

# Anti-Corruption and Integrity Outlook 2026

Harnessing the Integrity Advantage





# Anti-Corruption and Integrity Outlook 2026

HARNESSING THE INTEGRITY ADVANTAGE

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# Foreword

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Governments across the world aim to deliver better policies and services for people and businesses in a tightening fiscal space. Corruption remains a significant and evolving threat to these efforts, damaging economic growth, distorting public policies, and eroding public trust.

In this context, governments should take stronger actions and invest in results-oriented integrity reforms that build resilience to corruption in high corruption risk areas and focus on improving implementation. As they do so, using new technologies and utilising data more effectively will help achieve greater impact (for instance in corruption risk assessment, detecting patterns in large datasets to assist anti-fraud efforts or in internal and external audit, or the processing of large volumes of information such as in the verification of interest and asset disclosures). Governments should also strengthen integrity-enhancing measures in the justice system to ensure accountability for corruption offences. In taking this approach, governments and businesses can benefit

from the 'integrity advantage', where integrity systems become a key enabler of prosperous economies in which people feel their representatives are safeguarding their interests.

The 2026 edition of the Anti-Corruption and Integrity Outlook, the second in this series, aims to help countries harness this integrity advantage. For the first time, the Outlook has a global coverage, presenting data on 37 OECD countries and 25 partner countries. Drawing on new data gathered through the OECD Public Integrity Indicators, it updates OECD analysis of countries' anti-corruption and integrity strategies, and their systems for managing lobbying, conflicts of interest, political finance, and transparency of public information. It also presents new insights into integrity in countries' justice and disciplinary systems. Finally, in three new focus chapters it analyses trends and tools for mitigating the substantial risks and costs related to fraud, for improving integrity in public procurement, and for combatting organised criminals' use of corruption.

# Acknowledgements

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# Table of contents

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|  |           |
|--|-----------|
| Foreword   | 3         |
| Acknowledgements   | 4         |
| Executive summary  | 9         |
| <b>1 Overview</b>  | <b>15</b> |
| The integrity advantage  | 15        |
| Countries continue to invest in integrity, but reforms are not always improving quality and the implementation gap persists  | 16        |
| High-performing countries move from a rules-based to a risk-based, results-oriented and digital approach   | 20        |
| Greater uptake of technology and better-quality data can help government “do more with less”   | 21        |
| National integrity systems can be strengthened to better withstand corruption risks  | 21        |
| Fraud prevention efforts, integrity controls in public procurement and protecting public bodies from organised crime should be stepped up  | 22        |
| How to read the 2026 OECD Anti-Corruption and Integrity Outlook  | 23        |
| Note   | 25        |
| <b>2 Strategy</b>  | <b>27</b> |
| Introduction   | 28        |
| More countries are adopting first-generation strategies, but periods of strategic vacuum undermine progress  | 28        |
| The design and implementation of strategies could generally be strengthened, but have improved for OECD Member countries that did not let their strategies expire  | 31        |
| Well-designed strategies tend to have better implementation rates, but only 1 in 4 OECD Member countries track implementation in practice  | 33        |
| Strategic frameworks still rarely target high-risk areas, including the private sector   | 34        |
| Less than half of countries make use of outcome-level indicators and evaluation to demonstrate the concrete advantages of integrity improvements   | 36        |
| Note   | 38        |
| <b>3 Lobbying</b>  | <b>41</b> |
| Introduction   | 42        |
| Despite wider adoption of regulatory frameworks specific to lobbying, lobbying remains among the least regulated public integrity areas across the OECD and beyond, including due to declining beneficial ownership transparency | 42        |
| Lobbying registers and other transparency measures continue to provide only limited effective transparency, reflecting persistent implementation challenges  | 49        |
| Countries with lobbying registers generally have enforcement and compliance mechanisms in place, but stronger monitoring remains essential   | 53        |
| Note   | 54        |
| <b>4 Conflict of interest</b>  | <b>57</b> |
| Introduction   | 58        |

|   |           |
|---|-----------|
| While conflict-of-interest regulations are generally strong, the implementation gap for conflict of interest persists for OECD Members and is even greater for OECD partner countries   | 58        |
| Authorities in many countries could improve monitoring of whether officials in at-risk positions are disclosing their interests and/or assets   | 60        |
| To strengthen the efficiency and effectiveness of conflict-of-interest safeguards, countries can take a more risk-based approach for verification of declarations, and more frequently issue recommendations and use sanctions  | 62        |
| While most countries have rules on revolving door they could be more consistently tracked to better mitigate conflict-of-interests risks  | 63        |
| <b>5 Political financing</b>  | <b>67</b> |
| Introduction  | 68        |
| Many countries have strong regulations in place, but a significant implementation gap persists in countries' political financing systems  | 68        |
| Most countries have strong political financing reporting and transparency requirements, but political parties could better observe them   | 71        |
| Political financing supervisory bodies could make better use of certified auditors in the oversight of parties' accounts  | 74        |
| Digitalisation and globalisation are changing and complicating political financing and campaigning faster than regulations are adapting   | 75        |
| <b>6 Transparency of public information</b>   | <b>79</b> |
| Introduction  | 80        |
| Government transparency remains consistently high but could still improve, particularly in OECD partner countries   | 80        |
| Countries' transparency regulations contain many standard requirements, but for many countries data are still not open by default   | 82        |
| Data or information related to integrity remain less frequently published   | 83        |
| Transparency could be further enhanced if supervisory bodies conducted inspections, issued sanctions and reported on their activities   | 84        |
| Notes   | 86        |
| <b>7 Integrity of the disciplinary system</b>   | <b>89</b> |
| Introduction  | 90        |
| While most OECD Member and partner countries have clear regulations on disciplinary procedures for civil servants, they could be better supported through stronger fairness guarantees  | 90        |
| Implementation of disciplinary procedures could benefit from improved training on disciplinary investigations and use of digital tools  | 93        |
| <b>8 Integrity of the justice system</b>  | <b>95</b> |
| Introduction  | 96        |
| The basic safeguards for judicial and prosecutorial integrity are in place in the majority of countries, but stronger procedures for the selection, appointment and promotion of judges and prosecutors are needed in many countries to protect judicial independence and prosecutorial integrity | 96        |
| Standards of conduct for judges and prosecutors exist but implementation could be improved, particularly for managing conflicts of interest   | 101       |
| Whistleblowing mechanisms for reporting cases of judicial and prosecutorial misconduct are generally being implemented, but could be improved through strengthened public awareness of existing reporting procedures, as well as training on handling reports                                     | 104       |

