Key Recommendations to make the IRM more effective in strengthening UNCAC implementation

UNCAC Coalition submission to the first resumed sixteenth session of the UNCAC Implementation Review Group

June 2025

As States parties continue to deliberate on the next phase of the UNCAC Implementation Review Mechanism (IRM), the UNCAC Coalition has laid out specific and concrete recommendations to strengthen the IRM **to make it more transparent, inclusive, efficient, and effective, and to ensure more useful outcome documents**. These recommendations are a result of a community consultation of non-government stakeholders that are part of the UNCAC Coalition's network, and are based on prior UNCAC-related resolutions, the IRM Terms of Reference (ToR), the Secretariat's summaries of the discussions thus far, States parties publicly expressed positions, as well as good practices and experiences of other anti-corruption monitoring mechanisms.

Stakeholder engagement[1]

- A call for contributions should be made to collect input from non-governmental stakeholders at the beginning of the country review process. The focal point contact details and the initial timetable for the review should be provided.[2]
- The State party under review should prepare its responses to the comprehensive self-assessment checklist through broad consultations at the national level with all relevant stakeholders, including the private sector, individuals, and groups outside the public sector.[3]
- States parties should facilitate engagement with all relevant national stakeholders in the course of a country visit, and after the completion of the review, including through

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[1] UNGASS against corruption Political Declaration (2021), A/RES/S-32/1, para 79: " We encourage the Conference of the States Parties to the Convention to continue exploring activities, procedures and methods of work aimed at improving cooperation with relevant international and regional organizations and mechanisms and non-governmental organizations in line with the Convention": https://docs.un.org/en/A/RES/S-32/1.

[2] See the Joint CoSP 10 Statement on Transparency and Inclusion of Civil Society in the Implementation Review Mechanism that is endorsed by over 60 countries: https://www.gov.uk/government/speeches/joint-statement-on-transparency-and-the-inclusion-of-civil-society-in-the-implementation-review-mechanism.

[3] Based on the UNCAC IRM ToR, para 28: https://www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/Mechanism_for_the_Review_of_Implementation_-_Basic_Documents_-_E.pdf.

holding dedicated sessions, with a formal agenda, between national stakeholders, such as civil society, academia, and the private sector, and the review team.[4]

- The country under review should develop a plan to act upon the findings, observations, and recommendations emerging from its review, through broad consultations at the national level with all relevant stakeholders.
- Non-governmental stakeholders should be allowed to participate as observers in the IRG sessions.[5]
- Based on the findings of the country review and identified technical assistance (TA) needs, the State party under review should consider inviting individuals and groups outside the public sector to contribute to the development and implementation of TA programmes, upon request.[6]

Transparency

- States parties should publish all outcome documents from the country reviews, including the full reports, executive summary, and self-assessment checklist, on their UNODC country profile page.[7]
- Regularly updated information about the country review should be made publicly available on the UNODC website, such as a calendar for upcoming country visits, and when executive summaries and country reports will be completed.[8]
- The UNODC and the country under review should issue a press release to announce the release of the executive summaries and country review reports.[9]

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[4] Based on UNODC (April 2025), CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 52: https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/16-20June2025/CAC-COSP-IRG-2025-5/2505632E.pdf , and building on the IRM ToR, para 30.
[5] Rule 2 of CoSP Rules of Procedure;https://www.unodc.org/pdf/crime/convention_corruption/cosp/07-80230_Ebooke.pdf; UNODC (April 2025), CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 52: https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/16-20June2025/CAC-COSP-IRG-2025-5/2505632E.pdf and: UN Guidance Note on Protection and Promotion of Civic Space (2020): https://www.ohchr.org/sites/default/files/Documents/Issues/CivicSpace/UN_Guidance_Note.pdf
[6] CoSP Resolution 10/5, OP 12; https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-5; UNODC (April 2025) CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 50.
[7] Building on the IRM ToR, para 38, and strengthening CoSP resolution 8/12, OP4: https://www.unodc.org/corruption/en/cosp/conference/session8-resolutions.html "Encourages States parties to make their country review reports publicly available, in accordance with paragraphs 36, 37, 38 and 39 of the terms of reference of the Implementation Review Mechanism;"
[8] Builds on UNODC (April 2025), CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 39, with added language that the calendar should be regularly updated and lay out other important milestones that UNODC should aim to achieve to keep review schedules on track.
[9] UNODC (April 2025), CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 45.

- States Parties should report to the CoSP in writing, using a standardized template developed by the UNODC, on the results of country reviews and progress made to follow up on the recommendations from country reviews in phase 2 to strengthen UNCAC implementation.[10]
- During IRG sessions, the Secretariat could provide an updated overview of each ongoing/ pending review, the milestones that have been reached, and the status of the review.

