

Meaningful, transparent and inclusive UNCAC implementation reviews

Global Civil Society Coalition for the UNCAC¹ Submission to CoSP11

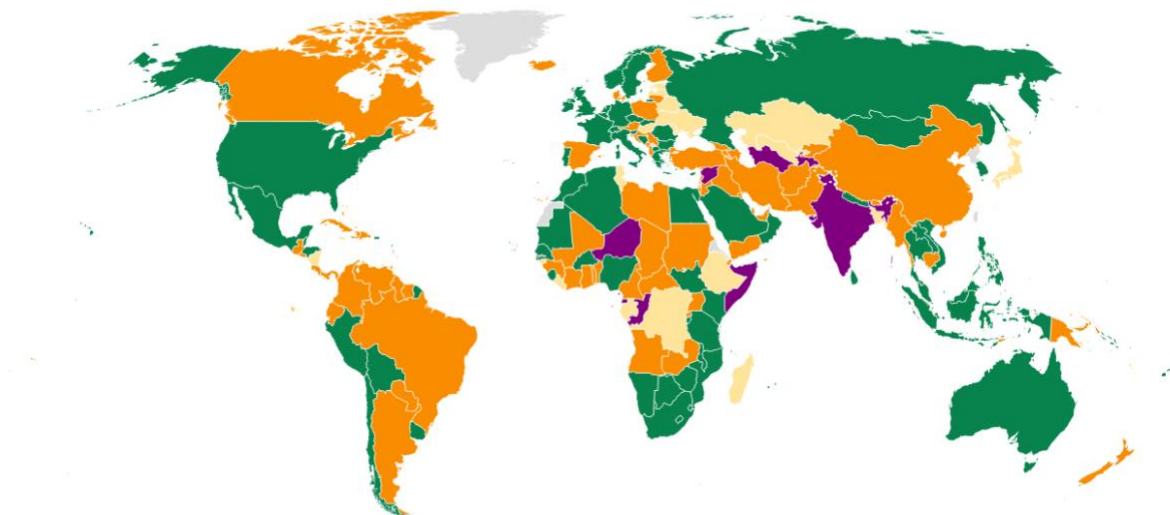
21 November 2025

This submission provides an overview of the status of UNCAC reviews globally, and outlines good practices of and challenges to meaningful, transparent, and inclusive civil society participation in the UNCAC Implementation Review Mechanism (IRM). The Coalition's tools are used by States Parties and civil society organizations (CSOs) alike.

1. UNCAC Review Status Tracker²

UNCAC Review Status Tracker

Completed Post Country Visit Pre Country Visit Unknown



Data accurate as of 20 November 2025.

Source: <https://uncaccoalition.org/uncacreviewstatustracker/> • Created with Datawrapper

Our interactive global map and accompanying spreadsheet show that many countries are opaque in their review processes, with little to no up-to-date information available.³ This makes it **difficult for civil society to participate in reviews.**⁴

¹ Has been known as the UNCAC Coalition.

² UNCAC Coalition, "UNCAC Review Status Tracker", <https://uncaccoalition.org/uncacreviewstatustracker/>.

³ Through regular outreach, the Coalition identifies national-level UNCAC focal points and obtains updates on their country's review status, while encouraging the inclusion of civil society in reviews.

⁴ Despite State's commitment to Article 13 of the UNCAC, making participation of non-governmental stakeholder in anti-corruption efforts mandatory. Article 30 of the UNCAC IRM Terms of Reference explicitly

Based on regular outreach to States and CSOs, **the Coalition tracks progress in UNCAC reviews.**⁵ Our tracker includes information on the status of country reviews, focal points, Transparency Pledge⁶ compliance, links to available documents, civil society parallel reports, and follow-up measures after completed reviews.⁷ The latest information we were able to obtain⁸ shows that out of 192 States Parties:

- 102 reviews are still ongoing:
 - 25 pre-country visit,⁹
 - 77 post-country visit;
- 77 reviews have been completed;
- for 13 reviews, the review status is unknown.¹⁰

Not a single review has been completed within the six-month period foreseen in the IRM's Terms of Reference.¹¹

- Quickest reviews: Liechtenstein, Malaysia and South Africa (1-1.5 years)
- Longest reviews: Bolivia and Honduras (9 years).

