Framework of Relevant Information for Practitioners

This framework will enable practitioners to assess a country struggling with corruption by evaluating its potential entry points (within the government, civil society, and private sector), the factors affecting each stage of the entry process (from the motivation for reform to the authorizing agent enabling the targeted actor/agency to proceed), and its overall political will for change.

### I. What type of anti-corruption project or initiative do you plan to undertake?

A. Do you have information about the extent and mechanisms of corruption within the country of interest?

B. What type of corruption poses the biggest challenge in the country of interest?

C. What specific type of corruption are you trying to address? Are there other types of corruption you’re willing to address?

D. Why do you want to undertake reform in this sector?

E. What champions are there for the reform?

F. Do the agencies identified as needing reform support this change?

G. From whom do you expect opposition to the reform? Could they block a reform effort?

H. Do you have resources dedicated to the reform? If so, what are they? How much? Is there a medium-term commitment?

I. Why is this reform being undertaken now?

### II. Has your government or country attempted anti-corruption reform in the past?

A. Which agencies were targeted for reform?

B. Was the same president, government, or ruling party in power when that reform was undertaken?

C. What was the outcome of that effort?

D. Who or which division of the public sector took the lead in that anti-corruption effort? Who did they partner with?

E. Who opposed the reform? How strongly did they mobilize against reform?

F. Who provided funding and resources for this reform?
G. Why was this point in time chosen for the reform?

H. Was there an evaluation or assessment of the reform that included a baseline? Were goals for the reform specified? What was considered a success?

I. Have anti-corruption reforms been recommended to your government by an external organization or agency? What type of reform was recommended?

J. Were the recommended reforms implemented? Why or why not?

K. What lessons were learned from any previous reform efforts?

### III. Current Legal Framework

A. Has the country signed and ratified any international anti-corruption conventions?

B. Does existing legislation cover the following areas?
   1. Conflict of interest?
   2. Immunity protection of elected officials?
   3. Financial disclosure of personal assets?
   4. Right to information or freedom of information acts?
   5. Whistleblower protections?

C. Is there a gap between the existing anti-corruption legislation and its enforcement? Are there exemptions to these laws that allow the government to selectively enforce them?

D. Are gaps or exemptions more prevalent in certain sectors? Does it target specific groups of citizens? Are there more gaps at the central or local level?

### IV. Civil Society

A. Does civil society have access to information that allows them to participate in anti-corruption projects or efforts? Is civil society invited to participate in reform efforts?

B. Does civil society have the ability to mobilize? What are the legal constraints on civil society activism?

C. Are there civil society groups that are specifically working on anti-corruption reform? Do these groups work independently or in partnership with government?

D. Which civil society organizations would you seek to partner with? Are there any you would not want to partner with?

E. Who owns the media? Is the media state-owned, privately owned, or mixed? Is it able to monitor and comment on government activities? Are there defamation or sedition laws that prevent the media from reporting on corruption?
V. Public Sector Institutional Capacity

A. Does the government have the ability to enforce existing anti-corruption laws? How could that ability be improved?

B. Have any government commissions or agencies been established that are specifically designed to combat corruption or manage anti-corruption efforts?
   1. How is their budget determined?
   2. How is their effectiveness measured or evaluated?

C. For the judiciary:
   1. How are judges appointed?
   2. How long are judicial appointments?
   3. What grounds are there for removing a judge?
   4. Can a judge’s salary be reduced?
   5. Can judges be transferred to a different district?

D. For prosecutors:
   1. How are prosecutors appointed?
   2. What grounds are there for removing a prosecutor?

E. For public officials and civil servants:
   1. How can public officials and civil servants report corruption?
   2. Are there whistleblower protections that protect public officials and civil servants from retribution after reporting corruption?
   3. Are public official and civil servants trained on how to detect and report corruption?
   4. Is there a code of ethics for public officials and civil servants? Are they trained on these ethics?
   5. For high-level public officials:
      a) Are they obligated to submit asset disclosures?
      b) Are they investigated prior to assuming high-level positions?
      c) Are their assets placed in blind trusts while they are in office?

F. Are there laws that prohibit government officials from employment in the private sector while working in public sector?

G. Does this apply to the civil service as well? Are there laws regulating post-civil service employment?

H. Are there individuals or groups holding key positions in government who appear to be organized into networks? Do they use this position for resource capture?
I. What existing government initiatives encourage individual citizens to participate in anti-corruption efforts?

J. To what government agency can individual citizens report corrupt activity? How?

VI. Private Sector Interest

A. Has the private sector actively supported anti-corruption reform?

B. Is there a particular industry that would directly benefit from the proposed reform?

C. Are there particular companies or firms that would directly benefit from the proposed reform?

D. Are there any companies that would directly oppose the proposed reform?

E. Are there any sectors of the economy that would directly oppose reform?

F. Is there interest in the domestic private sector for reform, the foreign private sector, or both? How has that interest been expressed?

G. Have any foreign companies been investigated or prosecuted for violating the Foreign Corrupt Practices Act (FCPA) or an analogous law?

H. Is there legislation or a code governing campaign finance? Are campaign donations publicly disclosed? Are there laws regulating lobby activities?