|  |            |
|--|------------|
| <b>Focus chapters</b>  | <b>107</b> |
| <b>9 Fraud prevention</b>  | <b>109</b> |
| Introduction   | 110        |
| The funds lost to public sector fraud are substantial, and increasing  | 112        |
| While governments have basic safeguards in place, most countries lack a strategic framework to address fraud   | 114        |
| Investments in emerging technologies and AI are key to counter increasingly complex and transnational fraud schemes  | 117        |
| While governments often rely on traditional enforcement methods, there is an increasing understanding that investing in fraud prevention is more cost-effective than dealing with the consequences once fraud has occurred | 121        |
| Notes  | 122        |
| <b>10 Integrity in public procurement</b>  | <b>125</b> |
| Introduction   | 126        |
| Provisions and mechanisms to ensure the integrity of the public procurement system are well established in the related regulatory frameworks   | 128        |
| Efforts to promote integrity among suppliers could be advanced   | 129        |
| Developing targeted tools to address risks would contribute to strengthening integrity in public procurement   | 131        |
| Harnessing digital technologies for proactive integrity risk management in public procurement offers considerable potential, but adoption remains limited  | 132        |
| Note   | 134        |
| <b>11 Organised crime and corruption</b>   | <b>137</b> |
| Introduction   | 138        |
| Organised criminals are increasingly seeking to gain undue advantage by using corruption to infiltrate the legal economy and public services, and fraud to appropriate public funds  | 138        |
| Countries need coherent strategic frameworks and better cross-government and international co-operation to tackle the corruption and integrity threats posed by organised crime  | 140        |
| Countries could build resilience against organised crime by enhancing the integrity of public institutions   | 144        |
| <b>References</b>  | <b>148</b> |
| <b>Country abbreviations</b>   | <b>155</b> |

## FIGURES

|  |    |
|--|----|
| Figure 1.1. State of play for public integrity across all OECD Member countries and 25 OECD partner countries – the implementation gap is the key challenge                              | 17 |
| Figure 1.2. The implementation gap persists over time across the OECD  | 18 |
| Figure 2.1. Most countries have a strategic approach to anti-corruption  | 29 |
| Figure 2.2. Countries are increasingly adopting their first anti-corruption and integrity strategy, but gaps between strategies are frequent   | 30 |
| Figure 2.3. Strategies in OECD Members that have not expired are becoming more evidence-based, with better guidance for successful implementation and better consulted with stakeholders | 31 |
| Figure 2.4. Progress by individual countries since 2020  | 32 |
| Figure 2.5. Exchange of good practices at the global level can help countries improve their strategies   | 33 |
| Figure 2.6. Strong strategies track the implementation rate  | 34 |
| Figure 2.7. OECD Member countries could better target high-risk areas and sectors, including the private sector  | 35 |
| Figure 3.1. Regulatory frameworks on lobbying remain underdeveloped in most countries, 2025  | 44 |

|  |     |
|--|-----|
| Figure 3.2. An increasing number of countries are adopting lobbying regulatory frameworks  | 45  |
| Figure 3.3. Beneficial ownership transparency has weakened across the OECD   | 47  |
| Figure 3.4. Countries with cooling-off periods for public officials  | 48  |
| Figure 3.5. Characteristics of lobbying registers by country   | 50  |
| Figure 3.6. Implementation gaps vary between OECD member and partner countries   | 52  |
| Figure 4.1. Strong regulations but weak practice undermines the effectiveness of conflict-of-interest systems                                    | 59  |
| Figure 4.2. Regulations are well-established but submission is often not monitored in practice   | 61  |
| Figure 4.3. Countries which have a digital platform for asset / interest disclosures   | 62  |
| Figure 5.1. An implementation gap in political financing persists in OECD Member countries and is wider in OECD partner countries                | 70  |
| Figure 5.2. Most countries have an independent body for supervising political financing, but not many have certified auditors on their payroll   | 75  |
| Figure 5.3. Countries are updating their political financing regulations but safeguards around political financing are not necessarily improving | 76  |
| Figure 6.1. OECD Member countries' transparency systems have remained consistent in recent years   | 81  |
| Figure 6.2. Many governments do not require that government data are open by default   | 82  |
| Figure 6.3. OECD Member and partner countries' proactive disclosure of data sets   | 84  |
| Figure 7.1. Procedural fairness guarantees in disciplinary proceedings   | 92  |
| Figure 8.1. Merit-based procedures for the selection and promotion of judges   | 98  |
| Figure 8.2. Independent bodies advising on the appointment and promotion of judges across countries  | 99  |
| Figure 8.3. Percentage of countries in which judicial and prosecutorial candidates have a right to appeal decisions on appointment and promotion | 100 |
| Figure 8.4. Judges and prosecutors exhibit lower rates of compliance with interest disclosure requirements                                       | 103 |
| Figure 8.5. Implementation gaps in the establishment of internal whistleblowing channels in OECD Members and OECD partner countries              | 105 |
| Figure 8.6. Percentage of countries with available confidentiality training for staff handling reports on judicial and prosecutorial misconduct  | 106 |
| Figure 9.1. Anti-fraud strategies in OECD Member and partner countries   | 115 |
| Figure 9.2. Integrity risk management is often not practiced universally   | 116 |
| Figure 9.3. Stage of generative AI and LLM use by type of organisation   | 117 |
| Figure 9.4. Specific benefits of AI use cases  | 118 |
| Figure 9.5. AI deployments across OECD Members who use AI in tax administration  | 119 |
| Figure 10.1. Provisions and/or mechanisms to manage threats to integrity included in the public procurement regulatory framework, 2024           | 129 |
| Figure 10.2. Efforts to promote integrity among suppliers, led either by the public or private sector, 2024                                      | 130 |
| Figure 10.3. Tools implemented for the management of public procurement risks, 2024  | 132 |
| Figure 10.4. Digital technologies used to identify, analyse, and monitor integrity risks in public procurement, 2024                             | 133 |
| Figure 11.1. Characteristics of organised crime definitions in OECD Member and partner countries   | 139 |
| Figure 11.2. OECD Member countries' use of certified internal audit at the national level  | 146 |

## INFOGRAPHICS

|                                      |    |
|--------------------------------------|----|
| Infographic 1. Key facts and figures | 11 |
|--------------------------------------|----|

## TABLES

|   |     |
|---|-----|
| Table 1.1. Regional classification: Countries included in the analysis  | 24  |
| Table 2.1. The use of outcome-level indicators, targets and evaluations could improve   | 37  |
| Table 4.1. Countries tracking office holders' movement into sectors they formerly regulated   | 64  |
| Table 5.1. Political parties in OECD Member and partner countries are not all meeting transparency and reporting requirements           | 72  |
| Table 6.1. Countries' supervisory bodies may not be publicly reporting effectively, making inspections or issuing sanctions             | 85  |
| Table 7.1. Statute of limitations for disciplinary cases  | 90  |
| Table 8.1. Key strengths in regulations for judicial and prosecutorial integrity  | 97  |
| Table 8.2. Standards of conduct for judges and prosecutors are in place but not all countries have established ethics advisory channels | 101 |
| Table 11.1. Alignment of OECD Member countries' anti-corruption and organised crime strategies  | 141 |

# Executive summary

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Integrity is a strategic asset for OECD Member and partner countries. When well designed and effectively implemented, public integrity systems protect democracies from corruption, strengthen trust in public institutions, and support the conditions for growth, fair competition and investment. Through assessing performance in seven key areas of 37 OECD Member and 25 partner countries' integrity systems, the 2026 *Anti-Corruption and Integrity Outlook* shows how, in the face of evolving corruption risks, countries can better harness the integrity advantage to enable prosperous economies and resilient, trusted public institutions.