In almost all regional groups, the longest review took around eight years to complete. The overall average time of completed reviews is 5.3 years.

Some States Parties have stated that they are reluctant to publish the self-assessment checklist and the full country report, both key documents of the reviews, expressing concerns that they would provide an outdated picture of national anti-corruption frameworks.

encourages States Parties to “**facilitate engagement with all relevant stakeholders in the course of a country visit.**” See UNODC, “Mechanism for the Review of Implementation of the United Nations Convention against Corruption – Basic Document”,

[https://www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/Mechanism for the Review of Implementation - Basic Documents - E.pdf](https://www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/Mechanism%20for%20the%20Review%20of%20Implementation%20-%20Basic%20Documents%20-%20E.pdf).

⁵ The map is complemented by a comprehensive tracker spreadsheet, available on the UNCAC Coalition's website here:

<https://docs.google.com/spreadsheets/d/1uVcQ8xT7bJwkVsQZ7yT6bOfq7gxL4kQBOGOafqNjICE/edit#gid=0>.

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

⁷ States Parties have the possibility to publicly report on the measures taken after the completion of the country review, which is even more important now that the follow-up phase is being discussed, but may only start with some delay.

⁸ These numbers may differ from the aggregated official numbers the UNCAC Secretariat shares in the context of the IRG.

⁹ One review is currently on hold.

¹⁰ Since CoSP10, we have been able to find out the status of 25 previously unknown reviews, including due to enhanced country profile pages released by UNODC.

¹¹ UNODC, “Mechanism for the Review of Implementation of the United Nations Convention against Corruption—Basic Documents”,

[https://www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/Mechanism for the Review of Implementation - Basic Documents - E.pdf](https://www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/Mechanism%20for%20the%20Review%20of%20Implementation%20-%20Basic%20Documents%20-%20E.pdf), p. 9.

However, **these key documents include crucial information on States Parties' anti-corruption efforts and making them public increases transparency and accountability.**

The good news is that an increasing number of countries are agreeing to publish them: out of 77 completed reviews, 13 self-assessment checklists (16,9%) and 48 full country reports (62,3%) have been published.¹²

2. Transparency Pledge¹³

The Coalition is **encouraging States Parties to sign the Transparency Pledge** – a voluntary commitment to minimum standards of transparency and civil society participation in the UNCAC IRM, including publishing timely information on the State's UNCAC focal point, an updated review schedule, the self-assessment checklist and full country report; involving civil society throughout the review, organizing a briefing with civil society to discuss review outcomes, and supporting participation of civil society observers in UNCAC subsidiary bodies.

42¹⁴ out of 192 States Parties have signed the Pledge so far, with 23 new signatories since CoSP8 in 2019. This upward trend is encouraging, given the often-narrow civic space¹⁵ in UNCAC-related fora over the past years.¹⁶ **Since the Coalition started actively monitoring Pledge compliance, civil society has been engaged more in national reviews, and more information has been made public.¹⁷**

In 2025, Switzerland and Chile became fully compliant with the Transparency Pledge, joining North Macedonia and the USA.¹⁸

¹² This refers to publication of these documents of States Parties that have completed their reviews on the UNODC country profile pages: UNODC, "Country Profiles", <https://www.unodc.org/corruption/en/country-profiles/view/search.html>. The total number of published self-assessment checklists on these country profile pages, including of ongoing reviews, is 15.

¹³ UNCAC Coalition, "Transparency Pledge", <https://uncaccoalition.org/uncac-review/transparency-pledge/>.

¹⁴ Six more than at CoSP10.

¹⁵ See another written submission to CoSP11: UNCAC Coalition, "Protecting and promoting civic society participation in anti-corruption: Fulfilling the spirit and intent of UNCAC Article 13", <https://uncaccoalition.org/wp-content/uploads/Protecting-and-promoting-civic-society-participation-in-anti-corruption---CoSP11-submission---Global-Civil-Society-Coalition-for-the-UNCAC---November-2025.pdf>.

