

Anti-Corruption Priorities in the SWANA Region

Global Civil Society Coalition for the UNCAC¹
Regional Written Submission to CoSP11

21 November 2025

This submission is presented by civil society organizations from the Southwest Asia and North Africa region (SWANA) of the Global Civil Society Coalition for the UNCAC, ahead of the 11th Conference of the States Parties (CoSP) to the United Nations Convention against Corruption (UNCAC). It sets out regional priorities, integration of civil society in policy design and oversight, and recommendations to States Parties, drawing on UNCAC obligations and CoSP10 outcomes, as well as widely used international standards and evidence.

Regional context ahead of CoSP11: corruption risks and governance gaps

The anti-corruption environment in the SWANA region faces a serious sustainability crisis for CSOs and a shrinking civic space.² Limited democratic governance and restricted public participation have constrained accountability and transparency efforts. Anti-corruption groups struggle as aid programmes are suspended and funding sharply reduced.³ These are compounded by increasing political, legal, and administrative restrictions that limit civil society activities, including through laws removing CSOs' ability to file public interest cases and prosecutions that have forced organizations to suspend operations.¹ Across the region, human rights defenders and journalists are frequently subject to harassment, prosecution, and detention.⁴

Such operational challenges obstruct CSOs' ability to address deep governance gaps, including weak enforcement mechanisms and limited transparency.⁵ Corruption risks remain high in critical areas such as humanitarian assistance, the mining sector, and future reconstruction initiatives.¹ In response, CSOs have focused on improving access to information, providing targeted capacity

¹ Has been known as the UNCAC Coalition.

² UNCAC Coalition. "1st SWANA Regional Meeting in 2025: Civil Society Faces Mounting Challenges Amid Global Aid Cuts and Shifting Anti-Corruption Priorities", 2025. <https://uncaccoalition.org/1st-swana-regional-meeting-in-2025-civil-society-faces-mounting-challenges-amid-global-aid-cuts-and-shifting-anti-corruption-priorities/>.

³ UNCAC Coalition. "Building Financial Resilience: Insights from the Second SWANA Regional Meeting in 2025", 2025. <https://uncaccoalition.org/building-financial-resilience-insights-from-the-second-swana-regional-meeting-in-2025/>.

⁴ CIVICUS Monitor. "Middle East and North Africa". Accessed 20 October 2025. https://monitor.civicus.org/globalfindings_2024/middleeastandnorthafrica/.

⁵ UNCAC Coalition. "SWANA Civil Society Unites Ahead of CoSP11 to Advance Anti-Corruption Agenda", 2025. <https://uncaccoalition.org/swana-civil-society-unites-ahead-of-cosp11-to-advance-anti-corruption-agenda/>.

building on financial management and strategic advocacy, and expanding regional networks to enhance resilience and joint advocacy.² In parallel, some countries are introducing structured information classification and governance systems, illustrating how procedural and technological improvements enhance transparency and compliance. Efforts to institutionalize government–civil society dialogue through open government frameworks, such as the Open Government Partnership, provide structured, inclusive entry points to counter shrinking civic space. Coordinated partnerships that align national CSO initiatives further strengthen collective advocacy and regional anti-corruption impacts.

CSOs are also advocating for stronger anti-money laundering frameworks, greater parliamentary oversight of natural resource management, and a few states have signed the UNCAC Transparency Pledge,⁶ committing to engage civil society in the review process.⁹

Regional anti-corruption priorities

1. Access to information and open government

Resolutions 10/1 and 10/3 call on States to ensure effective public access to information.⁷ In SWANA, although some states have adopted Access to Information (ATI) laws, implementation remains uneven due to weak independent oversight, limited appeal mechanisms, and insufficient safeguards for necessity, proportionality, and public interest disclosure.⁸

States should adopt and implement comprehensive ATI laws that guarantee full disclosure, strengthen independent oversight, integrate necessity and proportionality safeguards, and provide robust appeal mechanisms. High-value datasets, including budgets, spending, contracts, lobbying, political finance, and asset disclosure, should be published proactively in open, machine-readable formats to enable public monitoring, analysis, and participation in governance processes, in line with UNCAC articles 10 and 13.