Corruption remains a significant and evolving threat. It hurts economic growth by making markets less stable and predictable, stifling innovation and investment, and adding cost and inefficiency. On the expenditures side, recent estimates show countries are losing a significant share of GDP to fraud, corruption and waste, with trillions in revenue lost by public, private and not-for-profit organisations each year. At the same time, corruption also distorts public policies, deepens inequalities and erodes public trust. The number of people with low or no trust in the national government now exceeds those who express trust. Fewer than one in three people find it likely that the government would refuse a corporation's demand if it went against the public interest. These trends are further complicated and entrenched as corruption becomes more complicated, with organised crime networks and increasingly sophisticated fraud schemes, often enabled by new technologies, further amplifying corruption risks.

In the face of these challenges, countries are taking steps to strengthen their integrity systems. The number of

countries that have adopted their first-ever anti-corruption strategy or lobbying law has risen. However, across all areas presented in this report, the average implementation gap – where countries do not translate regulations into practice – now stands at 19 percentage points. This remains the key challenge for integrity systems. While in several areas regulations have gradually improved, implementation lags behind, particularly in conflict-of-interest management, political financing and disciplinary systems. In addition, countries are often not monitoring the implementation of their integrity systems, with only one in four OECD Member countries and one in two partner countries tracking the implementation of actions in their anti-corruption strategies.

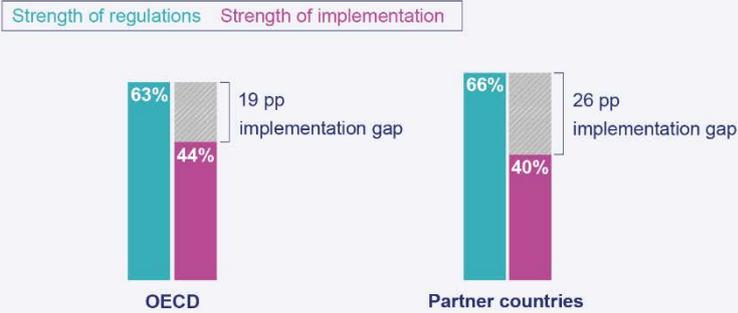
Chapters 2-8 of this Outlook show that high-performing countries are moving away from approaches to integrity that are overly rules-based, compliance-focused and process-heavy. Instead, they are adopting digital, risk-based and results-oriented approaches to tackle the most harmful risks in the most cost-effective ways. The strongest integrity systems extend the focus of anti-corruption measures to address corruption risks in the private sector and other high-risk areas including healthcare or defence. To support these efforts, it is essential to make better use of digital tools and improve data quality, interoperability and governance, particularly in oversight, enforcement and accountability functions. And, where corruption offences do occur, high levels of judicial integrity, based on strong selection and promotion procedures, codes of conduct as well as mechanisms for reporting wrongdoing, are important to ensure accountability.

This edition's focus chapters, Chapters 9-11, explore how corruption risks related to fraud, public procurement and organised crime are evolving. Fraud has become the fastest growing of all crime types in several countries, and globally organisations are estimated to lose 5% of funds to fraud each year. The complexity of procurement processes and transactions, the sums involved, the close interactions between the public and private sectors, and the global and fragmented nature of procurement supply chains increase the risk of corruption. Estimates suggest that between 8-25% of global public investment

may be lost to mismanagement and corruption each year. Many of these problems are underpinned and exacerbated by the growing threat of organised crime, the costs of which are now estimated to amount to as much as 5% of annual global GDP. Countries should therefore step up integrity efforts in these areas, by building strategic, evidence-based, preventative approaches which use resources more effectively and protect public funds and institutions better than relying on enforcement alone.

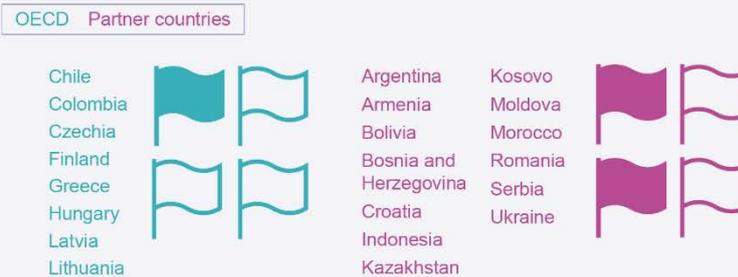
## Infographic 1. Key facts and figures

### The gap between the strength of integrity regulations and their implementation persists



### 1 in 4 OECD countries, and around half of partner countries, track the implementation of their anti-corruption strategies

Countries tracking the implementation of their anti-corruption strategies

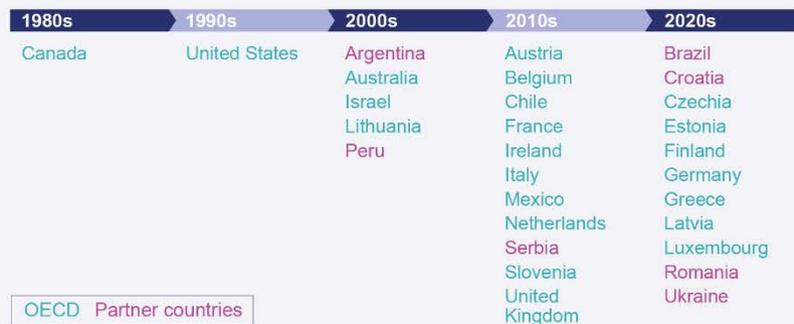


### In addition to government, strategies often target corruption risk in the private sector, but could better safeguard other high-risk areas

% of strategies targeting corruption risk in:



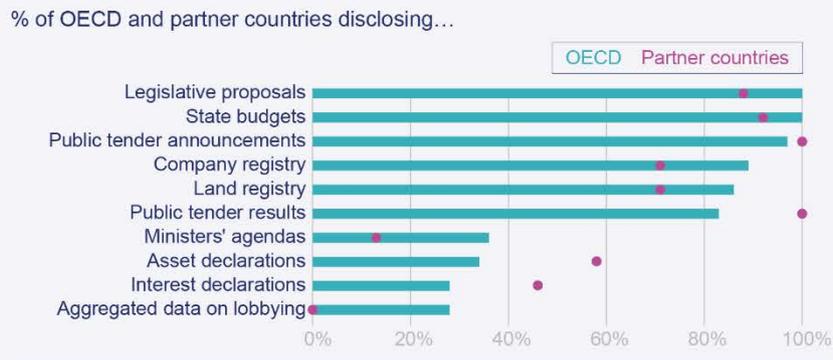
### More countries are adopting lobbying laws