¹⁶ This refers both to objections made by States Parties to the participation of civil society organizations in CoSPs, as well as the involvement of "other stakeholders" in UNCAC reviews. This refers to a wide range of non-governmental actors and does not necessarily mean that independent stakeholders were consulted and involved.

¹⁷ UNCAC Coalition, "Transparency Pledge Compliance Tracker", <https://uncaccoalition.org/uncac-review/transparency-pledge/#:~:text=United%20Kingdom-,United%20States,-Disclaimer%3A%20Reviews>.

¹⁸ Both countries have published the focal point name, review schedule and review documents on a dedicated governmental website, they both included civil society organizations in the country visit, published their self-assessment checklist and full country report on their UNODC country profile page, held a follow-up briefing to

There are promising signs that more countries will soon sign the Transparency Pledge.

We call on those States Parties who have not done so yet to sign the Pledge.

3. Guide to Transparency and Participation in the UNCAC Implementation Review Mechanism¹⁹

The Coalition's guide provides a roadmap for States Parties and civil society on best practice examples of transparency and civil society participation at different stages of the review process **and follow-up**:

Overall:

- **Integrating civil society throughout the country review process** through a multi-stakeholder committee to make recommendations to address gaps.²⁰
- **Publishing updated focal point and review schedule information on a government website.** Best practice: Switzerland, Chile, Armenia, and Sweden.²¹
- See detailed good practices and shortcomings of civil society inclusion in ongoing reviews in our 20-year UNCAC anniversary blog.²²

Self-assessment checklist:

- Organizing workshops with civil society and other stakeholders **to gather input for the checklist, or to prepare for the country visit.** Best practice: Togo, Nigeria.
- **Sharing a draft checklist for civil society input.** Best practice: UK, Switzerland, and Germany.²³

Country visit:

discuss the findings of the report with civil society. Both countries support the participation of civil society observers in UNCAC subsidiary bodies.

¹⁹ UNCAC Coalition, "Guide to Transparency and Participation in the UNCAC Implementation Review Mechanism", https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Guide-to-Transparency-and-Participation-in-the-IRM_ESP.pdf.

²⁰ This has been the case, for example, in **Rwanda**, where civil society representatives have been included in the governmental experts team and contribute to each step of the process. In **Jordan**, one CSO was included in all steps of the process so far, with others additionally included during the country visit.

²¹ See the dedicated governmental websites including this information for: **Switzerland**: <https://www.eda.admin.ch/eda/en/fdfa/foreign-policy/financial-centre-economy/corruption/un-convention-corruption.html>, **Chile**: <http://www.alianzaanticorruccion.cl/AnticorruccionUNCAC/convencion-de-las-naciones-unidas-contr-la-corruccion-uncac-en-chile/>, **Armenia**: <https://moj.am/en/page/655>, and **Sweden**: <https://www.government.se/government-of-sweden/ministry-of-justice/international-judicial-co-operation/the-implementation-review-mechanism-of-the-united-nation-conventions-against-corruption-uncac/>.

²² UNCAC Coalition, "20 years of UNCAC – How civil society participates in UNCAC Implementation Reviews", <https://uncaccoalition.org/20-years-of-uncac/>.

²³ A good practice example is the **United Kingdom**, where the Bond Anti-Corruption Group, a coalition of British NGOs, prepared a joint response to the self-assessment checklist, which was published by the government, and shared their findings in a meeting with the peer-reviewers.

