



IMPROVING THAILAND'S
PREVENTION MEASURES
ON CORRUPTION

PROJECT REPORT

ANALYSIS & RECOMMENDATIONS

United Nations Development Programme (UNDP)
and Office of the National Anti-Corruption Commission (NACC)

THAILAND 2021

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Disclaimer

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A. Introduction

I. Project Background

This project is a collaboration between UNDP in Thailand and the National Anti-Corruption Commission (NACC). Its objective is to support NACC in the form of research, training, and guidance to enhance ongoing efforts of preventing corruption. It builds on NACC's ongoing activities in key performance areas, including Transparency International's (TI) Corruption Perceptions Index (CPI), which is a key performance indicator (KPI) of the Thai National Strategy, and a working group was set up dedicated to improving Thailand's score for this indicator. NACC has developed its own Integrity and Transparency Indicator (ITA) as well as programs to prevent corruption. Accordingly, this project prioritizes the CPI and seeks to support, integrate, and enhance NACC's ongoing efforts.

The project consists of the following phases and corresponding activities:

- I. Desk Research (May-June 2020)
- II. Webinar Series (September-November 2020)
- III. Consultations with Experts and NACC (November-December 2020)
- IV. Recommendations and Guidance to NACC (January-March 2021)

Due to the pandemic, all activities were conducted remotely. The original plan included three missions during phases II-IV to facilitate personal interaction during training, consultations, and recommendations.

II. Report Overview

This document provides the following: (1) an overview of project activities and results; (2) recommendations for NACC, including options on how UNDP can assist going forward.

To ensure the content is clear and understandable to the reader, this report is relatively brief and concise. More detailed information, additional analysis, and further resources can be found in the Background Paper.

For quick reference, **results of the analysis and recommendations are highlighted in green font** while **reference to detailed information in the Background Paper is in orange font**.

The remainder of this report is structured as follows: a synopsis of Requirements for successful prevention of corruption (Chapter B) is followed by a description of the analysis conducted and its results (Chapter C), which form the basis for recommendations to NACC including options for a way forward (Chapter D).



B. Requirements for Successful Prevention of Corruption

I. Task: improving Anti-Corruption and Perceptions

Success in the fight against corruption, both prevention and suppression, does not automatically lead to immediate improvements in perceptions-based indicators. Based on its objective and the selection of the CPI as KPI, this project requires measures that will; (1) effectively prevent corruption and (2) reflect such improvement in the form of better indicator scores, namely the CPI score.

II. Challenges: difficulties inherent to this task

The following four types of **generic challenges** are expected in the pursuit of the objective set for this project. They need to be adequately considered.

- 1) Objective assessment: lack of data. Due to its clandestine nature, it is inherently difficult to correctly assess the extent (i.e., levels) of corruption or the effectiveness of countermeasures.
- 2) Subjective assessment: counterproductive effect. Intensifying efforts to prevent, detect and sanction corruption draws attention to the phenomenon, leading to subjective perceptions of increased levels.
- 3) Indicators: methodological flaws. In addition to the lack of data and subjectivity of perceptions, there are numerous issues associated with indicator methodologies, especially the CPI. It is therefore important to take these issues into account, and use indicator information correctly by carefully considering the information they provide, and consequently what context they can be used in.
- 4) Impact: time lag. Given the methodologies of indicators, namely the CPI, real-life changes brought about will be reflected with a delay that consists of several parts: the project must be fully implemented, manifest its success (lower levels of corruption), and subsequently these lower levels must be perceived as an improvement by those providing their views in perceptions-based measurements. These improved perceptions must then be picked up in the next round of data collection of the source indicator. Following publication of the source indicator, it will be picked up by the CPI and reflected in its next publication. A minimum time-lag can be calculated for each source. Realistically, creating any impact on the CPI inside a two-year window is impossible.