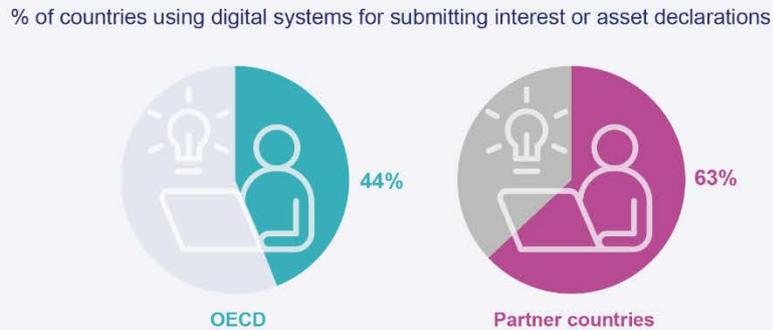
### Most countries regulate political finance transparency, but fewer follow the rules in practice



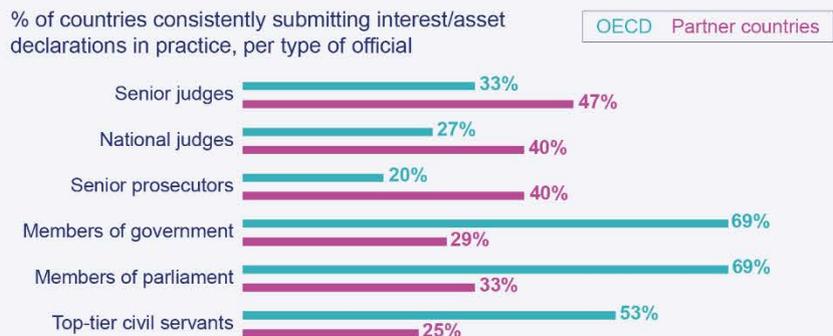
### Government transparency remains high, but the publication of integrity-related information is limited



### Tech and data can strengthen the implementation of integrity safeguards, but more uptake is needed



### Justice systems could benefit from stronger integrity safeguards for judges and prosecutors







# 1 OVERVIEW

## The integrity advantage

Integrity is a strategic asset for governments and businesses. When well designed and effectively implemented, public integrity systems protect democracies from corruption, strengthen trust in public institutions, and support the conditions for growth and fair competition. Countries that seize this integrity advantage are better positioned to attract investment, manage risks and respond credibly to citizens' expectations.

To generate this integrity advantage, governments must remain mindful of the evolving threat which corruption poses. Corruption hurts economic growth by decreasing levels of foreign direct investment. The now outdated view that corruption "greases the wheels" of the economy by circumventing inefficient regulations has little empirical backing. Rather, the evidence shows that corruption stifles innovation and investment, adds cost and inefficiency, and diverts resources away from intended uses, particularly in countries with low-quality governance (U4, 2017<sup>[1]</sup>; Damijan, 2023<sup>[2]</sup>; United States Trade Representative, 2025<sup>[3]</sup>). Integrity pays off as companies prefer to invest in stable and predictable political and regulatory environments. An uneven playing field adds uncertainty and potential costs, stifles entrepreneurship and distorts competition. Businesses view corruption as a significant challenge, with 1 in 4 firms worldwide singling out corruption as "a major or very severe constraint" according to the World Bank Enterprise Surveys (The World Bank, n.d.<sup>[4]</sup>). In the

European Union, more than three quarters think that over-close links between business and politics lead to corruption (77%) and around two-thirds that favouritism and corruption undermine business competition (65%) (European Union, 2025<sup>[5]</sup>).

On the expenditures side, weak integrity systems generate substantial fiscal losses. Countries lose a significant share of GDP to fraud, corruption and waste, with public, private and not-for-profit organisations estimated to lose 5% of revenue to occupational fraud each year globally (approximately USD 5 trillion in losses) and between 8-25% of global public investment may be lost to mismanagement of fraud in procurement operations (Association of Certified Fraud Examiners (ACFE), 2024<sup>[6]</sup>; Fazekas, Sberna and Vannucci, 2022<sup>[7]</sup>). This loss happens both at the stage of tax collection (countries at the same level of economic development but with lower levels of corruption are estimated by the IMF to collect around 4% more of their GDP in tax) and service provision. In several countries, fraud has become the most prevalent and fastest growing of all crime types in recent years. In addition, increasingly powerful and transnational organised crime networks are emerging, which use corruption as a tool to divert public resources away from their intended use by targeting public procurement, grants, licencing and planning processes. Technological developments, including artificial intelligence, are increasingly used by individuals and criminal organisations to commit fraud and increase the efficiency of their own operations at the public expense.

Corruption also distorts public policies, deepens inequalities and erodes public trust. According to the OECD Survey on Drivers of Trust in Public Institutions, the number of people with low or no trust in the national government now exceeds those who express trust. Balancing the interests of different groups in society for the public interest is among the most important tasks of parliaments and governments, and among the best levers for improving trust in national governments and legislative institutions, along with improved checks and balances within institutions and transparent, verifiable decision-making. However, fewer than one in three people find it likely that the government would refuse a corporation's demand if it went against the public interest. Nearly half doubt that a high-level political official would refuse to grant a political favour in return for a well-paid private sector job (OECD, 2024<sup>[8]</sup>). These trends have corresponded with a decline in engagement with politics and a growing scepticism about governments' ability to reliably address societal challenges.

In short, citizens and businesses want governments to uphold and prioritise integrity. Governments must table bold action and invest in risk-based, results-oriented integrity reforms that address the challenges raised by investors, consumers and voters, use new technologies for greater impact, and be able to showcase the benefits and work together across jurisdictions. However, the accumulation of burdensome and inefficient governance processes, as well as their often rigid implementation, has taken a toll on government capacity and efficiency to deliver reforms. Overly rules-based and process-heavy approaches to public integrity are outdated, introducing too much check and not enough balance into the business of government. Instead, as in other policy areas, governments must continue to adapt their integrity frameworks to ensure they are efficient, targeted and adding value for businesses and citizens.

For businesses, while compliance remains a legal and ethical obligation, compliance functions must increasingly demonstrate how their activity contributes to business objectives, beyond avoiding sanctions or reputational damage. New models are enabling companies to assess the "return on compliance", and effective and efficient compliance can explain 15–18% of

the variance in business performance (OECD, 2025<sup>[9]</sup>). Companies should pursue this shift to viewing integrity as a strategic capability, embedded in decision making and adaptable to business change, while also reinforcing the importance of a strong tone from the top to legitimise and sustain compliance efforts.

