

Key Recommendations for a User-friendly, Comprehensive Self-Assessment Checklist for the IRM's Second Phase

Global Civil Society Coalition for the UNCAC¹ Submission to the
17th UNCAC Implementation Review Group meeting

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The Global Civil Society Coalition for the UNCAC has developed comments and suggestions for the draft question flow of the self-assessment checklist² (SACL) for the Implementation Review Mechanism's (IRM) 2nd phase, to inform States Parties' deliberations at the upcoming Implementation Review Group's 17th Session. The SACL is critically important for promoting the collection of relevant, comprehensive, and up-to-date information in a user-friendly manner for country reviews, as outlined in Resolution 11/2.³ The SACL should reflect the resolution's elements on civil society participation and transparency, as well as other technical provisions, to increase the effectiveness of the country reviews and to ensure the process is clear and efficient for government officials and other stakeholders involved in country reviews.⁴

To achieve these aims, the following concrete recommendations for strengthening the draft are proposed:

¹ Has been known as the UNCAC Coalition.

² See the published 1st draft SACL prepared by UNODC and sent to all UNCAC States Parties earlier this year, asking States to share their comments and suggestions:
https://track.unodc.org/uploads/documents/UNCAC/Review-Mechanism/next-phase-preparation/Draft_Question_Flow_select_articles_-_next_phase_-_ENG_2026.pdf. See the recently published 2nd draft SACL prepared by UNODC, revised based upon suggestions and comments provided by States Parties:
<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/CAC-COSP-IRG-2026-3/2604189E.pdf>.

³ See CoSP Resolution 11/2 Operative Paragraph (OP) 9(a): "A user-friendly self-assessment checklist for the second review phase, containing clear and targeted questions, that reflects the scope of the next phase as decided in the present resolution, consistent with paragraph 15 of the terms of reference of the Implementation Review Mechanism, while continuing to explore technological solutions as an option to assist States Parties in completing their self-assessment checklist, including by prefiling responses on the basis of the outcomes of the reviews in the previous phase;"

⁴ See Resolution 11/2, and OPs 2,4, 9, 12, 15, 17, 18, 20, 21:
<https://www.unodc.org/corruption/en/cosp/conference/session11-resolutions.html#Res.11-2>.

1) Elaborate on measures taken to further promote and facilitate civil society stakeholders in collecting responses to the SACL:

- Support the current draft's introduction section, a key section for the country to provide information about how it has prepared responses to the SACL such as through engagement at the national level with relevant stakeholders, consistent with Resolution 11/2. "Please provide relevant information regarding the preparation of your responses to the self-assessment checklist, such as information on engagement at the national level with all relevant stakeholders invited by the State Party under review, where applicable, the list of stakeholders (both governmental and, if applicable, non-governmental) consulted in preparing the responses to the present self-assessment checklist, and any other information that you wish to include in the annex to the country review report."⁵
- Support questions 1&3 in the introduction, asking the country whether it will i) make its focal point information available on the country profile page and ii) publish its SACL response on the country profile page.⁶
- Support the inclusion of the **annex**, and the description: "Should the State Party under review wish to include in its response information provided by other stakeholders (such as civil society, community-based organizations, academia, the private sector and other individuals or groups outside the public sector) on the implementation of the articles under review, such information can be provided here."⁷
- Strengthen the introduction section by including the different non-governmental stakeholders that the country can check if they were involved in the preparation of

⁵ Consistent with Resolution 11/2 OP 9.(c) [added bold for emphasis]: "A simplified blueprint for the country review reports and the executive summaries that reflects the scope of the second review phase, ensuring that it captures all essential findings, provides a comprehensive and concise reflection of the review process and outcomes and **features supporting information in an annex to the report and contains relevant information regarding the review process, such as information on engagement at the national level with all relevant stakeholders invited by the State Party under review, where applicable**".

⁶ See Norway's published response to the 1st draft SACL: <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Norway.pdf>.

