suspected that Cameroon and Nigeria received overly optimistic scores; they rank much lower in other surveys (TI CPI and World Bank Control of Corruption indicators). On the other hand, Madagascar and Burkina Faso are probably underrated in the scoring, as they rank considerably higher in these other surveys.

## Correlation with Other Indicators

In principle, we might expect that the country scores from the checklist tool would correlate with the major indicators of perceived levels of corruption, in particular, the TI CPI and the World Bank Control of Corruption indicator. However, the correlations are neither strong nor statistically significant. Overall country scores have only modest correlations with the TI CPI ( $r=.336$ , not significant), and with Control of Corruption indicator ( $r=.280$ , not significant). An obvious explanation is that these indicators do not measure the same thing. Whereas our checklist is a composite measure of the extent to which reforms have been put in place, the CPI and the Control of Corruption indicator are both measures of the perceived incidence of corruption.

However, we do find that the anti-corruption scores from the checklist tool correlate strongly and in the expected direction with several aggregate indices of human development and political rights – more positive measures of reform programs. For example, the overall anti-corruption score correlates significantly ( $r=.586$ ,  $p<.02$ ) with the UNDP's Human Development Index (HDI for 2002); the extent of anti-corruption reforms in a country covaries with the quality of social and economic development.

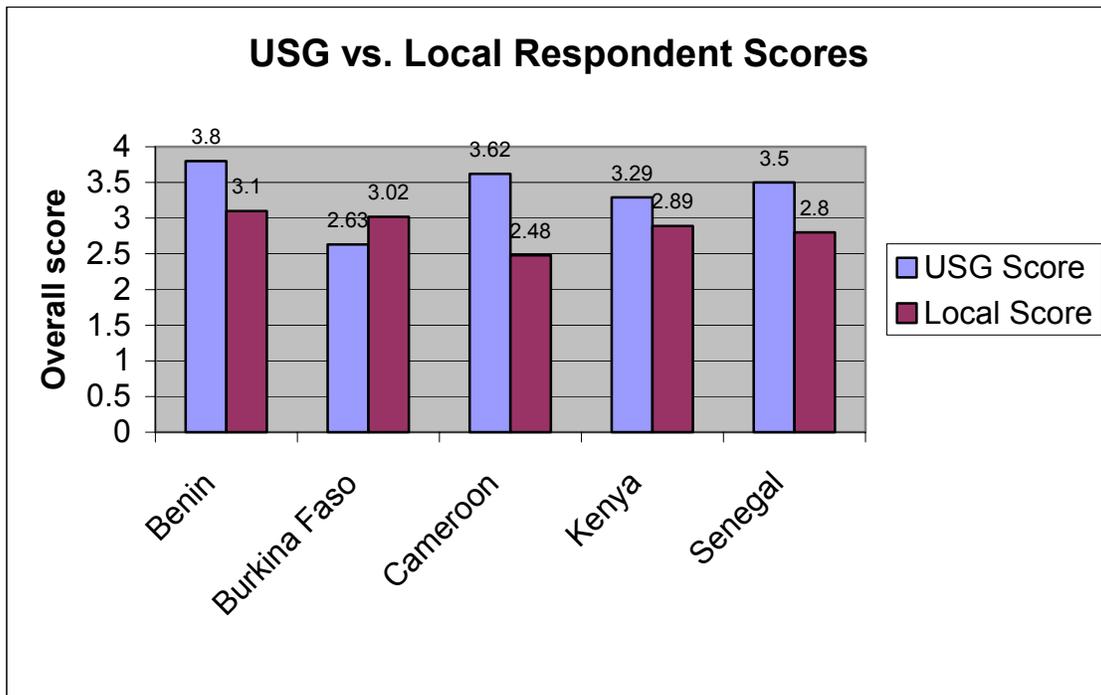
HDI is also correlated with two of the components of the overall anti-corruption score – Legal Environment ( $r=.524$ ,  $p<.045$ ) and Government Oversight Institutions ( $r=.521$ ,  $p<.046$ ). In addition, the civil society/media/business participation component of the anti-corruption score correlates strongly with the Freedom House Political Rights score ( $r=-.596$ ,  $p<.015$ ).

## USG Responses Compared with Host Country Responses

Are the USG respondents knowledgeable and accurate informants on these issues of anti-corruption activities in their resident countries? To test for bias across respondent

groups, we compared the scores of USG respondents with those of host country respondents (from civil society and business organizations). For the five countries in which we received completed checklists from both USG and local respondents, USG respondents in four countries (all but Burkina Faso) were significantly more optimistic about the implementation of anti-corruption controls, institutions, and procedures than the local groups. This finding suggests a potentially systematic bias by USG officials to be too optimistic or by local respondents to be too pessimistic that might be corrected in the future by formulating joint USG-host country teams to answer the checklist questions.

**TABLE 3. USG AND LOCAL RESPONDENT SCORES COMPARED**



## Detailed Discussion

### Component 1: Legal Environment

This component measures whether the appropriate laws have been put in place and whether these laws are being enforced in practice. The major finding from this section is that, by and large, the countries in the sample have put the requisite laws in place, but enforcement is lagging. Table 4 shows “Laws in Place” and “Laws Implemented” scores for each country. The average score for Laws in Place is 3.56, yet the average for Implementation is only 2.40, indicating that across the sample there is a major implementation gap in the area of legal reform.

For example, most countries have laws in place that require public hiring to be based on merit rather than nepotism, connections, and bribery. However, public hiring

decisions are actually based on merit only some of the time, and senior-level appointments are often given to supporters and friends rather than qualified persons. Similarly, in the area of asset disclosure, most countries have laws in place that require government officials to disclose their assets. Yet, this information is rarely made available to the public. As a third example, all countries, except Liberia and Mozambique, have national laws in place that define conflict of interest for public officials. However, within government agencies conflict of interest policies are not widely understood. This pattern holds true for the entire range of legal questions included in the checklist. As such, we conclude that for the sample as a whole the challenge for the future in the area of legal reform will be to move beyond enacting laws and instead focus on strengthening their implementation.

**TABLE 4. RESULTS FOR LEGAL ENVIRONMENT**

	<b>Laws in Place</b>	<b>Implementation</b>	<b>Overall Legal Environment Score</b>
Benin	5.00	2.69	<b>3.80</b>
Burkina Faso	3.29	1.75	<b>2.73</b>
Cameroon	4.00	2.22	<b>3.24</b>
Kenya	3.46	2.86	<b>3.25</b>
Liberia	1.57	1.50	<b>1.56</b>
Madagascar	3.86	2.22	<b>3.22</b>
Mali	5.00	3.18	<b>4.13</b>
Mozambique	2.43	1.63	<b>2.14</b>
Nigeria	3.86	3.00	<b>3.55</b>
Rwanda	4.00	3.13	<b>3.65</b>
Senegal	4.38	2.78	<b>3.73</b>
Sierra Leone	1.73	2.25	<b>1.87</b>
South Africa	5.00	2.85	<b>3.96</b>
Tanzania	2.71	1.46	<b>2.11</b>
Uganda	3.67	2.78	<b>3.29</b>
Zambia	3.00	2.17	<b>2.75</b>
<b>Average</b>	<b>3.56</b>	<b>2.40</b>	<b>3.06</b>

*Criminal Code (question 1):*

Most countries (14 of 16) have put in place national laws that explicitly define corruption as illegal. Typically, these laws specify the actions considered as corrupt and indicate punishments for cases of corruption.

*Conflict of Interest and Asset Disclosure (questions 2 and 6):*

In these areas, most countries have the requisite laws in place, but their implementation remains spotty. Thirteen countries have enacted national laws that define conflict of interest for public officials. However, only seven countries have put in place clear conflict of interest policies within government agencies, and in many instances these

policies are not widely understood by the officials working in the agencies. Similarly, with asset disclosure, the majority of countries (12 of 16) require government officials to disclose their assets. In practice, though, officials fail to provide this information in some countries, and asset information is rarely made available for public scrutiny.

*Public Hiring / Appointments (question 3):*

While most countries (12 of 16) have laws in place that require public hiring to be based on merit, in practice, hiring decisions are made on merit only some of the time. Further, in most countries senior-level appointments are given to political supporters and friends of the top leaders rather than qualified persons.

*Public Access to Information (questions 4 and 5):*

Citizen access to public information is problematic. In less than half of the sample (7 of 16), freedom of information (FOI) laws exist that allow citizens to access public documents related to government decision making. Even in those countries where FOI laws exist, obtaining documents in practice is frequently not possible. Further, only two countries have in place sunshine laws requiring that the meetings of boards or commissions be open to the public.

*Codes of Conduct within Public Institutions (question 7):*

In many countries (9 of 16), public institutions are legally required to have codes of conduct in place, and many institutions have in fact adopted codes of conduct with legally binding sanctions for offenders. However, awareness of these codes among the public employees remains uneven.

*Whistleblower Protection (question 8):*

Efforts in this area are lacking. Only five countries have put in place laws to provide protection for people who report cases of corruption. Even among those countries, the laws only provide protection for whistleblowers in practice some of the time.

*International Conventions (question 10):*

Nine countries have ratified the UN Convention Against Corruption and the AU Convention on Combating Corruption.

## **Component 2: Enforcement and Prosecution**

Component 2 measures whether countries are investigating and prosecuting offenders. Generally, the scores on enforcement were relatively good, though judicial independence was highlighted as an area of concern.

*Prosecution of Offenders (question 10):*

In all countries except Liberia and Burkina Faso, governments have undertaken corruption-related investigations and corruption cases have been brought before the judiciary in the last year. In the majority of these countries, prosecution did lead to conviction and the enforcement of sentences against those found to be guilty.

*Judiciary (questions 11 and 14):*

Judicial independence is a problem across the sample. In the overwhelming majority of countries, the judiciary is not sufficiently independent of political influence to issue verdicts against members of the ruling party. In addition, legal protection for witnesses in corruption cases is only provided in five countries.

*Money Laundering and Asset Recovery (questions 12 and 13):*

In this area the record is mixed. Nine countries out of 16 have put in place laws prohibiting money laundering (the process through which money derived from illegal activities is given the appearance of originating from a legitimate source). However, only five have created an investigative unit for money laundering, and only South Africa and Nigeria reported that investigations have led to convictions for offenses related to money laundering. The situation is similar for asset recovery. Only five countries have created an asset recovery unit, and the capacity of these units is generally seen as insufficient. Further, only four countries – Benin, Nigeria, South Africa, and Zambia - reported any cases in which public assets have actually been recovered either domestically or from abroad.

*The Police (question 15):*

The findings are encouraging. In all countries except Burkina Faso and Senegal, efforts are underway to monitor and curtail corruption within the police force. Further, in 11 countries, police members have been reprimanded or dismissed for corruption in recent memory.

### **Component 3: Government Oversight Institutions**

Component 3 looks at whether government institutions and agencies are able to provide the oversight needed to detect and combat public corruption. While oversight agencies and institutions do exist to detect and investigate corruption, generally the capacity and independence of these bodies is insufficient.

*Anti-Corruption Commissions (question 16):*

In all countries except Liberia and Rwanda, the government has created an anti-corruption agency or commission. Generally these commissions have the power to investigate all branches of government and their investigations do in practice lead to prosecution of offenders. However, commissions are only sufficiently independent to investigate members of the ruling party in 8 of the 16 countries. Furthermore, most commissions lack sufficient capacity to carry out their mission.

*Ombudsman (question 17):*

Ten countries have an ombudsman to investigate claims of public corruption. However, like the national commissions, ombudsman's offices across the sample tend not to have sufficient capacity or independence to fulfill their mandate. On the positive side, nine countries have created hotlines or other mechanism through which citizens are able to report cases of corruption.

*National Strategy (questions 18 and 20):*

The findings related to national strategies are cause for concern. While the majority of countries (11 of 16) do have a national anti-corruption strategy in place, the evidence suggests that government commitment to implementing these strategies may be limited. A smaller number (7) have carried out assessments to understand the causes and consequences of corruption. Only two countries – Mali and South Africa – have taken “significant action” to implement their national strategies. Most governments have taken little or some action. In addition, only six countries have put in place mechanisms to monitor the implementation of the national strategy, and only four regularly report on progress. At the sub-national level, only one country (South Africa) has put in place anti-corruption strategies at the regional or municipal level. Taken together, these findings suggest that few governments have fully embraced the objective of substantively reducing corruption and put in place the requisite strategies and monitoring and reporting procedures to gauge progress.

