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AN INITIAL REFLECTION ON ANTI-CORRUPTION POLICIES: SELECTED INPUTS FOR THE IMPLEMENTATION OF THE UNITED NATIONS CONVENTION AGAINST CORRUPTION FROM THE LATIN AMERICAN EXPERIENCE

Regional Centre for Latin America and the Caribbean, Panamá/ Regional Bureau for Latin America and the Caribbean/ Democratic Governance Practice Area

UNODC, Regional Office for Central America and the Caribbean in Panama (ROPAN)

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TEAM RESPONSIBLE FOR THE PREPARATION OF THE DOCUMENT

The document *An Initial Reflection on Anti-corruption Policies: Selected Inputs for the Implementation of the United Nations Convention against Corruption from the Latin American Experience* is a joint effort of the United Nations on Drugs and Crime- UNODC Regional Office for Central America and the Caribbean in Panama (ROPAN) and the Democratic Governance Practice Area of the United Nations Development Programme- UNDP Regional Service Centre for Latin America and the Caribbean.

Gerardo Berthin coordinated the elaboration of the document in close collaboration with Virginia de Abajo-Marqués, and with inputs from Karen Hussmann, Miguel Peñailillo, Candice Welsch, Melissa Flynn, Luis Ruiz-Gimenez, Borja de Aramburu, Adriana Ballestin, Camila Bozzo, and Janet Lennox.

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Presentation

It was no coincidence that the UNCAC and National Anti-Corruption Policies were the central topics of discussion and debate at this Workshop. The UNCAC is the first legally binding instrument in the fight against global corruption. As such, it promotes corrective measures, but also key is its capacity to promote preventive measures. This Convention demonstrated the importance of working together, among governments and their corruption prevention entities, the various agencies and programs of the United Nations system, and non-governmental and civil society organization. Corruption is a phenomenon that changes, transforms and furthermore crosses borders, so it is essential to coordinate efforts among all stakeholders.

On the other hand, anti-corruption policies in Latin America and the Caribbean have evolved over the past two decades. Although they still have a long way to go, one can identify some important achievements. However, there has not been an effort to analyze and systematize the development of anti-corruption measures, as well as the design and implementation of anti-corruption policies.

In spite of the clear need to work together, and given the importance of both the UNCAC and anti-corruption policies, there are not recent analyses with respect to the Latin American region. Since a mechanism for the Review of Implementation of the UNCAC now exists, having strategic and systematized knowledge on this topic and the specific experiences is essential. Hence, this document attempts to systematize a selected group of anti-corruption policy experiences, as well as the various factors and stakeholders of these processes.

This document, and the Regional Workshop on which it is based, are of vital importance. In the fight against corruption, it is not only important to have a level of awareness, but it is also necessary to promote cooperation and collaboration both within the United Nations systems, as well as with governmental and non-governmental stakeholders.

The idea is that this document could be a means to generate a practical interest and an active debate among the UNDP and UNODC country offices, in this region and in others, in Regional Service Centers and sub-regional offices of UNDP as well as UNODC, and the entire United Nations system, as well as professionals interested in this topic. Similarly, it is hoped that this document could be a reference not only for continued reflection, but to deepen the analysis of anti-corruption policies in Latin America. The idea is that the document could also help to focus and target projects and programs as well as regional activities.

The Regional Workshop in Panama was designed and implemented jointly by the UNODC Regional Office in Panama and the Democratic Governance Area of the UNDP Regional Centre for Latin America and the Caribbean. More than 30 participants were part of this Regional Workshop, representing seven countries (Argentina, Brazil, Colombia, Chile, El Salvador, Mexico and Panama), including representatives of corruption prevention entities and senior management professionals from anti-corruption offices, experts and specialists from UNODC and UNDP, and representatives of civil society. The objective of the workshop was to create a space for the collective exchange and construction of experiences and lessons learned that could serve as inputs in the process of implementation and review of the UNCAC.

This document is not intended to be prescriptive, nor assess anti-corruption policies or the compliance of the UNCAC in the Region. Rather, its purpose is to showcase the experiences in the region; highlighting the lessons

learned identified by government experts who participated in the event and to promote efforts to for a deeper understanding of the effort. It is clear that the impact of corruption affects society as a whole and therefore strategies must be integrated and inclusive. We hope that this document will provide some practical input towards our common goal.

Amado Philip de Andrés

Regional Representative

UNODC Regional Office for Central America

and the Caribbean

Freddy Justiniano

Director *a.i.*

UNDP Regional Centre of Latin America

and the Caribbean

Acknowledgement

Introduction

Coordinated policies against corruption and the role of preventive corruption entities are themes that have been seldom analyzed, not only in Latin America but in other parts of the world as well. There is a gap in the knowledge about experiences. Therefore, it is useful to have a systematization of experiences in anti-corruption policies, as well as lessons learned about the factors influencing those anti-corruption policies.

The study of public policy in Latin America is a relatively new phenomenon, and even newer is the study of anti-corruption policies. Public policies are complex and multi-dimensional processes that manifest differently in different contexts.

Public policy has been defined in different ways by different authors, under varied circumstances and realities. The following highlights some important conceptualizations of public policy as an example:

- "Public policy is a planned **program** of values, goals and practices…"[1]

- "Public policy is a **process** of successive approximations to a desired goal, where even this is subject to continual reconsideration…"[2]

- "Public policy is a set of **decisions** that result in strategically selected actions within a set of alternatives, according to a hierarchy of values and preferences of stakeholders …"[3]

- "Public policy is the result of **actions** that lead (or translate) to a more or less institutionalized response to a situation judged as problematic …"[4]

The few studies that have been carried out on anti-corruption policies demonstrate the difficulty and challenges of building anti-corruption policies, not only due to the sensitivity and complexity of the subject, but also because the topic involves several sectors, institutions, and stakeholders. Moreover, it involves an approach that articulates components of prevention as well as prosecution and administrative and/or criminal sanctions, as well as management and governance components. On the other hand, there is no unique formula for building anti-corruption policies.[5]

The countries of Latin America and the Caribbean have been "building policies" and implementing anti-corruption measures for almost two decades. Since the transition in several countries of Latin America from authoritarian and totalitarian regimes to democratic systems, the fight against corruption has taken major leaps forward. Even though these leaps alone are not sufficient, they form part of a basic platform from which other initiatives of

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[1] Harold Lasswell, "The emerging conception of policy science." *Policy Sciences* (1), pp.3-14, 1971. (Reproduced in Aguilar, Luis. "The Study of Public Policies." Porrúa, 1996).

[2] Charles E. "The Science of Muddling Through." *Public Administration Review* (19), pp.79-89, 1959.

[3] Carlos Gerardo Molina. *Model to design social policies and programs* (INDES, 2002), p. 2.

[4] Carlos Gerardo Molina, p. 3.