In summary, these difficulties are a main challenge faced by Anti-Corruption Agencies (ACAs), in terms of their own accountability. To be successful, NACC, as most ACAs, depends on support from both higher authorities and the public. Therefore, it needs to credibly demonstrate the accomplishment of its mandate and the successful discharge of its duties, thereby clearly adding value to society. This task is not a minor matter that can be dealt with in the form of a year-end project in the planning department. It should be a core function of any ACA. Due to the difficulties of this task and the resulting risk of disconnect between NACC's work and its achievements, especially in the short-term, it should be dealt with appropriately.

See [Background Paper \(Chapter C\)](#) for details on challenges with indicators.

III. Elements of Success: steps to systematically achieve improvement

A structured approach to achieving improvement for NACC is centered around the objective to consistently produce measurable results and ensure that they are perceived as such by relevant stakeholders.

Tackling this in a systematic approach is based on clear answers to the following four elementary questions:

1. Objectives are clear: *“What are we trying to achieve?”*
2. Path to success is defined, realistic and appropriate: *“How are we going to achieve it?”*
3. Implementation produces results and evidence: *“Are our activities implemented as planned and do they yield the intended results?”*
4. Improvement is visible: *“Are relevant stakeholders aware of improvements so that their perceptions change?”*

Both Analysis and Recommendations below are structured to address these questions.

C. Analysis: Summary of Results

I. Description of Activities

During project phases I-III (May to December 2020), analysis was conducted using the following resources:

- Examination of indicators: CPI and its sources used for Thailand, 39 of the most widely observed International indicators, and NACC's Integrity and Transparency Assessment (ITA)
- Review of documents: relevant strategy documents provided by NACC
- Consultations and discussions: videoconferences including three webinars and the corresponding Facebook group and interviews with the ITA team and five experts.

This section offers the most salient results that were used as the basis for the recommendations and the suggested way forward (below, Chapter D).

See [Background Paper \(Chapter E\)](#) for a list of documents reviewed and sources consulted.

II. Results: Issues Identified and Guidance for Remediation

1. Corruption Perceptions Index (CPI)

Background

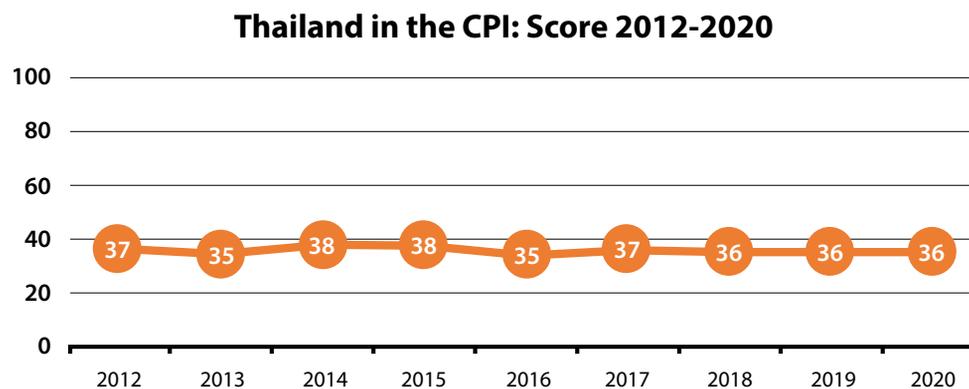
The CPI assesses countries based on how corrupt their public sector is perceived by experts and business executives. It is a composite index of 13 different Sources, nine of which are used to calculate the results for Thailand. The CPI provides three different pieces of information:

1. Score: Key result that indicates the country's performance, with a score of 0 equaling the highest and 100 equaling the lowest level of perceived corruption. It is calculated by applying mathematical operations to the source data.
2. Standard error: A measure of uncertainty of the country's score. A smaller value indicates sources used for a country's calculation coincide, making the score more reliable.
3. Rank: A listing of countries according to their score. It provides no information, as it can change without any change in score. For example, Thailand's score has been constant at 36 for three years, while its rank deteriorated from 99 to 101 to 104, a seemingly negative trend. Yet, any interpretation of this change in rank is misguided: a constant score indicates that there is no real change.

For the [CPI Methodology](#) and additional resources see the [Background Paper \(Chapter B.II\)](#).