In taking this approach, governments and businesses can benefit from the 'integrity advantage', where integrity frameworks become a key enabler of prosperous economies and dignified societies in which people feel connected to their representatives.

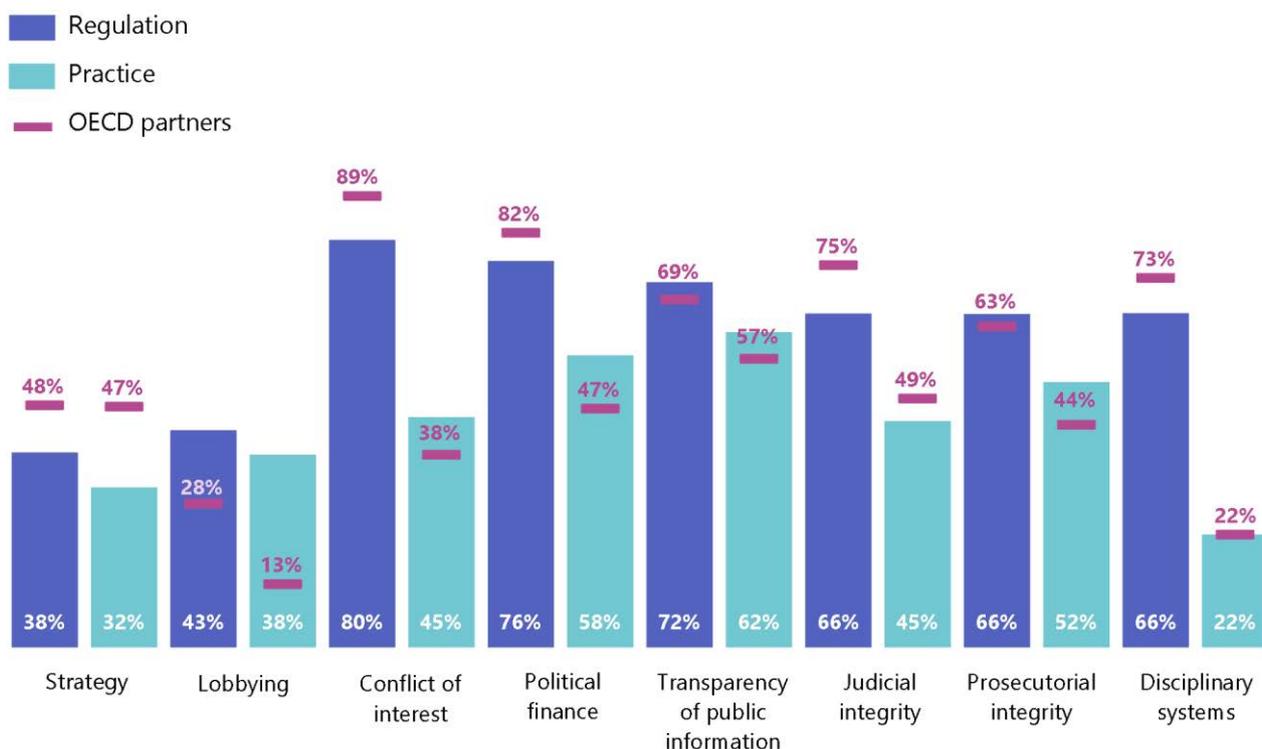
### **Countries continue to invest in integrity, but reforms are not always improving quality and the implementation gap persists**

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Governments across the world continue to reform their laws, institutions and practices to reduce corruption risks and gain advantages to society at large. The decline witnessed in, for example, the rule of law has not materialised in the public integrity area (WJP, 2025<sup>[10]</sup>). This Outlook shows that, for example, the number of countries that have adopted their first-ever anti-corruption and integrity strategy or lobbying law has risen. A provisional political agreement on the EU Directive on combating corruption was reached in December 2025, also illustrating that countries want to step up the fight against corruption as a key component of their growth and security agendas and in response to multiple ongoing crises. However, the quality of new laws is often not better than existing ones, and – most importantly – implementation is lagging.

The implementation gap persists and remains the key challenge for governments in 2026. For OECD Members, the gap is largest for disciplinary systems in the civil service (44 percentage points) and conflict-of-interest management (35 percentage points). Implementation-related values are lowest for strategic frameworks (32%) and disciplinary systems (22%). However, for strategy and lobbying in particular, even the formal, *de jure* values could improve, indicating that the quality of regulations could also be strengthened (Figure 1.1).

**Figure 1.1. State of play for public integrity across all OECD Member countries and 25 OECD partner countries – the implementation gap is the key challenge**



How to read: OECD Member country averages are represented by the blue bars, and OECD partner country averages are represented by the pink dashes. The averages are calculated by taking an average of the criteria fulfilled by both member and partner countries relating to the strength of regulations and practices in all areas presented. The implementation gap is calculated as the difference between criteria fulfilled on regulations and criteria fulfilled on practice.

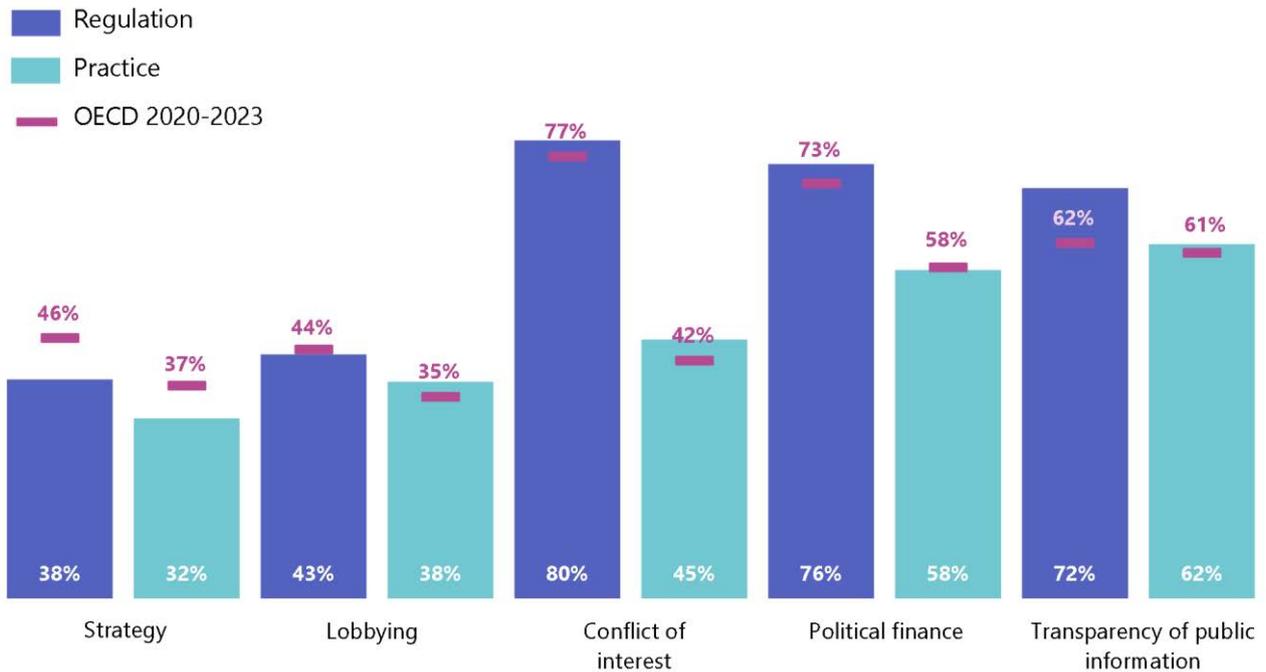
Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/hwy49v>

