

Analysis of UNODC's paper:
**"A summary of views and an outline of options and modalities for the next phase of the
Mechanism for the Review of Implementation of the UNCAC"**

UNCAC Coalition
3 February 2025
Discussion Paper

The UNCAC Coalition has analyzed UNODC's paper on options and modalities for the next phase of the Implementation Review Mechanism (IRM) to be discussed at the Implementation Review Group (IRG) meeting on 17-21 February. Our analysis identifies the options in the paper that the UNCAC Coalition believes will enhance the IRM in its next phase. Importantly, we have also put forward additional recommendations not found in UNODC's options paper that are crucial to strengthening the IRM in its next phase.

While States Parties highlighted the need for greater transparency and civil society participation in country reviews and follow-up during the 2024 Implementation Review Group's meetings and panel discussions, the UNODC's paper does not include options to address the IRM's major weaknesses in these areas.¹ We have provided concrete recommendations in this paper to address these significant omissions (see the 'What is Missing' section under each topic).

We encourage your country's delegation to give detailed statements at the IRG meeting that go beyond what is contained in the options paper and support the recommendations outlined below to make the IRM more transparent, inclusive, efficient, and effective. For more detailed information, please also see the UNCAC Coalition's [Key Recommendations](#) for making the IRM more effective.

1. Scope of follow-up mechanism:

Options to support:

- The next phase's scope should focus on all four elements outlined in the options paper to create an effective and meaningful follow-up mechanism:²
 - Follow-up on **implementation of recommendations** received in the first phase.

¹ UNODC paper (2023), [Lessons learned from other review mechanisms on their operation and transition to a next phase \(part II\)](#), Section F. on inclusion of non governmental actors, which states that the review mechanisms studied involve non-state actors in various ways in the review process and have initiated reforms and guidance to facilitate civil society engagement in the reviews. It concludes that "From the point of view of the secretariat representatives consulted, experiences with the involvement of non-governmental stakeholders in the review exercise have been positive. The contributions of such stakeholders are considered to improve the quality of country reports issued by the peer review mechanisms and to help with domestic follow-up."

² UNODC paper (2025), ["Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption"](#), Section 3, A1 a-e, p. 7.

- Review **new developments** that have taken place since the first phase reviews were carried out.³
- Review the **delivery of technical assistance** provided and whether it was sufficient.⁴
- Identify **new successes and good practices** since the most recent reviews, or developments regarding successes and good practices identified during the first review phase.

What is missing:

- Peer reviewers should have the **discretion to decide what sources of information they draw upon** to review these elements when carrying out reviews, including other UN documents such as Universal Periodic Reviews (UPRs), documents of other anti-corruption reviews, non-governmental reports and research, civil society parallel reports, and other credible sources of information.⁵

2. Approach for assessing the effectiveness of measures:⁶

Options to support:

- The IRM's next phase must analyze the effectiveness of UNCAC provisions in practice to be credible and impactful.⁷ While there are different ways to approach this, a quantitative and qualitative assessment could be valuable. One option that the paper suggests is the development of a set of questions that States Parties would respond to, with possible areas of focus around the existence of a legal framework or other measures, the adequacy of the legal framework or other measures, the results or impact of the legal framework or other measures, and the level of progress achieved through UNCAC implementation.⁸

³ New developments should consider such aspects as changes to anti-corruption frameworks and their implementation, notable improvements, new corruption risks, and how relevant CoSP resolutions have been implemented in a country, considering a country's specific context and corruption risks.

⁴ The review of technical assistance efforts should address the status of technical assistance delivered following the first phase reviews, assessing the quality of delivery and impact and the partners involved.

⁵ UNODC paper (2024), "[Methodologies and indicators for measuring corruption and the effectiveness of anti-corruption frameworks](#)". The paper highlights the valuable role non-governmental stakeholders play to help governments validate or cross-check information for measurement efforts, see paragraph 95: which concludes "Almost all submissions highlighted the role of non-governmental stakeholders in the development and conduct of any measurement exercise, as well as the usefulness of parallel reports or surveys carried out by non-governmental agencies that fed into the work conducted by public authorities or helped validate or cross-check its results. The private sector, civil society and academia were frequently named as invaluable actors in these exercises, and they were often surveyed or consulted during the development of any methodology. Others mentioned included judges, journalists, politicians, analysts, the media, international organizations, donors, and representatives of trade associations."

⁶ The text of the UNCAC has 37 mentions of "effective", often in relation to the need to effectively apply the UNCAC provisions.

