

Anti-Corruption Priorities in Sub-Saharan Africa

Global Civil Society Coalition for the UNCAC¹
Regional Submission to CoSP11

7 November 2025

1. The 11th Session of the Conference of the States Parties to the UNCAC (CoSP11) is a critical forum for reviewing how States are meeting their obligations under the Convention and for setting priorities that respond to today's challenges. For Sub-Saharan Africa, where corruption continues to weaken public institutions, deny access to services, and undermine trust in governance, CoSP11 is an opportunity to demand concrete action, accountability and sustained reform.
2. This written statement is the outcome of a consultative process among civil society organisations across Sub-Saharan Africa under the Coalition.² It reflects shared priorities and concerns gathered through regional dialogues and continuous engagement among members.
3. The submission aims to:
 - Review the region's progress and challenges since CoSP10;
 - Highlight emerging issues, especially shrinking civic space and human rights erosion;
 - Recommend measures to strengthen inclusive and effective UNCAC implementation in Sub-Saharan Africa.

Progress since CoSP10

4. Since CoSP10, Sub-Saharan Africa has made some progress in addressing corruption, though challenges remain significant across the region. Key areas of focus identified include

¹ Has been known as the UNCAC Coalition.

² Special thanks goes to the following civil society organizations within our network: Zimbabwe Women Against Corruption Trust, Anti Corruption Coalition Uganda, ARTICLE 19, Open Ownership, CIVICUS: World Alliance for Citizen Participation, Accountability Lab Liberia, Ghana Integrity Initiative, Africa Freedom of Information Centre (AFIC), CiFAR - Civil Forum for Asset Recovery, Mzalendo Trust, Pan-African Lawyers Union, Pay No Bribe Animators (PaNBA) Sierra Leone, Transparency International Kenya, Alliance for Accountability Accountability Advocated Zambia (AAAZ), Amalna South Sudan, Public -Private Integrity, Infrastructure Transparency Initiative Ethiopia (CoST Ethiopia), Zambia Council for Social Development (ZCSD), Pan-African Lawyers' Union, Ghana Anti-Corruption Coalition, West African Youth Network, Kenya Human Rights Commission, Africa Network for Environment and Economic Justice(ANEEJ), Center for Fiscal Transparency and Public Integrity, Civil Society Legislative Advocacy Centre (CISLAC)/ TI-Nigeria, Public-Private Integrity (PPI), Somali Journalists Syndicate (SJS), Rwenzori Anti-Corruption Coalition, Transparency International Uganda, Zimbabwe Coalition on Debt and Development, Transparency International Rwanda.

strengthening access to information, advancing whistleblower protections, increasing transparency in beneficial ownership, compensating victims of corruption and asset recovery.³

5. Since then, few countries have passed or amended access to information and whistleblower protection laws, whilst beneficial ownership registers are beginning to take shape in some jurisdictions. Regional institutions, including the African Union Advisory Board Against Corruption, have provided platforms for peer review and exchange of good practice.⁴ Civil society advocacy has yielded incremental gains in areas such as procurement oversight and open budgeting, contributing to greater transparency in how public resources are managed.
6. Despite these advances, implementation remains uneven and fragile. Legal reforms are not matched with adequate resourcing, enforcement, or institutional independence. Anti-corruption agencies continue to face political interference, limiting their ability to investigate and sanction high-level corruption effectively. Access to information is often hindered by restrictive regulations, slow administrative procedures, or a lack of awareness among citizens. Beneficial ownership registers, where they exist, are frequently incomplete or inaccessible to the public, and underutilised.

