



AUDITING NATIONAL SYSTEMS OF PREVENTION AND FIGHT AGAINST CORRUPTION

PROGRESS STATUS OF THE WORK

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BANGKOK OCTOBER 2024 DECISION TO LAUNCH THE GUIDE

Composition of the working group

SAls from ten countries :

→ Austria, Brasil, Bulgaria, France, Guatemala,
Morocco, Moldova, Papua New Guinea, The
Philippines, Thaïland



AGENDA OF THE GROUP

End of 2023: preparation of project proposal and concept note

A survey of project group members: on their country's anti-corruption policy and on their mandate to evaluate it

Four group meetings 2024 and 2025

Meetings with stakeholders (OECD, ONUDC, GRECO Transparency International, J-PAL (MIT), ZHAW (Zurich), FCAR (Canada))



THE CONCEPT OF THE GUIDELINES

The guide aims to help the SAIs do :

A transversal evaluation of the country's anti-corruption system : national strategy, laws, authorities, specialized services, means implemented

An evaluation involving the stakeholders

A report targeted on ways of improvement



SEVERAL CHALLENGES

The cross-cutting nature of the audit, the extent and complexity of the system to be evaluated imply challenges:

- Have an overall vision without ambitioning a total exhaustiveness ;
- A field where measurement tools may be lacking ;
- Stay within the scope of the SAI's mandate which varies from one country to another ;
- **Do not cross the red line of the separation of powers.**



SOME SOLUTIONS

To meet these challenges, the group has adopted the following solutions :

- Use wording “**audit of the anti-corruption framework**” : SAIs, according to their mandate, may translate by “**evaluation of anti-corruption policy**”, evaluation of the anti-corruption system
- **Respect the separation of powers** with regard to **certain authorities** concerned, by consulting or **associating** them rather than being intrusive
- **Rely as much as possible on the country’s international commitments** (ratified conventions and treaties like UNCAC), which provide a comparable reference for all countries and allows the SAI to refer to obligations recognized by the national authorities



THE STAKEHOLDER ASSOCIATION: “THE PANEL”

UNODC

OECD

GRECO

TRANSPARENCY INTERNATIONAL

J-PAL (MIT)

ZHAW (ZURICH UNIVERSITY)

CAAF/FCAR (NATIONAL NGO CANADA)



THE STAKEHOLDERS CONTRIBUTIONS TO THE GUIDELINES

- They are **still in progress** ;
- A real interest or even enthusiasm for the idea of **cross-functional audits** by country ;
- Most of them **make their tools available** ;
- They recommend that SAIs **should not seek to be exhaustive** or even plan for several publications staggered over time ;
- They finally recommend to exploit **existing works as much as possible**.



MAIN CHAPTERS

I. The opportunity and feasibility of auditing national anticorruption framework

- Existence and maturity level of systems of prevention and fight against corruption ;
- Capacity of the SAI in auditing the national system of prevention and fight against corruption : mandate and resources ;
- Capacity to bring together a panel of stakeholders, including if possible NGO/CSOs.



MAIN CHAPTERS

II. Methodology to audit an anticorruption public policy

- Exploit the sources ;
- Select and associate the panel at the key moments ;
- Choose for each subject the right level of precision desired and possible ;
- Use the UNCAC as a “maturity model” ;
- Select for each item the right level of precision desired and possible ;
- Communication and follow-up.



MAIN CHAPTERS

III. The audit of the system/framework : the different themes

- Overview of the anti-corruption strategy and system including legislation and institutions ;
- Evaluation of the different components of the national anti-corruption system :
 - * Preventive anti-corruption policies and practices,
 - * Criminalization and law enforcement,
 - * Role of civil society
 - * International cooperation;
 - * The special role of the SAI, in fighting corruption
- Areas that could be – or not – addressed only in a partial way, or from a particular angle in a limited way by the SAI, (ex private sector, asset recovery)



FOR EVERY ITEM OF THE AUDIT

A review of sources and tools will be in the guidelines :

Many sources and tools of great quality still exist, and some are undeniable, such as :

- The ratified treaties ;
- Recommendation of international organizations in the context of the implementation of treaties ;
- Country implementation review report ;
- Academic works by fondations, universities
- NGO works (Transparency International) with indicators and measurement tool (ex National integrity systems).



FOR EVERY ITEM OF THE AUDIT

We will endeavour to offer the SAIs the possibility to make an audit "à la carte" option allowing the degree of detail and deepening to be chosen, based on:

- National priorities or work already done by the SAI or other independent authorities;
- Their mandate and resources.



THIS AMBITIOUS GUIDE BY ITS THEME TURNS OUT TO BE A CHALLENGE !

→ Many trade-offs to take into account the different mandates, review of sources (with summaries appended) and tools that is time-consuming (and will probably make a rather voluminous document !)

WHICH MEANS THAT THE SCHEDULE CANNOT BE
RESPECTED :

→ We are in the redaction of the draft, which should be released in September/October 2025.



THANK YOU FOR YOUR ATTENTION
MERCI DE VOTRE ATTENTION