*Parliament (question 19):*

The findings related to the role of parliament suggest that the distribution of powers between the branches of the government is problematic. While parliaments in some countries are engaged in efforts to combat corruption, they are generally not seen as an effective counterbalance to the executive branch. This suggests that the ability of parliaments to play an oversight and watchdog role vis-à-vis the executive office is inadequate. Indeed, parliaments have initiated investigations into corruption in only three countries within the last year (Benin, Nigeria, and Uganda).

*Public Services (question 21):*

Within half of the countries (8 of 16), governments have put in place mechanisms to monitor the performance of public service agencies (health, education, etc.). In a larger number of countries (12 of 16), civil society groups monitor the performance of public services. However, in most countries citizens have inadequate avenues for seeking recourse in cases where public service fails.

**Component 4: Budget and Public Expenditure**

Component 4 assesses whether governments have put in place the necessary institutions and procedures to reduce discretionary use of public funds and detect misuse of funds. Across the sample, we found that procedures do exist to insure that public revenues are used for the intended purposes. However, financial information is generally not available for public scrutiny, and some institutions – especially parliaments and supreme audit institutions – lack the capacity and/or independence to oversee the executive branch.

*Financial Management Systems (question 22):*

All countries except two (Liberia and Sierra Leone) have put in place an integrated financial management system. Generally, these systems do provide information to legislative and parliamentary oversight committees. However, in most countries the

quality of the data is seen as less than reliable. Further, in most countries financial reports are not made available for public scrutiny in a routine manner.

*Audits (question 23):*

The picture with audits looks similar. In most countries, periodic audits of public accounts are legally required. However, in some countries audits are not conducted with sufficient regularity and recommendations are not implemented. Across the region, governments typically fail to make audit reports available for public scrutiny with sufficient regularity. Further, supreme audit institutions generally have low to medium capacity, and audit findings are subject to political interference at least some of the time in most countries.

*Parliamentary Oversight of Budget (question 24):*

While parliaments in all countries have legally mandated oversight power for budgets and expenditures, in practice they ensure that public funds are actually used for the intended purposes only some of the time. Furthermore, in most countries parliaments rarely or never investigate executive fiscal practices.

*Procurement (question 25):*

In all countries except Liberia multiple bids are legally required for major procurements. In most countries, invitations to bid are routinely advertised to interested parties. In practice, however, procurement decisions are made in accordance with required procedures only some of the time, and procurement decisions are made public with less regularity.

**Component 5: Civil Society, Media, and Business**

Component 5 assesses whether non-governmental actors are able to play oversight and watchdog roles. The results in this section are generally more positive than in the preceding sections, suggesting that non-governmental actors are mobilizing to combat corruption.

*Civil Society (question 26):*

In most countries (15 of 16), civil society organizations exist that claim anti-corruption as part of their mandate. Further, in most countries civil society organizations have in fact initiated actions that have had an impact on government policy, even though governments across the region remain somewhat unreceptive to civil society oversight.

*Media (question 27):*

In all countries, at least some of the major media outlets are privately owned. Across the sample, the media frequently reports on cases of corruption, and in most countries media reporting does in fact lead to government investigation of alleged cases of corruption some of the time. In some countries, the media is considered to be relatively free of political influence, but in others media independence continues to be a problem. Laws exist to protect the media's right to investigate cases of corruption in

only six countries, and in eight countries laws exist that inhibit the media's ability to investigate corruption (e.g., libel laws).

*Corruption Surveys (question 28):*

In all countries but three (Liberia, Mali, Rwanda), public opinion surveys of corruption have been carried out within the last three years, and in most of these countries, surveys have succeeded in elevating the issue of corruption in national debates.

*Public Awareness Campaigns (question 29):*

In eleven countries anti-corruption public awareness campaigns have been carried out in the last three years. Generally, these campaigns have succeeded in elevating the issue of corruption in national debates, although in some countries the impact of these campaigns was minimal.

*Business (questions 30 and 31):*

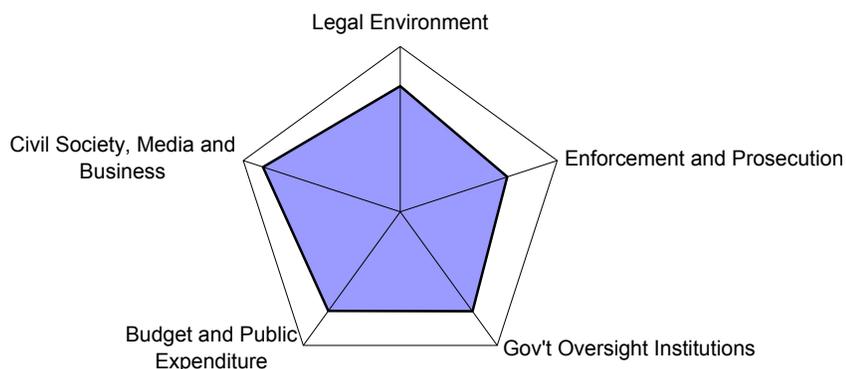
In seven countries professional associations have been formed to promote ethical practices. However, business practices are monitored by independent watchdogs in only five countries. The record on multinational corporations is mixed. In some countries, they generally follow international ethical standards of good business conduct, but in others they do not. Generally, multinationals fail to meet acceptable standards for transparency and accountability.

## 4. COUNTRY PROFILES

This section presents country-specific anti-corruption profiles based on the checklist responses. The profiles provide a quick window on the extent to which countries have been successful or not in establishing the prerequisites for significant anti-corruption programs. Strengths and weaknesses are highlighted in the discussion. Based on these profiles, USAID field managers can identify existing programs that might need strengthening and programmatic gaps that still need to be filled. The radar charts accompanying each country profile depict the extent to which anti-corruption prerequisites are currently in place, component-by-component. The more area that is shaded in the chart, and the closer the shaded area is to approaching any given point, the more that anti-corruption component is already effective.

### 1. Benin

1. Legal Environment	3.80
2. Enforcement and Prosecution	3.41
3. Government Oversight Institutions	3.72
4. Budget and Public Expenditure	3.71
5. Civil Society, Media and Business	4.37
<b>Overall</b>	<b>3.80</b>



#### 1. Legal Environment Score = 3.80

By and large, the main laws required to implement an anti-corruption strategy have been put in place in Benin. On the implementation side, results are mixed. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains insufficient. While a freedom of information act is in place, citizens are not always able to obtain public records. Advanced notice for public meetings is only given some of the time, and minutes of meetings of public boards and commissions are published in a place accessible to the public only some of the time. In the area of asset disclosure, information provided by government officials is rarely made available for public scrutiny. Lastly, it was noted that whistleblower protection is lacking; in practice people who report cases of corruption are not sufficiently protected from retribution.

## **2. Enforcement and Prosecution Score = 3.41**

Benin rates highly in the area of enforcement and prosecution. Corruption investigations have taken place in the past year, and in some cases they have resulted in fines or imprisonment. At the same time, the judiciary is not seen as being sufficiently independent to issue verdicts against members of the ruling party.

In the areas of money laundering and asset recovery, reform is spotty. While appropriate laws are in place, a money laundering investigation unit has not been created, and in practice no agencies carry out investigations related to money laundering. An asset recovery unit, on the other hand, has been created, and there have been cases in which public assets have been recovered. However, this unit's capacity is seen as insufficient. Lastly, legal protection for witnesses in corruption cases is lacking.

## **3. Government Oversight Institutions Score = 3.72**

The government has established a national strategy to combat corruption, has taken some action to implement the strategy, and has put in place mechanisms to monitor progress. These are all positive signs that indicate government commitment to fighting corruption. At the same time, progress is not reported regularly.

Government oversight institutions are generally in place and in operation. The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. However, this agency lacks capacity and independence.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is only minimally engaged in efforts to combat corruption and has limited ability to counterbalance the executive office. Despite these deficiencies, it was noted that concerns about corruption do frequently enter into parliamentary debates, and the parliament has initiated investigations into corrupt practices within the last year.

On the positive side, mechanisms exist within the government to monitor the performance of public service agencies (health, education, etc.), and citizens do have some recourse in cases where service delivery fails.

## **4. Budget and Public Expenditure Score = 3.71**

Benin has put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, the integrated financial management system is inadequate in the provision of information to public officials, and financial reports are made available to the public only some of the time. Similarly, audits are not always conducted regularly, and audit reports are not always available to the public. The supreme audit institution lacks sufficient capacity to carry out its mission.

On procurement, Benin appears to be doing relatively well. Appropriate laws are in place requiring that the government collect multiple bids for major procurements and

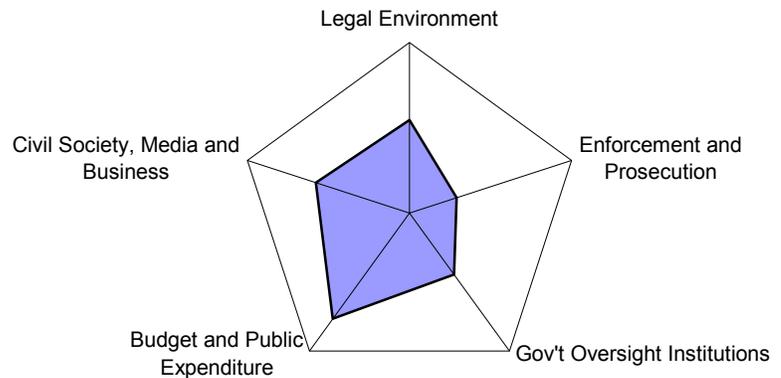
notify potentially interested parties of invitations to bid. In practice procurement decisions are generally made public, and procurements are by and large made in accordance with required procedures.

**5. Civil Society, Media and Business Score = 4.37**

In this area, Benin received the highest score of any country in the sample. Civil society groups appear to be actively engaged in efforts to fight corruption. The media is relatively free of political control and reports regularly on corruption cases. In some cases, media reporting has led to government investigations. Corruption surveys and public awareness campaigns have been conducted and have had a positive impact by elevating the issue of corruption in national debates.

## 2. Burkina Faso

1. Legal Environment	2.73
2. Enforcement and Prosecution	1.45
3. Government Oversight Institutions	2.22
4. Budget and Public Expenditure	3.83
5. Civil Society, Media and Business	2.89
<b>Overall</b>	<b>2.63</b>



### 1. Legal Environment Score = 2.73

While some of the key anti-corruption laws are in place, several others are missing in Burkina Faso. The criminal code does explicitly define corruption as illegal. Conflict of interest, public hiring, and asset disclosure laws are in place. Yet, freedom of information, whistleblower, and sunshine laws are absent. On the implementation side, results are discouraging. In the area of public hiring and appointments, hiring decisions are rarely made on merit, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains insufficient, and citizens are frequently unable to obtain public records. In the area of asset disclosure, government officials do not comply with requirements to disclose their assets.

### 2. Enforcement and Prosecution Score = 1.45

Burkina Faso's score is only slightly above the minimal possible score of 1 in this category, indicating that little progress has been made. The government has taken few actions to investigate, prosecute, or punish offenders. The judiciary is not seen as being sufficiently independent to issue verdicts against members of the ruling party. Investigative units for money laundering and asset recovery are absent. Lastly, legal protections for witnesses in corruption cases are lacking.

### 3. Government Oversight Institutions Score = 2.22

By and large, appropriate oversight institutions within the government are either lacking, insufficiently independent, or do not have sufficient capacity. The government does not have a national strategy to combat corruption, indicating that its political will may be weak. The government has created an anti-corruption agency; however, in practice investigations have not been referred to the judiciary for prosecution. The agency has insufficient capacity, is not seen as credible, and is not independent of the ruling party. An ombudsman does exist to investigate claims of corruption, and while its capacity is also inadequate, it does have some independence from political influence. In public services (health, education, etc.), mechanisms to monitor service delivery agencies are absent.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is only minimally engaged in efforts to combat corruption and has limited ability to counterbalance the executive office.

#### **4. Budget and Public Expenditure Score = 3.83**

Given the inadequacies noted in the previous sections, Burkina Faso scores remarkably well in the area of budget and public expenditure. Indeed, it appears that Burkina Faso has made a great deal of progress in putting in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. An integrated financial management system is in place and does provide information to decision makers, oversight committees, and the public, at least some of the time. Audits are conducted regularly; reports are provided to parliament routinely; and reports are made available to the public at least some of the time. Parliamentary oversight of the budget was noted as generally sufficient. On procurement, appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid. In practice, procurement decisions are generally made public, and procurements are by and large made in accordance with required procedures.

