

**DISCUSSION PAPER No. 335**

## **No time like the present to fight corruption: Innovative practice for a wicked development problem**

**By Martin Ronceray and Katja Sergejeff**

February 2023

In her last State of the Union address, European Commission president Ursula von der Leyen called on Europe to clean up its act on corruption internally, or risk losing its credibility as a promoter of the rule of law internationally. These words, pronounced in the context of the war in Ukraine, resonate all the more since shortly afterwards the EU was shaken by its largest corruption scandal of the century.

Corruption seriously undermines development and hits the most vulnerable hardest. But it is a multifaceted, wicked problem: one that resists simple solutions and even simple conceptualisations, and one that calls for modesty, trial-and-error and soul-searching. This paper reviews new evidence on how anti-corruption can be conducted, how the EU has been performing in this area and what should be done next to improve Europe's overall footprint.

Credible, cross-cutting international efforts to tackle corruption as a development obstacle – by looking both outward with projects and programmes, and inward by addressing one's own deficiencies and policy coherence – do matter. The EU and the wider 'Team Europe' have roles to play in this field, many of which are yet unfulfilled. To seize the window of opportunity in 2023 to overhaul Europe's fragmented, outdated and overall timid approach, the first priorities are giving it a proper policy framework and tapping into existing forces to mobilise new ones.

---

## Table of Contents

Acknowledgements .....	ii
Acronyms .....	ii
1.Introduction .....	1
2.Context: sizing up corruption as a topical development issue .....	1
2.1. Nature of the problem .....	1
2.2. Timeliness of anti-corruption efforts .....	4
3.General lessons in anti-corruption practice .....	5
3.1. Best practices at project and programmes level .....	5
3.2. Best practices in individual donor approaches .....	6
3.3. Best practices at the multilateral level .....	7
4.The EU as an anti-corruption actor .....	8
4.1. Framework and resources .....	8
4.2. Initiatives and opportunities .....	10
5.Recommendations for the EU and its member states .....	12
Bibliography .....	16

## List of Boxes

Box 1: Corruption, gender and intersectionality .....	2
Box 2: Political context matters – example from Zambia .....	3
Box 3: Cross-cutting approaches to trade and corruption .....	6

---

## Acknowledgements

This paper is part of a partnership between ECDPM and the Swedish Presidency of the Council of the European Union 2023. The authors are grateful to the Permanent Representation of Sweden to the European Union, to Sweden’s Ministry of Foreign Affairs and to Sida for their feedback. Additional thanks go to all those who shared views and insights during interviews, and to ECDPM colleagues Alexei Jones and Jean Bossuyt – the team leader of a recent evaluation of the EU’s support to the rule of law and anti-corruption – for their feedback and guidance, as well as Joyce Olders, Virginia Mucchi and Catarina Farinha for their work on layout and communication. The views are the authors’ and do not represent those of the Swedish Presidency, ECDPM or the European Union. Comments are welcome and can be sent to the authors.

## Acronyms

AAP	Africa Advocacy Program
AC	African Commission
ACE	Anti-corruption evidence
APP	Anti-corruption Partnership Pilot
CSO	Civil society organisation
DAC	Development Assistance Committee
DFI	Development finance institution
EC	European Commission
ECDPM	European Centre for Development Policy Management
EEAS	European External Action Service
EITI	Extractives Industries Transparency Initiative
EnACT	Enabling Access to Justice, Civil Society Participation, and Transparency
EP	European Parliament
EU	European Union
FATF	Financial Action Task Force
GSP	Generalised Scheme of Preferences
IFI	International financial institutions
MIP	Multiannual indicative programme
ODA	Official development assistance
OECD	Organisation for Economic Co-operation and Development
PFM	Public Financial Management
TEI	Team Europe Initiative
UK	United Kingdom
UNCAC	United Nations Convention against Corruption
UNODC	United Nations Office on Drugs and Crime
WTO	World Trade Organisation

---

## 1. Introduction

Corruption is a major obstacle to development with wide-ranging negative consequences to society. Over the last three decades, the fight against corruption has received fluctuating levels of political attention in Europe's foreign and development policy. But with COVID-19 highlighting the negative consequences of corruption in the health sector, the war in Ukraine revitalising the debate on democracy and anti-corruption, and Qatargate highlighting the worldwide pervasiveness of corruption, there is now momentum for Europe to strengthen its fragmented commitment and efforts in the area of anti-corruption.

This paper synthesises key considerations drawn from scholarship and practice of anti-corruption in international development, and formulates recommendations of adjustments and policies that the European Union (EU) and its member states should adopt. It is based on document review and practitioners' interviews, and borrows in parts from a more extensive study supported by Sweden in 2020 (Ronceray and Sergejeff 2020), as well as – most importantly – the very recent evaluation of the EU's rule of law and anti-corruption efforts 2010-2021 (EC 2022b).

The paper is structured in sections which lay out in turn the context of anti-corruption as a development challenge; international best practices from this field; the nature and role of the EU as an anti-corruption actor; and recommendations for improving its impact in this area.

Anti-corruption as an area of development cooperation is frequently understood as one of the aspects of governance support – alongside electoral assistance or civil society promotion, for instance – which require highly specialised interventions. Substantially reducing corruption is one of the ten ambitions of Sustainable Development Goal 16 which covers peace, justice, inclusive and accountable governance. Enhancing anti-corruption efforts is considered to be key in terms of strengthening democracy within and outside the EU, and for democracy promoters to remain credible in the wider world.<sup>1</sup> But corruption is a systemic set of issues which pervade all other areas beyond the concern for political governance. Hence, the spirit of this paper is to encourage connections across themes, both within development cooperation and in wider international discussions and at home.

## 2. Context: sizing up corruption as a topical development issue

### 2.1. Nature of the problem

**Corruption is a major development problem.** That is, it has an extremely negative impact on societies, often assessed to range in the area of trillions of euros annually worldwide. Such estimates hardly do full justice to the non-financial implications of defective rule of law, so they should be taken with a pinch of salt (Wathne and Stevenson 2021). The prominence of addressing corruption in the 2030 agenda – and related targets of the cross-cutting 'SDG 16 Plus' – reflects the consensus on a crucial sustainable development importance of corruption. There is ample evidence that corruption compounds inequalities, affecting in particular marginalised and vulnerable groups and undermining their inclusion. Recent research on corruption as a blocker of access to COVID-19 vaccination in developing countries show the "double barrier" it imposes on the poor in developing countries, which has undermined the global efforts to keep the pandemic under control (TI 2022). This points towards a high 'cost of inaction', should nothing be done about it.

---

<sup>1</sup> "If we want to be credible when we ask candidate countries to strengthen their democracies, we must also eradicate corruption at home." ([State of the Union address by Commission president V. d. Leyen, 14 September 2022](#)).

