Sub-Saharan Africa reflections on first-phase UNCAC reviews, and recommendations for the IRM next phase

Global Civil Society Coalition for the UNCAC

Regional Submission to the 2026 CoSP Special Session

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The United Nations Convention against Corruption (UNCAC) Implementation Review Mechanism (IRM) assesses how States Parties implement their commitments and identifies where further action is needed. Civil society participation is essential to ensure reviews reflect implementation in practice, not just legal compliance.

After validation from its Sub-Saharan Africa regional community, the Global Civil Society Coalition for the UNCAC (the Coalition) makes this submission to inform discussions at the 2026 Conference of the States Parties (CoSP) Special Session. The submission covers civil society experiences in UNCAC reviews, trends identified in the region in the first cycle, and recommendations for the next review phase.

1. Civil society participation in UNCAC reviews

According to the Coalition's UNCAC Review Status Tracker, of 47 Sub-Saharan Africa States Parties, 21 have completed their second cycle review, 19 reviews are ongoing and for 7, no information is publicly available. More than 15 years since it started, 7 Sub-Saharan African countries have not completed their first cycle reviews.

The Coalition has compiled experiences of Civil Society Organizations (CSOs) that participated in 2nd cycle UNCAC reviews across the region, showing examples of meaningful engagement, but also inconsistencies in how they are informed and involved. Among the 47 Sub-Saharan Africa States Parties, 24 have confirmed civil society participation in at least one stage of the 2nd cycle reviews. Several reported positive experiences in their involvement in filling out the self-assessment checklist, during the country visit – with 8 meeting the peer reviewers without the government under review present, and several receiving adequate advance notice to prepare. Others contributed through parallel reports, access to information requests and follow-up activities.

However, meaningful participation cannot be equated with simply inviting CSOs to a meeting. In several countries, CSOs reported receiving limited review information, invitations shortly before the country visit, no access to the self-assessment checklist or insufficient preparation time. In some cases, few organizations were invited, limiting the diversity of perspectives available to reviewers.[1]

[1] For example, CSOs in Zambia reported that, although there had been earlier informal communication about the review, the formal invitation was received only shortly before the country visit, limiting the number of organisations that could participate. In Guinea, CSOs reported that the self-assessment had not been made available to them despite their previous involvement in its preparation. The self-assessment and the questions from the UNODC experts were only presented shortly before the review meetings. While CSOs were subsequently given a dedicated closed-door session of approximately three hours with the peer reviewers, they reported that they had not subsequently been involved in presenting the findings or implementing the recommendations.

These experiences demonstrate that meaningful civil society participation requires information, adequate notice, sufficient time, broad and independent representation, opportunities for written submissions and space to engage directly with peer reviewers, without the government under review present. Across reviews, civil society had little to no involvement in follow-up.

a. Follow-up to reviews

A recurring concern is the weak or absent follow-up after country visits and completion of reviews. Under 10 CSOs reported being involved in follow-up to their country's review.[2]

In many cases, CSOs reported no clear timeline for next steps, information on the review outcomes or subsequent involvement in presenting or implementing the recommendations. Despite these gaps, CSOs have developed independent follow-up initiatives, using UNCAC reviews' findings and recommendations to drive advocacy, monitor reforms and engage national institutions.[3]

b. Transparency and access to information

Transparency remains a challenge in UNCAC reviews. The Coalition's UNCAC Review Status Tracker shows that information on country review status, focal points and review documents is difficult to obtain, hindering CSO participation and follow-up.[4]

The Coalition's Transparency Pledge provides minimum standards. It calls on States Parties to publish updated review schedules, information on the UNCAC focal point, announcements on completion of reviews, the self-assessment checklist and full country report and to organize civil society briefings on review findings.[5] Out of 47 Pledge signatories, there are only 2 in Sub-Saharan Africa – an indication of the limited uptake of the Pledge in the region.[6]

The Coalition's Access to Information campaign further highlights transparency gaps. Across 9 Sub-Saharan African countries, only 1 request resulted in full access to UNCAC review

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[2] These countries engaged civil society in follow-up: Benin, Zambia, Mauritius, Zimbabwe, Nigeria, Ghana, Kenya, and Togo.