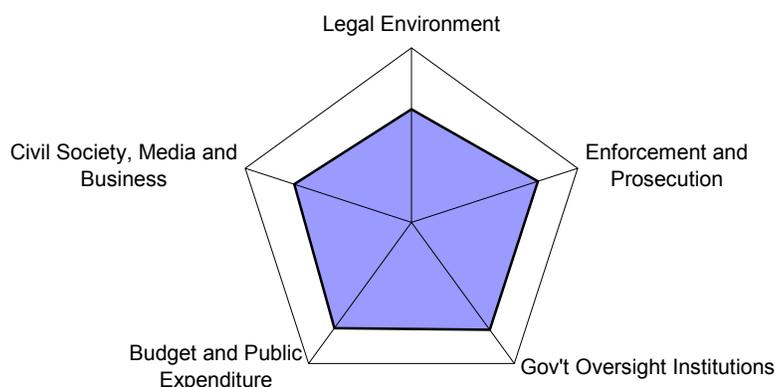
#### **5. Civil Society, Media and Business Score = 2.89**

In this area, the findings were mixed. Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have impacted government policy. The media, on the other hand, appears to lack sufficient independence from the state. Laws protecting the media's right to investigate corruption cases are absent, and reporting by the media in practice does not lead to government investigations.

Corruption surveys have been conducted and have had a positive impact by elevating the issue of corruption in national debates. Public awareness campaigns have not been carried out.

### 3. Cameroon

1. Legal Environment	3.24
2. Enforcement and Prosecution	3.80
3. Government Oversight Institutions	3.81
4. Budget and Public Expenditure	3.75
5. Civil Society, Media and Business	3.53
<b>Overall</b>	<b>3.62</b>



#### 1. Legal Environment Score = 3.24

Some of the main laws required as part of a comprehensive anti-corruption strategy have been put in place in Cameroon. Conflict of interest, asset disclosure, freedom of information, and code of conduct laws are in place. However, public hiring, whistleblower, and sunshine laws are absent. On the implementation side, findings are generally poor. In the area of public hiring and appointments, hiring decisions are rarely made on merit, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains insufficient. While a freedom of information act is in place, citizens are rarely able to obtain public records. In the area of asset disclosure, government officials rarely provide the required information and this information is never available for public scrutiny. It was also noted that whistleblower protection is lacking. One bright spot is that government institutions generally have put in place codes of conduct with legally binding sanctions; ethics training is provided within government institutions; and public employees are generally aware of the code of conduct.

#### 2. Enforcement and Prosecution Score = 3.80

Cameroon rates highly in the area of enforcement and prosecution. Corruption investigations have taken place in the past year, and in some cases they have resulted in fines or imprisonment. At the same time, investigations have avoided current members of the government, and no data was provided on whether the judiciary is sufficiently independent to investigate members of the ruling party.

There is room for improvement in the areas of money laundering and asset recovery. The appropriate laws are in place, and a money laundering investigation unit has been created. In practice, investigations have been carried out, but they have not led to convictions. An asset recovery unit has not been created. Lastly, legal protection for witnesses in corruption cases is lacking.

### **3. Government Oversight Institutions Score = 3.81**

The government has established a national strategy to combat corruption, has taken some action to implement the strategy, and has put in place mechanisms to monitor progress. These are all positive signs that indicate that the government is committed to fighting corruption. At the same time, progress is not reported regularly.

Government oversight institutions are generally in place and in operation. The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. However, this agency lacks capacity. No data was provided on whether or not it is sufficiently independent of political influence.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is engaged in efforts to combat corruption but has limited ability to counterbalance the executive office. The parliament has not initiated any investigations into corrupt practices within the last year.

On the positive side, mechanisms exist within the government to monitor the performance of public service agencies (health, education, etc.), and citizens do have some recourse in cases where service delivery fails.

### **4. Budget and Public Expenditure Score = 3.75**

Cameroon appears to have made a good deal of headway in putting in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, audits are not always conducted regularly, and audit reports are rarely available to the public. The supreme audit institution lacks sufficient capacity to carry out its mission.

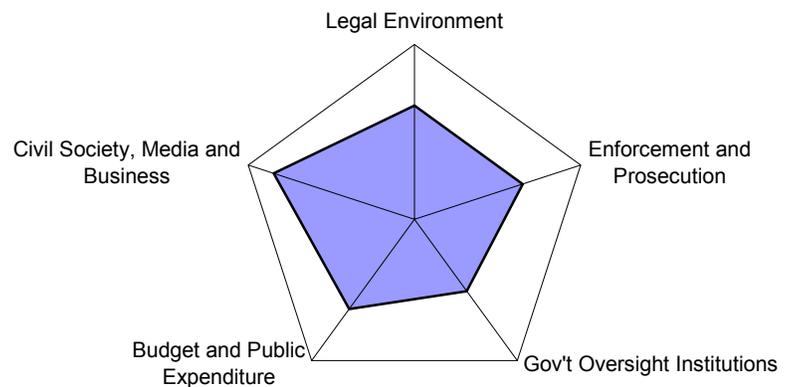
On procurement, the data is mixed. While appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid, in practice procurements are only made in accordance with required laws some of the time. Procurement decisions are rarely made public.

### **5. Civil Society, Media and Business Score = 3.53**

Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have impacted government policy. The media, on the other hand, appears to lack sufficient independence from the state. Laws protecting the media's right to investigate corruption cases are absent, while other laws are in place that inhibit the media's ability to investigate cases of corruption. Nonetheless, the media does report on corruption, and in practice reporting by the media does lead to government investigations at times. Corruption surveys and public awareness campaigns have been conducted and have had a positive impact by elevating the issue of corruption in national debates.

## 4. Kenya<sup>3</sup>

1. Legal Environment	3.25
2. Enforcement and Prosecution	3.25
3. Government Oversight Institutions	2.55
4. Budget and Public Expenditure	2.18
5. Civil Society, Media and Business	4.23
<b>Overall</b>	<b>3.29</b>



### 1. Legal Environment Score = 3.25

Some of the main laws required as part of a comprehensive anti-corruption strategy have been put in place in Kenya. Conflict of interest, asset disclosure, and code of conduct laws are in place. However, freedom of information, whistleblower, and sunshine laws are absent. On the implementation side, findings are mixed. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time. Public access to information also remains insufficient, given the absence of freedom of information and sunshine laws. In the area of asset disclosure, government officials do provide the required information fairly often in practice. One bright spot is that government institutions generally have put in place codes of conduct with legally binding sanctions; however, public employees are generally not aware of the code of conduct. Ethics training is provided within government institutions.

### 2. Enforcement and Prosecution Score = 3.25

Corruption investigations have taken place in the past year, and in some cases they have resulted in fines or imprisonment. At the same time, investigations have avoided current members of the government. Also, the judiciary is not seen as being sufficiently independent to issue verdicts against members of the ruling party.

In the area of money laundering reform is uneven. While investigations have been carried out regarding the movement of money derived from illegal activity, laws against money laundering are absent and an investigative unit has not been created. Lastly, legal protection for witnesses in corruption cases is lacking.

<sup>3</sup> Data for Kenya reported here was collected in July 2004. Since then, President Kibaki implemented reforms and Kenya's top anti-graft official, Permanent Secretary in Charge of Governance and Ethics John Githongo, resigned (on February 7, 2005), stating that he was unable to continue serving the government.

### **3. Government Oversight Institutions Score = 2.55**

The government has established a national strategy to combat corruption, and has taken some action to implement the strategy. However, it has not put in place mechanisms to monitor progress and does not routinely provide reports on progress. These findings raise questions about the government's commitment to fighting corruption.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. However, this agency lacks capacity and independence from political influence.

Lastly, no mechanisms exist within the government to monitor the performance of public service agencies (health, education, etc.), and citizens do not have any recourse in cases where service delivery fails.

### **4. Budget and Public Expenditure Score = 3.18**

Some movement has been made to put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, the integrated financial management system does not provide reliable and timely information to public officials. Similarly, the supreme audit institution is severely lacking in capacity, and audit reports are not always available to the public. The parliament, though legally empowered to oversee budget and expenditure processes, does not in practice ensure that public funds are used for their intended purposes. Nor does it carry out investigations of executive fiscal practices.

On procurement, the data is mixed. While appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid, in practice procurements are rarely made in accordance with required laws.

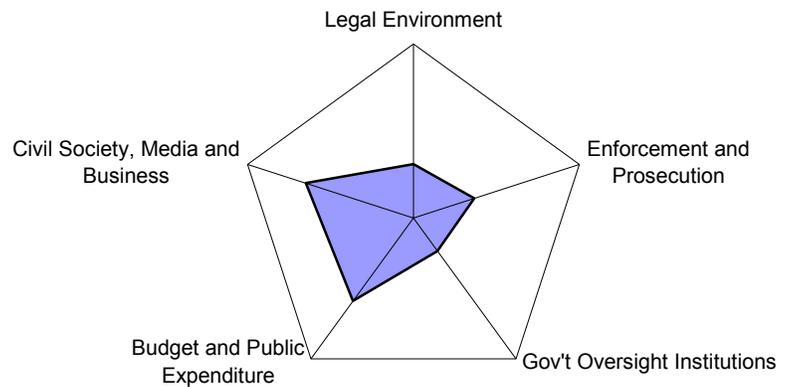
### **5. Civil Society, Media and Business Score = 4.23**

Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have impacted government policy. The media is generally free of political influence and frequently reports on corruption. Further, media reporting does lead to government investigations of alleged cases of corruption at times.

Corruption surveys and public awareness campaigns have been conducted and have had a positive impact by elevating the issue of corruption in national debates.

## 5. Liberia

1. Legal Environment	1.56
2. Enforcement and Prosecution	1.83
3. Government Oversight Institutions	1.17
4. Budget and Public Expenditure	2.95
5. Civil Society, Media and Business	3.24
<b>Overall</b>	<b>2.15</b>



### 1. Legal Environment Score = 1.56

Few of the key anti-corruption laws are in place. The criminal code does not explicitly define corruption as illegal. Conflict of interest laws are absent. While public hiring laws do exist, in practice these laws are generally disregarded. Hiring decisions are rarely made on merit, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains insufficient, and citizens are frequently unable to obtain public records, even though freedom of information laws are in place. Sunshine laws, asset disclosure requirements, codes of conduct, and whistleblower protection are all absent.

### 2. Enforcement and Prosecution Score = 1.83

There are few signs that any efforts are underway to enforce laws prohibiting corruption or to actually prosecute offenders. The government has not undertaken any anti-corruption investigations in the last year, nor have any cases have been brought before the judiciary. Money laundering and asset recovery units are both absent, as are legal protections for witnesses in corruption cases.

### 3. Government Oversight Institutions Score = 1.17

By and large, oversight institutions within the government are lacking. The government does not have a national strategy to combat corruption, indicating that its political will may be weak. The government has not created an anti-corruption agency or an ombudsman. In public services (health, education, etc.), mechanisms to monitor service delivery agencies are absent.

### 4. Budget and Public Expenditure Score = 2.95

Liberia does not have an integrated financial management system in place. However, periodic audits of public accounts are required, though in practice they are conducted only some of the time and findings are never available for public scrutiny. Parliamentary oversight of the budget was noted as generally insufficient. On procurement, appropriate laws are not in place requiring that the government collect

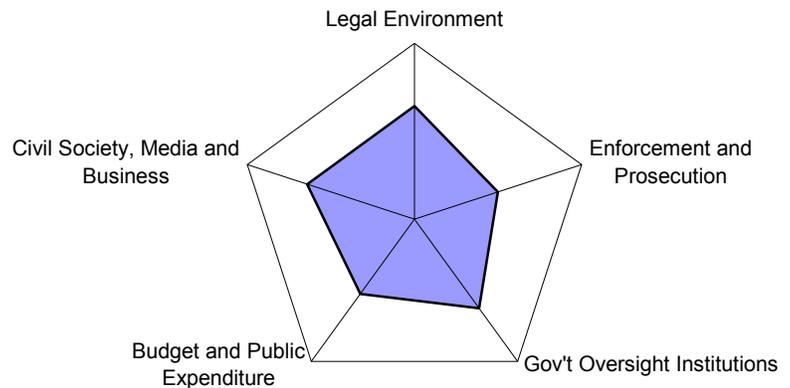
multiple bids for major procurements. In practice, procurements are rarely made in accordance with required procedures, and procurement decisions are generally not made public.