2. Open, fair, and accountable public procurement

Public procurement accounts for a large share of public spending in SWANA⁹ and is consistently flagged by civil society as a major anti-corruption concern. Transparency remains limited,

⁶ UNCAC Coalition. “Transparency Pledge”, <https://uncaccoalition.org/uncac-review/transparency-pledge/>

⁷ UNODC. “Conference of the States Parties to the United Nations Convention against Corruption, Resolutions 10/1 and 10/3”. Accessed 21 October 2025.

<https://www.unodc.org/unodc/en/corruption/COSP/session10-resolutions.html>

<https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-3>.

⁸ ARTICLE 19. “Right to Know Day: Progress on Access to Information in the MENA Region Despite Challenges”, 2024. <https://www.article19.org/resources/right-to-know-day-progress-on-access-to-information-in-the-mena-region-despite-challenges/>.

⁹ World Bank. “Driving Sustainability: World Bank’s Green Public Procurement Roadmap for MENA”, 2024. <https://thedocs.worldbank.org/en/doc/6b3c0248bc9617882434d7eb9a573031-0350012024/related/Session-8-JOCELYNE-JABBOUR.pdf>.

particularly regarding access to procurement information.¹⁰ State-Owned Enterprises, as major procurers, often operate outside clear public procurement rules, creating additional corruption risks.¹¹

SWANA countries should:

- Standardize procurement procedures and publish end-to-end procurement information regarding the planning, tender, award, contract, and implementation, in line with UNCAC Articles 9 and 10 and Resolutions 10/6 and 10/9.
- Adopt the Open Contracting Data Standard and its infrastructure extension to enable full transparency and monitoring of major projects.^{12 13}
- Strengthen oversight within procurement authorities to monitor irregularities, ensure proper implementation, and improve redress mechanisms.

3. Beneficial ownership transparency

States should establish centralized, structured, and interoperable registers capturing sufficient detail on ultimate owners, with risk-based public access and robust verification. Beneficial ownership and procurement datasets should be linked to detect conflicts of interest and illicit activities.¹⁴

4. Protection of reporting persons

States should adopt and enforce comprehensive whistleblower protection frameworks aligned with UNCAC Article 33 and Resolution 10/8.¹⁵ This includes secure and anonymized reporting channels, guaranteed confidentiality, protection from retaliation, and meaningful follow-up by independent oversight bodies. Protection should cover both public and private sectors and enable public interest disclosures. Strengthening regional coordination and sharing experiences can address the gaps caused by fragmented national systems and improve cross-border reporting and

¹⁰ UNCAC Coalition. “SWANA Civil Society Unites Ahead of CoSP11 to Advance Anti-Corruption Agenda”, 2025. <https://uncaccoalition.org/swana-civil-society-unites-ahead-of-cosp11-to-advance-anti-corruption-agenda/>.

¹¹ World Bank. “MENA: Procurement Activities of State-Owned Enterprises Need to Be More Transparent”, 2023. <https://blogs.worldbank.org/en/arabvoices/mena-procurement-activities-state-owned-enterprises-need-be-more-transparent>.

¹² Open Contracting Partnership. “Open Contracting Data Standard”. Accessed 20 October 2025. <https://standard.open-contracting.org>.

¹³ Open Contracting Partnership. “Open Contracting for Infrastructure Data Standard”. Accessed 20 October 2025. <https://standard.open-contracting.org/infrastructure/latest/en/>.

¹⁴ Open Ownership. “Open Ownership Map: Worldwide Action on Beneficial Ownership Transparency”. Accessed 23 October 2025. <https://www.openownership.org/en/map/>.