---

### Box 1: Corruption, gender and intersectionality

Corruption and gender inequality have in common that they are rooted in dynamics stemming from asymmetrical power relations, as well as entrenched cultural and societal representations. Groups that are most vulnerable in society also tend to suffer the most from corruption, and indeed women tend to experience more corruption than men. Corruption puts particular barriers to the ability of women to access basic services; and women also have a harder time seeking justice or protection from exploitation (U4 2021).

There are specific types of corruption that tend to target women, such as sextortion, which can refer to seeking to engage the victim in sexual activities against their will in exchange for access to certain services or benefits that they should be entitled to obtain freely (TI 2020). Corruption affects women more than men partly because women tend to be poorer, but also because they are also more often the primary caregivers in their household (UNODC 2020). This discussion of intersectionality in the context of corruption is picking up, with a growing recognition of the importance of broadening the analysis of corruption to diverse forms of exclusion. For instance, corruption intersects with poverty, age, rurality, and migration status, to name a few examples (U4 2021). This makes anti-corruption the ultimate cross-cutting work, with the layers of complexity – and potential for high impact – that it entails.

**Corruption is a many-faced problem.** Not all corruption affects development in the same way. Typologies of corruption point to extreme differences in impact. At one end of the spectrum are the most damaging types of corruption, such as those that syphon state resources and distort policies to the benefit of the few to the detriment of the many. At the other end, comparatively less damaging types of corruption act as ‘grease in the wheels’ of economies and societies, although they are rarely perceived as really legitimate by all parties involved. Legal concepts of corruption have in common that they see in it an act performed by a perpetrator, but in certain contexts corruption is also ‘part of a system’, which calls for a distinct set of practical responses (Jackson 2022).

**Corruption is also a wicked problem:** there are no simple solutions to it or ‘quick wins’. For one, it is clear that corruption is not going away on its own: with all the limitations of proxy indicators, the latest Corruption Perceptions Index suggests that over the past decade, 124 countries remained at similar levels of corruption, 31 declined and only in 25 countries did the situation improve.<sup>2</sup> This ‘wickedness’ is due to the fact that corruption tends to play in the hands of powerful interests; to its multifaceted nature and to the complex set of interrelated societal, economic and cultural parameters that determine, among other things, whether it is accepted in a given context. In most cases, it is impossible to pinpoint a significant measurable reduction of corruption due to direct anti-corruption initiatives. Arguably, that is largely due to how hidden and how difficult to measure corruption is in the first place. There is thus a lack of evidence base when it comes to the impact of anti-corruption efforts, although significant energy is invested in research and pilot projects (Wathne and Evans 2022).

**Reducing corruption is a process that builds on gradual endogenous dynamics.** A few countries have managed to dramatically reduce corruption in the last few decades: Botswana, Rwanda, Hong Kong, Singapore, Georgia, Mauritius and Estonia. These success stories were not externally-driven, and they have relied on a mix of momentous change (initiated for instance through revolutions) and slow evolutions of mentalities. Therefore there is fairly little that an external actor can hope to replicate as a whole, and international anti-corruption efforts should be seen as primarily a complement to promising existing dynamics.

---

<sup>2</sup> [2022 Corruption Perceptions Index - Transparency.org](#)

---

**International efforts address many complementary levers.** A limited number of initiatives are explicitly framed as anti-corruption, and reported as such under the OECD Development Assistance Committee (DAC). This *direct* anti-corruption ranges from support to dedicated authorities to support to organisations like Transparency International, through customs modernisation projects and many more. A wider diversity of initiatives can be understood as *indirect* anti-corruption: any project such as sectoral reform which factors in the concern for addressing corruption and integrates it; as well as activities and initiatives that lead to addressing the *drivers for corruption* (OECD 2012), a set of structural factors identified by the OECD that shape corruption outcomes, such as the possibility of transferring the proceeds of corruption abroad and keeping them in tax havens.<sup>3</sup> In other words, direct anti-corruption projects are but one set of tools in the large yet underused toolbox to address corruption as a development obstacle.

**Development partners have a role to play, which requires a specific mindset:** focusing on long term impact, do-no-harm, differentiated and flexible approaches informed by analysis. Some forms of corruption are too entrenched in existing power relations for external actors to address, and after thorough analysis donors may be better advised to work on mitigating their impact on vulnerable populations (see box 1) and wider sustainable development, while awaiting structural changes that may offer them a leeway further down the line. In fragile settings where it is an essential channel for rents and incomes, corruption may not only be too hard to root out, but attempting to do so may trigger instability and violence so that anti-corruption may cause more harm than good. In contexts of autocratic consolidation, anti-corruption can be used as a weapon against political opponents. In such contexts, approaches such as technical assistance to law enforcement agencies risk offering a varnish of legitimacy to regimes conducting repression, and helping them crack down on opposition. Because of these challenges, it is important to avoid rigid blueprints and to remain open to options such as cancelling, modifying or stepping up rapidly an initiative as befits the context.

### Box 2: Political context matters – example from Zambia

According to practitioners of anti-corruption in Zambia, the change of leadership which took place in 2021 has opened new doors to address corruption issues, as the “New Dawn” government has expressed strong commitment to fighting corruption and upholding rule of law. This was deemed promising as corruption in the health sector in Zambia has been endemic, and has led donors to pull out in the past (Jackson et al. 2020). Following a major scandal, in the medical supply in Zambia, corruption also became a key theme for elections (TI 2021).

In the analysis of EU practitioners consulted, the change of government has opened a window to work on anti-corruption. Such windows of opportunity tend to open and close according to the political life of countries, and it is important to make use of them by supporting reformists, while at the same time considering that announcements alone are not evidence of a genuine support to anti-corruption efforts. The Enabling Access to Justice, Civil Society Participation, and Transparency (EnACT, 2021-2025) programme will have a significant anti-corruption component. It seeks to support the government of Zambia in formulation and implementation of key legislation including on anti-corruption, produce analysis and strategies to combat corruption and build capacities of civil society organisations (AAP Zambia 2022). The EnACT will also complement and support the Anti-corruption Partnership Pilot (APP) programme implemented by Sweden and the U4 Resource centre.

---

<sup>3</sup> The recent Evaluation of the European Union support to Rule of Law and anticorruption in Partner Countries (2010-2021) has used a similar typology to assess the EU spending on anti-corruption, dividing it to primary and secondary support. Primary support refers to interventions with a clear objective to strengthen justice systems and AC frameworks, whereas secondary support refers to strengthening the entire institutional context for Rule of Law and AC, including topics such as PFM, Democracy, media and human rights (Particip 2022).

---

However, systemic corrupt practices do not disappear overnight. There have been allegations of corruption against the new Health minister Masebo (Lusaka Times 2022), and critics have questioned the efficiency of the government's anti-corruption reforms (Fabricius 2022). Furthermore, it is reported that the purges of ministry cadres in the name of anti-corruption has left administrations deprived of necessary competences, which in turn undermined delivery. This might constitute an example of 'removing the grease in the wheels' – removing corruption that, while harmful, was playing a practical role as enabler by increasing the incentives for the delivery of public services. This gives credence to calls for also developing approaches that 'replace corruption as a functioning mechanism', rather than just suppressing it.