**5. Civil Society, Media and Business Score = 3.24**

The one bright spot for Liberia is in the area of civil society and media. Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have had some impact on government policy. The media appears to be generally independent from the state, and the media frequently reports on corruption. Corruption surveys and public awareness campaigns have not been carried out.

## 6. Madagascar

1. Legal Environment	3.22
2. Enforcement and Prosecution	2.50
3. Government Oversight Institutions	3.14
4. Budget and Public Expenditure	2.63
5. Civil Society, Media and Business	3.21
<b>Overall</b>	<b>2.94</b>



### 1. Legal Environment Score = 3.22

By and large the main laws required as part of a comprehensive anti-corruption strategy have been put in place in Madagascar. However, sunshine laws and code of conduct laws are absent. On the implementation side, results are mixed. While conflict of interest laws are in place at the national level, some government agencies do not have clear policies in place. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time, but senior-level appointments are typically given to qualified persons rather than political supporters and friends of the top leaders. Public access to information remains insufficient. While a freedom of information act is in place, citizens are not always able to obtain public records. In the area of asset disclosure, government officials rarely provide the required information, and this information is not made available for public scrutiny.

### 2. Enforcement and Prosecution Score = 2.50

Enforcement and prosecution systems generally appear inadequate. While the government and the judiciary have undertaken corruption investigations in the last year, these have not resulted in any convictions. Moreover, the judiciary lacks sufficient independence to issue verdicts against members of the ruling party. One bright spot is that legal protections for witnesses in corruption cases are in place.

In the areas of money laundering and asset recovery, no progress has been made. The government has not put in place appropriate laws, or created investigative units.

### 3. Government Oversight Institutions Score = 3.14

The government has created a national strategy to combat corruption and has taken some action to implement the strategy. Significantly, the government has also put in place mechanisms to monitor progress and does provide regular progress reports. This is seen as a positive sign that the government has taken ownership of efforts to fight corruption and that political will for reform may exist.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption; however, this agency lacks capacity and independence. Similarly, an ombudsman exists, but its capacity is minimal and it lacks independence.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is only minimally engaged in efforts to combat corruption and has limited ability to counterbalance the executive office. In practice, the parliament has not initiated investigations into corrupt practices within the last year.

#### **4. Budget and Public Expenditure Score = 2.63**

Major inadequacies were noted in the area of budget and public expenditure. Madagascar appears to have made limited efforts to put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement.

The integrated financial management system does not provide reliable information to decision makers, and financial reports are rarely made available to the public. Similarly, audits are generally not conducted regularly, and audit reports are rarely made available to the public. The supreme audit institution lacks sufficient capacity to carry out its mission, and audit findings are susceptible to political influence.

The parliament appears not to provide any oversight of executive fiscal practices. It rarely ensures that public funds are used for their intended purposes, and does not initiate investigations into executive fiscal practices.

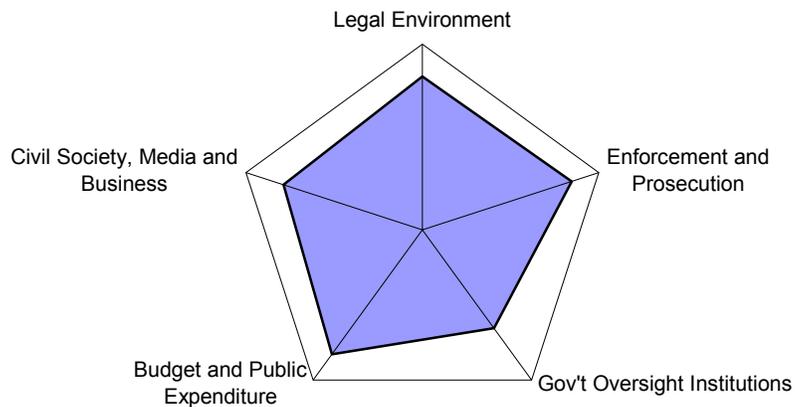
On procurement, appropriate laws are in place requiring that the government collect multiple bids for major procurements. However, procurements are rarely made in accordance with relevant laws, and decisions are generally not open to public scrutiny.

#### **5. Civil Society, Media and Business Score = 3.21**

Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have had some impact on government policy. The media is only moderately independent from the state. Perhaps because of this, the media rarely reports on corruption and media reporting rarely leads to government investigations. Corruption surveys and public awareness campaigns have been carried out, and these have had a moderate impact on elevating the issue of corruption in national debates.

## 7. Mali

1. Legal Environment	4.13
2. Enforcement and Prosecution	4.23
3. Government Oversight Institutions	3.28
4. Budget and Public Expenditure	4.14
5. Civil Society, Media and Business	3.93
<b>Overall</b>	<b>3.94</b>



### 1. Legal Environment Score = 4.13

By and large the main laws required as part of a comprehensive anti-corruption strategy have been put in place in Mali, and steps have been taken to implement them. The criminal code explicitly defines corruption as illegal. Clear conflict of interest laws are in place at the national level, and government agencies generally have conflict of interest policies in place. In the area of public hiring and appointments, hiring decisions are made on merit at least some of the time, and senior-level appointments are typically given to qualified persons rather than political supporters and friends of the top leaders. While a freedom of information act is in place, citizens are not always able to obtain public records. Advanced notice for public meetings is only given some of the time, and minutes of meetings of public boards and commissions are not published in a place accessible to the public. In the area of asset disclosure, government officials do provide the required information, and this information is generally available for public scrutiny.

### 2. Enforcement and Prosecution Score = 4.23

Corruption investigations have taken place in the past year; they have not explicitly avoided current members of the government; and in some cases they have resulted in fines or imprisonment. The judiciary has tried corruption cases during the last year, and has issued sentences. By and large the judiciary is seen as sufficiently independent to issue verdicts against members of the ruling party.

In the areas of money laundering, appropriate laws are not in place. A money laundering investigation unit has not been created, and in practice no agencies carry out investigations related to money laundering.

### 3. Government Oversight Institutions Score = 3.28

The government has established a national strategy to combat corruption, has taken significant action to implement the strategy, and reports progress routinely. At the

same time, the government has not created mechanisms for monitoring the implementation of its anti-corruption strategy, raising questions about the government's ownership of the strategy and commitment to its implementation.

Government oversight institutions are generally in place and in operation. The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. While the agency lacks capacity, it does appear to have sufficient independence from political influence. Similarly, the ombudsman lacks capacity, but does have a relatively high measure of independence.

One area of concern is the ability of the parliament to provide a check and balance against the executive branch. The parliament is somewhat engaged in efforts to combat corruption and has some ability to counterbalance the executive office. However, in practice, the parliament has not initiated any investigations into corrupt practices within the last year.

Lastly, in the area of service delivery, mechanisms do not exist within the government to monitor the performance of public service agencies (health, education, etc.), and citizens have limited recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 4.14**

Mali appears successful in terms of putting in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Generally, the integrated financial management system does provide information to oversight committees in a timely matter, and information is frequently made available to the public. However, it was noted that financial information is not always reliable. No data was provided about audit practices and procedures.

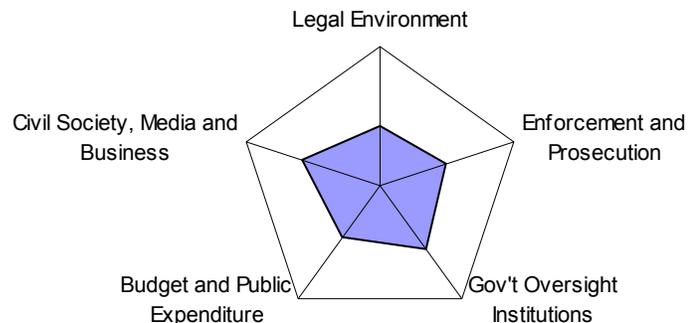
On procurement, the findings are positive. Appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid. However, in practice procurement decisions are made in accordance with relevant laws only some of the time, and decisions are not made public in all cases.

#### **5. Civil Society, Media and Business Score = 3.93**

Civil society groups that claim anti-corruption as part of their mandate do exist, but these organizations have had limited impact on government policy. The media appears to be generally independent from the state and does report frequently on corruption. Furthermore, media reporting has led to government investigations of corrupt practices.

## 8. Mozambique

1. Legal Environment	2.14
2. Enforcement and Prosecution	2.50
3. Government Oversight Institutions	2.78
4. Budget and Public Expenditure	2.27
5. Civil Society, Media and Business	2.95
<b>Overall</b>	<b>2.53</b>



### 1. Legal Environment Score = 2.14

Most of the main laws required as part of a comprehensive anti-corruption strategy are absent in Mozambique. The criminal code does define corruption as illegal and public hiring laws are in place. Most other laws – including conflict of interest, freedom of information, sunshine laws, asset disclosure, codes of conduct, and whistleblower protection – are missing.

In the area of public hiring and appointments, hiring decisions are made on merit only some of the time and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons.

### 2. Enforcement and Prosecution Score = 2.50

Enforcement and prosecution systems generally appear inadequate. While the government and the judiciary have undertaken corruption investigations in the last year, these have not resulted in any convictions. Moreover, the judiciary lacks sufficient independence to issue verdicts against members of the ruling party.

There has been limited reform in the areas of money laundering and asset recovery. The government has put in place appropriate laws regarding money laundering, but has not created an investigative unit, and in practice government agencies do not carry out investigations of money laundering. An asset recover unit has not been created.

### 3. Government Oversight Institutions Score = 2.78

By and large, oversight institutions within the government are lacking. The government does not have a national strategy to combat corruption, indicating that its political will may be weak. The government has not created an anti-corruption agency or an ombudsman. In public services (health, education, etc.), mechanisms to monitor service delivery agencies are absent.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption; however, this agency lacks capacity. An ombudsman does not exist.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is only minimally engaged in efforts to combat corruption and has limited ability to counterbalance the executive office. In practice, the parliament has not initiated investigations into corrupt practices within the last year.

#### **4. Budget and Public Expenditure Score = 2.27**

Major inadequacies were noted in the area of budget and public expenditure. Mozambique appears to have made limited progress in putting in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement.

The integrated financial management system does not provide reliable information to decision makers, and financial reports are rarely made available to the public. Similarly, although audits are generally conducted regularly, reports are not made available to the public. The supreme audit institution lacks sufficient capacity to carry out its mission.

The parliament appears not to provide any oversight of executive fiscal practices. It rarely ensures that public funds are in fact used for their intended purposes and does not initiate investigations into executive fiscal practices.

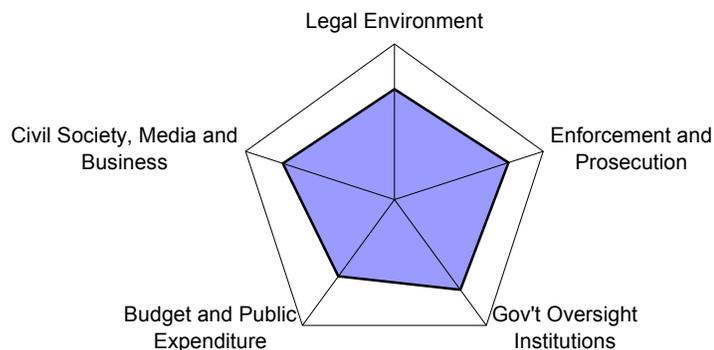
On procurement, appropriate laws are in place requiring that the government collect multiple bids for major procurements. However, procurements are rarely made in accordance with relevant laws, and decisions are not open to public scrutiny.

#### **5. Civil Society, Media and Business Score = 2.95**

Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have had some impact on government policy. The media is not independent from the state. But the media does frequently carry reports on corruption, and reporting does lead to government investigations at times. Corruption surveys and public awareness campaigns have been carried out and have had a moderate impact on elevating the issue of corruption in national debates.

## 9. Nigeria

1. Legal Environment	3.55
2. Enforcement and Prosecution	3.83
3. Government Oversight Institutions	3.58
4. Budget and Public Expenditure	3.05
5. Civil Society, Media and Business	3.75
<b>Overall</b>	<b>3.55</b>



### 1. Legal Environment Score = 3.55

Some of the laws required as part of a comprehensive anti-corruption strategy have been put in place in Nigeria. Conflict of interest, public hiring, asset disclosure, and code of conduct laws exist. However, freedom of information, whistleblower, and sunshine laws are absent. On the implementation side, findings are mixed. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time. Public access to information also remains insufficient. Citizens are only able to obtain public records some of the time.