- **Providing adequate notice** of and materials for the visit to civil society.²⁴ **Best practice:** Kenya, Switzerland (3 months), Bulgaria, Portugal, and Zimbabwe (1 month).
- **Involving a wide range of CSOs.** **Best practice:** Albania, Togo, and Zimbabwe.²⁵
- Arranging meetings between peer reviewers and civil society **before or at the beginning of country visits without the government under review present.**²⁶
- **Providing sufficient time** during the meeting, allowing substantive discussions between civil society and peer reviewers. **Best practices:** Nigeria (3 days), Bosnia and Herzegovina (a full civil society day), Mongolia (3 hours), and Portugal (1 hour per CSO).
- **Providing channels for written input to reviewers**, such as parallel or other reports on a country's performance on UNCAC implementation. **Best practice:** Togo, Bosnia and Herzegovina, Bulgaria, etc.²⁷

Follow-up:

- **Publishing the self-assessment checklist and full country report.** **Done by 13 countries.**²⁸
- **Actively communicating the release of the report to stakeholders and the public.**
- **Convening a meeting with civil society to discuss the findings and recommendations of the review.** **Several best practices.**²⁹

²⁴ For States Parties who invited civil society to participate in their UNCAC review country visit, we found that many failed to provide adequate information on the meeting, such as details about which authorities and other civil society actors would be present during the meeting and a draft of their self-assessment checklist. Some States provided very little prior notice to CSOs before the country visit meeting, leaving them with inadequate time to prepare. **Good practice examples of States who invited CSOs to join the country visit with at least two weeks prior notice are Australia, Cambodia, Mongolia and Papua New Guinea, Poland, Austria, Germany, etc.**

²⁵ In some countries, the level of engagement with peer reviewers left a lot of room for improvement, which made civil society engagement difficult. The main reasons for this were inviting only a small number of government-“friendly” CSOs or only ones operating at the national level, insufficient time allocated for receiving and discussing civil society input, and the presence of government officials of the State under review during civil society interventions, which, in contexts of restricted civic space, hindered CSOs from speaking openly and providing peer reviewers with relevant input. In these cases, the involvement of CSOs seemed more like a box-ticking exercise instead of genuinely aiming to take on board the expert input of civil society. However, we were able to identify some good practices by States Parties. **A good practice example is Albania**, where the UNCAC focal point reached out to the UNCAC Coalition to ask for suggestions of CSOs to invite to the country visit, ensuring broad participation. **Other good practice examples are Togo and Zimbabwe**, where one prominent CSO was asked to coordinate civil society participation in and input to the UNCAC review.

²⁶ Good practice examples of organizing a meeting between civil society and the peer reviewers without the government under review present before the country visit: **Austria, Namibia, Togo, Burundi, Mozambique, Uganda and Zimbabwe, Burundi, Bosnia and Herzegovina, Portugal, Switzerland and Bulgaria, Switzerland, Bulgaria, North Macedonia, Spain.**

²⁷ **Papua New Guinea, Germany, North Macedonia, Poland, Romania, Germany, Namibia, and North Macedonia.**

²⁸ Best practice in publishing both key documents: **Mauritius, Nigeria, Chile, Mongolia, Slovakia, Switzerland, Sweden, USA, Germany, Italy, Portugal, Slovenia, UK.**

²⁹ Best practices include: **North Macedonia, Slovenia, Australia, Chile, Italy; Switzerland:** where a discussion with civil society took place as part of the workshop of the Interdepartmental Working Group on Combating

- **Involving civil society in follow-up of recommendations. Best practice: Chile.**³⁰
- **Publishing follow-up measures taken since the completion of the report. Done by: Australia, Mauritius, Greece, Malta, Slovenia.**

With negotiations on the next phase of the UNCAC IRM ongoing, more than 500 NGOs, anti-corruption experts, and other entities, bodies, and companies have signed the Coalition's **Open letter calling on States Parties to adopt a stronger, more transparent, inclusive, effective, and efficient next phase.**³¹

Access our key recommendations to States on this key resolution, which will define the next 10-15 years of UNCAC reviews, in the footnote.³²

4. Civil Society Parallel Reports³³

To further inform the review process globally and build civil society's capacity, the Coalition has, to date, supported the production of over **50 civil society parallel reports** on the implementation of Chapters II (prevention of corruption) and V (asset recovery) of the UNCAC at the national level.