Thailand's performance in the CPI

The CPI is published annually. The most recent version, the CPI 2020, was published on 28 January 2021. The following chart provides an overview of Thailand's performance since 2012 in the form of CPI Scores. Results of prior years cannot be compared due to a change in the CPI methodology.



The following table provides more details in form of a breakdown of sources:

Thailand: performance in CPI and Sources										
Organization: Indicator	Index	2012	2013	2014	2015	2016	2017	2018	2019	2020
Bertelsmann Stiftung: Transformation Index	BFTI	45	40	40	40	40	37	37	37	37
Economist Intelligence Unit: Country Risk Service	EIU	38	38	38	38	37	37	37	37	37
Global Insight: Country Risk Ratings	GI	42	32	42	42	22	35	35	35	35
IMD - World Competitiveness Yearbook	IMD	38	36	33	38	44	43	41	45	41
Political & Economic Risk Consultancy: Asian Intelligence	PERC	35	39	35	42	38	41	37	38	38
PRS Group: International Country Risk Guide	PRS	31	31	31	31	32	32	32	32	32
Varieties of Democracy Project	VDEM					24	23	21	20	20
World Economic Forum: Executive Opinion Survey	WEF	35	35	39	43	37	42	42	43	43
World Justice Project: Rule of Law Index	WJP	33	33	44	26	37	40	40	38	38
Transparency International: CPI	CPI	37	35	38	38	35	37	36	36	36

These scores are not the original results, but the after transformation to the CPI scale (0 to 100). The CPI score (last line) is calculated by taking the average of the source scores.

Evaluation

These CPI results allow for the following general observations:

1. Thailand's CPI score is very stable: Changes over time are minor, indicating a reliable picture in two ways: (1) CPI score has been unchanged for the past three years, and shown very little movement since 2012. This means that over time, the CPI has been assessing Corruption in Thailand to be around the same level; (2) Source scores coincide all around the same level as the CPI, except for VDEM. This means that nine organizations looking at the situation from different angles, using their own methodology, also assess the situation around the same level; (3) Trends over the past five years are not observable. VDEM has been deteriorating slightly, albeit constantly. But overall, no significant trend is identified, in either CPI score or in individual sources. This provides a picture of an accurate and constant assessment of the situation of corruption in Thailand.
2. Changes to the Methodology had a significant impact: (1) Introduction of VDEM to the CPI in 2016 was a major setback for Thailand. This Source was not part of the CPI prior to 2016. Its results are constantly the lowest source of Thailand, significantly lower than the rest and are deteriorating; (2) The score for GI in 2016 is an outlier most likely caused by changes in the CPI methodology. Such alterations are one of several serious methodological flaws of the CPI.

Due to its methodology, no policy relevant conclusions can be derived from studying the CPI: its score is a direct result of applying a mathematical formula to the data collected from sources. It is therefore imperative that any policy or project relevant analysis and conclusions are limited to the level of sources. Additionally, as all sources have the same weight on the CPI score, it is not reasonable to prioritize based on performance. For instance, Thailand's currently weakest score is VDEM (20 out of 100) while its strongest is WEF (41 out of 100). Improving VDEM by 1 point from 20 to 21 will have the same effect on the CPI score as improving the WEF by 1 point from 40 to 41. Therefore, the results offer no opportunity for designing projects or for prioritizing sectors or projects.

Detailed analysis of the CPI results is provided in the background paper (Chapter B.II) including flaws and caveats on its methodology.

2. CPI Sources

Background

The nine CPI sources for Thailand were examined in depth to identify ways to achieve improvements in the CPI. This research included the methods of data collection and the content that is used for calculating the CPI.

In summary, it is recommended to address all efforts of NACC on working with external indicators – including the recommendations made above in a consolidated approach. Please see Chapter D for an outline of such an *Indicator Project*.

Details on this suggested *Indicator Project* are provided in the Background Paper, Chapter C.III.