⁷ UNODC paper (January 2025), A.2, 11, p.3: "The majority of responding States Parties supported the inclusion of an analysis of the practical implementation or effectiveness of measures taken to implement the Convention."

⁸ UNODC paper (2025), Table 1, Option 2, p. 6-7. The paper also cites the possibility of using a standardized and indicator-based methodology to generate qualitative data that can help assess effectiveness.

What is missing:

- The following aspects should be examined as part of any methodology to assess the effectiveness and the impacts of the country's legal framework: the loopholes and gaps in the legal and policy framework; the set-up of relevant bodies and institutions, including if their resourcing, independence, mandates, transparency, and activities are adequate to promote effective UNCAC implementation; detail activities to promote measures and compliance (preventive activities, awareness raising, oversight mechanisms, etc.) as well as investigative and enforcement actions.⁹

3. Technical Assistance:

Options to support: (support all options proposed in the paper)¹⁰

- Provide a **more detailed analysis of technical assistance needs** that links to the executive summary's narrative, findings, and recommendations. The outcome documents should include specific technical assistance recommendations to address challenges identified in the review and identify intended beneficiaries.
- Provide a dedicated technical assistance session during or after the country visit.
- Meet with donors if requested by the State Party under review.

What is missing:

- There should be a **follow-up process for monitoring and promoting the implementation of targeted technical assistance efforts** to meet identified needs from country reviews; follow-up on technical assistance should be included as part of the structured and regular reporting process.
- Evaluate technical assistance needs from the first phase and their impact in addressing recommendations.
- To increase transparency in technical assistance projects, **create a publicly available database of all technical assistance projects and the partners involved.**
- To maximize the impact of technical assistance and capacity-building efforts and **encourage multi-stakeholder approaches**, promote the involvement of stakeholders such as NGOs, international and regional organizations, and donors.

4. Thematic sequence and reporting after the conclusion of a review:

Options to support:

- A **structured and regular reporting process** is crucial to ensure accountability for implementing recommendations in an effective and timely manner.¹¹

⁹ States Parties can also make use of the [UNODC guidance](#) on how to fill in the Self-Assessment Questionnaire from the second cycle of the first phase.

¹⁰ UNODC paper, Table 9, p. 9.

¹¹ See Option 2 of Table 3, p. 7. The UNODC paper states that "States Parties have discussed how reporting on measures taken and achievements after the conclusion of a review can be used to strengthen the effectiveness and impact of the Implementation Review Mechanism, in part inspired by

- The paper proposes conducting reporting at regular intervals to the IRG, which could be done orally or in writing and uploaded to the IRG website or the country profile websites. We support having countries submit and publish progress reports annually, which should include reporting on the status of the implementation of recommendations, new developments, technical assistance, and how stakeholders have been engaged in the follow-up.
- Develop and use reporting templates to facilitate reporting on information after a review is concluded.
- Create a publicly available dashboard of good practices and recommendations and a follow-up matrix.

What is missing:

- It is important that whatever thematic sequence agreed upon by States Parties covers all UNCAC chapters and ensures that country reviews in each cycle are carried out in a timely and efficient manner, with **clear deadlines for completing reviews, follow-up, and reporting** that countries and UNODC are held accountable to.
- UNODC should issue a press release upon completion of a national review to raise awareness among the public and key stakeholders of the review findings, outcomes, and recommendations.
- The reporting process after a country review is completed should take into account whether recommendations made in previous cycles have been met; issues yet to be addressed should be added to the recommendations of the current review cycle.
- Countries should **organize stakeholder dialogues and meetings to jointly shape a follow-up action plan** to implement the review recommendations and also invite civil society actors to make written contributions on the follow-up process and reporting.
- When reviews are completed, States Parties and peer reviewers should present their findings to the IRG; States Parties should also regularly provide updates on progress with follow-up to reviews to the IRG.
- **States Parties should report orally and in writing on follow-up actions to implement review recommendations**, including technical assistance needs, and new developments at the Conferences of States Parties.
- **Civil society actors should be allowed to participate as observers in the IRG meetings and all other subsidiary bodies of the UNCAC** and to present civil society parallel reports and submissions on UNCAC implementation in specific countries as part of the IRG discussions.

5. Information gathering, information technology, and drawing of lots

Options to support:

other anti-corruption peer review mechanisms in place to facilitate the periodic reporting on measures taken after a review has been concluded.” (see C 16).