[5] For an example see, Karen Hussmann y Hannes Hechler "The Construction of Anti-corruption policies in practice: Implications to Implement the UNCAC," *U4 Brief* No. 19, august de 2008; and Karen Hussmann, "The Construction of anti-corruption policies in practice: What can be learned to implement Article 5 of the UNCAC? Comprehensive Study of Six Cases: Georgia, Indonesia, Nicaragua, Pakistan, Tanzania and Zambia," *U4 Report*, 2007.

medium and long-term can be launched and projected, perhaps in a more strategic manner and within the public policy cycle framework in favor of transparency and against corruption.[6]

In March of 1996, 21 countries of the Organization of American States (OAS) gathered in the city of Caracas, of the Bolivarian Republic of Venezuela, and signed the Inter-American Convention against Corruption (IACAC). This became the first international treaty that addressed the issue of corruption. Shortly thereafter, in 1997, the Organization for Economic Cooperation and Development (OECD) adopted the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. Already in the XXI century, on October 23, 2003, the UN's Convention against Corruption (UNCAC) was approved, making it the first universal legally binding instrument in the fight against corruption. It proposed the introduction of measures to detect, investigate and prosecute corrupt behavior while making clear reference to the recovery of criminal proceeds and furthermore, promoting preventive measures and more effective international cooperation. To date, there are only six countries in Latin America and the Caribbean that have yet to ratify the UNCAC.[7]

All of these national, regional and global initiatives created broad and specific preventive and sanctioning frameworks, for the construction of anti-corruption policies (Table 1). While these provide new opportunities and directions for anti-corruption policies and measures, they also pose considerable future challenges for transparency and the fight against corruption. Therefore, it is useful to have a systematization of anti-corruption policy experiences, as well as the lessons learned about the factors affecting these policies.

In this context, in August 2012, the *Regional Workshop: From the United Nations Convention against Corruption (UNCAC) to Anti-Corruption Policies in Latin America* took place in Panama. The workshop was designed and implemented jointly by the Regional Office of the United Nations against Drugs and Crime (UNODC) and the Democratic Governance Area of the United Nations Development Programme (UNDP) for Latin America and the Caribbean. The event hosted more than 30 participants, representing seven countries (Argentina, Brazil, Colombia, Chile, El Salvador, Mexico y Panama), including representatives of corruption prevention entities and senior management professionals from anti-corruption offices, experts and specialists from UNODC and UNDP, and representatives of civil society.

The objective of the workshop was to create a space for the collective exchange and construction of experiences and lessons learned that could serve as inputs in the process of implementation and review of the UNCAC. To this end, the workshop was organized in two parts. The first part was more theoretical and revolved around the UNCAC, and in particular the mechanism for the Review of Implementation of the UNCAC and preventive measures. The second part offered an opportunity to analyze five different anti-corruption policies in Latin America (Mexico, Argentina, Chile, Colombia, and El Salvador), and their diversity in terms of integrated policies, coordination and the role of prevention bodies in the design and implementation.

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[6]See Gerardo Berthin, "Strengthening the Capacity to Design and Implement Anti-corruption and Transparency Policies in Latin America," CLAD Journal, *Reforma y Democracia*, No. 41, June-July 2008.
[7]According to the UNODC registry of ratifications in Vienna, until September 2013, Barbados, Belize, Grenada, Saint Kitts and Nevis, Saint Vincent and the Grenadines and Suriname had not ratified the UNCAC.

Table 1: Preventive Measures in the IACAC and the UNCAC: Frameworks for Anti-corruption Policies	
Inter-American Convention Against Corruption (IACAC)	**United Nations Convention against Corruption (UNCAC)**
Article III (Summary/Excerpts) Preventive Measures: 1. Standards of Conduct 2. Mechanisms to enforce these standards of conduct. 3. Instruction to government personnel to ensure proper understanding of their responsibilities and the ethical rules governing their activities. 4. Systems for registering the income, assets and liabilities of persons who perform public functions in certain posts as specific by law and, where appropriate, for making such registrations public. 5. Systems of government hiring and procurement of goods and services that assure the openness, equity and efficiency of such systems. 6. Government revenue collection and control systems that deter corruption. 7. Systems for protecting public servants and private citizens who, in good faith, report acts of corruption, including protection of their identities, in accordance with their Constitutions and the basic principles of their domestic legal systems. 8. Oversight bodies with a view to implementing modern mechanisms for preventing, detecting, punishing and eradicating corrupt acts. 9. Mechanisms that deter bribery of domestic and foreign government officials. 10. Mechanisms to encourage participation by civil society and nongovernmental organizations in efforts to prevent corruption.	**Chapter II** **Preventive Measures** *Article 5* *Policies and practices to prevent corruption* 1. Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability. 2. Each State Party shall endeavor to establish and promote effective practices aimed at the prevention of corruption. 3. Each State Party shall endeavor to periodically evaluate relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption. 4. States Parties shall, as appropriate and in accordance with the fundamental principles of their legal system, collaborate with each other and with relevant international and regional organizations in promoting and developing the measures referred to in this article. That collaboration may include participation in international programmes and projects aimed at the prevention of corruption.

The mechanism for the Review of Implementation of the UNCAC, in place since 2010, has facilitated and promoted relatively intense work among and with detection, investigation and enforcement corruption entities in the region. At the same time, prevention agencies, referred to in the important Chapter II of the UNCAC (covering preventive measures) have been operating regionally, but in a less coordinated manner, which constituted an important topic of discussion in the workshop.

The workshop itself was a milestone, not only because it was a first attempt to systematize anti-corruption policy and the role of preventive entities in Latin America, but also because of the joint and collaborative work among all participants. The two-day workshop was itself, the result of an effort that preceded it, through which information was gathered from participants in a questionnaire format that provided inputs not only for the workshop, but for the analysis of the experiences.

Objective of the Document

The idea behind the workshop was to obtain inputs and lessons directly from the experience of participants, particularly the government experts who were present, and to produce discussions and analysis for a document that could capture lessons learned from these experiences. This document is the result of the workshop and of inputs from a questionnaire filled by participants prior to the workshop. It is a first reflection on anti-corruption policies in Latin America in the context of the UNCAC.

Efforts to build anti-corruption policies are an inherent part of the evolution of governments. During the last two decades considerable amounts of national, regional and international resources have been invested in administrative reform efforts toward more transparent governments and with the ability to be accountable and prevent and sanction corrupt practices. In all these efforts, there are lessons that can guide future initiatives.

This document, which focuses on the experiences of Argentina, Colombia, Chile, El Salvador and Mexico, in the design and implementation of anti-corruption policies, captures the rich discussions that occurred in the context of the Regional Workshop in Panama, and examines the progress of policy processes and actions in all five cases, the regulatory context, characteristics, stakeholders and major challenges.

By examining these efforts, an initial basic framework for reflection emerges to understand the design, implementation, critical junctures for the adoption of anti-corruption policies and other elements necessary for sustainability. Rather than evaluating and/or providing recipes, this document instead focuses more on systematizing processes to identify useful lessons. Its intention is not to judge or evaluate the quality of policies and/or efforts in the countries mentioned above. By systematizing the design and implementation of anti-corruption policies in each country, this document aims to contribute to the dialogue and knowledge on anti-corruption policies in Latin America.