Regional context: Shrinking civic space and human rights regression

7. The most significant cross-cutting challenge in the region is the shrinking of civic space and regression of human rights in the fight against corruption.⁵ When civil society cannot speak freely, access information, or report wrongdoing without fear of retaliation, the implementation of UNCAC obligations becomes ineffective.
8. Restricted civic space weakens investigative journalism, procurement oversight, and political finance transparency, while also leaving gendered forms of corruption largely unchallenged. Marginalised groups are disproportionately affected, facing harassment, sexual corruption, and exclusion from decision-making, which further undermines their ability to participate in public life.
9. Corruption erodes the enjoyment of human rights by diverting public resources away from essential services such as health, education, and social protection. It erases the principle of “leave no one behind,” as African people are outpaced in achieving the SDGs.
10. Recognising this, the UN Human Rights Council recently adopted Resolution A/HRC/59/L.6 on the negative impact of corruption on human rights,⁶ while CoSP Resolution 10/3 called on

³ Anti-Corruption Priorities in Sub-Saharan Africa, UNCAC Coalition Regional Submission to CoSP10. Available at: <https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-CoSP-10-Submission-Regional-Submission-for-Sub-Saharan-Africa.pdf>.

⁴ African Union Advisory Board Against Corruption: AUABC hosts 2024 African Anti-Corruption Dialogue in Arusha to tackle whistleblower protection mechanisms. Available at: <https://anticorruption.au.int/en/news/press-releases/2024-11-04/auabc-hosts-2024-african-anti-corruption-dialogue-arusha-tackle>.

⁵ CIVICUS. (n.d.). CIVICUS Monitor: Tracking civic space globally. Available at: <https://monitor.civicus.org/>.

⁶ 59th regular session of the Human Rights Council: Resolution A/HRC/59/L.6. "The negative impact of corruption on the enjoyment of human rights,". Available at: <https://docs.un.org/A/HRC/RES/59/6>.

States to integrate human rights safeguards into anti-corruption frameworks.⁷ Similarly, regional frameworks like the African Charter on Human and Peoples' Rights (ACHPR),⁸ and the African Union Convention on Preventing and Combating Corruption (AUCPCC),⁹ further highlight the importance of civic participation and accountability for effective anti-corruption.

11. Without an enabling environment where civic actors can participate, monitor, and hold governments accountable, commitments made at CoSP risk remaining paper promises.

Executive recommendations

- Commit to and implement legal reforms that guarantee freedoms of expression, association, and assembly; establish independent mechanisms to prevent and remedy reprisals against civic actors; and institutionalise meaningful civil society participation in UNCAC implementation and follow-up through consultation, data-sharing, and parallel reporting.

Priority themes and recommendations

Protection of Whistleblowers

12. Whistleblowers are crucial to uncovering corruption, yet they operate in environments where speaking out is often dangerous. Civil servants, journalists, and activists frequently face dismissal, legal prosecution, social stigma, or security threats when exposing wrongdoing. This directly undermines whistleblower protection: when individuals cannot speak freely, institutions cannot detect or respond to corruption.¹⁰
13. Regional frameworks such as the AUCPCC and the ACHPR reinforce the protection of whistleblowers, while CoSP Resolution 10/8 explicitly calls on States to adopt effective measures to protect whistleblowers.¹¹ UN Special Rapporteurs have consistently highlighted the necessity of confidential reporting channels, legal safeguards, and remedial measures.¹² Despite these instruments, Sub-Saharan Africa continues to experience uneven implementation, limited institutional capacity, and insufficient enforcement.

⁷ 10th Session of the Conference of the States Parties to the United Nations Convention against Corruption. Resolution 10/3 — Follow-up to the Marrakech declaration on the prevention of corruption. Available at: <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-3>.

⁸ African Charter on Human and Peoples' Rights (ACHPR). Available at: <https://au.int/en/treaties/african-charter-human-and-peoples-rights>.

⁹ The African Union Convention on Preventing and Combating Corruption (AUCPCC). Available at: https://au.int/sites/default/files/treaties/36382-treaty-0028_-_african_union_convention_on_preventing_and_combating_corruption_e.pdf.

¹⁰ UNCAC Coalition, Silencing the brave: Why Africa must urgently protect its whistleblowers. Available at: <https://uncaccoalition.org/silencing-the-brave-why-africa-must-urgently-protect-its-whistleblowers/>.