[3] In Liberia, CSO advocacy following parallel reporting contributed to momentum for legislation on whistleblower protection, witness protection, anti-money laundering, and institutional strengthening of the anti-corruption commission, resulting in the adoption of four anti-corruption laws in 2022. See: Global Civil Society Coalition for the UNCAC, "Making a difference in Liberia: A story of civil society success", https://uncaccoalition.org/follow-up-activities-liberia/.
While in Uganda and Zambia, follow-up work has focused on whistleblower protection, access to information and asset recovery, demonstrating how UNCAC recommendations can be translated into targeted national reform agendas. See: Global Civil Society Coalition for the UNCAC, "Strengthening witness protection, asset recovery & UNCAC Review Implementation in Uganda: A civil society impact story", https://uncaccoalition.org/strengthening-witness-protection-asset-recovery-uncac-review-implementation-in-uganda-a-civil-society-impact-story/; and, "Strengthening Whistleblower Protection, Access to Information, the UNCAC Review Process in Zambia: A Civil Society Impact Story", https://uncaccoalition.org/strengthening-whistleblower-protection-access-to-information-the-uncac-review-process-in-zambia-a-civil-society-impact-story/.

[4] Global Civil Society Coalition for the UNCAC, "UNCAC Review Status Tracker", https://uncaccoalition.org/uncacreviewstatustracker/.

[5] Global Civil Society Coalition for the UNCAC, "Transparency Pledge Compliance Tracker", https://uncaccoalition.org/participate/campaigns/transparency-pledge/: In Sub-Saharan Africa only Liberia and Mauritius have signed the Coalitions Transparency Pledge.

[6] Ibid.

documents.[7] In the remaining 8 countries, access to review information was unsuccessful or remained subject to administrative silence.[8] While several countries have made part of review documentation publicly available,[9] the campaign demonstrates that publication does not necessarily translate into effective access to information, particularly where key documents remain unpublished, requests are redirected between institutions, information is withheld on grounds of sensitivity and no response is provided.[10]

CSOs should not need to rely on access-to-information requests to obtain review documents. The self-assessment checklist and full country report contain important information on anti-corruption frameworks and their implementation. Publishing them increases transparency, facilitates public participation and enables independent monitoring.

c. Civil society parallel reports

Civil society parallel reports are important for strengthening the UNCAC review process. The Coalition has supported the production of 19 parallel reports in countries across the region for both review cycles.[11]

These reports provide an independent assessment of implementation in practice, beyond examining incorporation of UNCAC provisions into national legislation, to examining how laws and institutions operate, in practice, including through stakeholder interviews, and access to information requests.[12]

Evidently, parallel reporting has opened space for discussions on reform priorities and implementation challenges between civil society and authorities – thereby strengthening accountability.[13]

2. First-Cycle review in hindsight: Common challenges identified and

[7] In Benin, authorities provided the self-assessment checklist and full country report along with information on civil society participation, the summary of recommendations and the final country information, although the follow-up action report was only partially provided.
[8] In Botswana and Tanzania, most official UNCAC documentation had been published, but the self-assessment checklists remained unavailable. In Cameroon, authorities referred requesters to the UNODC country profile and subsequently indicated that the full country report could not be released because of its sensitive nature, while providing only a link to the publicly available first cycle report. In the Democratic Republic of the Congo, the request was redirected to a national focal point rather than answered directly, while the Republic of the Congo, Ethiopia and Mali were reported as having no access-to-information legislation.
[9] Out of 96 completed second-cycle reviews overall, 17 self-assessment checklists (17%) and 57 full country reports (59,4%) have been published. Four self-assessment checklists and one full country report have been released through our Access to Information campaign – all from other regions.
[10] Global Civil Society Coalition for the UNCAC, "How Transparent are Countries about their UNCAC Implementation?", https://docs.google.com/spreadsheets/d/1dQyEdIPN1hDDQ76GPF9TUAYLVaLYbiM2HOLNKrM-iMk/edit?gid=1623168729#gid=1623168729
[11] Global Civil Society Coalition for the UNCAC, "Civil Society Parallel Reports", https://uncaccoalition.org/resources/civil-society-parallel-reports/2nd-cycle/ and https://uncaccoalition.org/resources/civil-society-parallel-reports/1st-cycle/: 1st cycle parallel reports from Sub-Saharan Africa: Zambia, Zimbabwe; 2nd cycle parallel reports from Sub-Saharan Africa: Burundi, Democratic Republic of the Congo, Liberia, Togo, Uganda, Ghana, Benin, The Gambia, Madagascar, Zambia, Chad, Guinea, Nigeria, Cameroon, Kenya, Rwanda and Mozambique.
[12] Global Civil Society Coalition for the UNCAC, "Civil Society Parallel Reports".
[13] Global Civil Society Coalition for the UNCAC, "International Anti-Corruption Day 2025 - UNCAC at a Glance, Three Years Later - tracking UNCAC reviews", 2025, https://uncaccoalition.org/international-anti-corruption-day-2025/.