2.1. International Indicators

Background

In addition to the CPI and its nine sources, 29 of the most important qualitative and quantitative international indicators were examined. They contain 290 relevant data points, mostly questions or assessments on different aspects of (Anti-)Corruption, Transparency, Integrity, or Governance that were categorized into the following pillars to assess the “Big Picture” of the situation in Thailand: Civil Society, Enforcement, Executive, Judiciary, Legislative, Media, Private Sector, and Public Sector.

Details are provided in the Background Paper (Chapter B.I).

Evaluation

Through analysis of information provided by these indicators for each pillar, the following sectors were identified as priority areas: legislative, private sector, and public procurement.

For most indicators, there is no clear-cut option for improving a country’s performance. However, there are a few cases that offer such “Low Hanging Fruit”. This means that they offer straightforward ways of improving Thailand’s performance.

In summary, it is not recommended to prioritize according to international indicators, even though the information they provide allows for it. NACC is in a better position to evaluate risks and select priorities than the organizations producing these indicators – using the ITA for instance.

Secondly, addressing Low Hanging Fruit should be considered (see below: *Indicator Project*, Chapter D).

2.2. Integrity and Transparency Assessment (ITA)

Background

Information was collected through documents made available as well as a videoconference with the ITA team. The objective of this project, with regards to the ITA, is providing suggestions and guidance on how NACC can integrate it to improve its prevention of corruption.

In its current version, the ITA is an assessment consisting of three categories as follows:

- (1) Internal stakeholders (Internal Integrity and Transparency Assessment: IIT) is based on responses from government officers within the organization.
- (2) External stakeholders (External Integrity and Transparency Assessment: EIT) is based on views of natural persons, private companies, or other government agencies receiving services or interacting with government agencies, and
- (3) Open data (Open Data Integrity and Transparency Assessment: OIT) is based on data collection measuring levels of an organization's information disclosure to the public.

As the ITA is currently being revised, the analysis conducted is preliminary. Instead of a detailed review of the old version, the focus is on providing input during the ITA revision.

Evaluation

The ITA is an excellent initiative, and exactly what is needed to achieve the core objective suggested in this project: to produce measurable success and document evidence supporting these results. Furthermore, the design is aligned to CPI sources, addressing the issue from three aspects: External Stakeholders, Internal Stakeholders, and Openness and Transparency, as well as the extensive coverage of institutions.

The inclusion of the ITA in systematic Monitoring and Evaluation (M&E) efforts of NACC was not observed. This is the main suggestion for its revision. The methodology should produce data that can be used for M&E purposes, in the form of an indicator framework suitable to be applied to its preventive work at all levels along the Theory of Change – see below, Chapter D.

3. Strategic Documents and Interviews

Background

In addition to information drawn from indicators, an assessment of NACC's current situation with regards to the *Elements of Success* was conducted. To this end, documents related to strategies of NACC and Thailand were reviewed, and corresponding expert interviews conducted.

For a list of documents reviewed and interviews conducted, see Background Paper (Chapter E).

Evaluation

Element of Success 1: Objectives are clear.

Strategy: There are several documents from various institutions and bodies defining different parts or aspects of the national strategy. In some cases, these definitions are done in complex ways. For instance, ten sub-strategies, 23 masterplans and a matrix on how they interact to achieve the national strategy. Additionally, due to several revisions, some of the documents are outdated or revised. In summary, this led to a situation of documents with potential redundancies and contradictions, leaving it unclear, even to interviewed experts, what the currently valid strategy is.

Simplifying and streamlining strategy documents will add clarity, continuity, and reliability. Going forward, abstaining from revisions, where possible, will ensure reliability and continuity.

Goals: Several instances are observed of targets being set in a way that makes their achievement unrealistic or out of NACC's control. Three examples for illustration purposes:

- i. **Objective:** *Thailand is free from Corruption and Misconduct* (Masterplan). Given historic experience of modern civilizations, this is considered impossible to achieve.
- ii. **Indicator:** *CPI* (rank/score). Firstly, due to its methodology, the CPI is not suitable to measure progress on the objective above – this is especially true for rank, which should not be referred to at all. Secondly, using the CPI as an indicator to measure performance on different levels of the strategy hierarchy – the National Strategy itself as well as Subplan-level is not recommended.
- iii. **Target:** CPI score of 50 in 2022. Firstly, given the development between 2012 and 2020, it is unlikely this target will be achieved. Secondly, and more importantly, due to the time-lag as well as the content of the sources, it is out of NACC's control to reach this target.