A Focus on Anti-corruption Policies and Regulatory Frameworks

The creation of anti-corruption policies is a process, and as such is necessarily linked not only to political, but also to institutional and management capacities. Thus, progress toward the ultimate goal of effective and sustainable anti-corruption policies has to go through different levels. Not only is important to recognize the presence of corrupt practices as a public and governance problem, but also to translate that recognition into political and institutional "action." Offering alternatives to address the problem is another important step, as is the development of a minimum agenda of priorities. Another important step is already a sequence of actions that lead (or translate) into a policy response that is more or less institutionalized. The actions already imply or carry out an implicit plurality and diversity in decision-making and the natural characteristics of public policy.[8]

The latter, in this case, is associated with the "more or less institutionalized" response. To have anti-corruption policies necessarily involves a variety of strategies, because it departs from the premise that corrupt practices respond to a multiplicity and complexity of causes. It is also important to recognize that while one must work with a diversity of strategies, they must be articulated, coordinated and systemic in preventive aspects as well as in enforcement, prosecution and sanctions.

Each country faces distinct challenges and risks of corruption. Similarly, each government chooses an approach to prevent and sanction corrupt practices. However, while the approach could be different a number of common features can be observed. For example, some countries have chosen to develop comprehensive national anti-corruption strategies, some of which contain hundreds of measures while others adopt more targeted policies aimed at improving the integrity, transparency and accountability in certain key public administration areas. Other countries, in turn, have preferred to integrate anti-corruption measures in broader public sector reforms. Some countries have promoted transparent legislative and anti-corruption agendas with the goal of improving systemic weaknesses in their legislation. Other countries have decided to make use of legislative approaches in order to comply with international treaties, such as Latin America and the Caribbean with the IACAC and more recently the UNCAC.[9]

In Latin America, countries have responded divergently to the need of preventing and sanctioning corrupt practices. Some, such as El Salvador and Colombia, are in the process of establishing their mechanisms and anti-corruption policies, while others, such as Mexico, have been on this path for the past 30 years. The five countries included in this systematization have adopted corruption standards according to their legal framework and in response to meeting regional and global commitments. In any case, discussion and exchanges in the Workshop point to enforcing anti-corruption normative and legal frameworks as the main challenge.

On the other hand, both the design and the implementation of anti-corruption policies and/or actions generate different dilemmas. For example, the existence of, or lack of, political will to tackle the problem of corruption, not only in the Executive, but also in the Legislative and the Judiciary branches; governmental changes and the possibility of re-inventing actions or build on what has already been achieved; the need to meet regional and global anti-corruption commitments or strengthen national frameworks that are important for compliance. These circumstances show that the issue of public anti-corruption policies present important challenges and dilemmas for the actors involved.

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[8]Berthin , 2008.
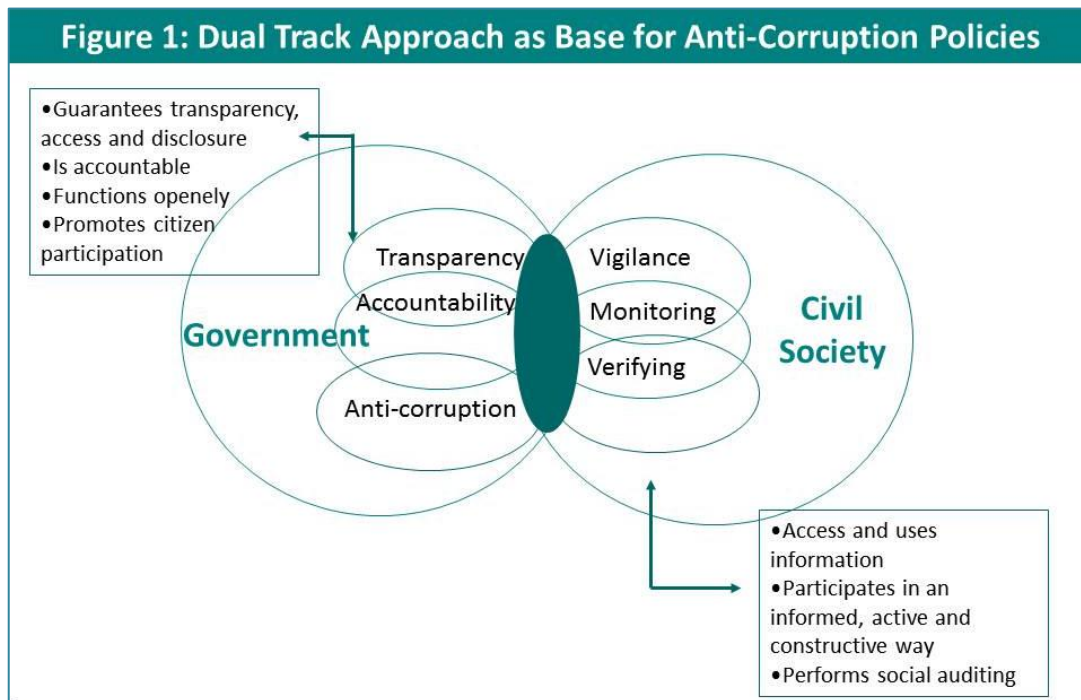[9]Hussmann y Hechler, 2008.

The main reflection of the discussions and analyzes in the Regional Workshop, in relation to anti-corruption policies and regulatory frameworks, revolved around the complexity of the phenomenon of corruption and the importance not only of having adequate regulatory frameworks, but also to structure effective preventive systems. Although the international and regional frameworks (IACAC and UNCAC), as well as national frameworks, provide guidance to design, implement and evaluate anti-corruption policies, the construction and implementation of anti-corruption policies is not a linear and/or automatic process. The institutionalization of transparency or of other anti-corruption policies involves a joint effort with concrete strategies to strengthen the State and democratic governance and the assignment of competencies and presence or absence of anti-corruption capacities. While regional and international frameworks can support the initial guidelines to promote transparency and for fighting corruption, as well as for financing projects and/or programs, inadvertently they can promote anti-corruption actions only as an end, and not as a means for a broader national governance policy.[10]

An anti-corruption policy seen as an end and means to improve democratic governance involves reassessing the role of the State and its institutions to assume leadership proactively and publicly not only to articulate policies in favor of transparency and anti-corruption, from top down or vice versa, and inside the State apparatus but also to promote strategic alliances with social organizations and citizens. That means that before designing any transparency or anti-corruption policy it is important to measure the political feasibility in terms of legitimization, capacity and resource allocation. Operational and administrative viability also needs to be taken into account so that the prioritized activities can be implemented through the existing organization and/or with the help of others that may be enticed to contribute to the organizational goal. Last, but not least, social feasibility, to the extent that social organizations and citizens, not only are active stakeholders and an integral part of anti-corruption policy, but they also assume a commitment.