### 2. Enforcement and Prosecution Score = 3.83

The government and judiciary have carried out corruption investigations and brought cases to trial during the last year. However, no convictions resulted. No data was provided on whether the judiciary is sufficiently independent to investigate members of the ruling party.

In the areas of money laundering and asset recovery, Nigeria scores relatively high. The appropriate laws are in place, and a money laundering investigation unit has been created. In practice, investigations have been carried out, and they have led to convictions. An asset recovery unit has also been created, and cases of asset recovery have been documented.

### 3. Government Oversight Institutions Score = 3.58

The government has established a national strategy to combat corruption, has taken some action to implement the strategy, and has put in place mechanisms to monitor progress. These are all positive signs that indicate government commitment to fighting corruption. At the same time, progress is not reported regularly.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. However, this agency lacks capacity. No data was provided on whether it is sufficiently independent of political influence. An ombudsman's office also exists.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is only minimally engaged in efforts to combat corruption and has limited ability to counterbalance the executive office. One encouraging sign is that the parliament has initiated investigations into corrupt practices in the last year.

Lastly, mechanisms exist within the government to monitor the performance of public service agencies (health, education, etc.), but citizens have limited recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 3.05**

Nigeria has taken steps to put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, the government's integrated financial management system provides reliable information only some of the time. On the positive side, financial information is generally made available for public scrutiny. However, audits are not conducted regularly, and audit reports are rarely made available to the public. It was also noted that the supreme audit institution lacks sufficient capacity to carry out its mission.

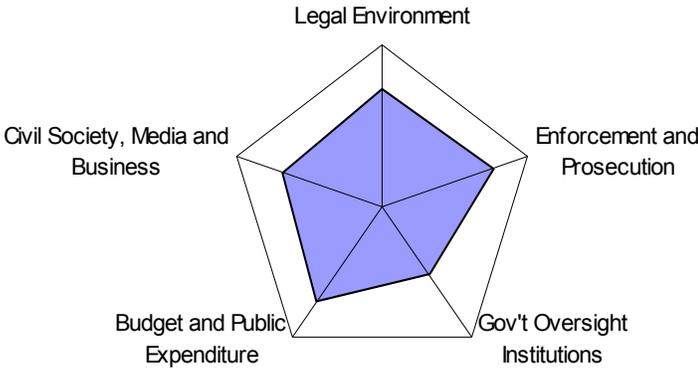
On procurement, the data is mixed. While appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid, in practice procurements are rarely made in accordance with relevant laws.

#### **5. Civil Society, Media and Business Score = 3.75**

Civil society groups that claim anti-corruption as part of their mandate do exist, but these organizations have had little impact on government policy. The media appears to be generally independent from the state. In practice, the media does frequently report on corruption, and reporting does occasionally lead to government investigations. Corruption surveys and public awareness campaigns have been conducted.

# 10. Rwanda

1. Legal Environment	3.65
2. Enforcement and Prosecution	3.80
3. Government Oversight Institutions	2.63
4. Budget and Public Expenditure	3.67
5. Civil Society, Media and Business	3.43
<b>Overall</b>	<b>3.43</b>



**1. Legal Environment Score = 3.65**

Many of the key laws required as part of a comprehensive anti-corruption strategy have been enacted in Rwanda. Public hiring, asset disclosure, and code of conduct laws are in place. However, freedom of information, whistleblower, and sunshine laws are absent. On the implementation side, findings are mixed. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time. Public access to information also remains insufficient. Citizens are only able to obtain public records some of the time. Regarding asset disclosure, government officials do in practice provide the required information, but this information is rarely made available for public scrutiny.

**2. Enforcement and Prosecution Score = 3.80**

The government and judiciary have carried out corruption investigations and brought cases to trail during the last year, and some cases have led to convictions. No data was provided on whether the judiciary is sufficiently independent to investigate members of the ruling party. An asset recovery unit has not been created, and data was not provided on money laundering.

**3. Government Oversight Institutions Score = 2.63**

Government oversight appears to be particularly weak in Rwanda. The government has not established a national strategy to combat corruption, nor has it created an anti-corruption agency or commission. The parliament is somewhat engaged in efforts to combat corruption and does have some ability to counterbalance the executive office. However, the parliament has not initiated investigations into corrupt practices in the last year. Mechanisms do not exist within the government to monitor the performance of public service agencies (health, education, etc.), and citizens have limited recourse in cases where service delivery fails. One positive note is that an ombudsman's office does exist, and it has relatively high capacity and independence.

#### **4. Budget and Public Expenditure Score = 3.67**

Rwanda has taken some steps to put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, the government's integrated financial management system provides reliable information only some of the time. Audits are not conducted regularly, and reports are rarely available to the public.

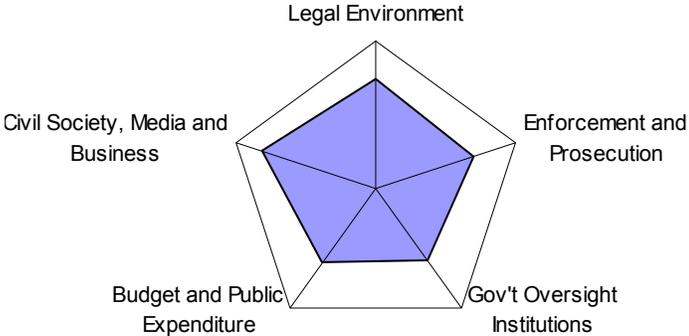
On procurement, appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid. However, procurements are rarely made in accordance with relevant laws.

#### **5. Civil Society, Media and Business Score = 3.43**

Rwanda lacks civil society groups that claim anti-corruption as part of their mandate. The media appears to be only moderately independent from the state. In practice, the media does frequently report on corruption, and reporting does lead to government investigations at times. Public awareness anti-corruption campaigns have been conducted and these have succeeded in elevating the issue of corruption in national debates. Corruption surveys have not been conducted.

# 11. Senegal

1. Legal Environment	3.73
2. Enforcement and Prosecution	3.53
3. Government Oversight Institutions	3.04
4. Budget and Public Expenditure	3.13
5. Civil Society, Media and Business	4.06
<b>Overall</b>	<b>3.50</b>



### 1. Legal Environment Score = 3.73

By and large Senegal has put in place the laws required as part of a comprehensive anti-corruption strategy. The implementation of these laws is spotty, however. In the area of public hiring and appointments, hiring decisions are only sometimes made on merit, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains inadequate. While freedom of information laws are in place, citizens are rarely able to obtain public records in practice. One bright spot is that conflict of interest laws are in place, and government institutions generally have policies in place that are understood by some of the officials working in those agencies. Government institutions also generally have created codes of conduct with legally binding sanctions, and ethics training is provided within some government institutions. Asset disclosure and whistleblower protection laws are absent.

### 2. Enforcement and Prosecution Score = 3.53

The data on enforcement and prosecution is mixed. Corruption investigations have taken place in the past year, and in some cases they have resulted in fines or imprisonment. At the same time, investigations have avoided current members of the government, and the judiciary is not sufficiently independent to investigate members of the ruling party.

In the areas of money laundering and asset recovery, reform is generally positive. The appropriate laws are in place, and a money laundering investigation unit has been created. In practice, investigations have been carried out, but they have not led to convictions. An asset recovery unit has also been created, although its capacity is somewhat limited. Lastly, legal protections for witnesses in corruption cases are in place.

### 3. Government Oversight Institutions Score = 3.04

Government oversight is problematic. Existing institutions lack capacity and independence; political will appears to be inadequate; and the parliament does not serve as an effective counterbalance against the executive office.

The government has not established a national strategy to combat corruption. The absence of a national strategy suggests that the government's ownership of and commitment to substantial reforms to reduce corruption may be weak.

On the positive side, the government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. While this agency is seen as being independent of political influence, its capacity is limited. No ombudsman's office is in place.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is not engaged in efforts to combat corruption. The parliament's ability to counterbalance the executive office is limited, and in practice, the parliament has not initiated any investigations into corrupt practices within the last year.

On the positive side, mechanisms do exist within the government to monitor the performance of public service agencies (health, education, etc.), and citizens do have some recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 3.13**

Senegal has made some movement towards putting in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the government's willingness to allow public scrutiny. Specifically, the government's integrated financial management system does provide reliable information to policy makers. Yet, financial reports are generally not available for public scrutiny. Laws requiring periodic audits of public accounts are not in place. In practice audits are conducted irregularly, and reports are rarely available to the public. It was also noted that the supreme audit institution lacks sufficient capacity to carry out its mission.

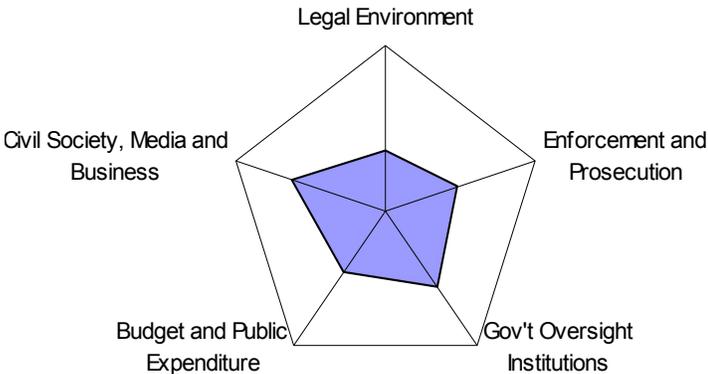
On procurement, the data is mixed. While appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid, procurements are made in accordance with required laws only some of the time. Procurement decisions are rarely made public.

#### **5. Civil Society, Media and Business Score = 4.06**

Senegal scores very highly in this area. Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have significantly impacted government policy. The media is generally independent from the state. The media frequently reports on corruption, and in practice reporting by the media often leads to government investigations. Corruption surveys have been conducted and have had a positive impact by elevating the issue of corruption in national debates. Public awareness campaigns have not been carried out.

## 12. Sierra Leone

1. Legal Environment	1.87
2. Enforcement and Prosecution	2.41
3. Government Oversight Institutions	2.86
4. Budget and Public Expenditure	2.27
5. Civil Society, Media and Business	3.11
<b>Overall</b>	<b>2.50</b>



### 1. Legal Environment Score = 1.87

Few of the key anti-corruption laws are in place. The criminal code does not explicitly define corruption as illegal. Public hiring laws do not exist. In practice hiring decisions are rarely made on merit, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains insufficient, and citizens are frequently unable to obtain public records, as freedom of information and sunshine laws are not in place. Asset disclosure requirements, codes of conduct, and whistleblower protection are all absent.

### 2. Enforcement and Prosecution Score = 2.41

While some positive signs exist that the government is making attempts to enforce anti-corruption laws and prosecute offenders, key institutions appear to be weak or absent. On the positive side, the government has carried out corruption-related investigations in the last year, and some public officials have been sanctioned. Cases have also been brought before the judiciary in the last year, and some convictions have resulted. However, the judiciary lacks sufficient independence to issue verdicts against the ruling party. Money laundering and asset recovery units are absent.

### 3. Government Oversight Institutions Score = 2.86

The results in this area are mixed. The government does have a national strategy to combat corruption, but has taken limited action to implement it. Further, the government has not put in place mechanisms to monitor the implementation of its anti-corruption strategy, nor does it report regularly on progress. These indicators suggest that the government's ownership of and commitment to substantive reforms may be weak.

On the positive side, the government has created an anti-corruption agency that appears to have significant capacity and independence. However, investigations typically do not lead to prosecution.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is not engaged in efforts to combat corruption. The parliament is not

able to counterbalance the executive office, and in practice, the parliament has not initiated any investigations into corrupt practices within the last year.