⁷ See p. 66 of 2nd draft SACL. Colombia, Canada and Norway published responses to the 1st draft SACL propose being more specific about what relevant stakeholders are. See Colombia's published response: <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Colombia.pdf>. See Canada's published response: <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Canada.pdf>.

the checklist.⁸

- If non-governmental stakeholders were not consulted, the country should provide a rationale for why and indicate whether they will be consulted at a later stage (such as during the country visit)⁹
- Ask the country to provide information on measures taken to further promote and facilitate the engagement at the national level of all relevant stakeholders, including efforts to gather and consider information from non-governmental stakeholders in the preparation of responses to the self-assessment checklist.¹⁰
- Add in this section an **outline of the deadlines and due dates for each stage of completing the SACL**.¹¹ This would help to keep the process on track to avoid the lengthy delays experienced in the first phase.

2) Provide general information, including on the legal, institutional, and political system, international and regional review mechanisms, identifying TA needs in priority areas and sectors, and broader developments.

- Support the general information section of the 2nd draft SACL and the five questions listed.¹²

⁸ Break down by different categories of non-governmental organizations: non-governmental organizations, community-based organizations, the private sector, academia, the media, individuals, and groups outside the public sector. See Norway's published response to the 1st draft SACL.

⁹ See Canada's published response to 1st draft SACL proposing that the country provide an explanation for why the country has not involved civil society in the SACL exercise and to indicate if the country will involve them at a later stage.

¹⁰ Resolution 11/2, OPs 9(c) & 12.

¹¹ See Bolivia's published response proposing to include deadlines for key stages of completing the SACL and also that there be a system to automatically alert users to upcoming deadlines:
<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Bolivia.pdf>.

¹² The five questions in the 2nd draft SACL: 1) providing updates to the description of the **legal, institutional, and political system** from the first review phase, 2) providing links, copies, and hyperlinks to relevant laws, policies, and/or other measures that are cited in the responses, 3) indicating which **international and regional** anti-corruption review mechanisms related to anti-corruption that the country is a member of (with a list of mechanisms to check, if applicable, including "other" or "none"), 4) identifying Technical Assistance (TA) needs in **priority areas and sectors**, and 5) indicating if the country has provided TA in previous review cycles and if so, to provide details. "Legal, institutional and political system" is wording from the 1st phase self-assessment checklist. See Germany's published response to the draft SACL on identifying TA in priority areas and sectors, consistent with Resolution 11/2:
<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Germany.pdf>.

- Add more examples in question 2 in this section to show a broader range of supportive documentation that the country should provide in response to the questions, including documentation to demonstrate the impacts and results achieved from implementation in practice, such as **progress reports, evaluations & audit reports, outcomes of compliance measures, websites, or other materials with statistical information on enforcement actions**, etc.
- Strengthen question 3 by adding a follow-up question asking the country to indicate whether **findings of review mechanisms informed legislative, institutional, or practical measures and reforms relevant to implementation of the Convention**.¹³
- Reinsert question 5 from the general information section in the 1st draft SACL, asking the country to update on “broader developments”¹⁴ **such as trends in corruption, circumstances in which corruption offences are committed**¹⁵, **emerging and cross-cutting issues, and resolutions adopted by the Conference of the States Parties to the Convention**.¹⁶

3) Ensure comprehensive reporting, including reporting paragraph by paragraph within each article, overall progress achieved, how observations/challenges from previous country reviews have been addressed, successes and good practices, measures taken since the first review phase, and difficulties encountered since the first phase reviews.

¹³ See Ukraine’s proposed response, proposing that “To further the “user-friendly” objective and reduce the administrative burden, we suggest formally allowing cross-referencing to recent reports of other international 2 mechanisms (e.g., GRECO, OECD, FATF). If relevant data or statistics have been recently verified by these bodies, States should be able to refer to specific paragraphs of those reports instead of duplicating the information.”:

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Ukraine.pdf>.

¹⁴ Reporting on broader developments is important because it has been 10-15 years since the first phase reviews have taken place and major changes, actions, updates and other developments affecting UNCAC implementation overall are likely to have happened.