As illustrated in Figure 1, a "dual track" approach where government and civil society have their respective roles is the foundation of any anti-corruption policy. While several countries have anti-corruption norms, agendas and/or measures, and are able to address some of the key elements contained in the regional and/or international conventions (access to public information, prevention of conflicts of interest among staff and public procurement; see for example Box 1 in relation to the UNCAC) these elements do not necessarily automatically translate into anti-corruption policy.

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[10]Berthin, 2008.

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Figure 1: Dual Track Approach as Base for Anti-Corruption Policies

- Guarantees transparency, access and disclosure
- Is accountable
- Functions openely
- Promotes citizen participation

Transparency
Accountability

Government

Vigilance

Monitoring

Verifying

Civil Society

Anti-corruption

- Access and uses information
- Participates in an informed, active and constructive way
- Performs social auditing

Box 1: Articles of the UNCAC and Anti-Corruption Policy

Article 5: Preventive Anti-Corruption Policies and Practices
Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anticorruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability.

Article 6: Preventive Anti-Corruption Body or Bodies

Each State Party shall, in accordance with the fundamental principles of its legal system, ensure the existence of a body or bodies, as appropriate, that prevent corruption by such means as: (a) Implementing the policies; b) Increasing and disseminating knowledge about the prevention of corruption.

Articles 7-14 can be considered frameworks for anti-corruption policies in various themes:

Article 7   Public sector
Article 8   Codes of conduct for public officials
Article 9   Public procurement and management of public finances
Article 10   Public reporting
Article 11   Measures relating to the judiciary and prosecution services
Article 12   Private sector
Article 13   Participation of society
Article 14   Measures to prevent Money-laundering

Source: UNCAC

In Latin America, there is no universal or homogeneous institutional architecture to implement international, regional and/or national anti-corruption norms. In each country, a different structure exists, and the preventive and disciplinary institutional mechanisms are also diverse. One can identify specialized preventive institutions and entities in various anti-corruption issues (comptroller, auditing, procurement, public service, and public ethics). Although their primary mandate may not be necessarily be the fight against corruption. The analysis of how this institutional architecture contributes and/or can contribute to anti-corruption policy becomes a strategic topic. To understand if the institutional architecture has been forged in response to the international (UNCAC) and/or regional (IACAC) anti-corruption obligations, or if in fact it is part of a national anti-corruption policy is also a strategic aspect. The answers to these questions, frame both challenges and opportunities in the process of designing anti-corruption policies.

In relation to the nature of anti-corruption policies, another important consideration was raised during the Workshop: the link between the design and implementation of anti-corruption policies and the political cycle in the national context. Usually, at the beginning of a new administration or government anti-corruption policies are launched or re-launched. These may or may not reflect the election campaign promises to fight corruption. Sometimes this can lead to a lack of continuity in anti-corruption policies, beyond internationally and/or regionally acquired commitments. Changes are not only at the ministerial level of specialized agencies and/or entities, but also in the area of public officials.

Workshop participants noted that in general, anti-corruption policies in some countries may be subject to vested interests, to a lack of strategic planning and coordination, to the absence of effective institutional arrangements, to poor allocation of financial and human resources and few tools to prevent and/or manage the risk of corruption.[11] This scenario, according to the workshop participants tends to constrain not only the impact of anti-corruption policies, but also the political and institutional space to enforce the laws. In this context, any anti-corruption action would be affected in terms of depth, institutionalization, articulation, and sustainability.

Some examples of anti-corruption measures, which have managed to transcend beyond the political time and/or duration of a government were also analyzed in the Workshop. For example, the laws on access to information in Mexico (both at the federal and the State level); the system of sworn declarations for public officials to prevent possible conflicts of interest that has been applied in the federal government and some provinces in Argentina; the public procurement system in Chile; and the internal control system in Colombia.

In any case, the general consensus in the Workshop was that the design and development of anti-corruption policies is not a linear process. Similarly, it does not strictly depend on international, regional and/or national standards. Rather, it is a multidimensional, interactive, dynamic, political, technical and institutional process involving a number of actors. Another important consensus that was produced in the Workshop was about the importance of defining not only what an anti-corruption policy is, but what minimum elements that policy should contain. Participants analyzed whether the existence of documents or statements (anti-corruption strategies), of agendas of transparency in the Executive, Legislative and Judicial branches, and anti-corruption approaches that are part of broader governance reform agendas, are part of an anti-corruption policy and to what extent their articulation or disarticulation affect the design and/or implementation of anti-corruption policies. Similarly, the link between national anti-corruption initiatives with regional (IACAC) and/or international (UNCAC) commitments was examined.

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[11]Hussmann2007.

Anti-Corruption Policies in Latin America: Perspectives from the experience of Argentina, Colombia, Chile, El Salvador and Mexico

The workshop provided an opportunity to share some of the key lessons of anti-corruption policies in Latin America, particularly in those cases with sufficient information to be able to analyze their continuity and historical evolution from a regional perspective. The selection of countries, therefore, was made primarily on the basis of the visibility of different policies and/or the existence of a basic vision on anti-corruption. On the other hand, different cases were selected to illustrate the existence of anti-corruption policies in different stages of evolution. Third, the attempt was made to obtain a representation of the different sub-regions of Latin America, which could illustrate the different contexts and challenges in relation to the phenomenon of corruption.

Each country in Latin America faces similar challenges and risks related to the phenomenon of corruption. However, the anti-corruption forms/approaches/strategies have been varied and linked to the institutional, political and social conditions of each country. The cases of Argentina, Colombia, Chile, El Salvador and Mexico illustrate the variety in terms of responses to corruption. Each country is in a different stage in regard to the evolution of its anti-corruption policy, and they have responded differently to the regional (IACAC) and global (UNCAC) normative frameworks.

Of the five experiences, Mexico is the country with the oldest anti-corruption policy history. It was initiated as part of the political and constitutional reform process in 1976, and was reinforced by the subsequent adoption of the Federal Law of Transparency and Access to Public Information and the various state laws in the decade of 2000. The 1976 political reform was broad, and included reforms to various articles of the Constitution. The approved reform contained aspects relative to elections, political parties and how to enhance political representation integrate national representation. Similarly, several reforms related to anti-corruption were included, such as the reform of Article 6 of the Constitution, which consisted of adding on the same original text the following: "... the right to information will be guaranteed by the State." Similarly, Articles 74, 76 and 93 refer respectively to the filing date of the budget to the Chamber of Deputies, to review the public accounts, and the appearances by officials to Congress to report on the status of accounts for which they were responsible, among others.