Information gathering and self-assessment checklist

- Reviewing States Parties should consider sources of information relevant to the implementation of the Convention, including findings and recommendations from competent international organizations and regional organizations, and international mechanisms for combating and preventing corruption that the State Party under review is a member of, as well as other credible and relevant sources of information.[11]

Scope of the 2nd phase and follow-up[12]

- The Scope of country reviews in the 2nd phase should include:
  - A review of the implementation by the State party under review of the recommendations received in the first review phase.
  - New developments since the first phase reviews, including follow-up to the recommendations.
  - Where TA was requested, a review of the delivery of such assistance and whether it was sufficient.
  - Identification of new successes and good practices since the most recent reviews, or developments regarding successes and good practices identified during the first review phase [13]

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[10] Builds on UNODC (April 2025), CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 23 & 24.
[11] Strengthening the UNCAC IRM ToR, 27(c).
[12] UNCAC IRM TOR, paras 40 & 41.
[13] Lifted verbatim from UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption", p.6, para 29(a-d): https://track.unodc.org/uploads/documents/UNCAC/WorkingGroups/ImplementationReviewGroup/17-21February2025/CAC-COSP-IRG-2025-2/2424356E.pdf.

Reporting and monitoring after the review process

- A regular and structured reporting and monitoring mechanism to take account of measures taken by States Parties to implement recommendations from country reviews should be developed, including:
    - Annual progress reports, using a standardized template, on measures taken to follow-up on the recommendations from phase 2 reviews, new developments since the most recent review, the delivery and impact of TA efforts, and new successes, good practices and challenges since the most recent reviews. These should be uploaded to the country profile page.
    - Periodic reviews by the Secretariat of the information provided by States Parties to assess progress made to follow up on recommendations from country reviews.[14]

Effectiveness of measures[15]

- Country reviews should assess the effectiveness of the implementation of measures taken, based on a structured set of questions [or "reference points"]. States parties shall report on: (a) the existence of a legal framework or other measures; (b) the adequacy of the legal framework or other measures; (c) the results or impact of the legal framework or other measures; and (d) the level of progress achieved in implementing the Convention.[16] This should include such aspects as the set-up of relevant bodies and institutions, including if their resourcing, independence, mandates, transparency, and activities are adequate to promote effective UNCAC implementation; detail activities to promote measures and compliance (preventive activities, awareness raising, oversight mechanisms, etc.) as well as investigative and enforcement actions.
- UNODC should develop guidance with a structured set of questions or reference points for the State under review to consider when reporting on the effectiveness of its implementation and for peer reviewers to consider when assessing effectiveness.[17]

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[14] UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption", p.7, Option 2.

[15] CoSP resolution 10/4, OPs 4 and 6:
https://www.unodc.org/corruption/en/cosp/conference/session10-resolutions.html#Res.10-4.

[16] UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption", p.6, Table 1, Option 2.

[17] States parties could build on the current UNODC (June 2016): "Guidance to filling in the revised draft self-assessment checklist on the implementation of chapters II (Preventive measures) and V (Asset recovery) of the UNCAC",https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/20-24June2016/V1603598e.pdf.

Outcome documents:

- The recommendations in the country report and executive summary should be clear, accurate, implementable, and monitorable.
- The executive summary and full report should include a section listing the non-governmental stakeholders consulted in the reviews and a section on non-governmental stakeholder views and how they were taken into account.
- The UNODC country profile page should include a section with submissions from non-governmental stakeholders resulting from calls for contributions.

Technical Assistance (TA):

- Dedicated sessions during the IRG could be devoted to discussing specific TA needs.[18]
- UNODC regional platforms should have more focus on the follow-up to reviews and TA needs, including in promoting collaboration and cooperation with non-governmental stakeholders in these efforts.[19]
- UNODC should develop a dashboard of review outcomes that displays TA needs, recommendations, good practices, and TA projects and partners, that is regularly updated and includes evaluations and lessons learned from such projects.[20]
- A more detailed description of TA needs should be provided in the outcome documents, linking those needs in the narrative and recommendations of the executive summary and country review report, including a dedicated TA session during or after the country review visit. [21]

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[18] UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption" p. 10, Option 3

[19] UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption", p. 10, Option 2: adding collaboration with non-governmental stakeholders; CoSP Resolution 10/5, OP 12; UNODC (April 2025) CAC/COSP/IRG/2025/5: "Summary of discussions held to date on the second phase of the Implementation Review Mechanism", para 50.

[20] UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption", p. 10, option 1, and adding: "regularly updated and evaluations and lessons learned from such projects"

[21] UNODC (December 2024), CAC/COSP/IRG/2025/2: "Summary of views and an outline of options and modalities in relation to the next phase of the Mechanism for the Review of Implementation of the United Nations Convention against Corruption", p. 9, table 9, option 1& 2.