follow-up on recommendations

Ten years after the first review cycle was meant to close, it is worth asking what the region learned from it. 39 of the region's States Parties have completed first-cycle reviews of UNCAC Chapters III and IV, but only 16 published the full country report, and just 5 their self-assessment checklist.[14] For the remaining 23, a seven-to-twelve-page executive summary is the entire public record of a process that ran for years and produced dozens of recommendations. Most first-cycle findings were therefore never made public.

What can be read points to a consistent set of problems:[15]

- Reviews repeatedly identified **incomplete criminalization of foreign bribery, passive trading in influence, private sector bribery and illicit enrichment**. These gaps can limit prosecution under domestic law, despite international obligations to criminalize certain forms of conduct and to consider criminalizing others.[16]
- **Specialized anti-corruption authorities suffer from persistent problems:** lack of independence from political pressure, insufficient budgets and personnel, inadequate training, and poor coordination with other law enforcement agencies. Additionally, they often lack investigation and prosecution capabilities.
- **Definitional gaps persisted,** with the term "public official" frequently failing to capture ministers, parliamentarians, judicial officers or unpaid public servants.[17]
- **Various States have confiscation laws, but procedures for identifying, freezing, seizing and managing criminal proceeds are fragmented or missing entirely.**[18]
- **Few states use the Convention as a legal basis for extradition or mutual legal assistance.** Instead, they rely on parallel treaties that often exclude its offences with most of them concluding only limited agreements for special investigative techniques or for simplified extradition procedures.[19]

The more troubling finding is the lack of follow-up. Of those 39 completed reviews, only 7 have reported publicly on measures taken since their review concluded.[20] The IRM generates recommendations but imposes no obligation on States to report on their actions, and nobody tracks implementation between cycles. Where follow-up has occurred, it has been through UNODC's regional platforms rather than the review: Eastern Africa, Southern Africa, and West Africa and the Sahel have each converged on whistleblower protection, financial

[14] Global Civil Society Coalition for the UNCAC, "UNCAC Review Status Tracker", https://uncaccoalition.org/uncacreviewstatustracker/.
[15] Artificial intelligence (Claude) was used to support the analysis of regional trends and challenges, with a systematic review of all publicly available first and second-cycle country reports and executive summaries for Sub-Saharan Africa States Parties, as well as from UNODC, "State of Implementation of the United Nations Convention against Corruption: Criminalization, Law Enforcement and International Cooperation", 2017.
[16] UNODC, "State of Implementation of the United Nations Convention against Corruption: Criminalization, Law Enforcement and International Cooperation", 2017, Executive Summary, p. Viii. https://www.unodc.org/documents/treaties/UNCAC/COSP/session7/V.17-04679_E-book.pdf.
[17] Ibid., Part One, "Definition of a public official (article 2)," pp. 9–10.
[18] Ibid., p. Viii - ix
[19] Ibid., pp. viii–ix.
[20] None of that reporting appears on their UNODC country profiles, which carry review status and published documents but no record of follow-up. Five of the seven are voluntary statements made to a single session of the Implementation Review Group in November 2016. See: https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/14-16November2016/Statements/, by Burkina Faso, Guinea, Kenya, Liberia, Namibia, Niger and Tanzania. The other two are submissions filed to the tenth Conference of States Parties seven years later. See: https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/submissions/CAC-COSP-2023-8/ by Burkina Faso, and Niger.