After Mexico, Chile would be the country with the second longest history of anti-corruption policies. Chile's trajectory began in 1994 with the creation of the Public Ethics Commission. The Commission issued a report on the prevention of corruption with concrete recommendations on various issues such as, conflict of interest, sworn declarations, control and oversight, public procurement and contracts, criminal and penal aspects, financing of political activities, and access to public information. Over the years, a large part of the recommendations of this report were implemented in various stages, such as the legislative and modernization of the State policies (1994-1998), the Government Audit Policy (1998-2005), and the Probity Agenda (2005 to present).[12]

In Argentina it can be argued that the onset of anti-corruption policy was in 1997 when it ratified the Inter-American Convention against Corruption and its *corpus juris* was incorporated into domestic law by Law No. 24.759. This international instrument was established as a relevant guide for directing efforts to prevent and combat corruption. Although Argentina is not a permanent member of the Organization for Economic Cooperation

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[12]Hussmann, 2007; and Miguel Peñailillo, "Implementation of probity and transparency policies under adverse circumstances: crisis as an opportunity. An analysis of the Chilean case," paper presented in the IX CLAD International Congress on State and Public Administration Reform, Madrid, Spain November 2 – 5, 2004.

and Development (OECD), they participated continuously in the Working Group on Bribery that operates within the framework of this Organization and transposed the Convention into domestic Law No. 25,319. Similarly, in 1997 the Public Ethics Office (ONEP) was created and institutionalized by Decree No. 152/97 in the Presidency of the Republic. This Office was responsible for developing a National Public Ethics Regulation, the development of ethics education, control of policy inconsistencies and the tracking of the assets of public officials.

The general perception was that ONEP's results were limited. With the change of government in 1999, and in accordance with commitments made by the new government in election campaigns, the Anti-Corruption Office was created by Article 13 of Law No. 25.233. It was decreed that the Office would function within the realm of the then Ministry Justice and Human Rights. Its main functions according to the law were to develop and coordinate the programs to fight corruption in the national public sector in coordination with the Office of Administrative Investigations. The Anti-Corruption Office contained two departments, one of preventive character (Department of Transparency Policy Planning) and the other (Department of Investigation) whose goal was to implement and promote criminal investigations.

Meanwhile, Colombia began its Presidential Program to Fight Corruption in the late 1990s and the Anti-Corruption Statute began more recently. Both processes were the basis for consolidating a broad anti-corruption agenda and finally, in the last two years the design of an integrated policy is coming to fruition. Regarding anti-corruption policies in the case of Colombia three (3) key moments were identified before, during and after the period 2002-2010:

1) The first, marked by the fight against drug trafficking and its impact on policy (i.e. the Eight Thousand Process).[13]

2) The second arises from the government's commitments and the campaign against corruption. As a result, it creates an anticorruption program in the Presidency, which gave continuity to Decree 2405 of November 30, 1998 and Decree 127 of January 19, 2001, and subsequently modified both by Decree 519 of March 5, 2003. The Presidential Program sought to combat all forms of corruption in Colombia's public administration, and to ensure efficient and transparent management of the state.

3) The third is the current government (2010-2014) that has made anti-corruption policy more evident through the reform of the Anti-Corruption Statute, and the creation of the Secretariat of Transparency by Decree 4637 of 2011, replacing the Presidential Program for Modernization, Efficiency, Transparency and Anti- Corruption.

Finally, the example of El Salvador is the most recent experience. In June 2009, a Secretariat for Strategic Affairs was established and as part of it, the Secretariat for Transparency and Anticorruption (SSTA) was also created, in response to an extensive and intense social demand. The SSTA defined three areas of work within the framework of anti-corruption:

1. Transparency and participation;
2. Strengthening of internal control the Executive entities, and;
3. Internationals Internalization of International Conventions.

At the same time, two major policy areas were defined: 1) close cooperation and coordination with other government agencies related to this topic and 2) openness and encouragement for civil society participation. Since its inception, the SSTA has promoted actions and strategies of access to public information, accountability,

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[13]The 8000 Process (8 thousand process) is the name given to the judicial proceedings initiated against former President Ernesto Samper on charges of drug trafficking funding his presidential campaign.

promotion of ethics, strengthening internal control, openness to citizen complaints and reports of possible acts of corruption and creating a culture through outreach and education on transparency. In this way, transparency and anti-corruption became a comprehensive programmatic element, which is understood, in a transversal manner, to all the Executive institutions through a National Transparency and Anticorruption Policy.

As shown in Tables 2 and 3 respectively, the length of time of anti-corruption policies is varied in the five experiences presented in the context of the workshop. They range from the oldest of almost four decades (Mexico), to the newest of just four years (El Salvador). Similarly, the stages of anti-corruption policy cycles in the five experiences are diverse. Mexico has gone through all of the stages of the cycle, while Colombia and El Salvador are in the early stage of Design moving to the Implementation stage.

Table 2: Age of anti-corruption policies in the five countries					
Country	Mexico	Chile	Argentina	Colombia	El Salvador
When it began	1976	1994	1997	1998	2009

Table 3: Stages of development in anti-corruption policies in the five countries				
	Design	**Implementation**	**Evaluation**	**Re-evaluation**
Colombia	X			
El Salvador	X			
Argentina	X	X	X	
Chile	X	X	X	
Mexico	X	X	X	X

This brief overview of the five experiences presented in the framework of the workshop, offers a number of findings and lessons learned about the design and implementation of anti-corruption policies. For example, the political consensus and support for anti-corruption policies are essential to any strategy for the medium and/or long term. Anti-corruption policies must transcend governmental periods and should have institutional mechanisms to ensure their strength and sustainability. There are no magic formulas or models for the design and implementation of anti-corruption policies. It is clear that these should be linked to national policy framework, institutional capacity, and political context.

In the five cases analyzed, the design of anti-corruption policies responded to distinct reasons. For example:

- Political scandals;
- Changes in government;
- Policy reform processes and/or democratic governance;
- Demands from the business and/or economic sector to attract foreign investment and/or participate in regional and/or global free trade agreements;
- The adoption of conventions and/or other international anti-corruption instruments;
- Pressures and/or conditioning by international agencies (international, institutional or financial donors) international and national NGOs, media and research centers;
- The fight against drug trafficking; and
- Leadership and/or demand from political leaders and civil society.

Similarly, the five cases show different dynamics with respect to the design and implementation of anti-corruption policies. For example, and as it will be discussed below, in general, anti-corruption policies have different approaches. In most cases, anti-corruption policies represent a range of preventive measures stemming from various sources (Executive, Legislative, Judicial), although the role of the Executive is more pervasive. They also respond to regional and/or international convention commitments. The coordination of these actions show different results in all five cases. In federal countries (Mexico and Argentina) coordination is initially centralized and is linked to intermediate governments (states or provinces); characterized by eminently national coverage (which includes sub-national governments). In unitary countries (Chile, Colombia, El Salvador), the coordination is executed from the national level, and depending on the degree of deconcentration and delegation of functions to regions, departments and/or municipalities (sub-national governments), a national entity (or various national entities) articulate anti-corruption policies towards sub-national governments.

