

Submission of Comments on the Draft Practical Guide to Operationalize the UNODC Statistical Framework to Measure Corruption

By the Gender, Inclusion and Corruption Working Group of the Global Civil Society Coalition
for the UNCAC

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1. General Comments

The draft Practical Guide to Operationalize the UNODC Statistical Framework to Measure Corruption represents a comprehensive and technically rigorous effort to support countries in developing standardized, policy-relevant corruption statistics. Its emphasis on institutional coordination, methodological soundness, and alignment with international statistical standards is highly commendable.

The Guide is particularly strong in its phased, flexible, and non-prescriptive approach, allowing countries to progressively build statistical capacity and leverage existing data ecosystems. Its grounding in real-world pilot implementations further enhances its practical value and credibility.

However, the current draft does not sufficiently integrate gender equality, intersectionality, and inclusion considerations across its framework, indicators, and implementation guidance. Corruption is not experienced uniformly; gender norms, power asymmetries, and structural inequalities shape both exposure to and reporting of corruption. As such, the absence of a systematic gender and inclusion lens risks limiting the accuracy, inclusiveness, and policy relevance of the resulting data.

In addition, the Guide does not adequately capture non-monetary forms of corruption, particularly sexual corruption (sextortion), where sexual acts function as currency. In line with UNCAC Resolution 10/10, which recognizes sexual corruption as a specific form of corruption, this represents a critical gap. Addressing this omission is essential for ensuring that corruption measurement reflects lived realities, particularly in sectors such as education, healthcare, and law enforcement.

2. Recommended Additions and Refinements

2.1 Add Dedicated Section: Measuring Sexual Corruption and “Body Currency”

The Guide should include a dedicated operational section addressing sexual corruption as a form of bribery.

Proposed content:

- Conceptualization of sex as a form of “currency” in corrupt exchanges
- Legal-statistical guidance aligned with a “Do No Harm” approach, ensuring victims are not classified as offenders
- Reference to emerging legal practices (e.g., Tanzania) that distinguish coercion from complicity
- Ethical safeguards for data collection

Methodological guidance should include:

- Use of list experiments and randomized response techniques to capture stigmatized experiences
- Protocols for safe disclosure and confidentiality

2.2 Add Section: Victim-Centered and Proxy Reporting Protocols

The Guide should address barriers to reporting faced by women and marginalized populations.

Proposed content:

- Integration of proxy reporting mechanisms (e.g., legal intermediaries reporting on behalf of victims)
- Case examples such as the Republic of Korea model
- Indicators to measure the effectiveness of secure and anonymous reporting channels

This would strengthen measurement under the enabling environment dimension and improve visibility of underreported corruption.

2.3 Integrate Gender and Intersectionality Framework

The Guide currently lacks definitions and operational guidance on gender and inclusion.

Recommendation: Introduce a subsection that includes:

- Definitions (gender, intersectionality, vulnerable groups)
- Explanation of how power relations shape corruption risk
- Practical implications for all stages of data production

2.4 Strengthen Gender-Sensitive Indicators and Analysis

While the Framework includes a wide range of indicators, it does not require:

- Sex-disaggregated data
- Measurement of gender-specific corruption risks
- Analysis inclusion of intersectionality

Recommendations:

- Establish sex-disaggregation as a minimum standard
- Introduce indicators capturing:
 - Gender differences in exposure to bribery
 - Reporting behaviors and barriers
 - Access to public services
 - Sexual corruption (sextortion)
- Provide guidance on cross-tabulation analysis by other gender and sex related factors such as ethnicity

2.5 Expand Appendix 3 (Checklist Assessment)

It is recommended to integrate gender and sexual corruption into:

- (a) Criminal offences → include sexual corruption as a corruption risk
- (b) Preventive measures → include safeguards against abuse of authority
- (c) Enabling environment → include:
 - Safe reporting channels
 - Survivor protection mechanisms
 - Recognition of sextortion in complaint systems

2.6 Address Gendered Barriers in Data Collection

The Guide does not sufficiently address how inequality affects data reliability.

Recommendations:

- Include gender-sensitive data collection guidance:
 - Confidential and safe survey environments
 - Strategies to address underreporting
 - Adaptations for literacy, access, and digital divides
- Incorporate trauma-informed data collection approaches

The Guide should explicitly recommend methods to capture hidden corruption.

Recommendation:

- Include guidance and templates for list experiments, randomized response techniques, and other research-backed methods

3. Cross-Cutting Recommendation

Gender and inclusion considerations should be systematically integrated across all steps of:

- 1) Coordination: Include gender ministries and women-led organizations.
- 2) Data Collection: Apply gender-sensitive and trauma-informed methods.
- 3) Validation: Identify bias and exclusion in datasets.
- 4) Analysis: Conduct disaggregated and equity-focused analysis.
- 5) Dissemination: Ensure accessibility and inclusivity of outputs.
- 6) Monitoring: Track inclusive measurement practices.

4. Conclusion

The Practical Guide provides a strong technical foundation for advancing corruption measurement globally. Integrating gender equality, intersectionality, and recognition of non-monetary forms of corruption will significantly enhance its relevance, accuracy, and transformative potential. A more inclusive approach will enable countries to better understand differentiated experiences of corruption, design more effective policy responses, and ensure alignment with broader commitments to equity and sustainable development.