Lastly, in the public services (health, education, etc.), mechanisms to monitor service delivery agencies are in place, but citizens have no recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 2.27**

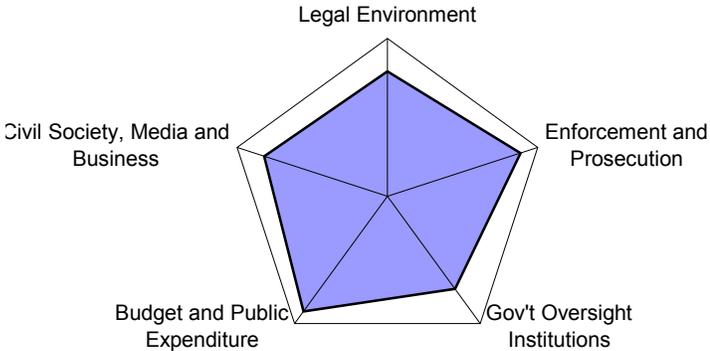
Sierra Leone has not put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. There is no integrated financial management system. Audits are rarely conducted, and reports are generally not made available for public scrutiny. The capacity of the supreme audit institution is minimal. Parliamentary oversight of the budget was noted as generally insufficient. On procurement, appropriate laws are in place requiring that the government collect multiple bids for major procurements. However, in practice, procurements are rarely made in accordance with required procedures, and decisions are generally not made public.

#### **5. Civil Society, Media and Business Score = 3.11**

The one bright spot for Sierra Leone is in the area of civil society and media. Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have had some impact on government policy. The media appears to be generally independent from the state, and the media frequently reports on corruption. In some cases, media reporting has led to government investigations. Corruption surveys and public awareness campaigns have been carried out, and both have had some impact in elevating the issue of corruption in national debates.

# 13. South Africa

1. Legal Environment	3.96
2. Enforcement and Prosecution	4.42
3. Government Oversight Institutions	3.63
4. Budget and Public Expenditure	4.52
5. Civil Society, Media and Business	4.11
<b>Overall</b>	<b>4.13</b>



**1. Legal Environment Score = 3.96**

The main laws required as part of a comprehensive anti-corruption strategy have been put in place in South Africa. On the implementation side, results are generally good, but some deficiencies were noted. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. In the area of asset disclosure, information provided by government officials is rarely made available for public scrutiny.

**2. Enforcement and Prosecution Score = 4.42**

Corruption investigations have taken place in the past year, and in some cases they have resulted in fines or imprisonment. At the same time, the judiciary is not seen as being sufficiently independent to issue verdicts against members of the ruling party.

In the areas of money laundering and asset recovery, South Africa is in an excellent position. Appropriate laws are in place; a money laundering investigation unit has been created; and in practice government agencies do carry out investigations related to money laundering. Investigations into money laundering have led to convictions. An asset recovery unit has also been created, and there have been cases in which public assets have been recovered. However, this unit's capacity is seen as insufficient.

**3. Government Oversight Institutions Score = 3.63**

The government has established a national strategy to combat corruption and has taken significant action to implement the strategy. Furthermore, the government has put in place mechanisms to monitor progress and does report on progress routinely. These are all positive signs that indicate government commitment to fighting corruption.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. This agency is generally seen as being independent of political influence, though its

capacity is somewhat inadequate. Similarly, an ombudsman's office exists, but lacks sufficient capacity and independence.

While parliament is somewhat engaged in the fight against corruption, distribution of powers remains problematic. The parliament lacks the ability to counterbalance the executive office and has not initiated investigations into corrupt practices in the last year.

Lastly, mechanisms exist within the government to monitor the performance of public service agencies (health, education, etc.), but citizens have limited recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 4.52**

South Africa has put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. The integrated financial management system generally provides reliable information to decision makers, and financial reports are generally available to the public. Audits of public accounts are carried out routinely, and reports are available for public scrutiny. However, it was noted that the supreme audit institution lacks capacity.

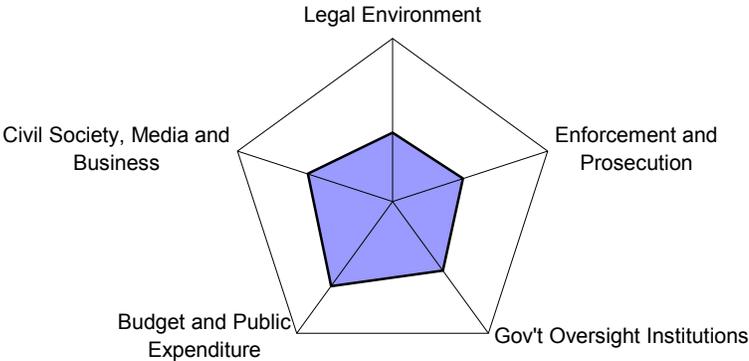
On procurement, the data is excellent. Appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid. Procurement decisions are generally made public, and in practice procurements are by and large made in accordance with required procedures.

#### **5. Civil Society, Media and Business Score = 4.11**

Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have had some impact on government policy. The media is independent from the state, and the media frequently reports on corruption. In some cases, media reporting has led to government investigations. Corruption surveys have been carried out and have had some impact in elevating the issue of corruption in national debates. Public awareness campaigns have not been carried out.

# 14. Tanzania

1. Legal Environment	2.11
2. Enforcement and Prosecution	2.26
3. Government Oversight Institutions	2.62
4. Budget and Public Expenditure	3.22
5. Civil Society, Media and Business	2.74
<b>Overall</b>	<b>2.59</b>



### 1. Legal Environment Score = 2.11

While some of the key anti-corruption laws are in place, several others are missing. The criminal code does explicitly define corruption as illegal. Conflict of interest, public hiring, and asset disclosure laws are in place. Yet, freedom of information, whistleblower, and sunshine laws are absent. On the implementation side, results are discouraging. In the area of public hiring and appointments, hiring decisions are rarely made on merit, and senior-level appointments are typically given to political supporters and friends of the top leaders rather than qualified persons. Public access to information also remains insufficient, and citizens are frequently unable to obtain public records. In the area of asset disclosure, government officials do not comply with requirements to disclose their assets.

### 2. Enforcement and Prosecution Score = 2.26

The government has taken limited actions to investigate, prosecute, or punish offenders. While the government has initiated investigations in the last year, these have not resulted in convictions. Further, the judiciary is not seen as sufficiently independent to issue verdicts against members of the ruling party. Basic laws for money laundering and asset recovery are absent. Lastly, legal protections for witnesses in corruption cases are lacking.

### 3. Government Oversight Institutions Score = 2.62

The data on oversight is mixed. The government has established a national strategy to combat corruption and has taken some action to implement the strategy. Further, the government has put in place mechanisms to monitor progress and does report on progress routinely. These are all positive signs that indicate government commitment to fighting corruption. However, given the lack of enforcement and prosecution noted in the previous section, one should be cautious about concluding that the government is committed to substantially reducing the level of corruption in Tanzania.

The government has created an anti-corruption agency. However, it does not have the legal power to investigate all branches of the government, and investigations do not lead to referral of cases to the judicial system. While the agency has some

capacity, it is not sufficiently independent. An ombudsman does exist to investigate claims of corruption, but it lacks both capacity and independence. In public services (health, education, etc.), mechanisms to monitor service delivery agencies are absent.

A major deficiency in the distribution of powers was noted regarding the role of the parliament, which is somewhat engaged in efforts to combat corruption, but has limited ability to counterbalance the executive office. In practice, the parliament has not initiated any investigations into corrupt practices in the last year.

#### **4. Budget and Public Expenditure Score = 3.22**

An integrated financial management system is in place, but it does not provide reliable information to decision makers and oversight committees. Financial reports are rarely made available to the public. Audits are not conducted regularly, and resulting reports are made available to the public only some of the time. The supreme audit institution has moderate capacity and limited independence.

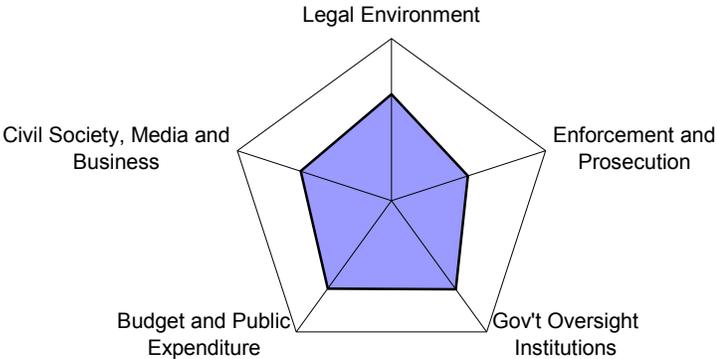
On procurement, appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid. However, in practice procurements are made in accordance with required procedures only some of the time, and procurement decisions are generally not made public.

#### **5. Civil Society, Media and Business Score = 2.74**

Civil society groups that claim anti-corruption as part of their mandate do exist, and these organizations have had some impact on government policy. The media, on the other hand, appears to lack sufficient independence from the state. Laws protecting the media's right to investigate corruption cases are absent. However, the media does report on corruption in practice, and reporting does lead to government investigations at times. Corruption surveys have been conducted and have had a positive impact by elevating the issue of corruption in national debates. Public awareness campaigns have also been carried out but have not elevated the issue of corruption in national debates.

# 15. Uganda

1. Legal Environment	3.29
2. Enforcement and Prosecution	2.47
3. Government Oversight Institutions	3.38
4. Budget and Public Expenditure	3.35
5. Civil Society, Media and Business	2.95
<b>Overall</b>	<b>3.09</b>



### 1. Legal Environment Score = 3.29

Some of the main laws required as part of a comprehensive anti-corruption strategy have been enacted in Uganda. Conflict of interest, public hiring, and asset disclosure laws are in place. However, freedom of information, code of conduct, whistleblower protection, and sunshine laws are absent. On the implementation side, findings are mixed. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time and senior-level appointment are frequently given to supporters and friends of the top leaders rather than qualified persons. In the area of asset disclosure, government officials generally do provide the required information in practice, and this information is generally available for public scrutiny.

### 2. Enforcement and Prosecution Score = 2.47

Corruption investigations have taken place in the past year, and in some cases they have resulted in fines or imprisonment. At the same time, investigations have avoided current members of the government. On the positive side, the judiciary is seen as being sufficiently independent to issue verdicts against members of the ruling party. However, no convictions have been reached in corruption cases within the last year.

The data compiled reflect weakness in the area of money laundering. While investigations have been carried out regarding the movement of money derived from illegal activity, laws against money laundering are absent. Neither an investigation unit nor an asset recover unit has been created. Lastly, legal protection for witnesses in corruption cases is lacking.

### 3. Government Oversight Institutions Score = 3.38

The government has established a national strategy to combat corruption, but has taken limited action to implement the strategy. The government has not put in place mechanisms to monitor progress and does not routinely provide reports on its progress. These findings raise questions about the government's commitment to fighting corruption.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. While this agency lacks capacity, it appears to be relatively independent from political influence.

The parliament appears to be moderately engaged in efforts to combat corruption, and has some ability to counterbalance the executive office. In practice, debates about corruption are common in the parliament, and it has initiated investigations into corrupt practices in the last year.

Lastly, mechanisms do exist within the government to monitor the performance of public service agencies (health, education, etc.), yet citizens have limited recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 3.35**

Some steps have been taken to put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, the integrated financial management system does not routinely provide reliable and timely information to public officials. Financial reports are made available to the public only some of the time. Audits are not conducted regularly, and reports are not always available to the public. The supreme audit institution is severely lacking in capacity.

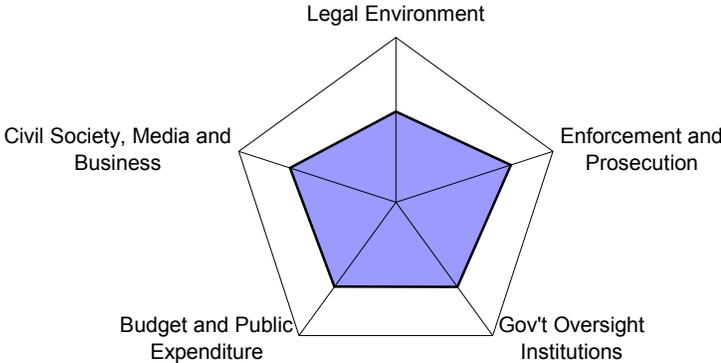
On procurement, the data is mixed. While appropriate laws are in place requiring that the government collect multiple bids for major procurements and notify potentially interested parties of invitations to bid, in practice procurements are made in accordance with required laws only some of the time. Generally, procurement decisions are made available to public scrutiny.