Similarly, the link and/or integration of anti-corruption policy reforms with sectorial policies are varied in the different cases. In some, anti-corruption policies are an integral part of the strategies of "good governance" and/or political reform, while in others they are isolated actions that may not fall within any strategy of political reform. The same applies to the type of institutional mechanisms for implementation, coordination and monitoring of anti-corruption policies. In some cases, the institutional mechanism is shared among several entities (Comptroller, Ministries, Secretariats, etc.) In other cases a single entity assumes leadership and primary responsibility. There may also be cases where the institutional mechanism is not clearly defined. Any of the three scenarios has implications not only for the design, implementation and monitoring of anti-corruption policies, but also for the prioritization of actions and the sequence of anticorruption actions. Last but not least, the articulation and/or coordination of preventive and punitive anti-corruption policies in the five cases are also diverse. In most cases, there is not a clear connection and/or coordination between the two anti-corruption pillars. Where there is minimum articulation and/or coordination, there is not enough evidence to evaluate their effectiveness. In all five cases, preventive measures are predominant. In this context, it is important to note the lack of a government strategy for strategic communications that allows for information, awareness, and accountability for actions,

expected results, and the anti-corruption challenges. The lack of this strategic element or "opacity," among others, tends to generate a vacuum of information that affects not only public perception but also fuels mistrust of democratic governments.

This complex and multi-dimensional dynamic also generates a series of dilemmas for the analysis of anti-corruption policy that was widely analyzed in the workshop. In effect, participants in the workshop inquired and asked about how they can assess whether or not a country has an anti-corruption policy. Similarly, it is no less important to inquire how to distinguish or differentiate an anti-corruption agenda from an anti-corruption strategy, and these from anti-corruption policies. There are also no magic formulas to determine whether anti-corruption policies should be only preventive and/or punitive, which combination is the most appropriate and/or balanced between preventive and/or punitive. Finally, another dilemma was if some *ad hoc* actions could promote transparency and accountability in public administration, without necessarily being part of an anti-corruption policies framework.

In summary, based on the experience of the five cases analyzed in the workshop, a combination of internal and external factors can drive the design and implementation of anti-corruption policies. In some cases, the demand was generated by a reaction of citizens, civil society and the media in response to corruption scandals. In others, the business sector has pressured to ensure greater investment and economic opportunities for the country. Finally, it is worthy to note the momentum generated by the need to transpose the *corpus juris* of the obligations of the Conventions and other international anti-corruption initiatives, particularly in their review mechanisms, which has promoted national anti-corruption initiatives.

Characteristics of Anti-Corruption Policies

Discussions in the workshop were rich in content, especially the analysis of experiences in different stages of anti-corruption policy. Below is a summary of the main issues raised in those discussions.

On the design of anti-corruption policies

- **Are anti-corruption policies based on thorough assessment of the problem of corruption necessary?** Having an analysis of the phenomenon in a country in the design stage is a desirable requirement not only to generate the necessary knowledge that would adequately address the problem, but also to identify the main sources of incidence and risk of corruption, and so to design policies and policy instruments to address these areas. Such broad and deep assessments can also provide strategic inputs to have indicators with which to design a monitoring and evaluation plan. According to workshop participants, in all five cases there were assessments, but most were partial. For example, in Argentina various analyses developed by civil society and/or academia were prepared as inputs, but there was no general, or comprehensive public assessments, and there are no evaluations to determine to what extent these partial assessments offered inputs for anti-corruption policy. In Chile, the Public Ethics Commission issued a report in 1994 with a number of recommendations covering a vast range of activities and materials, but in the opinion of the Workshop participants not all were concrete anti-corruption efforts. More recently, in El Salvador there were some consultations with civil society and public opinion surveys, but there was no evaluation to determine how these inputs were used to nourish the national anti-corruption policy. Meanwhile, Colombia is in the process of making an initial assessment. However, it is not exhaustive, and is being considered as a "baseline effort" that could be further developed in the future. Unlike the other four countries, in the case of Mexico the feeling among participants was that there has been a reverse trend towards excessive corruption assessments in various initiatives, from different perspectives, and in different moments. Furthermore, according to the participants not only has this contributed to the "fatigue" that can be detected in the country with regards to the topic of corruption, and yet the anti-corruption policies have not been linked to the high expectations forged by citizens.

- **Who were the key stakeholders in the anti-corruption policies?** In all five cases, anti-corruption policies have had, one way or another, the participation of the three branches of government (executive, legislative and judicial). Although mostly the Executive Branch has played a predominant role. Similarly, in the five cases, civil society has played an important role in promoting and designing anti-corruption policies. In some cases, selected civil society groups have taken the lead in demanding a more structured anti-corruption policy. In the cases of El Salvador and Argentina, a handful of civil society leaders have agreed to leadership governmental positions in anti-corruption matters. The active and broad participation and involvement of civil society sectors in the promotion of anti-corruption policies can be a symptom of the deepening and strengthening of democracy. However, it can also represent a challenge as the interaction with civil society sectors can create more complex decision-making processes. For example, in Chile the *Lobby* Bill illustrates a case of a participatory process that became stagnant. The National Chilean Congress has needed a decade to discuss a standard to regulate *lobbying*, referring to actions aimed at influencing public administration to promote decisions that favor certain sectors of society, particularly the private sector. At the time of the Workshop (2012) the bill had not been approved. The academic sector (universities and research centers) has also played an important role in some countries more than in others, particularly in generating knowledge of the

phenomenon of corruption in the different national contexts and their impact on society, and to raise awareness through public campaigns.

- **What should be the role of the media?** Another group of actors who have played a key role in promoting anti-corruption policies have been the media. In most countries, the existence of independent media and their ability to have enjoyed a significant degree of freedom has been a key element for, on the one hand, investigations and reports on the existence of corruption, and on the other, to help raise the awareness within the general population. Although several workshop participants also recognized that a recent trend in some countries is the capturing of the media by political and governmental forces, and/or the restriction of freedom of press in traditional media formats (television and newspapers). Almost all participants recognized that if this trend continues, it could be detrimental not only to the effective implementation of anti-corruption policies, but also on their implementation, monitoring and tracking.

On the political and institutional context of the anti-corruption policies

- **To what degree are the anti-corruption policies centralized/decentralized?** Given the current political model in a large majority of countries in Latin America, including the five cases featured in the workshop, anti-corruption policies are usually highly centralized and designed and/or implemented from the top down. Within the five cases, there are federal systems (Mexico and Argentina) as well as unitary systems (Chile, Colombia, El Salvador). The structure and the degree of decentralization vary from country to country. Government participants argued that political power, even in federal cases, is still highly centralized. The other challenge recognized in the workshop was the lack of sub-national (states, provinces, municipalities) capacity to implement anti-corruption policies. In this context, the issue of articulation and management is key, although it may not have been deservedly recognized as an anti-corruption policy priority. Similarly, regulatory compliance and/or anti-corruption policy enforcement varies between the national and sub-national entities.