## 2.2. Timeliness of anti-corruption efforts

**COVID-19 and corruption in the health sector.** With its severe consequences for access, quality, equity, efficiency, and efficacy of health services, corruption is an obstacle to the long-term goal of achieving universal health coverage (Hussman 2020). Corruption hotspots in the health sector include manufacturing and distribution; regulation; procurement – especially the emergency ones that flourished in the early phases of COVID-19 vaccines production; high-level governance and health workforce (Steingrüber and Gadanya 2022). In the context of the pandemic, corruption was driven by economic, political and social factors including poor level of preparedness to pandemics, lack of transparency, restricted space for civil society and deficient emergency procurement procedures (Cepeda Cuadrado and Kirya 2022). An interviewee from Transparency International's Global Health programme emphasised the need for development partners, in order to improve global health, to change the current siloed approach for a holistic view of corruption as an issue to tackle across the board and making use of all levers, including by championing it in global institutions and in particular international financial institutions (IFIs).

**The war in Ukraine and its anti-corruption implications.** Since February 2022, the war has triggered a renewed attention to the impact of illicit financial flows and to corruption as an instrument of statecraft and destabilisation – as opposed to solely a means for enrichment. Building on the momentum of targeted sanctions against high-profile Russians involved in the war or suspected of war crimes, the usage of the American Magnitsky act and the call for a similar, overhauled sanctions framework for the EU have multiplied. In this context, a number of entities and countries such as Canada and the Netherlands have made it official policy to promote the establishment of an international anti-corruption court. In the words of an expert, Russia's war in Ukraine showed the need for Europe to calibrate anti-corruption sanctions in order to gain better means of retribution without escalating to full-on economic war. By relaunching discussions around accession to EU membership, the war has also placed a new priority on efforts by candidates and pre-accession countries to comply with rule of law standards – including anti-corruption. Incidentally, the war has also provided evidence of the high importance of corruption in the military when it comes to performance on the ground, with the reputedly more powerful but also more corrupt Russian army suffering a number of defeats attributed in parts to its logistics chain (Stephenson 2022).

**Anti-corruption for a (more) geopolitical Europe.** The war in Ukraine also created a watershed moment in what was already a trend towards recognition that geopolitical competition is leading to a relative marginalisation of Europe (see for instance EEAS 2022). The EU holds more and more limited importance, as does development cooperation more widely in the face of other sources of funding. The EU is perceived as declining in influence in relation to Russia in the Sahel, following in the steps of the declining importance of France. Whether Europe remains relevant or becomes irrelevant depends on how it leverages its added values, including a comparatively high normative focus. This focus makes it hard to compete at times with efforts such as China's Belt & Road Initiative that aren't held by the same standards. High standards however cannot entail a factually inaccurate dichotomy between 'a clean West and a dirty rest', when corruption is structural within the EU as well, as highlighted by the recent Qatargate, among

---

other things. Already prior to this scandal of exceptional proportions, the need to stay relevant by addressing global corruption with modesty and on the basis of partnerships of equals is likely to be what underpinned the emphasis on anti-corruption in the Commission President's aforementioned 2022 State of the Union address.

### 3. General lessons in anti-corruption practice

The boundary between direct and indirect anti-corruption is sometimes blurry or artificial, but it is instrumental in showing the diversity of angles through which corruption can be tackled and to emphasise the research finding that anti-corruption can be most effective *without the name* (Ronceray 2021). The overall best practice is to draw from all relevant types of initiatives – including many with no explicit reference to corruption – and coordinate them for a maximal combined effect across levels: project/programme, donor country approach, international coalitions. This section follows that order from the micro to the macro level.

#### 3.1. Best practices at project and programmes level

**Promising approaches juggle innovatively between accountability constraints and adaptability needs.** Development work in anti-corruption and beyond is increasingly trying to factor in the political economy approaches that are so crucial in tackling corruption, and to embed a measure of flexibility to be able to build on the analysis and adapt to changing contexts (Byiers 2023; Byiers et al. 2021). This holds promising potential for targeting the right types of corruption through the right direct and indirect means, building on existing traction and in a way that makes the most out of decisive changes. This remains an uphill battle but with significant advances and lessons learned.

**Measuring results** in light of a numeric baseline agreed *ex ante* remains a key rule of the game in international development – and one that is problematic for anti-corruption. But the time frames for anti-corruption projects are expanding and flexibility is being introduced. Qualitative analysis is increasingly being used in complement to measurements of perception of corruption, 'leakage' of funds or prosecutions as proxy variables.

**Long-term focus.** The main tools at the disposal of donors, such as capacity building and funding, do not allow them to play a leading role in momentous changes that can lead to fast anti-corruption results. But they can contribute by fostering coalitions that prepare the grounds for future progress (e.g. the Dialogue & Dissent programme funded by the Netherlands over 2016-2020, and its successor named Power of Dialogue).

**Coalition building** is increasing, and direct anti-corruption projects are building in a longer inception phase to immerse themselves in the political context, generate synergies with other projects and ongoing initiatives in order to maximise locally-driven pressures for change, as is the case of the SUGAR project (2015-2020) in Uganda, funded by the UK and EU, or the Anti-corruption Partnership Pilot (APP) (2021-2024) launched by Sweden in Zambia. The latter builds flexibility in the design but also by placing the in-country Swedish representation in the lead, in partnership with Sida, U4, three donor countries and the EU.

**Creativity.** Initiatives such as the anti-corruption evidence (ACE) programme (2015-2022, UK funded) are providing indirect strategies for anti-corruption interventions that are politically savvy. For instance, this includes changing problematic regulation to remove the reason for corruption instead of only stressing enforcement. Initiatives such as the APP offer a chance to use the extended inception phases and coalition building to develop out-of-the-box solutions. More widely, there is a largely unquestionable principle of *zero tolerance for corruption* in most



---

development agencies and their partners, but also a recognition that this needs to be applied on a differentiated and phased basis, building on context analysis.

### 3.2. Best practices in individual donor approaches

**Donors willing to engage in anti-corruption need an overall vision statement** about it, which isn't easy considering the conceptual issues and the 'wickedness' of the problem. A high level policy which provides a mandate for action, and/or a sectoral strategic document on corruption as a development issue, can play this vision-setting role, and give anti-corruption more political weight. However, there can be a trade-off between sector-specific documents that integrate fine-grained analysis of the issues at stake and high-level statements that carry more political weight and can support cross-cutting efforts by mobilising different administrations. Sustained political support and administrative capacity over the long term are required to ensure that these statements come to fruition.