#### **5. Civil Society, Media and Business Score = 2.95**

Civil society groups that claim anti-corruption as part of their mandate do exist, but these organizations have had limited impact on government policy. The media is not free of political influence. However, in practice the media does report on corruption, and media reporting does lead to government investigations of alleged cases of corruption at times. Corruption surveys and public awareness campaigns have been conducted and have had a positive impact by elevating the issue of corruption in national debates at least somewhat.

# 16. Zambia

1. Legal Environment	2.75
2. Enforcement and Prosecution	3.67
3. Government Oversight Institutions	3.17
4. Budget and Public Expenditure	3.17
5. Civil Society, Media and Business	3.37
<b>Overall</b>	<b>3.22</b>



### 1. Legal Environment Score = 2.75

Some of the key laws required as part of a comprehensive anti-corruption strategy have been enacted in Zambia. Conflict of interest, asset disclosure, and whistleblower protection laws are in place. However, public hiring, freedom of information, and sunshine laws are absent. On the implementation side, findings are mixed. In the area of public hiring and appointments, hiring decisions are made on merit only some of the time and senior-level appointments are frequently given to supporters and friends of the top leaders rather than qualified persons. In the area of asset disclosure, government officials provide the required information only some of the time, and this information is not always available for public scrutiny.

### 2. Enforcement and Prosecution Score = 3.67

The data on enforcement and prosecution are positive. The government and judiciary have carried out corruption investigations and brought cases to trial during the last year, and some cases have led to convictions. However, the judiciary is not sufficiently independent of political influence to be able to issue verdicts against members of the ruling party.

A money laundering investigation unit has been created, and in practice government agencies do carry out investigations related to the movement of money derived from criminal activity. An asset recovery unit has also been created. While its capacity is somewhat insufficient, there have been cases in which public assets were recovered.

### 3. Government Oversight Institutions Score = 3.17

The government has established a national strategy to combat corruption, but has taken limited action to implement the strategy. The government has not put in place mechanisms to monitor progress and does not routinely provide reports on its progress. These findings raise questions about the government's commitment to fighting corruption.

The government's anti-corruption agency has appropriate powers to investigate cases of corruption, and in practice investigations do lead to prosecution of offenders. While

this agency lacks capacity, it is thought to be relatively independent from political influence.

The parliament appears to be engaged in efforts to combat corruption, but has limited ability to counterbalance the executive office. In practice, debates about corruption are common in the parliament, but there have not been investigations of corrupt practices in the last year.

Lastly, mechanisms do exist within the government to monitor the performance of public service agencies (health, education, etc.), yet citizens have limited recourse in cases where service delivery fails.

#### **4. Budget and Public Expenditure Score = 3.17**

Some steps have been taken to put in place appropriate rules and regulations for public financial management, parliamentary oversight of expenditures, and government procurement. Nonetheless, deficiencies were noted in the reliability of these systems and in the government's willingness to allow public scrutiny. Specifically, the integrated financial management system does not routinely provide reliable and timely information to public officials. Financial reports are rarely made available to the public. Audits are not conducted regularly, but reports are generally available to the public. The supreme audit institution is severely lacking in capacity.

Procurement practices are problematic. While appropriate laws are in place requiring that the government collect multiple bids for major procurements, in practice procurements are rarely made in accordance with required laws. Procurement decisions are made available to public scrutiny only some of the time.

#### **5. Civil Society, Media and Business Score = 3.37**

Civil society groups that claim anti-corruption as part of their mandate do exist, but these organizations have had limited impact on government policy. The media is generally free of political influence, and it frequently reports on corruption. Media reporting does in practice lead to government investigations of alleged corruption at times. Corruption surveys and public awareness campaigns have been conducted but have had a limited impact in elevating the issue of corruption in national debates.

## 5. IMPLICATIONS AND RECOMMENDATIONS

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### Practical Implications concerning the Checklist Assessment Technique

The Checklist Assessment tool provides a good and detailed overview of a country's anti-corruption program. Rather than focus on the extent of the corruption problem, the technique directs the attention of assessors to what is being accomplished to control the problem. Importantly, it is an easy to use and quick tool that highlights the important questions and issues that USAID field managers should be asking to develop a broad diagnosis of the state of anti-corruption activities in a country. Moreover, the conclusions drawn from using the technique lend themselves readily to programmatic options that USAID, other donors and the host country can incorporate in future plans.

This pilot test has demonstrated that the questions asked by the checklist are answerable by knowledgeable USG democracy and governance officers in the field. Because of the multidimensional nature of the checklist, we found that a better way to complete it might be to organize a team of specialists within a field Mission or embassy or by convening a joint team of USG-host country experts.

For the purposes of cross-country comparisons, we have transformed the checklist responses in this pilot test into quantitative indicators. However, such quantification is not necessary for practical assessment purposes in the field.

This checklist tool might be thought of as a first, high-level assessment of the state of anti-corruption programs in a country. If the technique identifies particularly weak or nonexistent institutions or systems that need further analysis, additional, more probing assessments may be commissioned to detail alternative paths for future reform programs.

### Recommendations concerning the Checklist Technique

Based on this pilot study, we have several recommendations for next steps to refine the checklist tool for application in the field.

- 1. Revise and refine the Checklist tool.** Carefully assess the questions against the results to determine if certain questions should be reworded or deleted and if additional questions should be included. Also, review the response values offered for each question and whether open-ended questions should be added.
- 2. Obtain a larger sample.** Get additional USAID Missions and US Embassies to complete the Checklist tool. In addition, get one or two appropriate think tanks in each country to complete the checklist. With these new respondents, test a

variety of ways to get the checklist completed – by individual respondents, group efforts, facilitated group exercises, and USG-local team efforts. Assess the pros and cons of each approach.

- 3. Conduct a more detailed analysis across the region.** With a larger sample of countries, it will be possible to conduct a more definitive analysis of the state of anti-corruption program in Africa. As well, analyses can be conducted to assess if there is potential and unwarranted optimism or pessimism from USG respondents.
- 4. Develop a set of toolkits based on the results.** Based on a broad comparative analysis across the region, it is likely that particular deficiencies and weaknesses in existing anti-corruption programs will emerge. These findings can be used to develop some basic toolkits that address common problems that are faced on a country-by-country basis.

## Policy Implications

In the broadest sense, reducing corruption requires limiting the discretionary power of government officials to use public resources for their own personal and political gain. In Africa, leaders since independence have been relatively unencumbered in their discretionary power. The transition to more democratic political systems has placed some restrictions on leaders. They are now subject to popular elections in many countries. Society and the media also have more freedom to voice criticism of the government and to demand information. Opposition political parties now exist in many countries to challenge the practices of incumbent parties.

Yet, despite these positive changes, leaders still retain significant discretion over the distribution of public resources. The data from the checklist strongly indicate that the distribution of power within African governments remains skewed toward the executive office. Parliaments and judiciaries are generally unable to challenge the authority of the executive office and/or carry out investigations into abuses of power. In addition, the checklist found that institutions and agencies that have been created to play oversight roles frequently lack the capacity and/or independence to fully investigate and sanction corrupt officials.

Across our sample of countries, the majority have carried out what we call “stroke of the pen” reforms – that is, reforms that can be enacted either by legislation or decree. Typically, these reforms include putting in place new laws and/or creating new commissions and agencies. However, new laws are frequently not implemented, and new agencies often do not have the power or resources to fulfill their mandates in practice. This is often intentional. African leaders rely on the use of state resources – distribution of public funds, jobs, business licenses, scholarships for students, etc. – to build and maintain networks of political supporters. As such, incumbent leaders have little incentive to implement substantive reforms that would reduce their discretionary power.

The challenge for those seeking to promote reform, therefore, is to find ways to change the incentive structure that government officials face. This can be done in multiple ways and at multiple levels. First, the international donor community and international financial institutions can continue to demand that governments adopt principles of good governance and transparency as a condition for receiving aid. However, donors must push for substantive reforms, not just window dressing. Second, donors can continue to support the development of the institutions needed for democracy – free and fair elections, strong political parties, etc. Democracy provides an opportunity for the population to sanction corrupt leaders and may push incumbent leaders to embrace reforms. Third, donors can continue to support societies in developing the capacity to monitor the government and hold it accountable. Finally, donors can continue to provide strategic support for reforms within governments. However, donors should be realistic about the broader political framework in which these reforms are being enacted. Providing support for anti-corruption agencies, for example, may not make sense in countries where the executive office is determined to limit the power of that agency. Careful assessments of the political landscape need to be conducted in designing strategies. Where political will is weak or absent, donors may be better off using funds to support civil society.

## Programmatic Recommendations

The recommendations that follow are addressed to donors and reformers working at the country level in Africa and are derived from the substantive findings of this pilot study.

- 1. Focus on Political Will:** Government will for reform appears to be inadequate in many countries. While most countries have national strategies to combat corruption, few have taken significant actions to implement these strategies. Even fewer have put in place monitoring mechanisms to measure progress made on national goals or procedures for routinely reporting on progress. While it may be difficult to directly increase political will of government officials, donors need to be realistic about the possibilities for affecting change in countries where political will is weak or absent.
- 2. Focus on Building Checks and Balances / Distribution of Power:** Distribution of power between the main branches of government remains problematic. Parliaments and judiciaries generally have limited power to hold the executive office accountable, sanction corrupt practices, or perform an oversight function. Donors should look for strategic opportunities to provide support to strengthen these institutions. Support may be particularly useful following a transition of government or where incumbents appear genuinely committed to reform.
- 3. Build Capacity of Institutions and Agencies:** The capacity of agencies, commissions, and institutions with a mandated role to combat corruption is generally insufficient. Donors should look for strategic opportunities to strengthen anti-corruption agencies, ombudsman's offices, supreme audit agencies, and service delivery agencies.

Donors should be careful to target support to countries that have demonstrated a commitment to building the capacity and independence of these agencies.

- 4. Continue to Work with Civil Society:** Civil society is actively engaged in the effort to reduce corruption. The vast majority of countries reported the presence of civil society organizations that have adopted corruption as part of their mission, and in a significant number of countries civil society organizations have succeeded in impacting government policy. Donors can conduct needs assessments to determine whether civil society could benefit from additional support, and provide support where needed. One area that may be worth investigation would be to strengthen the capacity of civil society groups to collect and disseminate data on corruption and the government's progress on combating it. In many cases, basic information is absent or incomplete.
- 5. Continue to Work with Media:** The media is actively engaged in investigating and reporting on corruption. In most countries, the media is reasonably free from government control and frequently reports on cases of corruption. In several countries media reporting has led to government investigations of corruption. Donors can conduct needs assessments to determine whether the media in various countries could benefit from additional support, and provide support where needed.
- 6. Maintain Pressure for Open Budget and Expenditure Systems:** In many countries, the availability of government financial data is limited. Though most countries reported the use of an integrated financial management system, financial data and audit reports are frequently not made available to oversight agencies or the public. Pressure from donor agencies and international financial institutions may play a pivotal role in creating incentives for incumbent rulers to adopt more transparent practices.
- 7. Support Initiatives to Strengthen Public Access to Information / Transparency:** Across the sample, citizens in many countries have difficulty in obtaining various types of information from the government. Governments are shielded from public scrutiny by outdated laws and practices. In some countries, donors should push for legal reforms that will legalize the public's right to access government information. Donors can support governments in drafting and ratifying freedom of information laws, sunshine laws, financial disclosure laws, and audit laws. Secondly, donor support may be useful in helping citizen's groups learn how to take advantage of such laws where they exist. For example, in countries where freedom of information laws are in place, civil society and media groups may be unaware of their rights or of the process for obtaining information.
- 8. Support Money Laundering and Asset Recovery Laws and Agencies:** Few countries in the sample have put in place appropriate legislation regarding money laundering and/or asset recovery. And few have created appropriate investigative units for implementing such laws. Donors may be able to support the development of legislation and the creation of appropriate agencies.

- 9. Support Public Service Reform:** In some countries mechanisms exist to monitor the performance of public service agencies (health, education, etc.). However, these mechanisms are absent in many other countries. Across the sample, citizens generally have little recourse in cases where service delivery fails. For the vast majority of African citizens, the primary point of contact with the government is the public service sector, and corruption in this sector affects people's lives in tangible ways. There is presently limited knowledge about how to reduce corruption in this sector. Donors should take stock of what has been tried and continue to develop best practices. One option might be to strengthen civil society organizations that monitor the service sector (through report card surveys and social audits, for example) so that reliable data about performance becomes available and citizens have an organization to turn to for support and advocacy in cases of service failure.
- 10. Provide Training on Implementation of Anti-Corruption Laws:** A key finding of this study in the area of Legal Environment was that in many countries relevant laws are in place but are not being fully implemented. Donors could target this "implementation gap" by providing technical assistance to institutionalize laws and procedures, and by offering training to government agencies and civil society groups to build capacity, improve awareness and strengthen enforcement of existing laws.