- **Specialized Entities?** Within the five cases presented in the workshop, in some the institutional mechanism is shared among several entities (Comptroller, Ministries, and Secretariats), while in other cases a single entity assumes leadership and primary responsibility. There may also be cases where the institutional mechanism is not clearly defined. Not one of the five cases analyzed has a public authority or entity specializing in anti-corruption issues. Rather they are partially specialized institutions such as courts of auditors/accounts, comptrollers, prosecutors, anti-corruption secretariats in the Executive Branch, and/or access to information boards/commissions. In addition, the monitoring and follow-up mechanisms of regional (IACAC) and international (UNCAC) anti-corruption treaties are also located in other governmental entities, such as the ministries of foreign affairs. Therefore, the anti-corruption mandate is by nature partial, shared and/or dispersed. This means that some responsibilities are shared among various entities and/or institutions, and several institutional gaps can be detected affecting implementation and coherence of anticorruption policy.

- **How much of the budget is dedicated to anti-corruption policies?** With the exception of El Salvador, the rest of the Workshop participants mentioned that in their countries, there are funds in the national budget intended for anti-corruption policies. However, the amount varies by country. Comparatively, it was argued that Mexico and Chile may have the highest anti-corruption budgets. However, as there is no comparative study to expand and/or confirm this hypothesis, it is difficult to ascertain. In any case, a major topic of

discussion at the workshop was the question of what resources can be considered as sufficient to prevent and fight corruption.

On the performance of anti-corruption policies

- **What about measuring the performance of anti-corruption policies?** The consensus that emerged from the Workshop was that there are no indicators to systematically measure the performance of anti-corruption policies, especially in the area of prevention. Existing indicators such as the Corruption Perception Index is not intended to measure performance. On the other hand, there was also consensus among workshop participants that performance cannot be measured if there is no access to information, and/or objective analysis of available information. In general, the few analyses that have been done on issues related to anti-corruption policies (sworn declarations, corruption offenses, /complaints, proceedings, judgments and sanctions) show limited results and/or that the results of anti-corruption policies have not transcended public perception.

- **What about the monitoring and follow-up systems?** During the workshop internal and external systems were analyzed, particularly those that link the State Parties to the regional (IACAC) and international (UNCAC) conventions. According to workshop participants, although all countries have internal control mechanisms, most of the five countries do not have specific mechanisms for monitoring internal anti-corruption policies. For most, the periodic reports generated by regional (MESICIC) and international (the mechanism for reviewing the implementation of the UNCAC) monitoring mechanisms are relevant in several respects. Not only in terms of participation of civil society and the media, but also to follow-up on specific measures, such as access to information, rules of conduct, procurement, and whistleblower protection among others. Overall, the consensus in the workshop was that external monitoring systems have contributed to advancing anti-corruption policies. For example, in establishing common minimum standards; placing the issue on the country's policy agenda; creating pressure; helping to reduce impunity, including through removal of safe heaven and recovery of stolen assets in other countries (often found in developed countries); contributing to raising the penalties and forcing a systematic data collection that involves creating information systems that allow evaluation. It was also mentioned that the process of monitoring and follow-up can be slow and tedious, and that there are no effective mechanisms to enforce the commitments made by the conventions. Furthermore, the dilemma to publish or not to publish the review reports was noted, although in the case of the IACAC, all reports are public.

- **What communication strategies exist?** The workshop recognized the importance of communication strategies, although experience in the five cases is varied. According to participants, Mexico is the country that has invested the most resources in communicating not only anti-corruption policies, but also their results. However, the governmental participants stressed that despite measurable results and communication resources invested in Mexico, the population still shows dissatisfaction over the State's performance on anti-corruption. Another interesting case is Chile, which is always referred to as an exceptional case when it comes to corruption in the region, differing from most Latin American countries. This may contribute to the invisibility and misinterpretation of the size of the problem, since according to the governmental participants in the workshop the phenomenon manifests in different ways.

Table 4 summarizes the main characteristics of anti-corruption policies, which are a product of the discussions and reflections and exchanges that took place in the context of the workshop. The methodology of the workshop provided an opportunity for participants from each country to do a short and simulated review and summary of the reality of each of their countries under the UNCAC. In this context, the opportunities and challenges in each of the five cases are summarized in Tables 5-9, respectively.

	Is there a decentralized policy?	Is there a single specialized body?	Is there inter-institutional coordination?	Are there sufficient resources given?	Is there a monitoring system with indicators?	Are there measurable results?	Is it in the public agenda?
Argentina	No	No	Partial	No	Incomplete	Some	No
Chile	No	No	Yes	Yes	Incomplete	Some	No
Colombia	In process	Yes	In process	No	In process	In process	Yes
El Salvador	No	Yes	Partial	No	In process	No	Yes
Mexico	Yes	In process	Yes	Yes	Yes	Yes	Yes

Table 4: Principal characteristics of the anti-corruption policies and initiatives in the five countries

Table 5: Argentina

Opportunities	Challenges
• Public Ethics Law, including an affidavits system.	• Absence of the topic of anti-corruption placed on the public agenda.
• Broad participation in international initiatives.	• Lack of progress in some key areas (i.e. lobbying, laws, access to information).
• Stability of the anti-corruption office.	• Use of the current institutional and legal structure to investigate and if there is evidence, prosecute corrupt acts.
• Renewal of the Supreme Court Justice.	• Decentralization and/or deconcentration of anti-corruption policies to sub-national governments.

Table 6: Chile	
Opportunities	**Challenges**
• Perception of low corruption.	• Keep the topic on the public agenda.
• Relatively favorable perception of institutions in general.	• Maintain an appropriate allocation of resources in favor of transparency and accountability.
• Broad participation in several international initiatives.	• Regain a more ambitious reform agenda on the topic of anti-corruption.
• Active participation by civil society and academia sectors that drive issues and apply pressure on opinion, government and legislative leaders.	• Expand internal and external communication to strengthen the knowledge of policies and coordination mechanisms.
• Some anti-corruption measures have constitutional support (i.e. access to public information).	• "Invisibility" of some forms of corruption.
• Inter-institutional coordination exists.	• Decentralization and/or deconcentration of anti-corruption policies to sub-national governments.

Table 7: Colombia	
Opportunities	**Challenges**
• Political will in favor of the anti-corruption agenda.	• Complete some key norms/legal framework (whistleblower protection law).
• Topic on the public agenda.	• Must continue to improve the communication among institutions.
• Plans to strengthen institutional existing structure.	• More actively incorporate the private sector.
• Broaden stakeholder participation, including civil society, trade unions, the church and the general public.	• Align citizen expectations with institutional capacity in anti-corruption issues.
• Assistance provided by international agencies is seen as relevant and useful.	• Insecurity prevents some measures of transparency (i.e. publication of civil servants´ sworn declarations.)

Table 8: El Salvador	
Opportunities	**Challenges**
• Political will and commitment.	• Strong budgetary dependence on international aid agencies for anti-corruption issues.
• Public support to gain momentum.	• Improve and expand inter-institutional coordination mechanisms.
• In the current implementation stage, there is the opportunity to create an effective institutional architecture.	• High expectations by citizens for the prevention and management of risks of corruption.
• The Sub-Secretary of Transparency and Government Ethics Tribunal enjoy relative credibility.	• In 2014, general elections will be held and for now, the main attention is focused on that process.