**Donors should favour cross-cutting approaches to corruption.** How donors conduct anti-corruption is a matter of choice and of their respective added value, but there are some overall practices that may contribute to better results. Besides policy statements and strategies, the elements of a policy coherence system in favour of anti-corruption can range from coordination mechanisms to a system of label whereby all actions with an impact on international corruption get flagged and incentivised internally, all the way to 'mainstreaming' anti-corruption in other policies. It may help to conceptualise anti-corruption in terms of the overall footprint of a donor country, so that each part of government and of development work is responsible to the extent that it has an impact on corruption, even very indirectly. The label of a 'whole-of-government' approach can be helpful in stressing the cross-cutting nature of the effort. Policy coherence is a matter of effectiveness and efficiency of the anti-corruption efforts, but also of credibility. Indeed, in order to 'lead by example' donor countries need to start by addressing their own shortcomings and suppress the drivers for corruption that they generate.

#### Box 3: Cross-cutting approaches to trade and corruption

The trade chains of some goods are widely recognised hotspots for corruption – for instance precious minerals and wider extractives; arms and timber. Hence, approaches such as the Extractives Industries Transparency Initiative (EITI) play a key role in promoting transparency and scrutiny all the way from attribution of extraction rights to commercialisation. Because the value chains of these goods frequently take them through Europe and because the EU's market has a critical mass, the continent has a strong added value in regulating its imports and imposing standards across the value chain.

From high profile regulations and international commitments to sectoral and local initiatives, trade offers ample evidence that it is possible to tackle corruption as an obstacle to development beyond development projects. Levers range from the legally-binding treaty of the United Nations Convention against Corruption (UNCAC) and multilaterally agreed best practices in the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, all the way to police efforts under Interpol, sectoral initiatives and initiatives to facilitate the repatriation of assets stolen in particular by rulers of developing countries during their period in office (StAR), trade work under the World Trade Organisation (WTO) and taxation (of multinational companies) in their business dealings and especially intra-corporation trade (for instance through the Financial Action Task Force - FATF).

Examples of donor-supported trade corridors also show the ambivalent relationships between corruption and trade. An analysis of customs reform showed the added value of a digitalisation entry point to conduct anti-corruption – as opposed to the use of an anti-corruption label, but in coordination with anti-corruption. A comparative analysis of the Beira and Nacala trade corridors in Southern Africa showed that trade facilitation was effective where it served powerful (corrupt)

---

interests among portuary elites which ensured that the corridors became effective by preventing other forms of corruption (Byiers et al. 2020).

According to interviews, in the European institutions, the trade-corruption nexus is approached primarily by the EEAS and DG Trade via the trade regimes in effect with partner countries. For instance, the Generalised Scheme of Preferences (GSP) includes a requirement for partner countries to adopt a package of regulations and commitments in order to benefit from the GSP+ tariff-free access to the European market – including the ratification and implementation of the UNCAC. The EU conducts monitoring missions which offer an avenue to leverage trade to promote anti-corruption. Other trade regimes and partnerships with regions and countries offer specific ‘handles’ to tackle corruption, though in most cases this remains at the level of potentialities.

### 3.3. Best practices at the multilateral level

**International channels are multiple.** Direct political and policy dialogue remains an essential avenue to promote anti-corruption, although it is unlikely to be enough on its own. Continuous dialogue on corruption as well as reacting to incidents by the use of the diplomatic channels requires political backing in addition to solid analysis. Political backing is also essential to leverage coalitions of like-minded partners to reinforce messages and multiply their respective weights. Together, this allows at a minimum to share analysis and at best to coordinate to avoid sending incoherent messages to partners, and to maximise the ‘pressures for change’ on institutions, regimes and persons involved in corruption. Even when a single country or actor cannot go very far on their own, their energy can have positive spill overs in reinvigorating other partners.

**International support for the anti-corruption agenda is on a slow increase.** There has been sustained development assistance for direct anti-corruption over time, despite fluctuations of higher intensity than overall ODA fluctuations. As of 2023, interest has been reignited and political attention as well as numeric financial commitments are on the rise, although this starts from a rather low baseline as far as *direct* anti-corruption is concerned.<sup>4</sup> These figures do not capture *indirect* anti-corruption spending but significant energy has been dedicated to curb the drivers for corruption, starting with a few countries beginning to come to terms with their own problematic impact as financial centres.

**Political leadership should be exerted and backed with sufficient (human) resources.** Resources are crucial to ensure that a country is represented and able to take leadership in the wide diversity of international initiatives that aim to curb corruption, but the general context is adverse to increased spending. Many administrations are stretched thin when it comes to representation in all the fora relevant to anti-corruption, and there is a relative leadership vacuum since Brexit diverted away the UK’s energy for anti-corruption. So there is a space and a demand for a single or a few donors to assume leadership and reinvigorate the international anti-corruption agenda, but this requires resources and creativity in making use of existing resources and partnerships. The international landscape of initiatives to tackle drivers of corruption being crowded already, reinvigorating existing ones is more indicated than initiating new ones.

---

<sup>4</sup> Ranging in the area of only 0.1% of the overall global total of ODA spending.

---

## 4. The EU as an anti-corruption actor

### 4.1. Framework and resources

The EU has traditionally focused on corruption within its borders and in neighbourhood/accession countries.<sup>5</sup> But it also carries out **anti-corruption initiatives as a part of its external action and development cooperation**, which is the focus of this section. Policy documents stating this ambition include the Agenda for Change (2011) which clearly stipulates that the EU should help its partner countries tackle corruption, a commitment reiterated in the European Consensus on Development from 2017, and mentioned in the EU Global strategy (2016) as well as the regional strategy on Africa (2020). Furthermore, EU Action Plans for Human Rights and Democracy (2015-2019 and 2020-2024) include direct pointers to fighting corruption. It aims at doing so by providing “comprehensive assistance to prevent and fight against corruption by supporting public administration reform, effective anti-corruption strategies and legal frameworks, including whistle-blowers and witness protection, specialised bodies, parliaments, independent media and civil society, and developing anti-corruption guidelines [and] support[ing] the ratification and implementation of the UN Convention against Corruption.” (EEAS 2020). The action plan is translated to country-level strategies on human rights and democracy, which are prepared by the respective EU Delegations. These documents are not public, but interviews confirm that many of them include some references to corruption.

While the ambition to tackle corruption is included in key strategic documents, they mainly mention it as a part of a long list of priorities, and lack a clear strategic approach and operational guidance on the topic. There is a communication and a publication under the EU’s Tools and Methods series, that focus explicitly on corruption, but these are over a decade old, more internally-focused and in need of an update (EC 2011).

**The EU thus lacks an overall political framework and related guidance on addressing corruption as a development obstacle (Okechukwu 2023).** Inclusion of anti-corruption in the EU’s overall strategic documents and policies is a step forward, but the existing policy framework does not contain guidance on how to achieve the EU’s ambitions in anti-corruption, or how to measure the achievements. Strategic documents or guidance on a political level could help provide more political clout and legitimacy to anti-corruption efforts, empowering and motivating the officials to strengthen the work on anti-corruption (Ronceray & Sergejeff 2020). On the operational level, the EU is however working on guidelines that will help staff, in particular in EU Delegations, to address corruption. While this is a highly welcome step, it however is likely to provide only a partial solution and not fill the need for a more political-level strategic framework.