¹¹ Conference of the States Parties: 10th session (CoSP10). Resolution 10/8 — Protection of reporting persons. Available at: <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-8>.

¹² United Nations Human Rights Office. (2015). Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression. Available at: <https://www.ohchr.org/en/documents/thematic-reports/ahrc3522-report-special-rapporteur-promotion-and-protection-right>.

Recommendations:

- a. Adopt and enforce comprehensive whistleblower protection laws in line with UNCAC Article 33 and AU best practices, ensuring protection from retaliation, clear reporting channels, and remedies for victims.
- b. Integrate whistleblower mechanisms into anti-corruption institutions and national strategies, with adequate funding and public awareness campaigns.

Political Finance Transparency

14. UNCAC Articles 7 and 8 urge States Parties to adopt measures that prevent corruption in public institutions, including electoral processes, while SDG 16.6 and 16.7 emphasise accountable institutions and inclusive decision-making. In Sub-Saharan Africa, weak enforcement of campaign finance regulations, undisclosed donations, and the influence of illicit funds undermine the fairness of elections and compromise the legitimacy of governance.¹³
15. Since 2024, the African region has had over 25 national elections, which remain vulnerable to corruption due to opaque political financing and weak regulatory frameworks. Civil society actors in the region have documented these gaps, advocating for robust regulation, monitoring, and public disclosure to prevent undue influence and ensure that elected officials are accountable to citizens.¹⁴
16. Regional frameworks, including the African Charter on Democracy, Elections and Governance (ACDEG),¹⁵ and the AComHPR Guidelines on Access to Information and Elections,¹⁶ provide clear standards to enhance transparency, promote inclusive participation. Similarly, the 2021 UNGASS Political Declaration emphasised the need to protect electoral integrity and reinforce trust in public institutions.¹⁷

Recommendations:

- c. Establish or strengthen regulatory frameworks requiring disclosure of political party and campaign financing, ensuring compliance with UNCAC Articles 7 and 8.

¹³ Governments perform 50 per cent worse in controlling corruption where political finance is not adequately enforced. Transparency International (2020). Building Political Integrity to Stamp out Corruption. Available at: <https://www.transparency.org/en/news/building-political-integrity-to-stamp-out-corruption-three-steps-to-cleaner-politics>.

¹⁴ UNCAC Coalition. (2024). Discussions on Money, Power, and Corruption: How Campaign Financing Undermines Electoral Integrity in Africa. Available at: <https://uncaccoalition.org/money-power-and-corruption-how-campaign-financing-undermines-electoral-integrity-in-africa/>.

¹⁵ The African Charter on Democracy, Elections and Governance (ACDEG). Available at: <https://au.int/en/treaties/african-charter-democracy-elections-and-governance>.

¹⁶ African Commission on Human and Peoples' Rights (ACHPR) Guidelines on Access to Information and Elections. Available at: <https://achpr.au.int/en/node/894>.

¹⁷ United Nations General Assembly (2021). Resolution adopted by the General Assembly, S-32/1. Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation. Available at: <https://ungass2021.unodc.org/ungass2021/en/political-declaration.html>.

- d. Adopt independent oversight mechanisms with powers to audit, investigate, and sanction violations, ensuring transparency and preventing state capture.

Public Procurement Transparency

17. Public procurement in Sub-Saharan Africa represents a significant portion of government spending, yet processes are often opaque, enforcement is weak, and citizen oversight is limited. UNCAC Articles 9 and 10 call on States Parties to ensure procurement systems are transparent, competitive, and based on clear, objective criteria. SDG 16.5 underscores the need to reduce corruption in public institutions, while several CoSP resolutions stress the importance of proactive disclosure and accountability.¹⁸
18. Regionally, the AU encourages competitive, fair, and efficient procurement practices, emphasising integrity and value for public resources. The AUCPCC and the Common African Position on Asset Recovery (CAPAR)¹⁹ further stress that transparent procurement is essential both to prevent misappropriation of funds and to support effective asset recovery. AComHPR guidance on access to information also reinforces citizens' right to monitor procurement processes. Despite these frameworks, the region continues to face challenges, especially insufficient institutional capacity, political interference, low adoption of digital procurement platforms, and limited civil society participation.