The average implementation gap across all areas<sup>1</sup> for OECD Member countries now stands at 19 percentage points. For the areas of strategy, lobbying, conflict of interest, political financing and transparency of public information (the areas covered in both the 2024 and 2026 editions of the Outlook), the average implementation gap has risen from 14 to 15 percentage points. There is a difference in the number of countries covered between this edition of the Outlook and the last, but this slight change in implementation gap is partly a

result of regulations incrementally improving on average, mainly for transparency of public information (from 60% to 62%), whereas average practice has remained the same (at 47%). Comparing the current datasets with those presented in the last edition, conflict of interest continues to be the area with the largest implementation gap, and transparency of public information continues to show the best practice-related values across all areas (Figure 1.2). Comparison over time is not yet possible for OECD partner countries.

**Figure 1.2. The implementation gap persists over time across the OECD**



Note: Strategy data was first published in 2021 and updated in 2023 and 2025. Data on conflict of interest, lobbying and political finance was first published in 2022 and updated in 2025. Data on judicial integrity, prosecutorial integrity and the disciplinary system was published in 2026 and no time trend is available. Data on corruption risk management included in the 2024 Anti-Corruption and Integrity Outlook has not been updated for this edition and is therefore not shown. Data for 2020-2023 are an update of the data presented in Figure 1.1 in the 2024 Anti-Corruption and Integrity Outlook: additional countries and a regulation criterion for political finance was re-categorised as lobbying.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/bdl1yj>

Focusing on the implementation gap should not preclude improving the quality of regulations. Many countries which have high practice values also have very high-quality regulations. In fact, Latvia and Lithuania, which have the highest average across all areas on

practice-related indicators (78% and 76% respectively) also have the highest average value of all countries on strengths of regulations (89 and 86%). Box 1.1 presents possible causes of the implementation gap.

### Box 1.1. Possible causes of the implementation gap

The Anti-Corruption and Integrity Outlook measures the implementation gap in the following ways:

- Across thematic areas:** comparing all OECD Public Integrity Indicators criteria fulfilled for regulations and implementation across countries' integrity systems.
- At the criteria level:** comparing a criterion related to a regulatory requirement and the matching criterion related to its implementation in practice
- Numerical indicators:** making a direct measurement of implementation rates (e.g. the implementation rate of activities committed to in a strategic framework).

Several possible causes of the implementation gap are explored further throughout this report:

- **Lack of resourcing / financing**, e.g. regulations may require all asset and interest declarations to be verified by a responsible authority, but that authority may not necessarily have the human or financial resources to undertake the required verifications.
- **Challenges with oversight, monitoring or centralisation of data**, e.g. not tracking what office holders do upon leaving their public roles makes it impossible to implement rules on revolving door, such as prohibitions on certain types of work or work in certain sectors.
- **Lack of political backing**, e.g. the legislature or parliamentary committees not engaging with oversight bodies' annual reports in a timely way undermines oversight bodies' role in supporting implementation through identifying gaps and risks and proposing mitigations.
- **Skills or knowledge deficit**, e.g. countries not certifying public sector auditors can lead to weaker implementation of audit rules and standards.
- **Design / reality gap (or unimplementable policies)**, e.g. a regulatory or strategic commitment to digitalise asset and interest declarations when the basic administrative, institutional and infrastructure arrangements are not already in place.
- **Not reaping the benefits of digitalisation**, e.g. not enabling electronic submission of asset and/or interest declarations which improves submission rates, verification, analysis, and inter-agency collaboration.

Source: OECD elaboration

A culture of integrity benefits from effective rule of law, a system of checks and balances, civic engagement and strong law enforcement. The global rule of law recession documented by the World Justice Project, with shrinking civic space and weakening checks and balances, makes strong public integrity systems even more essential, across all branches of government, to resist pressures of undue influence (WJP, 2025<sup>[10]</sup>). Weak enforcement of

foreign bribery is symptomatic of this challenging environment, which makes the job of integrity champions more difficult (Box 1.2). In this context, the global stagnation in the state of public integrity looks more encouraging. Integrity standards are not being dismantled and anti-corruption and integrity institutions continue to work.

### Box 1.2. Enforcement of foreign bribery must be stepped up

Amid mounting pressure on the rule of law worldwide, the enforcement of anti-bribery laws across members of the OECD Working Group on Bribery remains steady, but uneven, according to national data recently collected by the OECD Working Group on Bribery. The data provide a snapshot of how governments have been enforcing anti-bribery laws – since 1999 through 2024 – as obligated under the OECD Anti-Bribery Convention, which targets the supply side of bribery in international business transactions. According to the data:

- Enforcement has continued steadily since 1999 and companies are increasingly the focus, with corporate sanctions and convictions picking up since 2021.
- At the same time, the annual rate of new criminal sanctions against individuals has slowed in recent years.
- Beyond overall trends, enforcement is uneven across countries: sixteen Parties to the Convention have yet to report a single conviction or sanction for foreign bribery.

The data underscore the need for decisive government leadership to accelerate enforcement and commit the political attention and resources required to fight foreign bribery effectively. Companies have a critical role to play: Robust corporate compliance programmes are essential to preventing bribery before it occurs, and to ensuring that integrity is embedded in decision making.

In 2025, the OECD Working Group on Bribery launched the pilot OECD Anti-Bribery Convention Country Monitoring Dashboard to monitor implementation of 47 Parties to the Convention. The Dashboard points to systemic implementation challenges:

- More than half of Parties are currently subject to additional measures, and eight have been subject to additional measures for over five years.
- Over the past five years, the Working Group has applied 166 additional measures to 33 Parties, with no discernible downward trend during that period.
- Particularly concerning are deficiencies related to the very definition of the foreign bribery offence, which currently affect one quarter of Parties, including four that have failed to enact expected reforms for more than five years.
- Additional monitoring measures have also been imposed on Parties regarding a wide range of other issues, notably weak or ineffective enforcement, gaps in corporate liability regimes, inadequate sanctions, and concerns regarding the independence of investigations, prosecutions, or the judiciary.