Unachievable objectives, unsuitable indicators, and targets out of its control make it difficult for NACC to present itself as a successful ACA.

Defining realistic objectives, suitable indicators (like the ITA or public opinion surveys), and achievable targets enables NACC to adequately measure progress and document success.

Requirement 2: Path to success is defined, realistic, and appropriate.

Defined: A rationale, in the sense of logical framework or Theory of Change, appears to be missing. For instance, it is unclear how the prevention subplan is derived. Such a framework enables NACC to ensure its work is on track and to demonstrate success. It is the theoretic backbone that defines how overarching goals are achieved, connecting project level and strategy. In combination with a corresponding indicator framework, it is the foundation for appropriate M&E.

Adding clarity by defining such a Theory of Change (or by explicitly using it in case it already exists), enables NACC to produce and document measurable success.

Realistic: There are several approaches and tools suitable to gauge whether the objectives an agency sets for itself are realistic – in the sense that the organization can achieve them, and what risks there are. For example, Risk Assessment, Stakeholder Analysis, Capacity Assessment, Political Economy Analysis.

This aspect is not part of the project and therefore was not analyzed. Tools are available, and specific recommendations can be prepared – see Background Paper (Chapter D).

Appropriate: The third level of the strategy hierarchy (the Subplan for Prevention) has not been reviewed in detail. It is therefore unclear how projects are chosen. Comments cannot be made on their appropriateness – in terms of whether they are suitable to step by step achieve the set targets.

A systematic approach for selecting projects that are fit for the purpose should be based on a Theory of Change and monitored and evaluated using an indicator framework and meet international good practice standards. Even though there is no one-size-fits-all approach, considering lessons learned and good practice tools should be part of such a process.

See Background Paper (Chapter D) for such tools and resources.

Requirement 3: Implementation is done as planned and yields intended results.

Quality of the Framework: The information and documentation available leaves several key questions unanswered, for example:

- How are the indicators of the **Subplan for Prevention** chosen and measured?
- Is a baseline established against which progress is measured?
- How does the **conceptual framework** extend to the third level?

An appropriate M&E framework, extending from project level up to strategy achievement, is the basis for NACC to ensure its project activities are implemented as planned and achieve the intended results.

Indicators and Objectives: In addition to the concerns about the CPI, some objectives and indicators raise questions about their suitability. Three examples from the *Subplan on Prevention* for illustration purposes:

1. Internal logic: It is unclear how objectives and indicators of the *Development Approach* interdepend. For example: How does reaching a target lead to the objective? How does achieving objective at lower levels of the hierarchy contribute to achieving objectives at higher levels? Three cases are noted for illustration purposes:

- Objective 1: *“The people have a culture and behavior of integrity”*
It is unclear how this will lead to the achievement of the objective on the next level of the hierarchy, the Masterplan (“Thailand is free from corruption and misconduct”).
- Indicators for Objective 1: *“Percentage of Thai children and youth behaving with integrity”, “Percentage of people who value integrity, anti-corruption and are against corruption and misconduct”, “Percentage of state agencies that passed the ITA assessment.”*
It is unclear how they are defined and how achieving target values leads to the objective.
- Objective 2: *“Corruption and misconduct cases are reduced”, and the corresponding Indicator “Number of corruption cases are reduced overall”.*
Apart from leaving out misconduct, the objective and the indicator are identical.

The point is not to question the conduciveness of integrity to reduce corruption, or the general suitability of these indicators and objectives. However, clearly laying out how success on lower levels leads to the achievement of objectives on higher levels, allows NACC to credibly demonstrate that its work is on track.

2. Content of Objectives and Indicators: some objectives and indicators raise concerns about their appropriateness. For example: Objective 2 and the corresponding indicators just mentioned above.