Table 9: Mexico	
Opportunities	**Challenges**
• Anti-corruption system continues to advance (for example, administrative sanctions have been adopted for irregularities in public management, improved administrative investigations were implemented such as the rotation of investigators).	• Improve and continue to strengthen the independence and effectiveness of the entities responsible for administrative investigations.
• Concrete standards and decisions on several levels of anti-corruption.	• Work on a register of interests and/or a *Lobby* bill.
• Concrete results have been produced, such as reducing federal procedures and high-profile criminal cases.	• Growing public dissatisfaction (fatigue with the topic) and realignment of policy with expectations.
• Significant resources invested, including communication campaigns.	• Expand and strengthen decentralization and/or deconcentration of anti-corruption policies to sub-national governments.
• Widespread participation in several international and national anti-corruption initiatives.	• Evaluate advantages and disadvantages of creating a centralized and specialized anti-corruption institution.

Final Reflections of the Workshop

Based on the deliberations in the workshop and the experiences analyzed, numerous preliminary trends on anti-corruption policy in Latin America can be identified. The most significant were:

On corruption

- Despite great efforts and increased awareness, corruption is still perceived as a serious problem in the region.

- In the last decade, despite great improvements in human development and economic performance, a correlation (not necessarily causation) between inequality and the perception of corruption in the region can be identified.

- There is growing awareness among citizens and civil society about the problem of corruption, which is generating a greater demand on governments for greater transparency and accountability.

- Beyond international efforts (not all public), extensive and profound national corruption assessments in each country do not exist. This has limited the design, implementation and evaluation of policies and institutions.

On anti-corruption policies

- Despite various actions and initiatives, a comprehensive and sustainable model of anti-corruption policy cannot be identified yet in the region, (one that survives the various changes of government).

- There is still no proper understanding of anti-corruption policies in the region, neither conceptually or operationally.

- The diversity of institutional responsibilities on anti-corruption issues in the region has contributed to the dispersion of responsibilities; an absolutely independent and autonomous prevention entity is still difficult to detect in the region.

- Generally anti-corruption policies and/or the agenda have been promoted by the Executive Branch. The challenge remains in promoting more proactive and complementary anti-corruption issues from the judiciary branch, the legislature, (including political parties), civil society and the private sector.

- The sectoral approach provides an opportunity to introduce and articulate issues of transparency and accountability in human development sectors (health, education, and environment).

On the UNCAC and anti-corruption policies

- Both the IACAC as well as the UNCAC have served as frameworks to promote anti-corruption agendas focusing primarily on the public sector (i.e., prevention of conflicts of interest, the professionalization of civil servants and the improved management of public affairs and resources).

- There is an opportunity to rethink how to involve civil society, academia, the media and the private sector in promoting transparency and anti-corruption policy agenda. Regional (IACAC) and global (UNCAC) frameworks offer interesting opportunities.

- Review Mechanisms of international treaties (UNCAC) establish processes and obligations for States to coordinate and collect information on those issues under review. However, these do not replace internal systems for monitoring and evaluation.

On the design and implementation of anti-corruption policies

- Interagency coordination is *sine qua non* for the design and implementation of anti-corruption policies.
- Measuring the impact of anti-corruption policies is challenging, particularly in responding to citizens' expectations.
- The anti-corruption policies have not necessarily been accompanied by an effective communication strategy, particularly aimed at reporting on the objectives and results of anticorruption actions.

- The anti-corruption policies can be really beneficial if they are linked to broader democratic governance reforms, including e-government, open government, access to information, and civil service reform among others.

On a possible future anti-corruption policy agenda and topics

- Adopt a proactive approach (not reactive).
- Focus actions on good policy management (the "how").
- Ensure adequate resources (human and financial).
- Strengthen the civil service, especially the ethical values of public servants and public service.
- Strengthen technical skill level of the prevention agencies and clarify preventive roles, including prosecution and sanctions.
- Focus on policies in high-risk areas (bribes, procurement, contracts, budget).
- Incorporate key sectors in the anti-corruption policy process (private sector, youth, and women).
- Explore forms of regional cooperation and the exchange of knowledge and experiences in anti-corruption policy, such as: the sectoral approach, private sector measures, the promotion of a culture of legality, potential improvements to international monitoring mechanisms, systems for filing complaints and the strengthening of the institutional architecture among others.

Annex

Participant List
Regional Workshop: From the UNCAC to anti-corruption policies in Latin America
August 23-24, 2012
Panama City, Republic of Panama

	Name	Country	Organization
1	Marco Stella	Colombia	UNDP
2	Ana Paulina Sabbagha	Colombia	Transparencia Colombia
3	Rosalía Correa	Colombia	Observatorio Cali Visible
4	Rafael Merchán	Colombia	Secretaria de Transparencia
5	Paola Casabianca	Colombia	UNODC
6	Nora Luzi	Argentina	UNDP
7	Ezequiel Nino	Argentina	ACIJ
8	Néstor Baragli	Argentina	Oficina Anticorrupción
9	Laura Rivera	El Salvador	UNDP
10	Liliana Rincón	El Salvador	UNDP
11	Jaime López	El Salvador	FUNDE
12	Aquiles Parada	El Salvador	Presidencia
13	Manuel Cruz	El Salvador	Sub-Secretaria de Transparencia
14	Diego Antoni	México	UNDP
15	Eduardo Bohórquez	México	Transparencia Mexicana
16	Alfredo Esparza	México	Secretaría de la Función Pública
17	Rocío Noriega	Chile	UNDP
18	Patricia Arriagada	Chile	Contraloría de la República de Chile
19	Francisco Sánchez	Chile	Chile Transparente
20	Rodrigo Vitoria	Brazil	UNODC
21	José Manuel Pérez	Panama	UNDP
22	Mario Morales	Panama	Consejo Nacional de Transparencia contra la Corrupción
23	María Angélica Vásquez	Panama	UNDP Regional Centre for Latin America and the Caribbean
24	Borja De Aramburu	Panama	UNDP Regional Centre for Latin America and the Caribbean
25	Luis Ruiz-Giménez	Panama	UNDP Regional Centre for Latin America and the Caribbean
26	Lissa Schäfer	Panama	UNDP Regional Centre for Latin America and the Caribbean
27	Freddy Justiniano	Panama	UNDP Regional Centre for Latin America and the Caribbean
28	Louise Agersnap	Panama	UNDG-LAC
29	Amado Philip de Andrés	Panama	UNODC-Central America and the Caribbean
30	Melissa Flynn	Panama	Anti-Corruption Regional Academy for Latin America and the Caribbean/UNODC
30	Bo Shakira Harris	Panama	UNODC- Central America and the Caribbean
31	Karen Hussmann		Facilitator
32	Miguel Peñailillo		Facilitator
33	Gerardo Berthin	Panama	Facilitator, UNDP Regional Centre for Latin America and the Caribbean
34	Sebastian Hammel	Panama	Facilitator, UNODC- Central America and the Caribbean
35	Janet Lennox		Rapporteur