The Dashboard's findings will inform the Working Group's preparations for its next phase of country evaluations, which are expected to start in late 2026.

Source: OECD elaboration

## High-performing countries move from a rules-based to a risk-based, results-oriented and digital approach

Countries that take a risk-based and results-oriented approach are better positioned to close the implementation gap, protect public funds and institutions, and promote economic growth and trust. As explored throughout this report, governments have created rules (laws and regulations) but are not implementing them adequately and achieving the expected results. Rules that are not implemented, not enforced, or do not lead to results, can also lead to a sense of impunity and may lower public trust. Traditional approaches based on the creation of more rules and stricter compliance have been of limited effectiveness. In line with the OECD Recommendation on Public Integrity (OECD, 2017<sup>[11]</sup>), moving towards a risk-based approach emphasises the most cost-efficient mitigation of the most harmful corruption risks. The 2024 Outlook urged countries to close the implementation gap by clarifying institutional responsibilities, monitoring implementation through reliable data, building office holders'

understanding and buy-in, and enforcing appropriate sanctions. In a world of scarce resources, governments will have most success if they find the regulatory sweet spot and strengthen their efforts to address the integrity risks where institutions are most vulnerable.

OECD Member countries have transitioned from a rules-based and compliance-focused approach towards a risk-based and results-oriented one for the past decade, prompted by the adoption of the 2017 Recommendation. While this journey is not complete, there are useful lessons to share with other countries. The PII values set a baseline for OECD partner countries when aligning with OECD legal instruments on public integrity. The implementation gap is generally larger for the 25 countries included in the Public Integrity Indicators (PIIs) that are non-Members (OECD partner countries), in particular in the areas of conflict-of-interest, political finance, judicial integrity and disciplinary systems where the distance between the strength of regulations and implementation capacities and results in practice is wider (Figure 1.1). This group of countries includes all 9 countries seeking accession to the OECD and other advanced and developing economies around the world. There is also a variation at

regional level, and this Outlook explores how trends in regions compare to the global, OECD member and partner country averages throughout.

### **Greater uptake of technology and better-quality data can help government “do more with less”**

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To close the implementation gap, all countries must further leverage technology and data in support of public integrity functions by integrating digital tools into their day-to-day operations. Data is a strategic asset, and high data quality, interoperability and effective data governance are prerequisites for reaping the integrity advantage. The use of artificial intelligence is becoming more widespread, but from a low base. Machine learning techniques for data analysis and natural language processing for text analysis are delivering efficiency gains by, for instance, supporting corruption risk assessment, detecting patterns in large datasets to assist anti-fraud efforts or in internal and external audit, or the processing of large volumes of information such as in the verification of interest and asset disclosures. However, while efforts to broaden digital and analytical skills across the workforce are under way, skills gaps persist and continue to limit the full potential of data-driven approaches, particularly in functions of oversight, enforcement and accountability. At the same time, challenges related to explainability, transparency and accountability of algorithmic outputs remain significant and, rightly, continue to temper the pace of adoption, reflecting the need to ensure compatibility with quality assurance and legal certainty.

### **National integrity systems can be strengthened to better withstand corruption risks**

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Chapters 2-8 of the Outlook analyse the strength of national integrity systems across seven thematic areas: anti-corruption and integrity strategies, lobbying, conflict of interest, political finance, transparency of public information, disciplinary systems for civil servants, and integrity of the justice systems.

Anti-corruption strategies continue to be a key means for countries to facilitate a ‘system approach’ to integrity which is risk-based, prioritised and coherent. As

Chapter 2 shows, more countries are adopting such a strategic approach for the first time. However, many other countries are allowing gaps to open up between the reporting periods of their strategies, leading to strategic vacuums which can undermine the effectiveness of their anti-corruption efforts. Where countries have retained an active strategic approach, its quality and implementation have generally improved in recent years, but for other countries there remains scope to strengthen both the design and implementation of their strategic approach. One key area for improvement in strategy design remains that countries’ strategies still rarely target high-risk areas, including the private sector. Well-designed strategies tend to include measures for tracking implementation, but less than half of countries track implementation rates in practice and therefore remain unable to check whether strategies are supporting the desired outcomes. Many countries could also make better use of outcome-level indicators and evaluation techniques to gauge implementation and strengthen future strategies.

Lobbying safeguards prevent asymmetric or undue influence over policymaking, and help to ensure that knowledge, expertise and interests continue to inform policymaking in a way which supports the public interest and stable, competitive markets. However, as Chapter 3 shows, despite wider adoption of regulatory frameworks in recent years, the quality of lobbying regulations remains among the lowest in OECD Member and partner countries’ integrity systems. In large part this is due to declining beneficial ownership transparency. In practice, measures to enhance the transparency of lobbying activities, including lobbying registers, could improve. And while countries with lobbying registers in place generally maintain appropriate enforcement and compliance mechanisms, measures to monitor lobbying activities could be strengthened. If not, the quality and stability of policymaking and market competition are at risk.

Measures for managing conflicts of interest in the public service ensure office holders continue to serve citizens and businesses’ interests. Chapter 4 shows, however, that in recent years the implementation gap has persisted in OECD Member countries. The authorities responsible for receiving and overseeing declarations of interest are not adequately monitoring whether at-risk officials are disclosing their interests and/or assets. Authorities therefore do not know whether safeguards

are working in practice. This monitoring gap also applies to the 'revolving door', where many countries still do not track office holders' movement in and out of public entities. Improving the management of conflicts of interest is not just a case of layering process over existing mechanisms. Many countries could introduce a risk-based approach to managing interests and assets, which focus efforts on those office holders most exposed to the highest corruption risks. In addition, countries could enhance institutional capacity, improve verification procedures, make recommendations for resolving conflicts before they cause harm, and use appropriate sanctions for breaches.

Political financing allows individuals and entities to channel support to the candidates and parties which best represent them, and enhances competition and greater choice in elections. But not maintaining effective safeguards around political financing can produce harmful policy outcomes, biased and burdensome regulation, and the overrepresentation of certain interests in society and markets. However, as explored in Chapter 5, although both OECD Member and partner countries' political financing regulations are generally strong, a significant implementation gap in their political financing systems persists. Political parties in many countries do not uphold reporting and transparency rules, also exposing them to the risk that prohibited sources of funding and malign influences over policymaking remain undetected. Supervisory bodies could make better use of in-house certified auditors to enhance their oversight of parties' financial accounts. And although digitalisation and globalisation are rapidly changing the risks around political financing, many countries' laws are not adapting to the new risks and continue to omit key safeguards.