Starting from a relatively low baseline, the **political interest in anti-corruption on the highest levels of the EU Commission is growing.** Following the war in Ukraine, the interest of the EU in defending democracy has grown, as evidenced by the speeches referenced in the above section on the timeliness of the effort. The evidence base on what works and doesn’t in the EU’s approach to anti-corruption is getting enriched by a relatively critical new evaluation, which contributes to the interest within the administration and among partners and indeed watchdog organisations that seek to influence it.

**The EU is a significant funder of anti-corruption, but it punches below its weight.** The evaluation estimates that between 2010 and 2020 the EU has dedicated roughly € 3,5 billion to primary and € 5 billion to secondary support to anti-corruption and the rule of law (bundled together), both of which targeted Africa in majority. However, direct

---

<sup>5</sup> In the past years, the Rule of law agenda, and with it anti-corruption has received increasing political attention in the EU, with the publication of the Union’s first Rule of law report (2020), that assesses the performance of the 27 member states, including in AC frameworks ([ROL/AC evaluation 2022](#); EU 2020). While the focus of the Rule of Law reports is internal, the report asserts the link between rule of law and anti-corruption in the EU policy frameworks.

---

anti-corruption received only a fragment (3%) of that funding. According to OECD DAC data, in 2020, the EU allocated roughly \$ 30,5 million to anti-corruption organisations and institutions, which represents 1 % of the EU's total allocation to governance and civil society (DAC code 150), and 0,18% of total sector allocable ODA for that year – an underwhelming figure. This major discrepancy reflects the fact that funds directly and namely committed to anti-corruption are just a small fraction of the effort to combat corruption overall, but it also reflects the **lack of incentives to emphasise the anti-corruption dimension in wider programming in support of the rule of law**. However, figures on international spending to anti-corruption are even at best only partial.<sup>6</sup>

**The EU is relatively influential in dedicated multilateral fora**, supporting a vast range of international initiatives aiming at curbing corruption like the extractive industries transparency initiative (EITI) and cooperating with organisations such as Transparency International and the UN in anti-corruption issues, and it is a member of the UN convention against anti-corruption (UNCAC) alongside every single one of its member states. The regional and thematic multiannual indicative programmes (MIPs) – setting out priority areas for cooperation with partner countries and regions around the world for 2021-27 – also point out that the EU plans to support anti-corruption partnerships in multi-country and global levels. For instance, a regional Team Europe Initiative in sub-Saharan Africa will combat illicit financial flows and transnational organised crime, and will have an anti-corruption component.

**A fragmented approach with the potential to be more innovative and ambitious.** According to the recently concluded evaluation, the EU lacks comprehensive and integrated response strategies to address corruption, though the case studies revealed a few exceptions (e.g. Nigeria where the EU could support in various ways the existing momentum for structural anti-corruption reform). In turn, the overall timid EU response in this area can also be attributed to the complexity of the issue (as a deeply entrenched phenomenon), a lack of clear policy frameworks and incentives to spend political capital on the topic, as the evaluation shows. Providing answers to more concrete questions on how to pursue anti-corruption, how to achieve (sustainable) results over a longer period of time, let alone monitor them, have largely been left to individual actions (see below).

The evaluation finds that **the EU has not sought to systematically mainstream the support to anti-corruption** in its interventions, even though indirect approaches are often the most promising ones (Ronceray and Sergejeff 2020). This includes sectors and areas where corruption is most prevalent and harmful, such as private sector development, natural resources management or trade. Corruption, whenever it was a topic in the first place, was usually confined to the 'silo' of the governance unit and not addressed in other areas. There is limited evidence of cross-fertilisation between the expanding EU interest in promoting the rule of law internally (through a variety of new tools, including annual performance reviews) and the rule of law support provided externally, although the DG HOME and DG JUST are broadening their international remit and providing useful inputs to EU delegations. The evaluation also noted that at times the (diplomatic) EU support to anti-corruption efforts was fragile and uncertain, risking the intimidation and closure of the agencies if they challenged the status quo in the country, and that on the whole, political and policy dialogues have had a mixed track record on anti-corruption, with difficulties in finding a common ground. This is not likely to have improved in the years since 2020 since the COVID-19 pandemic also halted much of these processes.

**There is room to scale up inter- and intra-institutional coordination around anti-corruption.** Corruption is a multifaceted and multi-dimensional issue, and therefore anti-corruption efforts benefit from multi-sectoral and integrated approaches. Moving towards that, in turn, requires effective coordination and cooperation going beyond institutional silos, both within and between DGs. While DG HOME is formally in the lead on anti-corruption in the

---

<sup>6</sup> There are several areas of support, which contribute to anti-corruption but are excluded from the numbers above. These include, for instance, flows to public finance management (\$836 million in 2020 in disbursements), legal and judicial development (\$559 million in 2020) and public procurement (\$ 2.6 million in 2020).

---

EU, corruption is addressed in several DGs, including DG INTPA, NEAR, and JUST as well as in the EEAS. The geographic focus of DG HOME and NEAR are different from that of INTPA but without precluding commonalities of objectives, so coordination between these three is particularly needed. Similarly, within DGs, there can be several units looking at anti-corruption in their respective files. Based on the interviews, there is an appetite in theory at least to increase coordination both within and between the different DGs, and some efforts to set up a coordination group within DG INTPA have been made. However, even informal coordination groups take commitment, resources and time to be set up and become functional, and the investment that officials need to make, in terms of giving room in busy schedules, means that they require political backing. To be sustainable in the longer term, coordination efforts need to be coupled with adequate resourcing and support, to ensure that not only technical but also management levels can harmonise their views and approaches.

**Capacity and (human) resources are needed to step up the work on anti-corruption.** At the level of INTPA, the human resources on anti-corruption are less than two full-time equivalents. Similarly at the level of delegations, the findings of the evaluation on Rule of Law and Anti-corruption indicate that the low number of staff dedicated to it hinders effective engagement on the topic, and does not match the EU's commitments, while staff rotation and the loss of institutional memory further exacerbate these challenges. If the EU is to step up its support to anti-corruption, in the long-term, the human resources and knowledge management will need to match the policy commitments, and training and resources should be provided to sector staff to integrate anti-corruption considerations in their respective files. Furthermore, there is a need to incentivise the staff at all levels to coordinate and exchange beyond the institutional silos and also with external partners and experts including from member states under the Team Europe Approach.

## 4.2. Initiatives and opportunities

**Anti-corruption has a place under the ongoing multiannual financial framework.** It is featured in the NDICI-GE regulation governing the EU's main funding mechanism for international action, as one of the areas of intervention under both geographic and thematic pillars. The regulation mentions fighting corruption for instance in the contexts of strengthening public administration, and extractive sectors. Under the global challenges programme, the EU aims at "combating money laundering, corruption, illicit financial flows as well as tax evasion and avoidance" as well as "promoting progressive taxation, anti-corruption measures and policies for redistributive public expenditures" (EU 2021). One of the novelties of NDICI-GE is moving towards more interlinked, multisectoral and nexus approaches, which is illustrated in the shift from priority sectors to wider priority areas in programming of the funding allocations of 2021-2027. In principle, this should allow for more interlinked approaches, potentially creating better opportunities to work on complex and multidimensional issues, like anti-corruption, though it will be important to assess how this develops in practice.