The parallel reports provide a current assessment of anti-corruption, anti-money laundering, and asset recovery policies nationally, analyzing not only the legal framework

Corruption of 10 September 2025; **Mongolia**: a short presentation on UNCAC review findings was held during the workshop aimed at developing a roadmap for implementing the National Anti-Corruption Program (adopted in June 2023), with over 30 CSOs present. The report's findings were also discussed with NGOs during a short session of a training for NGO representatives on 25 June 2025.

³⁰ In **Chile**, the results of the report and how to address them are discussed in meetings of the multi-stakeholder Alianza Anticorrupción UNCAC, which civil society is a part of, both in Working Groups as well as at the General Assembly, see Alianza Anticorrupción UNCAC, <https://www.alianzaanticorruccion.cl/AnticorruccionUNCAC/preguntas-frecuentes/>; **Mauritius**: regular working sessions are held throughout the year with different stakeholders and anti-corruption platforms to ensure implementation of recommendations and follow-ups; **Nigeria**: CSOs have been integrated into the Inter-Agency Task Team working groups to address review recommendations and other issues to combat corruption; **Bosnia and Herzegovina**, a committee will be set up with civil society as an equal partner to government institutions involved in the 2nd cycle UNCAC review, to monitor and follow-up on the recommendations that came out of the review.

³¹ See our written submission to CoSP11: UNCAC Coalition, "Key recommendations for strengthening the next phase of the Implementation Review Mechanism of the UNCAC", <https://uncaccoalition.org/wp-content/uploads/Key-recommendations-to-strengthen-the-UNCAC-IRM-next-phase---CoSP11-submission---Global-Civil-Society-Coalition-for-the-UNCAC---November-2025.pdf>. A full version of the letter can be found here: UNCAC Coalition, "Open Letter: Enhancing Anti-Corruption Efforts Globally by Adopting a More Effective, Transparent, and Inclusive UNCAC Review Mechanism", https://uncaccoalition.org/open_letter_irm/.

³² UNCAC Coalition, "Key Recommendations to make the IRM more effective in strengthening UNCAC implementation", <https://uncaccoalition.org/wp-content/uploads/UNCAC-Coalition-%E2%80%93-Recommendations-for-the-IRM-next-phase.pdf>.

³³ UNCAC Coalition, "Civil Society Parallel Reports", <https://uncaccoalition.org/uncac-review/access-to-information-campaign/>.

but also exposing implementation in practice. CSOs writing these reports conduct interviews with relevant government and non-governmental stakeholders and send freedom of information requests to obtain statistical and other relevant information. By identifying good practices and deficiencies, parallel reports highlight what is working in practice and provide recommendations for improvement – all to make the fight against corruption more effective.

The Coalition has supported the following parallel reports,³⁴ from mostly ODA-recipient countries,³⁵ as almost no donor funding is available for such reports from CSOs in developed countries:³⁶

- Sub-Saharan Africa: 16 published + 3 in progress
- Latin America and the Caribbean: 13 published³⁷
- Asia-Pacific: 9 published
- Europe: 8 published
- South-West Asia and Northern Africa: 3 published + 1 in progress

After publication, the Coalition shares the reports' main findings with the focal point and Permanent Mission of the respective country covered, and with its peer reviewers and other relevant stakeholders. **We encourage States Parties to take these independent civil society parallel reports into account in their UNCAC reviews – and to involve the authoring organizations in follow-up actions to their review.**

The Coalition also supports CSOs in conducting **follow-up activities** to promote parallel report findings and the implementation of its recommendations.³⁸

³⁴ The parallel reports published in 2025 were on [Guatemala](#), by Acción Ciudadana, on [Sri Lanka](#), by Transparency International Sri Lanka, on [Cameroon](#), by International Governance Institute – Cameroon, on [Iraq](#), by Investigator Organization for the Rule of Law, on [Kenya](#), by Transparency International Kenya; and on [Rwanda](#), by Transparency International Rwanda. The report on [Nigeria](#) by Center for Fiscal Transparency and Public Integrity was published in late 2024 but officially launched in early 2025.