¹⁵ UNCAC Article 61 on “trends in corruption, circumstances in which corruption offences are committed as a way to interpret new developments” could guide States on the reporting of new developments.

¹⁶ See Nigeria’s published response to the 1st draft SACL proposing to have countries report on emerging or cross-cutting issues, which could be included under the question on broader developments:

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Nigeria.pdf>. See USA’s published response to the 1st question flow proposing to add implementation of CoSP resolutions as an aspect that can fall under the broader

developments section:

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/USA.pdf>.

- Change the reporting for each article so that **all questions apply to each paragraph within an article**¹⁷; see the 2nd draft SACL for Article 30. The questions are broken down by paragraph, which should be done for all articles. This change reflects that in many cases, each paragraph within an Article can require different responses and implementation approaches, as well as involve different governmental institutions. A paragraph-by-paragraph approach is consistent with the structure of the 2nd cycle of the first phase SACL, making responses clearer and more targeted.
- Support Question 1 under A. for the country to update information, **describe overall progress** impacting implementation of the paragraph under review: "Please update this information, describing the overall progress made since the completion of the first phase review that would impact the implementation of the **paragraph**¹⁸ under review (e.g. changes to policies and practices, as well as legal, administrative, regulatory and institutional frameworks), or indicate if there have been no updates."¹⁹
- Support Question 2 under A of the 2nd draft SACL, asking the country to **describe measures** taken to address the challenges identified in the first review phase and "If the challenges have been partially addressed or have not been addressed, please describe ongoing efforts or the measures required to implement them."²⁰ Importantly, add that the country should also provide explanations for **any other findings contained in the country review reports** that have been addressed.²¹
- Support Question 3 (under A) of the 2nd draft SACL, asking the country to "describe any **difficulties** with implementation of the **paragraph** under review since the first

¹⁷ See France's published response to the 1st draft SACL proposing the paragraph-by-paragraph approach: <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/France.pdf>, see also published responses of The Netherlands, Norway and USA.

¹⁸ Text in bold is a change from "article" to "paragraph" as laid out in the previous bullet point.

¹⁹ See Thailand's proposed response to the 1st draft SACL, stating that "Confirming information provided during the first phase and allowing States parties to identify significant developments affecting implementation, such as legislative amendments or improvements in enforcement mechanisms, thereby enabling reviewers to systematically compare the current situation with previously reported information": <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Thailand.pdf>.

²⁰ Importantly, for each challenge that has been partially addressed or not addressed, the country is asked to outline steps that have been taken and further steps that are needed.

²¹ Consistent with resolution 11/2 OP 4. This is important because there may be other important findings and challenges in the country review report, besides the review formal recommendations, that the country should also report on and that the 2nd phase country review should review.

phase (such as regulatory, institutional or operational difficulties, and difficulties in inter-institutional coordination or international cooperation)".²²

- Support Question 4 asking the country to "provide information on progress achieved in connection with the successes and good practice(s) identified in the first review phase, including whether such measures continue to be implemented or have been revised." Add that the country should provide links or other documentation that provides more detailed information.
- Support Question 6 (under A) in the 2nd SACL, asking the country to provide any other information on measures taken relating to the implementation of the article. Add the following: "**such as resolutions adopted by the Conference of States Parties**" to provide States with the opportunity to share progress they have made on relevant resolutions related to the article under review.²³ Add that the country should provide any links, or other documentation where more detailed information on measures taken.

4) Ensure meaningful reporting to demonstrate "implementation in practice" and provide supportive evidence to demonstrate results and impact:

- Support Question 5 (under A) in the 2nd draft SACL, asking the country to describe how the article is implemented in practice.²⁴ Strengthen the question by providing more examples for how countries should show impact and results to that will yield useful responses with data, case examples and other information to assess implementation in practice:²⁵ (language additions in bold): "Please describe how the

²² It is important to use the term "difficulties" to make clear that this question is focused on new difficulties arising since previous reviews and is not referring to the formal "challenges" identified in previous country review reports. See Colombia's published response proposing to add specific barriers affecting UNCAC implementation more broadly, which is very relevant since a long time has lapsed since previous reviews: <https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Colombia.pdf>.