investigations and asset recovery as priorities,[21] and the Southern African Development Community (SADC) has folded its 2023 road map into Anti-Corruption Strategic Action Plan[22] These are parallel channels, not anchored to the recommendations each State received. Civil society is well placed to help close this gap.

3. Recommendations for the IRM next phase

Resolution 11/2[23] and civil society experiences across Sub-Saharan Africa highlight the need for a review process that is more transparent, inclusive, participatory and with structured follow-up.

We urge States Parties to adopt review documents for the IRM next phase that reflect its new scope, systematically revisit recommendations from previous review cycles, and cover progress in implementing those recommendations, their practical impact, remaining implementation challenges, the impact of technical assistance (TA) received and priority sectors requiring it, and other developments in UNCAC implementation since completing earlier reviews.

Importantly, reviews should complement and reinforce findings and developments under the African Union Convention on Preventing and Combating Corruption and other relevant sub-regional mechanisms, including SADC and ECOWAS frameworks.

Furthermore, we urge States Parties to strengthen:[24]

1. **Stakeholder participation,** by:
    a. **Ensuring early engagement,** including access to review information and opportunities to provide written and oral input.
    b. **Preparing the self-assessment checklist through broad consultations and ensuring dedicated meetings** between peer reviewers and civil society in a safe setting.
    c. **Considering information provided by non-governmental stakeholders** for the reviews and annexing it in the report.[25]
    d. **Developing national follow-up plans** to implement recommendations and

[21] UNODC, "Regional Anti-Corruption Platform for Eastern Africa," https://www.unodc.org/corruption/en/uncac/ac-hubs-and-platforms/eastern-africa-platform.html; "Regional Anti-Corruption Platform for Southern Africa," https://www.unodc.org/corruption/en/uncac/ac-hubs-and-platforms/southern-africa-platform.html; "Fast-tracking the implementation of UNCAC in West and Sahel Africa," 23 November 2022, https://www.unodc.org/unodc/frontpage/2022/November/fast-tracking-the-implementation-of-uncac-in-west-and-sahel-africa.html.

[22] UNODC, "Regional Anti-Corruption Platform for Southern Africa" (as above), on the road map adopted at the Luanda conference of June 2023 and its integration into the SADC Strategic Anti-Corruption Plan 2023–2027.

[23] UNODC, "Resolution 11/2", https://www.unodc.org/corruption/en/cosp/conference/session11-resolutions.html#Res.11-2.

[24] **Please also consult our Open Letter on Enhancing anti-corruption efforts globally by adopting a stronger UNCAC implementation review mechanism, which outlines steps States Parties can take in the lead-up of the next IRM phase: https://uncaccoalition.org/wp-content/uploads/2026/10/Final---Open-Letter-on-Enhancing-anti-corruption-efforts-globally-by-adopting-a-stronger-UNCAC-implementation-review-mechanism_CoSP-Special-Session_as-of-16-October-2026.pdf.**

[25] In line with resolution 11/2, operative paragraph (OP) 12.

involving other stakeholders in designing and delivering TA.

2. **Transparency, by:**

    a. **Proactively publishing key review documents**, including the focal point names, review schedule, self-assessment checklist and full country report.

    b. **Providing regular updates on review progress.**

    c. **Publishing the list of stakeholders engaged** in the review and how they were engaged.[26]

    d. **Publicly communicating review outcomes** through joint UNODC-State Party announcements when review documents are published.

    e. **Publishing updates on implementing review recommendations ahead of CoSP sessions.**

[26] In line with resolution 11/2, operative paragraph (OP) 12. The names of the non-governmental stakeholders involved should only be included if they consent to this inclusion. In some contexts, this may not be desirable due to security or retaliation concerns.