Recommendations:

- e. Adopt digital solutions for secure, traceable procurement, support efficient and fair decision-making, and ensure open access to beneficial ownership data, in line with UNCAC Article 9, to enhance transparency and curb corruption risks.
- f. Adopt citizen-monitoring frameworks for public contracts, enabling CSOs and journalists to oversee procurement processes.

Gender, Inclusion and Anti-Corruption

19. Corruption disproportionately affects women, who often face gender-based violence, sexual corruption, and exclusion from decision-making. Despite the adoption of frameworks like the Maputo Protocol²⁰ and the African Charter, gender considerations remain largely absent in national anti-corruption laws and policies.

¹⁸ 10th Session of the Conference of the States Parties to the United Nations Convention against Corruption. Resolution 10/1 — Atlanta 2023: promoting integrity, accountability and transparency in the fight against corruption. Available at: <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-1>.

¹⁹ Common African Position on Asset Recovery (CAPAR). Available at: <https://au.int/sites/default/files/documents/42297-doc-COMMON-AFRICAN-POSITION-ON-ASSET-RECOVERY-ENGLISH-NEWLY-PROOFREAD-1.pdf>.

²⁰ Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol). Available at: <https://au.int/en/treaties/protocol-african-charter-human-and-peoples-rights-rights-women-africa>.

20. Resolution 10/10 urges States to collect disaggregated data on the impact of corruption on women and girls and to address sexual corruption effectively.²¹ Regionally, the AU adopted the Convention on Ending Violence Against Women and Girls (AU CEVAWG) in February 2025.²² This comprehensive legal instrument aimed at eradicating all forms of violence against women and girls across the continent.

Recommendations:

- g. Integrate gender-responsive measures into anti-corruption frameworks, aligning with UNCAC Resolution 10/10, the Maputo Protocol and the AU CEVAWG.
- h. Collect and analyse disaggregated data on the impact of corruption on women and girls, implement legislative provisions to address sexual corruption, and eradicate all forms of violence against women and girls.

Strengthening the UNCAC Implementation Review Mechanism (IRM)

21. The IRM remains the most important tool for monitoring how States implement the UNCAC. Yet, reviews remain inconsistent, delayed, and often inaccessible, with few opportunities for civil society to contribute meaningfully.²³ Many countries have not published full reports, limiting transparency and preventing citizens from evaluating progress.

Recommendations:

- i. Guarantee transparency and inclusiveness in the IRM by committing to proactively publishing full country review reports, the self-assessment checklists and follow-up actions.
- j. Establish national multi-stakeholder follow-up mechanisms to track implementation of IRM recommendations, with civil society as equal partners. More recommendations from civil society globally in this Open Letter.²⁴

²¹ 10th Session of the Conference of the States Parties to the United Nations Convention against Corruption. Resolution 10/10 — Addressing the societal impacts of corruption. Available at: <https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-10>.

²² African Union Convention on Ending Violence Against Women and Girls (AU CEVAWG) adopted in February 2025. Available at: <https://au.int/en/aucevwag>.

²³ UNCAC Coalition, Regional Meeting on enhancing transparency and civil society engagement in the UNCAC review process s. Available at: <https://uncaccoalition.org/11th-regional-meeting-for-sub-saharan-africa-enhancing-transparency-and-civil-society-engagement-in-the-uncac-review-process/>.

²⁴ Open Letter: Enhancing Anti-corruption Efforts Globally by Adopting a More Effective, Transparent and Inclusive UNCAC Review Mechanism. Available at: https://uncaccoalition.org/open_letter_irm/.