¹⁵ UNODC. “10th Session of the Conference of the States Parties to the UNCAC - resolution 10/8 — Protection of reporting persons”. Accessed 20 October 2025. <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-8>.

oversight. Discussions at the Second Arab Forum in Iraq highlighted the importance of reinforcing regional collaboration to enhance whistleblower protection.¹⁶

5. Transparent and accountable political finance

SWANA countries should implement real-time or near-real-time digital disclosure and openly publish all donations, loans, spending, and advertising archives for candidates and political parties. States should limit cash and anonymous contributions, conduct donor due diligence, close third-party spending loopholes, and empower independent oversight bodies with clear mandates and sanctioning powers. These measures operationalize UNCAC Article 7(3) and advance transparency and accountability in political financing.¹⁷

Youth and civic groups should participate in monitoring campaign finances, using digital tools and public dashboards to track contributions, expenditures, and campaigning. This engagement can expose irregularities, strengthen accountability, and increase public awareness of political funding and structures.

6. Integrity in state-owned enterprises and public bodies

States should align SOE governance with the 2024 OECD Guidelines,¹⁸ emphasizing clear separation of ownership and regulation, independent professional boards, transparent reporting and disclosure, high integrity and compliance standards, and protection of small investors.

7. Transparent asset recovery and social reuse

SWANA countries should strengthen legal and operational frameworks for early asset tracking and freezing, implement non-conviction-based confiscation with due process safeguards, enhance international cooperation, and ensure transparent management and socially beneficial reuse of confiscated assets.^{19 20}

8. Climate finance and natural resources integrity

¹⁶ Arab Organization for Enhancing Transparency and Good Governance. “The Second Arab Forum for Enhancing Transparency and Good Governance: Concluding Recommendations”. Baghdad, Republic of Iraq, 10-12 September 2024.

https://www.arabintegrity2024.org/files/ugd/df6c23_ba8cd27cb4db41feb2d5866f4581e65d.pdf.

¹⁷ Transparency International. “Transparency of the Funding of Candidates and Political Parties”, 2023 <https://www.transparency.org/en/publications/transparency-of-funding-candidates-and-political-parties/>.

¹⁸ OECD. “OECD Guidelines on Corporate Governance of State-Owned Enterprises 2024”, 2024. <https://doi.org/10.1787/18a24f43-en>.

¹⁹ Open Contracting Partnership & CoST – Infrastructure Transparency Initiative. “Open Contracting for Infrastructure Data Standard (OC4IDS)”. Accessed 20 October 2025. <https://standard.open-contracting.org/infrastructure/latest/en/>.

²⁰ StAR Initiative & The World Bank. “Asset Recovery Watch Database”. Accessed 23 October 2025. <https://star.worldbank.org/asset-recovery-watch-database>.

States should integrate robust anti-corruption controls into climate, energy transition, and environmental programs, in line with UNCAC Articles 5, 9, and 12 on preventive measures, transparent public procurement, and private sector accountability. States should ensure transparency in the selection and management of climate and infrastructure projects, require public beneficial ownership disclosure for licensees and contractors, and facilitate independent and community-based monitoring of implementation.^{21,22} States should also strengthen multi-level oversight of climate finance through regional platforms, engage civil society and youth in monitoring, publish regular financial and social impact reports, and establish integrity indicators to track accountability.

9. Digitalization with algorithmic accountability

States should adopt safeguards for Artificial Intelligence (AI) and automated decision-making in the public sector, including transparent registers of public algorithms, impact assessments, algorithmic explainability, and redress mechanisms aligned with international AI principles. States should also promote AI and regional digital platforms for early detection of corruption risks in public programs, including climate finance, while ensuring these tools do not expose activists and civil society actors to undue surveillance or legal risk, thereby protecting civic space and trust.

10. Integration of civil society and the public

States should actively institutionalize mechanisms for co-creation with civil society in national anti-corruption strategies and sector reforms, including standing, multistakeholder forums, participation in procurement and infrastructure oversight, co-creation of open data, and protection of civic space. Mechanisms should include youth-led and women-led organizations to strengthen diversity and sustained public engagement. Civil society must have access to information, the ability to submit amicus and parallel inputs, and meaningfully participate in parliamentary hearings and regulatory consultations.