- **Develop and publish dashboards of horizontal review outcomes** that could cover good practices, recommendations, and technical assistance needs. This will increase transparency and help promote more effective follow-up.¹²
- If an information technology solution is adopted, the UNCAC Coalition supports Option 1, which would have the technology used to not just facilitate information-gathering, desk review and drafting of the executive summary and report but would also be used to help facilitate reporting on measures taken to address recommendation once a review has been completed, facilitate ways for countries to follow up on their reviews (such as through use of action plan templates) and also have analytical features that could be used for dashboards of horizontal review outcomes.¹³ **When developing action plans, it is important that countries seek the views of non-governmental stakeholders;** completed action plans should be published on the UNODC country profile page.¹⁴

What is missing:

- **The paper does not address the essential role of civil society and other non-governmental actors in providing their valuable expertise, perspectives, and experience to the country review process and follow-up.**¹⁵ Civil society and non-governmental stakeholders should be engaged at key stages in the process, including providing submissions on a country's UNCAC implementation in preparation of the self-assessment checklist, providing input in the development of the outcome documents, participating in the country review visits, and contributing to the development and implementation of follow-up action plans and reports on follow-up.
- **Peer reviewers should be able to integrate the findings of other anti-corruption review mechanisms and other relevant reviews** into UNCAC country review reports.
- **The launch of the review should be publicly announced and a call issued at the beginning of the review process for non-governmental stakeholders to make submissions** on UNCAC implementation in the country under review; these submissions should be placed on the UNODC country profile page.

6. Direct dialogue

Options to support:

- **The UNODC paper proposes a public calendar of upcoming country visits to increase transparency.** In addition to providing a schedule of upcoming country

¹² See UNODC paper, Table 8, p. 9.

¹³ See UNODC paper, Table 8, Option 1, p. 9.

¹⁴ See [UNGASS political declaration](#) (paragraphs 21 and 31), CoSP10 Resolution 10/1, OPs 8, 9 & 13 and the preamble: [Atlanta 2023: promoting integrity, accountability and transparency in the fight against corruption](#).

¹⁵ According to UNODC paper (July 2024), "[Updated analysis of the views of States Parties on the next phase of the IRM](#)", see C.23: "Fifty-seven percent of respondents indicated that the self-assessment checklist should include space that could be used by other stakeholders to provide information, if they were invited to do so by the State Party under review, in line with paragraph 28 of the terms of reference."

visits, a public calendar should **also provide a list of country reviews that will be completed that year and a schedule for when the IRG will discuss specific county reviews that have been completed.** The public calendar should be regularly updated and provide explanations for delays and how they will be addressed.¹⁶

- Allow the possibility of longer country review visits if necessary.

What is missing:

- **Organize a meeting with non-governmental stakeholders during the review visit** (ideally at the beginning of a review visit and without the government under review present).
- **Publish a country review timeline and how NGOs can engage** in the review process on the UNODC country profile page; **provide up-to-date contact details for the government focal point** to enable NGOs to obtain more information on how they can engage in the country review process.

7. Outcome documents

Options to support:

- The **executive summaries and country reports should have more substantive analysis**, and legal texts could be included in the response to the self-assessment checklist or an annex to the report.¹⁷ We support option 3¹⁸ to extend the executive summary and include substantive analysis and summaries of each section of the country report and the outcomes.

What is missing:

- **All inputs and outputs of the review visit should be published.** It is insufficient for countries only to publish the executive summary; all countries should publish their full country reports to ensure that a complete picture of a country's UNCAC implementation is publicly available.
- **The executive summary and country report should provide a section summarizing how civil society stakeholders were engaged in the country reviews**, the specific stakeholders that were engaged (which could be included as an annex), documents and other input received by stakeholders, and how stakeholder views were taken into account in the review.
- **Country reports and executive summaries should also include a section that lays out the major corruption challenges in the country, the political/economic context, and the operating environment for civil society**

¹⁶ One way to promote accountability in staying on track with review schedules is to include specific deadlines for each stage of the review process that are put up on the UNODC country profile page and regularly updated.

¹⁷ UNODC paper, F 26, p. 6.

¹⁸ UNODC paper, Table 7, Option 3, p. 9.

to actively participate in efforts to combat and prevent corruption (consistent with UNCAC Article 13 and the UNGASS political declaration).¹⁹

¹⁹ It is critical that “the conditions are present for the effective contribution of individuals and groups outside the public sector, including civil society, non-governmental organizations, community-based organizations, the private sector, academia and media to achieving the objectives of the Convention, including the ability to operate independently and without fear of reprisal because of their efforts in preventing and combating corruption.” See [UNGASS political declaration](#) (paragraphs 21 and 31), and CoSP10 Resolution 10/1, OPs 8, 9 & 13 and the preamble: [Atlanta 2023: promoting integrity, accountability and transparency in the fight against corruption](#).