The successful prevention of corruption should, in theory and over the long term, lead to a reduction in cases. However, there is a high risk that this objective conflicts with the overall objective of successfully fighting corruption. The number of cases strongly depends on the quality and intensity of suppression of corruption. Improved detection and investigation lead to more cases. Even considering the potentially negative impacts on perceptions-based indicators, as mentioned, this is a desirable result that will be most effective in fighting corruption in the long term. Objective 2 conflicts with such improved suppression. In practical terms, installing a successful whistleblowing regime that helps detect new cases, thereby successfully fighting corruption, will lead to failure in this objective.

Ensuring data shows how – step by step, bottom up – achievements lead to targets is key for a high-quality M&E framework. The content of corresponding indicators must be well chosen and aligned.

Requirement 4: Achievements are visible and noticed by stakeholders.

NACC brand: Explicit and concerted efforts help ACAs build up their reputation. Rendering accountability by reporting achievements to higher authorities is a basic requirement. It requires considerations of mandate, budget and other issues that are not part of this project. Equally important is the public image of NACC. Building trust and gaining support from the public is of the highest importance for a successful ACA. A few good practice examples for illustration purposes:

- ICAC (Hong Kong): the most important measure for its success is an externally collected annual survey of public opinion (not the CPI or other international indicators)
- KPK (Indonesia): in times of crisis, the public has come to support KPK and protest against higher authorities curtailing its powers.

Building a strong brand should be on top of NACC’s agenda. The general approach suggested (producing measurable results and communicating them to relevant stakeholders) is the basis for achieving it step-by-step. Being proactive in its communication and independent from international rankings leaves NACC in a stronger position to tell its own “good story” rather than depending on assessments it cannot control, like the CPI.

Setting priorities: Depending on an ACA's objective, different stakeholders and their respective focus matter. In the case of NACC, the analysis conducted suggests the following prioritization:

1. Create a positive impact on public perceptions: Issues that mostly affect large parts of the population directly. Focus on petty corruption, potentially in areas that are either considered most corrupt or most important to the public, for example the road police. In many countries, these are issues that affect livelihood most directly: sector approaches in health, water, and education are common choices.
2. Focus on the CPI: even though the CPI does not allow drawing of policy relevant information, prioritizing it as KPI implies that the private sector should be a priority. Additionally, CPI sources can be worked on through dedicated projects (*Indicator Project, Chapter D*). It should be noted that prioritization according to other international indicators is also possible, as described above, but this is not recommended.
3. Identify and secure quick wins: there are several indicators that can be improved on directly. Even though they are not part of NACC's focus, it is commonly accepted that indicators create their own reality. Improvements in some of them will be picked up as positive signs and therefore most likely result in other perceptions-based indicators.
4. Use available international mechanisms to create a positive image: the UNCAC Implementation Review, OECD Integrity Review, or achievement of the Sustainable Development Goals can be opportunities that can be actively pursued and used for creating a positive image.

III. Summary

Several issues were identified in the analysis. This brief synopsis describes and illustrates them by providing examples. Given the low level of detail, this is not a final assessment or specific guidance. It is, instead, intended to start a review process of potential weak spots and to suggest basic approaches for improvement. The next section provides recommendations and options for a way forward.

D. Recommendations: Proposal for a Way Forward

I. Action Plan in Four Steps

Step 1: Strategy Review

Goal: Be clear on what NACC is trying to achieve: define a stringent and clear hierarchy of objectives.

Recommendation: Where possible, revisit strategic documents with the objective of improving the overall strategic approach by aligning the three hierarchical levels into a coherent framework. Ensure objectives are clear, systematic and goals are well defined and realistic.

Approach:

- Activity 1: Determine levels of the hierarchy (i.e., what documents) at disposition for revision.
- Activity 2: Conduct additional analysis in the form of a desk-based review of those documents, considering their clarity, coherence and achievability. This would be similar to the current project, but with more detail and including specific recommendations rather than exemplified weak spots.
- Activity 3: Based on this analysis, conduct stakeholder consultations and input to respective bodies in charge of strategy formulation. Start at the top, then go down the hierarchy of documents. In case the higher levels of the hierarchy are not possible to change, limit this work to those parts under control of NACC – the Masterplan or the Project Level.