# APPENDIX:

## ANTI-CORRUPTION CHECKLIST INSTRUMENT

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PART 1. LEGAL ENVIRONMENT	
<b>1. Criminal Code:</b>	
a. Does the criminal code explicitly define corruption as illegal?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Does it specify actions considered to be corrupt?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. Does it indicate punishments for corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>2. Conflict of interest:</b>	
a. Is there a national law that defines conflicts of interest for public officials?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Do government agencies have clear conflict of interest policies?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. If yes, are the policies widely understood by officials working in the agencies?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not understood</i> <span style="float: right;"><i>Well understood</i></span>
<b>3. Public hiring / appointments:</b>	
a. Are laws in place that require public hiring to be based on merit rather than nepotism, connections, and bribery?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Are public hiring decisions actually made on merit?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Rarely</i> <span style="float: right;"><i>Sometimes</i></span> <i>Always</i>
c. Generally, are senior-level appointments given to qualified persons or to political supporters and friends of the top leaders?	<input type="checkbox"/> <span style="margin-left: 150px;"><input type="checkbox"/></span> <i>qualified person</i> <span style="float: right;"><i>supporters / friends</i></span>
<b>4. Freedom of Information:</b>	
a. Are freedom of information laws in place that allow citizens to access public documents related to government decision making?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, are citizens actually able to obtain public records in practice?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Never</i> <span style="float: right;"><i>Always</i></span>
<b>5. Sunshine law:</b>	
a. Is a national "sunshine law" in place requiring that meetings of boards or commissions must be open to the public?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Is reasonable notice of meetings given?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/>

	Never Always
c. Are minutes of the meeting published in a place accessible to the public?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Always
<b>6. Asset Disclosure:</b>	
a. Are government officials required by law to disclose their assets?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Does the law require public disclosure?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. In practice, do public officials provide the information required by law?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Always
d. Is such information readily available to the public?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Always
e. Are asset disclosures verified by an independent body?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>7. Codes of Conduct:</b>	
a. Are public institutions legally required to have a code of conduct?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Do public institutions actually have codes of conduct in place with legally-binding sanctions?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> None Some All
c. Do public institutions provide ethics training?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> None Some All
d. Generally, are public employees aware of the code?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> None Some All
<b>8. Whistleblower protection:</b>	
a. Are whistleblower laws in place to provide protection for people who report cases of corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, are people who report cases of corruption actually protected from retribution?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Always
<b>9. International Conventions:</b>	
a. Has the government ratified the UN Convention against Corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Has the government ratified the AU Convention on Combating Corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. For SADC countries, has the government ratified the SADC Protocol against Corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>PART 2. ENFORCEMENT and PROSECUTION</b>	
<b>10. Enforcement</b>	
a. Has the government undertaken any corruption-related	Yes <input type="checkbox"/> No <input type="checkbox"/>

investigations in the last year?	
<i>If yes:</i>	
b. Have investigations avoided current members of the government?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. Have any public officials been removed from their jobs, fined, or put in prison for corruption in the last year?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>11. Judiciary:</b>	
a. Have any corruption cases been brought to trial in the court system during the last year?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Have any cases resulted in convictions?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. Have sentences been executed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. Is the judiciary sufficiently independent of political influence to be able to issue verdicts against members of the ruling party?	Yes <input type="checkbox"/> No <input type="checkbox"/>
e. Do specialized criminal courts exist for corruption cases?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>12. Money laundering:</b>	
a. Are laws in place prohibiting money laundering (the process through which money derived from illegal activities is given the appearance of originating from a legitimate source)?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Has a special money laundering investigative unit been established?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. In practice, do any agencies carry out investigations related to the movement of money derived from criminal activity?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Never</i> <i>Frequently</i>
d. If yes, have any investigations led to convictions?	Yes <input type="checkbox"/> No <input type="checkbox"/>
e. If convictions have been reached, have sentences been enforced?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>13. Asset Recovery</b>	
a. Has an asset recovery unit been created?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Does the unit have sufficient capacity (people, training, funds) to carry out its mission?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Insufficient capacity</i> <i>Sufficient Capacity</i>
c. Have there been any cases in which public assets have been recovered (either domestically or from abroad)?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>14. Witness protection:</b>	
a. Are legal protections in place for witnesses in corruption cases?	Yes <input type="checkbox"/> No <input type="checkbox"/>

<b>15. Police:</b>	
a. Are efforts underway to monitor and curtail corruption within the police?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Have any police members been reprimanded or dismissed for corruption in recent memory?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>PART 3. GOVERNMENT OVERSIGHT INSTITUTIONS</b>	
<b>16. Anti-Corruption Agency:</b>	
a. Has the government created a special anti-corruption agency or commission?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Does it have the power to investigate all branches of government?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. Do investigations lead to referrals to the justice system?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. Do investigations lead to prosecution by the justice system?	Yes <input type="checkbox"/> No <input type="checkbox"/>
e. Does it have sufficient capacity (staff, training, funds) to carry out its mission?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Insufficient capacity Sufficient Capacity</i>
f. Is the agency/commission sufficiently independent to investigate members of the ruling party?	Yes <input type="checkbox"/> No <input type="checkbox"/>
g. Is it generally seen as being credible?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not credible Very credible</i>
<b>17. Ombudsman (public complaints unit):</b>	
a. Does an ombudsman exist to investigate claims of public corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Does it have sufficient capacity (staff, training, funds) to carry out its mission?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Insufficient capacity Sufficient Capacity</i>
c. Is it sufficiently independent of political influence to be able to issue accurate findings?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not independent Very independent</i>
d. Is the public aware of its existence?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not aware Very aware</i>
e. Is it generally seen as being credible?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not credible Very credible</i>
f. Do hotlines or other mechanisms exist for citizens to report cases of corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>18. National Strategy:</b>	
a. Does the government have a national anti-corruption	Yes <input type="checkbox"/> No <input type="checkbox"/>

strategy?	
<i>If yes:</i>	
b. Has the government taken action to implement the strategy?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>No action</i> <span style="float: right;"><i>Significant action</i></span>
c. Has the government created mechanisms for monitoring the implementation of its anti-corruption strategy?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. Does the government report regularly on its progress in combating corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
e. Has the government carried out an assessment of the causes and consequences of corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
f. Are there any senior government officials within the ruling party that have emerged as "champions" for anti-corruption reform?	Yes <input type="checkbox"/> No <input type="checkbox"/>
g. Do opposition parties call for corruption probes of the government?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Never</i> <span style="float: right;"><i>Frequently</i></span>
h. Does the country have viable opposition parties that could unseat the ruling party in the next election?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>19. Parliament</b>	
a. Is the parliament engaged in efforts to combat corruption?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not</i> <span style="float: right;"><i>at</i></span> <span style="float: right;"><i>all</i></span> <i>Significantly</i>
b. To what extent is the parliament able to act as a counterbalance to the executive branch?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Not</i> <span style="float: right;"><i>at</i></span> <span style="float: right;"><i>all</i></span> <i>Significantly</i>
c. How frequently do concerns about corruption enter into debates within the parliament?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Never</i> <span style="float: right;"><i>Frequently</i></span>
d. Has the parliament initiated any investigations into corrupt practices within the last year?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>20. Municipal/regional level:</b>	
a. Do municipalities or regional governments have anti-corruption strategies?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, have municipal/regional government units taken action to implement the strategy?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>No action</i> <span style="float: right;"><i>Significant action</i></span>
<b>21. Corruption in public services:</b>	
a. Are there functional mechanisms within the government to monitor the performance of public service agencies (health, education, etc.)?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Do civil society groups monitor the performance of public services?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. Do citizens have recourse in cases where service delivery fails?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> <i>Never</i>

	<i>Usually</i>
<b>PART 4. BUDGET and PUBLIC EXPENDITURE PROCESS</b>	
<b>22. Financial Management System:</b>	
a. Is there an integrated national financial management system?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. Does that system provide reliable information for public decision making?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> No <span style="float: right;">Yes</span>
c. Does the system provide routine financial reports for Legislative and Parliamentary oversight committees?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. If yes, are these reports made available in a timely manner?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
e. Are financial reports made available to the public?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
f. If yes, are these reports made available in a timely manner?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
<b>23. Audits:</b>	
a. Is a law in place requiring periodic audit of public accounts?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<i>If yes:</i>	
b. In practice, are audits conducted regularly?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
c. Are audit reports provided to parliament?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. Are audit reports open to the public?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
e. Are the recommendations in audit reports implemented?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
f. If yes, are recommendations implemented in a timely manner?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Always</span>
g. How would you rate the capacity of the supreme audit institution (staff, training, funds) to carry out its mission?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Low capacity <span style="float: right;">High Capacity</span>
h. Are its finding heavily influenced by political actors?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never <span style="float: right;">Frequently</span>
i. Are auditors required to follow international auditing standards?	Yes <input type="checkbox"/> No <input type="checkbox"/>
j. Do national auditors associations exist that sanction corrupt auditors?	Yes <input type="checkbox"/> No <input type="checkbox"/>

<b>24. Parliamentary oversight of budget:</b>	
a. Does parliament have oversight power over budgets and expenditures?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, does it in practice ensure that public funds are used for the intended purposes?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not Routinely at all
c. Are open budget hearings held?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. How often does parliament investigate executive fiscal practices?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Frequently
<b>25. Procurement:</b>	
a. Are multiple bids required for major procurements?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Are invitations to bid advertised so that they are known by all interested parties?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Always
c. Are procurement decisions made public?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Always
d. In practice, are procurements made without following required procedures?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Frequently
<b>PART 5. CIVIL SOCIETY, MEDIA, and BUSINESS</b>	
<b>26. Civil Society:</b>	
a. Do civil society organizations exist that claim anti-corruption as part of their mandate?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, have these organizations initiated actions that have had an impact on government policy?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> No impact Significant impact
c. Is the government receptive to civil society anti-corruption oversight?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not at all Very
<b>27. Media:</b>	
a. Is the media considered to be independent of political influence?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not independent independent Very
b. Are laws in place that <b>protect</b> the media's right to investigate cases of corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. Are laws in place that <b>inhibit</b> the media's ability to investigate cases of corruption (for example, libel laws)?	Yes <input type="checkbox"/> No <input type="checkbox"/>
d. In practice, does the media report on corruption cases?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Frequently
e. Does media reporting ever lead to government investigations of alleged cases of corruption?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Never Frequently
f. Are any of the major media outlets privately owned?	Yes <input type="checkbox"/> No <input type="checkbox"/>

g. Do "gag laws" exist that restrict media reporting on corruption?	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>28. Corruption Surveys:</b>	
a. Have public opinion surveys of corruption been carried out within the last three years?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, have they succeeded in elevating the issue of corruption in national debates?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not at all Significantly
<b>29. Public Awareness Campaigns:</b>	
a. Have anti-corruption public awareness campaigns been carried out in the last three years?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. If yes, have they succeeded in elevating the issue of corruption in national debates?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not at all Significantly
<b>30. Business</b>	
a. Have any professional groups formed associations to promote ethical practices?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Do any independent watchdog organizations exist to monitor business practices?	Yes <input type="checkbox"/> No <input type="checkbox"/>
c. To what extent are local businesses engaged in and benefiting from government corruption?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not Extensively at all
<b>31. International Dimensions</b>	
a. Have external actors (donors and/or foreign governments) pressured the government to implement anti-corruption activities through conditional aid or other mechanisms?	Yes <input type="checkbox"/> No <input type="checkbox"/>
b. Does the impetus to combat corruption come primarily from external actors, the government, or both?	<input type="checkbox"/> external <input type="checkbox"/> gov't <input type="checkbox"/> both
c. Overall, how would you rate the government's commitment to controlling corruption?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> None Significant
d. Do multinational corporations in the country follow international ethical standards of good business conduct?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Rarely Usually
e. How would you rate the transparency/accountability of multinational corporations active in this country?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Poor Acceptable
f. To what extent are foreigners and multinational corporations engaged in and benefiting from government corruption?	1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> Not Extensively at all