Participation and transparency in the UNCAC Implementation Review Mechanism (IRM) should be standardized, including the timely publication of full country reports and self-assessments, open consultations, and solicitation of civil society submissions as part of the country review,²³ as highlighted in the joint statement issued on 22 August 2025 by UN Special Procedures. The statement urges UNCAC States Parties to safeguard civic space, ensure meaningful civil society participation at the national level and in the IRM, publish full review documents and maintain a

²¹ UNCAC Coalition. “3rd MENA Regional Meeting 2024: Combatting Environmental Corruption”, 2024. <https://uncaccoalition.org/3rd-mena-regional-meeting-combating-environmental-corruption/>.

²² UNODC. “The Corruption Climate: How Corruption Stands in the Way of the Response to Climate Change”, 2024. <https://www.unodc.org/unodc/frontpage/2024/June/the-corruption-climate-how-corruption-stands-in-the-way-of-the-response-to-climate-change.html>.

²³ UNCAC Coalition. “Key Recommendations to make the IRM more effective in strengthening UNCAC implementation”, 2025. <https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Recommendations-for-the-IRM-next-phase.pdf>.

public calendar of reviews.²⁴ It also calls for granting NGOs observer status across UNCAC bodies and for an inclusive follow-up process that tracks implementation of recommendations.

Calls to comply with prior commitments

States Parties are strongly encouraged to implement and report on commitments adopted at CoSP10 on beneficial ownership transparency, whistleblower protection, and public procurement transparency, as well as in the UNGASS 2021 Political Declaration.²⁵ National reforms should formally recognize that promoting and protecting human rights and combating corruption are mutually reinforcing,²⁶ align directly with UNCAC obligations, and incorporate time-bound action plans and measurable indicators.²⁷

Stronger, more transparent, and inclusive next phase of the UNCAC IRM

We call for the next phase of the UNCAC Implementation Review Mechanism to ensure default publication of full country reports and self-assessments, defined review timelines, standardized civil society participation, a public registry of follow-up actions, and targeted technical assistance.²⁸ To strengthen coordination, States Parties should designate focal points for civil society engagement in the IRM, building on emerging regional good practices.

These measures are consistent with UNCAC Articles 10 and 13 on public reporting and participation, other international peer review mechanisms, and UNGASS 2021 commitments, strengthening the credibility, timeliness, and policy relevance of reviews.²⁹

²⁴ OHCHR, “Statement by UN Special Procedures on UNCAC Conference of the States Parties”, 2025. <https://www.ohchr.org/sites/default/files/statements/20250822-stm-uncac-cop-sr-assembly.pdf>.

²⁵ UNGA. “Political Declaration of the Special Session of the General Assembly against Corruption”, 2–4 June 2021. Accessed 21 October 2025. <https://ungass2021.unodc.org/ungass2021/en/political-declaration.html>.

²⁶ Recalling Human Rights Council resolution A/HRC/RES/59/6 from July 2025, entitled *The negative impact of corruption on the enjoyment of human rights*, in which the Council recognized that the promotion and protection of human rights and the prevention of and fight against corruption are mutually reinforcing, and that improvements in the promotion and protection of human rights at the domestic level have a central role to play in the prevention of and fight against corruption at all levels.

²⁷ UNODC. “Conference of the States Parties to the United Nations Convention against Corruption, Resolutions 10/6, 10/8, and 10/9”. Accessed 21 October 2025. <https://www.unodc.org/unodc/en/corruption/COSP/session10-resolutions.html>.

²⁸ UNCAC Coalition. “Key Recommendations to make the IRM more effective in strengthening UNCAC implementation”, 2025. <https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Recommendations-for-the-IRM-next-phase.pdf>.

²⁹ UNODC. “Technical Guide to the United Nations Convention against Corruption”, 2009. https://www.unodc.org/documents/treaties/UNCAC/Publications/TechnicalGuide/09-84395_Ebook.pdf.