Result: Depending on the level of intervention, a series of specific recommendations to concerned bodies or committees for improving the strategic hierarchy. Such changes help NACC in implementing a systematic approach to consistently achieve strategic objectives and produce data to demonstrate achievements.

Toolbox and Guidance: see [Background Paper \(Chapter D\)](#)

Step 2: Program Design: M&E

Goal: Be clear on how NACC achieves this success: solid data demonstrates progressive improvement.

Recommendation: Revisit strategic documents and consider them in their entirety to ensure that they are reflected in the form of a stringent Theory of Change; that objectives are broken down from top to bottom with achievable targets; and the corresponding indicator framework provides solid data.

Approach:

- Activity 1: Conduct a desk-based review. Start with backwards induction of the Theory of Change from Impact (objective of the strategy, potentially reviewed in Step 1), going to Outcomes and then Outputs. Subsequently consider the indicator framework the other way around, from Output to Outcomes to Impact. Ensure it is stringent, consistent, and appropriate to achieve the desired results, and suitable for monitoring progress and for evaluating results of the work done.
- Activity 2: Conduct consultations with stakeholders in the form of workshop or lab events to bring the concerned entities and stakeholders on board. Participation depends on what levels of the hierarchy are being addressed. For reviewing the third level (*Subplan for Prevention*) only, they would be NACC-internal.

Results: Revisions to (or a newly defined) ToC, including an indicator framework appropriate and realistically suitable to achieve the objectives and provide solid data for M&E, especially on the third level.

Toolbox and Guidance: See Background Paper (Chapter D). As noted above, there are aspects that are not covered in this project, such as Assessments of Risks, Stakeholders, Capacity, and Mandate. Additional support can be provided upon request.

Step 3: Changing perceptions

Goal: Ensure success is highlighted and leads to improved perceptions such by relevant stakeholders.

Recommendations: NACC should (1) build a strong brand and public trust based on solid data of success and (2) prioritize its work prudently to maximize the impact its success has on perceptions, and (3) channel its communication to ensure relevant stakeholders are aware of improvements.

Approach:

- Activity 1: build a strong brand. Due to well-known issues with international indicators (such as lack of expertise, methodological flaws, and own agenda), they should be disregarded to the extent that is possible. Given their prominence in the media, they cannot be ignored. However, NACC (as any ACA) is well advised to critically question rather than endorsing them. NACC's focus should be on developing its own convincing position (strong brand) that is supported by data from four components: (a) Backbone is M&E data produced by NACC's M&E activities; (b) The ITA is an excellent approach to produce additional data. In the currently ongoing revision, it should be aligned with the strategy and NACC's ToC to ensure the data it produces complements NACC's M&E data; (c) To be convincing, evaluations cannot exclusively originate from own data collection and self-assessments. External sources are naturally more credible. Therefore, NACC data and ITA should be supplemented by externally conducted regular (annual) public opinion surveys conducted by an independent and credible institution, such as a national university. Improvement can only be demonstrated against a baseline, and it is important that this is incorporated into the process; (d) Additional data can originate from external sources of evaluations, such as, for example, UNCAC Implementation Review, OECD Integrity Review, TI's National Integrity System, UN SDGs. Documented improvements in such external reviews send strong signals.
- Activity 2: Prioritize. Several approaches are available. The analysis conducted does not allow for conclusive recommendations. The following guidance appears justified: (a) Focus on petty corruption, as it impacts directly on the everyday experience of people; (b) Prioritize the private sector due to the attention given to the CPI – confirmed by the information extracted from a wide range of international indicators (see above, Chapter B.II.3). Additional consideration can be given to the following ideas; (c) Sector approaches are standard good practice, and their performance improvements can be well documented and demonstrated. The sectors best suited depend on local circumstances. Often, this is done based on a risk analysis, tackling the most pressing issues or areas first – as an example, a report titled 'The uncovering of Thailand's corruption risk towards sustainable development' highlights the approach to this in Thailand. Alternatively, sectors with the most direct impact on people's livelihood are popular choices, typically they are health, education and water – or politically set priorities; (d) Selecting and using simple and easy to use indicators with a methodology that allows for direct and clear improvement (low hanging fruit).