²³ Nigeria's published response proposes that the broader developments section include reporting on the impact of corruption on women and girls and initiatives to address it, following adoption of Resolution 10/10.

²⁴ See Thailand's published response stating importance of "Reporting on practical implementation, which provides an opportunity for States parties to explain how the relevant provisions of the Convention have been applied in practice, including through case studies, operational examples, or relevant statistical data".

²⁵ Note that Question 5 and examples provided should also be tailored to the specific provision under review, which is done in the 2nd draft SACL for Article 30, Question 5. On p. 26 "Please describe how this provision is implemented in practice, including examples of impact or results achieved (e.g. related court or other cases, reported or detected cases, investigations, prosecutions, convictions, etc., **information on the execution of sentences and criminal and non-criminal sanctions**, etc.), available statistics, etc." See Nigeria's comments to the 1st SACL on the importance of assessing the effectiveness of anti-corruption measures and the need to explicitly request the data and information needed to get sufficient information, drawing upon lessons from the 1st phase: 'Explicit request for quantitative data, statistics, and case examples under each article to

article is implemented in practice, including examples of impact or results achieved (e.g. related court or other cases, reported or detected cases, investigations, prosecutions, convictions, **and other outcomes; sanctions, administrative, civil or disciplinary measures imposed; audit, oversight or evaluation reports; strengthened controls or compliance measures; reforms adopted; survey data** etc.), available statistics, etc."

- Add a follow-up question asking whether any significant gaps were encountered during implementation in practice.

5) Reflect on past technical assistance (TA) delivery and better identify TA needs, the types of assistance, objectives, and intended results:

- Support Question 1 (in Section B) in the 2nd draft SACL that lays out targeted questions on TA provision, outcomes, and results achieved, and TA requests not met:²⁶ "Please provide information on TA that has been provided to your country since the completion of the review in the first review phase to improve the implementation of the article. Please elaborate on **who provided such assistance, the beneficiary institution(s), the time frame, and the intended objectives**, as well as the **outcomes and any results achieved**. Please also report on **technical assistance requests that were not met** and explain why they were not addressed."
- Support Question 2 (in Section B) in the 2nd draft SACL to precisely identify new or further TA needs and their intended objectives or outcomes."²⁷ Add an explanation

capture the effectiveness of anti-corruption measures. The UNODC's State of Implementation report notes that in most first-cycle reviews, "States Parties did not provide sufficient information, case law, examples or statistical data to support conclusions on the actual effectiveness of the measures applied." Targeted prompts for such data would address this gap²⁶:

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Nigeria.pdf>. See UNODC reports (2025): "State of Implementation of the UNCAC: Preventive Measures and Asset Recovery", and see the assessment of "effectiveness" throughout the report to see the challenges with getting sufficient data and examples for some articles: https://track.unodc.org/track/uploads/res/track/resourcehub/2025/state_of_implementation_of_the_united_nations_convention_against_corruption_preventive_measures_and_asset_recovery_html/UNODC_2025_State_of_UNCAC_-_Preventive_measures_and_asset_recovery.pdf.

²⁶ The question could also include categories for the types of technical assistance that may be needed but also leaving it open to other areas of TA a country may identify. See Ukraine's published response proposing that categories:

<https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22May2026/responses-CU2026-93/Ukraine.pdf>.

²⁷ The question is: "Is new or further technical assistance needed to support implementation of the article under review? If so, please elaborate on the specific assistance required, the time frames, the beneficiary institutions and the intended objectives or outcomes; please also identify priority areas or sectors. See Germany's published response to the 1st draft SACL laying out that priority areas and sectors should be identified, consistent with Resolution 11/2:

for why these areas were chosen as priorities and how this helps address a specific difficulty or gap raised in the responses.