**Overall, there is a reason to be cautiously optimistic about the programming of the EU's new NDICI-GE instrument.** Out of more than 100 multi-annual indicative programmes (MIPs), according to interviews with the commission, 34 do look into anti-corruption, and a vast majority of MIPs include governance as one of the priority areas. Even in the absence of clear priorities on anti-corruption, often MIPs (e.g. in The Gambia, and Zimbabwe) include priorities on PFM, accountability and enhanced functioning of the state, which link clearly to anti-corruption, and supports the overall finding of the recent evaluation on the tendency for a number of delegations to favour more indirect – and less confrontational – approaches to anti-corruption.

To better understand how corruption is included in the overall objectives of the EU at the country-level, ECDPM took a closer look at 13 MIPs and related Annual Action Plans in sub-Saharan Africa that have included more explicit mentions to anti-corruption in the MIP. The main findings of that analysis not only show some variety in how

---

explicitly the delegations are discussing corruption, but also helped to identify general ‘domains’ under which they envision the opportunities to tackle corruption. Here are some of the key takeaways:

- 1. The role of civil society:** The MIPs widely recognise the role of supporting civil society as part of curbing corruption. In the past, support to civil society has proven valuable in supporting *demand* for accountability and anti-corruption and not only the supply (through public institutions and enforcement), and the EU is planning to continue this support. For instance, in Namibia the EU aims at supporting civil society actors to enhance awareness of corruption and strengthen their capabilities as the watchdog ([MIP Namibia](#)). In general, the EU acknowledges well the role of civil society in the anti-corruption work and has several instruments for providing support to activists and CSOs that fight corruption. These include specific schemes to protect human rights defenders, such as an emergency fund for human rights defenders at risk (EC 2022a), which is managed by INTPA in coordination with EEAS. At the same time, the context for civil society actors to engage in anti-corruption is becoming more adverse in the many countries that see their civic space deteriorate, which leads many of them to pull out or reduce their corruption work, as well as to move to less dangerous areas.
- 2. Digitalisation as a part of fighting corruption:** Some MIPs also aim at **leveraging digital technologies** in fighting corruption. For instance, in Kenya, and Ghana the EU recognised the opportunities of digital transformation in the AC efforts. In Nigeria, The EU will support the government’s efforts to digitalise core governmental operations and services with the ambition to fight corruption, and support the implementation of the Nigeria Open Data Policy. Under a rather technical guise, digitalisation is recognised as a promising non-confrontational angle to tackle specific forms of corruption in given sectors, and this lesson learned has made it into the current MFF programming.
- 3. Anti-corruption is discussed in the context of public service delivery, though MIPs miss the opportunity to address corruption in the context of the COVID recovery.** There is a wealth of research pointing to the vulnerability of the health sector to corruption problems (see e.g. U4 brief on health sector in Colombia (Hussman 2022); as well as Hussman 2020). A recently published research by Transparency International also point out, that corruption may have a significant impact in halting equitable access to COVID-19 vaccines (TI 2022) but MIPs give only limited information on possible interlinked approaches in anti-corruption and basic services, with some exceptions, e.g. in Kenya where the MIP explicitly mentions the impact and cost of corruption in the public service delivery and Uganda, where the delegation wants to place more attention “on the social norms and behaviours that drive corruption in the public service” ([MIP Uganda](#)). Going forward, the EU Delegations could use closer examination to opportunities for anti-corruption in human development sectors.
- 4. MIPs show only limited links between corruption and other areas of intervention,** and don’t indicate plans or higher ambitions to mainstream anti-corruption outside governance sectors. Similarly, MIPs tend to miss the links of gender and corruption, and the specific effects of corruption on women and vulnerable groups. That being said, MIPs are meant to be overarching documents providing broad lines of what the EU intends to do and fund in the coming years. Therefore better analysis of the context and more interlinked approaches could be introduced at the level of Annual Action Plans and specific action documents detailing the activities and objectives on the level of individual projects and programmes. To some extent, Action Documents examined indeed show a better understanding of how corruption links with other issues. For instance, the Action Document for Strengthening the Rule of Law and the Fight Against Corruption in Ghana provides some analysis of gendered impacts of corruption, and the activities include e.g. conducting a gender analysis on corruption. However, most MIPs and Action Documents seem to lack an overall comprehensive approach to corruption and leave the opportunities to multi-sectoral approaches largely unexploited.

---

**Team Europe Approach and Team Europe Initiatives (TEIs) carry significant untapped potential in strengthening the EU's support to anti-corruption in partner countries.** TEIs bring together the EU, its member states and their implementing agencies, as well as European DFIs, pulling together resources and expertise around initiatives where the EU can have collective transformational impact (Jones and Sergejeff 2022). Speaking with one voice and acting jointly beyond development cooperation but also on a political front, would provide the EU more weight, and leverage in promoting its values. Therefore including anti-corruption to policy and political dialogues with partners could be more impactful as a Team Europe. Finally, this type of joint approaches offer the opportunity to surmount (human) resources limitations at the level of individual donors, and to make the most of existing expertise.

However, a review of TEIs shows that corruption is not very prominent as a theme. Anti-corruption is featured in a global TEI on Democracy and it is closely linked to a TEI on combating [Illicit Financial Flows and Organized Crime in Africa](#). But examples of **country-level TEIs that address corruption specifically are scarce**. Reportedly, this is linked to low levels of political interest among member states to address corruption, which is considered a politically sensitive topic. To push Team Europe to focus on corruption as a development obstacle, there has to be a critical mass of interested members with relevant capacities. As the vast majority of TEIs take place at a country level, gathering together interested actors depends highly on the context (see box 2) and member states present and active at the moment in the country. To increase the interest of member states and EU delegations to work on anti-corruption, a Team Europe Approach can be actively promoted by high level INTPA officials when engaging on anti-corruption with member states or other EU institutions including the European Parliament.

**Global Gateway** is a new infrastructure and connectivity strategy of the EU, launched at the end of 2021, often cited as the EU's more value-based response to China's Belt and Road Initiative. It will largely be implemented through TEIs (Teevan et al. 2022). Governance and anti-corruption are not stated priorities of the Global Gateway, however, values are the key factor with which the EU tries to distinguish itself from its competitors. Therefore, there is a strong rationale for mainstreaming anti-corruption under the Global Gateway and the TEIs implementing it.

## 5. Recommendations for the EU and its member states

Building on the snapshots provided above on the nature of corruption as a development obstacle, general context, practical lessons learned through practice and scholarship, and particular nature of the EU as an anti-corruption actor, this last section proceeds to summarise recommendations.