³⁵ OECD, “DAC List of Official Development Assistance (ODA) Recipients”, [https://static.daad.de/media/daad_de/pdfs_nicht_barrierefrei/infos-services-fuer-hochschulen/projektsteckbriefe/dac-list-of-oda-recipients-for-reporting-2024-25-flows_1 .pdf](https://static.daad.de/media/daad_de/pdfs_nicht_barrierefrei/infos-services-fuer-hochschulen/projektsteckbriefe/dac-list-of-oda-recipients-for-reporting-2024-25-flows_1.pdf).

³⁶ Developed countries often host enablers of facilitators of corruption in ODA recipient countries.

³⁷ This includes a parallel report on UNCAC implementation in Puerto Rico, which is a territory of the United States of America, which corresponds to the region of North America, but since it is geographically situated in the Caribbean, due to word limit constraints.

³⁸ See all follow-up activities we have supported here: UNCAC Coalition, “Follow-up Activities”, <https://uncaccoalition.org/uncac-review/cso-review-reports/follow-up-activities/>. In 2025, the Coalition also supported CSOs in Costa Rica and Yemen to conduct follow-up activities. In Costa Rica, the CSO consulted international and national governmental and non-governmental stakeholders to compile a set of recommendations for the government to consider when regulating the new whistleblower protection law. They also developed a comprehensive guide for whistleblowers in the country, which was disseminated in hundreds of governmental institutions across the country. See UNCAC Coalition, “Strengthening Whistleblower

5. Access to Information Campaign³⁹

Through this campaign, the Coalition collaborates with CSOs to ask governments and relevant anti-corruption authorities worldwide to release crucial UNCAC information and documents in response to freedom of information requests. Where access to information legislation does not exist, CSOs cite the transparency principles enshrined in the UNCAC, in particular Articles 10 and 13 on access to information and civil society participation.⁴⁰

Four years on, with 51 freedom of information requests having been sent in 46 countries across 6 continents, the Coalition is taking stock of our campaign:⁴¹

- A total of 27 official UNCAC review documents⁴² have been released so far, ranging from full country reports to self-assessment checklists (first and second review cycles). Before the filing of information requests, these documents were not publicly available.
- In 15 of the 46 countries (33%) in which information requests were sent for this campaign, the information request was not acknowledged, responded to, or was met with administrative silence. In the remaining 31 countries (67%) where authorities replied, only 5 countries (11%) released all official UNCAC documents and information relevant to the first and/or second implementation review cycles within their possession.
- Following an appeal brought by Access Info Europe against a partial refusal to release information, a court in a European country ruled that there were no reasons for confidentiality of a self-assessment checklist and established that the release was in the public interest. The government has yet to comply with the ruling.⁴³

In line with our Transparency Pledge, **we call on States Parties to proactively publish and share information on their second cycle country reviews.**

Protection & Transparency of the UNCAC Review in Costa Rica: A Civil Society Impact Story”, <https://uncaccoalition.org/followupactivitiescostarica/>.

³⁹ UNCAC Coalition, “Access to Information Campaign”, <https://uncaccoalition.org/uncac-review/access-to-information-campaign/>.

⁴⁰ UNCAC Coalition, “UNCAC”, <https://uncaccoalition.org/the-uncac/united-nations-convention-against-corruption/>.

⁴¹ UNCAC Coalition (last updated in June 2023), “Unveiling UNCAC: Analyzing the results of our Access to Information Campaign”, <https://uncaccoalition.org/ati-campaign-analysis/>.

⁴² UNCAC Coalition (last updated in August 2025), “How Transparent are Countries about their UNCAC Implementation”, <https://uncaccoalition.org/uncac-review/access-to-information-campaign/campaign-findings/>.

⁴³ UNCAC Coalition (3 September 2025): “Spanish court orders government to release anti-corruption review documents, yet Access Info is still waiting”, <https://uncaccoalition.org/spanish-court-orders-government-to-release-anti-corruption-review-documents-yet-access-info-is-still-waiting/>.