Result: To make NACC’s ToC and corresponding Indicator Framework most effective, it should be based on two preparatory reports; (1) A review (or preparation) of a plan for building a strong brand. Ensure it includes aligning the ITA, incorporating frequent externally conducted opinion surveys, and considers additional sources for building a strong set of data, as well as a baseline; (2) An assessment of how to prioritize efforts. In addition to a focus on the private sector and petty corruption, options are risk assessments and opinion surveys. As part of the second stage, to assist with onboarding stakeholders when preparing for guidance for decision makers, it helps to involve several stakeholders, within NACC, through participation in workshops or working groups.

Toolbox and Guidance: See Background Paper: Chapter D.

Step 4: Implementation: Action Plan or Road Map

Goal: Define specific measures and projects derived from the analysis.

Recommendation: Steps 1 to 3 establish the task at hand for NACC; a “starting point” (baseline) from where it is departing; a “finish line” of where it aspires to arrive (objectives); and a “path to success” of how it plans on getting there (ToC, Indicator Framework). Details on how these are then broken down in measures are not part of this project. Instead, some specific guidance is derived from the analysis.

The following activities should be addressed in the form of an “Indicator Project”:

(1) **CPI and its sources.** Due to its methodology, the CPI neither offers useful information for policy or project design, nor is it feasible to define projects to directly improve a country’s performance. Any analysis or project design must be on the level of CPI sources. Their relevant content (i.e, questions used for the CPI of Thailand) does not provide useful guidance other than prioritizing the private sector. There are, however, several entry points and activities that should be pursued.

(2) **International Indicators.** There are some indicators that can be improved directly. Even though they are not CPI sources, and probably not part of NACC’s focus, this is worth consideration. It is commonly accepted that indicators create their own reality (self-fulfilling prophecy), affecting each other. There is a good chance that higher scores in some indicators will be picked up as positive evidence, improving perceptions of the situation in Thailand, resulting in better scores in others.

(3) **No other indicator related activities.** Apart from these initiatives, no additional resources should be dedicated to “chasing indicators scores”, neither through research nor projects. This position should be clearly promoted as part of the proactive communication to build the NACC brand (Step 3 above).

Approach:

- **Activity 1: Project proposal.** Based on the outline provided, a project proposal can be prepared to elicit a decision on whether and how the proposed activities will be pursued. This should include a determination of resources (staff, budget, time) to be allocated to the project.
- **Activity 2: Project Plan.** Based on that information, a detailed project plan can be developed.

Result: Ideally, NACC has a designated team and a consistent approach for improving indicators – and distances itself proactively from other activities, especially separating its project work from the CPI and other external indicators – and applying the NACC M&E framework instead.

Toolbox and Guidance: See Background Paper: Chapter C.III for a basic outline of options of the proposed “Indicator Project”.

II. UNDP Assistance

UNDP can support NACC in the pursuit of these recommendations as follows:

Additional analysis

Several of the recommendations require additional research, for example the strategy review. While desk-based options for research are mostly exhausted, through interviews and review of additional documents, more detailed recommendations can be provided. Additional topics of interest, such as risk assessments and capacity assessments can be included in next steps as well.

Technical Expertise

NACC will be required to decide on the way forward, for ongoing technical assistance and guidance on the topics that NACC decides to address in the next steps, such as ITA review, design of ToC and an indicator framework. Support includes provision of expertise methodology, design, good practice examples, tools and specific guidance through both its local staff and its international network of organizations and experts.

Facilitation of Workshops or Capacity Building

To effectively move forward and put these recommendations into practice, several workshops, lab-type events, and training events are required. Topics to include, for example, the design of the Indicator Project as well as training of staff on ToC, Indicator Framework, and M&E in general.



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