### 1. Stressing why anti-corruption matters and the EU has a role to play

- Chronic corruption reflects failures to the rule of law and undermines the fabric of society. It is not simply a 'governance' issue, or a 'development' one, but a **factor in multiple issues** ranging from economic and environmental sustainability to legitimacy and efficacy of the state, social cohesion and violence. It is a root cause of migration, by undermining the economic perspectives of the youth. It is also a driver of radicalisation, especially in cases, for instance in the Sahel, where radical groups offer more reliable forms of services and indeed sometimes more integrity than other authorities. It entrenches inequalities, which plays against vulnerable groups and singularly women.
- As such, **anti-corruption works for the entire sustainable development agenda** about which Europe is particularly vocal and committed traditionally. However, the continent is *not* a governance role-model globally – with Qatargate as a case in point – and 'values-free' approaches are (re-)gaining way, building on a global tendency to authoritarian resurgence, including in Europe. This means that the EU and its member

---

states need to focus on anti-corruption jointly, as a way of fostering but also protecting public action in pursuit of the sustainable development agenda against adverse forces.

## 2. Giving the EU a stronger strategic framework for anti-corruption

- The evaluation recommends elaborating a **stronger and more comprehensive EU policy and strategy framework** on anti-corruption in the EU's external action, that is based on previous experience as well as solid evidence. While the upcoming operational guidelines will address a crucial gap in guiding the practical work around anti-corruption, they should be coupled with a more comprehensive strategy of engagement at the political level and in all relevant sectors.
- The evaluation also recommends better **factoring in the cross-cutting nature of corruption** across EU external action. This could mean, for instance, deeper reflection and indication, already in the planning phase, of whether any given initiative could provide an entry point to fight corruption or require controlling corruption in order to come to fruition. This would require attention by the EU but also member states to ensure that there is a critical mass among the core group of dedicated actors, and partnerships that compensate for the lack of human resources where it is not surmountable in the short term.
- **Mainstreaming the concern for corruption** across public action is at the same time desirable and risky, because it can generate unwelcome workloads and reporting requirements, and it can result in unhelpful 'box-ticking' exercises. A sequential approach that first revolves around identifying, flagging and valuing what is being done before integrating the updated anti-corruption approach in new documents – in the spirit of Sida's approach to the issue – should be preferred to a top-down imposition of a mainstreaming principle across the board; and outcomes-focused mainstreaming should be introduced alongside input-driven one.

## 3. Making use of the window of opportunity for reform in 2023

- The start of the year is characterised by a promising **consensus among actors directly involved that the EU needs an overhaul of its approach** to corruption in development. The release of the Rule of Law & anti-corruption evaluation provides an excellent starting point for rooting this discussion in solid evidence. This evidence stresses the need for both operational guidelines and strategic framework revision. The fact that guidelines are already in the making on the side of the Commission (and due in Spring 2023) also plays towards a strong momentum for anti-corruption. Strong language on anti-corruption in the 2022 State of the Union address by Commission President von der Leyen – momentous insofar as she urged the EU to clean up its own act, just months ahead of the Qatargate – provided a sense of high-level backing and reportedly lifted the reservations that existed on the need for a revised strategic approach.
- This drive combined with the EU's current formal vision and leadership gap in anti-corruption mean that there is a high potential impact for the constituencies that take part in the exercise, starting with rotating presidencies and like-minded countries. **This selling proposition of high return on investment is time-bound**, as the momentum linked to the current political context, the guidelines and the evaluation will eventually recede if it is not leveraged, although it is likely to extend into the next semester(s).
- Every step in the life cycles of relevant frameworks such as the multiannual financial framework, policy documents such as the EU's Human rights and democracy Action plan, and international fora such as the Summit for Democracy, offer entry points to make progress. The relevance of the EU's human rights framework is particularly palpable with the decision to include corruption in the EU's human rights **sanctions regime** announced in the last State of the Union address (in practice, the adoption of a separate sanctions regime for anti-corruption should also be considered (EP 2023)).



---

#### 4. Building coalitions and coordinating with champions

- It is important to **identify and work with focal points for anti-corruption across the EU system**. This includes the EEAS, DG INTPA but also NEAR, HOME and potentially JUST, OLAF, PISMA... Particular attention should be directed to the dedicated experts at INTPA G5: they are proactive but the (human) resources and formal political backing at their disposal have not been commensurate with the task, so they can face a ‘chicken-and-egg’ situation whereby they need to show the practical added value of the anti-corruption agenda before they can push for its prominence, but how internal documents they prepare – such as the guidelines – land depends as well on the political backing that they will receive.
- The focal points need to be able to **coordinate formally and informally**. While the need is well-recognised, in the wrong circumstances coordination groups risk becoming only an additional burden to already busy schedules. Therefore, if steps to more formalised coordination are taken, they need to be supported at the highest levels of the organisation and the officials should be given time and resources to carry out this coordinating task.
- Anti-corruption is a difficult topic that many of the actors it concerns can readily prefer to push aside or avoid, including by preferring other labels. Fostering a coalition of the willing on this theme will require coordination and a particular **attention to what drives or limits the involvement of each of them** – their favoured angles on the issue, as well as respective red lines.

#### 5. Framing the issue strategically

- Anti-corruption can effectively be depicted as being about **(cost-)effectiveness in development spending**, in the sense that it seeks to defuse risks of waste across public spending and hence plays a role of enabler in wider support. In the same spirit, it can be a means to get countries in the EU’s neighbourhood up to speed with the Union’s rules. It can be useful to emphasise the role of anti-corruption (and related activities) as **risk management; as investment in the long-term; and as promotion of core EU values**. These are possible ways to defuse the potential divisiveness of the anti-corruption label that can come in particular from some Member States and partner countries and actors unwilling to see their own record questioned by a more determined anti-corruption agenda.
- **Anti-corruption as an obstacle to development** doesn’t preclude looking inward (to sustainable development at home and to policy coherence) but the framing can defuse some misgivings. More widely, including or not the judiciary, trade, security and other constituencies can be decided in order to avoid a lowest-common-denominator approach that wouldn’t do justice to the core issue of corruption as an obstacle to development.
- The demand for accountability by citizens remains strong, and most holders of public offices in the world are bound by international law rules pertaining to anti-corruption. The spirit of **rights-based approaches** remains relevant for ensuring that duty-bearers are held to account and rights-holders do not see their human rights violated, starting with the delivery of public services of immediate urgency (for instance medical supplies).

#### 6. Leveraging opportunities provided by coordination and Team Europe Initiatives

- Between INTPA, NEAR and HOME, a **trilogue of DGs with complementary geographic scope** but potentially similar anti-corruption objectives could be established, with a role opening for the EEAS to act as a coordinator on the issue.
- The **Team Europe Approach** offers an opportunity for synergies between the EU, member states and DFIs building up to a better collective impact. However, this will require sustained political will from all key actors in a context of many – at times conflicting – priorities and interests.

- 
- Acting as Team Europe, **anti-corruption should also be further inserted into policy and political dialogues with partner countries and regions**. This needs to be done in a respectful way, in the spirit of a partnership of equals where no party is exempt of corruption and where perceptions around governance norms can differ. The results of the Mid-term review of the EU's Action Plan for Human Rights and Democracy 2020-2024, and in the longer term, the creation of its successor, could potentially be leveraged to scale up to political engagement and dialogue on anti-corruption, as could the Mid-term review of the NDICI-GE instrument.

## **7. Investing in the development of capacities on anti-corruption**

- Scaling up the work on anti-corruption and adopting comprehensive, politically informed approaches takes resources. The EU should **invest in capacity development on anti-corruption both in the levels of EU delegations as well as in Brussels**. To do this, the EU can build on existing resources and research, and utilise platforms like Capacity4Dev, as well as leverage existing expertise by making it more readily available across locations.
- Researching the **forms of corruption and their societal roles in a given political economy context** is crucial for sustained progress in anti-corruption efforts, whether direct or indirect. This should explore among other things the evidence on what works and what doesn't in a nuanced manner, and investigate the gender dimensions of corruption and its interaction with intersectional vulnerabilities. Some promising initiatives and centres of excellence are being supported, while others may become orphaned, for instance due to the United Kingdom's changes of priorities. So Europe as a whole has a useful role to play in ensuring continuity and further fostering a much-needed research ecosystem.

---

## Bibliography

- Byiers, B. 2023, [Thinking and working politically on African economic integration](#). TWP and ECDPM. January 2023.
- Byiers, B., Karkare, P. and Miyandazi, L. 2020. [A political economy analysis of the Nacala and Beira corridors](#). ECDPM Discussion paper 277. July 2020.
- Byiers, B., Ronceray, M. and Bossuyt, J. 2021. [Applying a political economy approach in Tunisia](#). ECDPM Discussion paper 290. January 2021.
- Cepeda Cuadrado, D. and Kirya, M. 2022. [Corruption during Covid-19 - Trends, drivers, and lessons learned for reducing corruption in health emergencies](#). U4. 1 December 2022.
- European Commission (EC). 2011. [Communication from the Commission to The European Parliament, the Council and The European Economic and Social Committee Fighting Corruption in the EU](#). COM(2011) 308 final. Brussels. 6 June 2011.
- European Commission (EC). 2022a. [Human rights: EU increases support to the protection of human rights defenders worldwide](#). 29 September 2022.
- European Commission (EC). 2022b. Bossuyt, J., Vaillant, C., MacKellar, L., et al., [Evaluation of the European Union support to rule of law and anticorruption in partner countries \(2010-2021\)](#), Publications Office of the European Union Directorate-General for International Partnerships, 2022. 9 December 2022.
- European External Action Service (EEAS). 2020. [EU action plan on human rights and democracy 2020-2014](#).
- European External Action Service (EEAS). 2022. [EU Ambassadors Annual Conference 2022: Opening speech by High Representative Josep Borrell](#), 10 October 2022.
- European Parliament (EP). 2023. [Towards an EU global sanctions regime for corruption](#). EPRS. February 2023.
- European Union (EU). 2021. [Regulation \(EU\) 2021/947 of the European Parliament and of the Council of 9 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe](#). Brussels. 14 June 2021.
- Fabricius, P. 2022. [A few hitches for Hichilema](#) ISS. 11 February 2022.
- Hussman, K. 2020. [Health sector corruption. Practical recommendations for donors](#). U4. 15 June 2020.
- Hussman, K. 2022. [Transparency as a game changer in the health sector?](#) U4.
- Jackson 2022, [Building anti-corruption resilience to combat entrenched corruption systems](#)
- Jackson, A., Forsberg, B. Chansa, C. and Sundewall, J. 2020. [Responding to aid volatility: government spending on district health care in Zambia 2006–2017](#). Global Health Action. 19 February 2020.
- Jones, A. and Sergejeff, K. 2022. [Half-time analysis: How is Team Europe doing?](#) ECDPM Briefing note 149. September 2022.
- Lusaka times. 2022. [Sylvia Masebo says reports of corruption allegations against her not true](#). 19 October 2022.
- OECD. 2012. [International Drivers of Corruption: A Tool for Analysis](#). 23 February 2012.
- Okechukwu, N. 2023. [Rethinking EU support to the rule of law: Taking a stand for sustainable development](#). ECDPM Briefing Note 154. 6 February 2023.
- Ronceray, M. 2021. [International anti-corruption: On the front page vs. under the radar](#). Democracy in Africa. 27 January 2021.
- Ronceray, M. and Sergejeff, K. 2020. [Pushing on a string or pulling threads together? Lessons learned for anti-corruption efforts by European donors](#). ECDPM. 2020.
- Sishuwa, S. 2022 [An assessment of President Hichilema's first year in Zambia | African Arguments](#).
- Steingrüber, S. and Gadanya, M. 2022. [Corruption in the medical supply chain: lessons from the pandemic](#). U4. 24 June 2022.
- Stephenson, M. 2022. [Why Has Ukrainian Military Corruption Been a Non-Story in the Current Conflict?](#) GAB. 10 March 2022.
- Teevan, C., Bilal, S., Domingo, E. and Medinilla, A. 2022. [The Global Gateway: A recipe for EU geopolitical relevance?](#) ECDPM Discussion Paper 323. Maastricht: ECDPM.

- 
- Transparency International (TI). 2020. [Breaking the Silence around Sextortion: The Links between Power, Sex and Corruption](#). 5 March 2020.
- Transparency International (TI). 2021. [Zambia's medical supply scandal makes anti-corruption a key electoral issue this year](#). 28 January 2021.
- Transparency International (TI). 2022. [The hidden barriers to equitable access – tackling corruption in the Covid-19 roll-out](#). 30 May 2022.
- U4. 2021. [Corruption and gender equality](#). 25 May 2021.
- United Nations Office on Drugs and Crime (UNODC) .2020. [Addressing the gender dimensions of corruption](#).
- Wathne, C. and Evans, P.J., 2022. [Effectively evaluating anti-corruption interventions](#). 18 July 2022.
- Wathne, C. and Stevenson, M.C. 2021. [The credibility of corruption statistics](#). U4. CMI. 2021.

## **About ECDPM**

ECDPM is an independent ‘think and do tank’ working on international cooperation and development policy in Europe and Africa.

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

Our main areas of work include:

- EU foreign and development policy
- Migration and mobility
- Digital economy and governance
- AU-EU relations
- Peace, security and resilience
- Democratic governance
- Economic recovery and transformation
- Climate change and green transition
- African economic integration
- Sustainable food systems

For more information please visit [www.ecdpm.org](http://www.ecdpm.org)

In addition to structural support by ECDPM’s institutional partners: Austria, Belgium, Denmark, Estonia, Finland, Ireland, Luxembourg, The Netherlands and Sweden, this publication also benefits from a contribution by the Swedish presidency of the Council of the EU.



ISSN1571-7577