Improving the transparency of public information can build citizens' and businesses' trust that governments are working in their interests, and can offer governments the opportunity to demonstrate the integrity and effectiveness of their work. Chapter 6 finds that in recent years, government transparency has remained consistently high, though there is still scope to improve, particularly in OECD partner countries. For example, although countries' transparency regulations contain many standard requirements, for many countries data are still not open by default. Key data which could enhance public sector automation and efficiency, and support market entry, innovation and competition is therefore not available. In addition, data related to

integrity are commonly not published. To help implement the transparency rules which countries have in place, supervisory bodies could carry out inspections, issue sanctions where appropriate, and report on their activities.

Maintaining effective disciplinary systems is essential for building and maintaining a strong, values-based culture of public integrity in the civil service. Appropriate disciplinary procedures help civil servants uphold standards of conduct and continue to act with integrity. As explored in chapter 7, while most OECD Member and partner countries have clear regulations on disciplinary procedures for civil servants, they could be better supported through stronger fairness guarantees. In addition, improved training on disciplinary investigations and use of digital tools could strengthen implementation of disciplinary measures in practice.

Upholding the integrity of the judiciary is essential to enable judges and prosecutors to perform their role in enforcing laws and regulations and ensuring accountability for corruption crimes and breaches of anti-corruption policies. As Chapter 8 shows, most countries have the basic safeguards for judicial and prosecutorial integrity in place, but there is scope to improve merit-based procedures for the selection, appointment and promotion of judges and prosecutors to protect judicial independence and prosecutorial integrity. Likewise, standards of conduct for judges and prosecutors are common, but implementation could be improved, especially around conflicts of interest. Whistleblowing mechanisms for reporting cases of judicial and prosecutorial misconduct are generally being implemented but could be improved through strengthened public awareness raising of existing reporting procedures, as well as training for staff on handling reports.

### **Fraud prevention efforts, integrity controls in public procurement and protecting public bodies from organised crime should be stepped up**

The focus chapters of this edition of the Outlook explore tools to mitigate evolving corruption risks related to fraud, public procurement and organised crime.

Countries are strengthening their anti-fraud functions at the strategic, institutional and operational level in the

realisation that existing integrity safeguards are no longer adequate to stem the rising tide of fraudulent activity. Estimates across several OECD Member countries suggest that public sector fraud is increasing, with one estimate from the European Public Prosecutor's Office indicating that fraud and other crimes against the EU budget increased by around 22% between 2023-2024, with more than half of the estimated damage linked to the systematic perpetration of cross-border fraud by criminal organisations. The first focus chapter, Chapter 9, shows that while many governments have basic safeguards in place, such as embedding anti-fraud and corruption in internal control and risk management, most countries lack a systemic approach for improving the coherence, targeting and effectiveness of their anti-fraud efforts. There is increasing recognition of the potential of emerging technologies to fight increasingly complex and transnational fraud schemes. For instance, some governments are leveraging AI to enhance their use of statistical techniques to identify outliers, patterns, transactions and behaviours which deviate from norms and that warrant human investigation. Overall, as governments seek public sector efficiencies, investing in fraud prevention will be more cost-effective than dealing with its consequences – a key example of the integrity advantage at work.

Public procurement accounts for approximately 13% of GDP in OECD Member countries (OECD, 2025<sup>[12]</sup>). The complexity of procurement processes and transactions, the sums involved, the close interactions between the public and private sectors, and the global and fragmented nature of procurement supply chains increase the risk of corruption. Estimates suggest that between 8-25% of global public investment may be lost to mismanagement and corruption (Fazekas, Sberna and Vannucci, 2022<sup>[7]</sup>). As the second focus chapter, Chapter 10 shows, OECD Member countries generally have legal provisions in place for upholding integrity in public procurements. However, efforts to promote integrity beyond the public sector to suppliers, including enhancing supply chain transparency or integrity certifications, could be advanced. Developing a risk-based approach to integrity in public procurement can increase the efficiency and impact of interventions and reduce the burden of implementing integrity regulations on public entities. And digital technologies, particularly better data governance and interoperability, could be better used to manage integrity risks.

Organised crime presents a significant threat to the global economy and societies across the world, with recent estimates suggesting that its global costs amount to as much as 5% of annual global GDP (UNODC, 2025<sup>[13]</sup>). The last focus chapter, Chapter 11, explores how organised criminals are increasingly seeking to gain undue advantage by using corruption to infiltrate the legal economy and public services, and fraud to appropriate public funds. In response, countries must introduce coherent strategic frameworks which account for the connections between corruption and organised crime, address gaps, weaknesses and inefficiencies which organised criminals can exploit, and improve cross-government and international co-operation. As part of this upgraded, more strategic approach, countries should build upstream resilience against organised crime by improving prevention tools and enhancing the integrity of public institutions, particularly in vulnerable sectors like licencing, borders, planning and procurement.

## How to read the 2026 OECD Anti-Corruption and Integrity Outlook

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The 2026 Anti-Corruption and Integrity Outlook provides insights on the strengths and weaknesses of countries' integrity systems, identifies characteristics of good performers, and indicates steps that countries can take to strengthen their laws, regulations, institutions and practices. It does so by comparing integrity policies, regulations and practices. The cross-country analysis in the first seven chapters is accompanied by country notes which help explain the context of specific countries and place the global, thematic and regional findings into perspective.

These first chapters present the state of play for public integrity across 37 OECD Member and 25 partner countries for each of the thematic areas covered by the PII. The three focus chapters are not covered by the PII but focus on areas where the cost of corruption and integrity risks are high and increasing: fraud prevention, integrity in public procurement and organised crime.

The 2024 Outlook set a baseline for OECD country performance on strategy, conflict of interest, lobbying, political finance, transparency of public information and corruption risk management. This edition can track progression or regression over time for OECD Member

countries in these areas. In 2024, OECD averages were based on 33 countries participating, whereas in 2026, 37 OECD Member countries participated overall. The Strategy chapter is based on 37 OECD Member countries, whereas the chapters on lobbying, conflict of interest, political finance and transparency of public information are based on 36 OECD Member countries. Judicial integrity and the disciplinary system for civil servants were added as new chapters in 2026, both currently covering 31 OECD Member countries as well as 15 partner countries. The Outlook therefore now covers integrity systems not only in the executive and legislative branches of government, but also the judiciary. No updates were made to the corruption risk management data for this version, and this area is therefore not explored in a data chapter this time.

Besides the trends analysis, this version of the Outlook also has greater country coverage. 25 OECD partner

countries have joined the PII since 2024, and their data has been included. Broader geographical coverage allows for greater peer learning and new insights into what works and why in curbing corruption. When the data shows substantive differences across OECD Member countries and partner countries, these two groups of countries are compared to explore causes and potentially formulate recommendations to further align with OECD policy and legal instruments. Greater geographical coverage also allows for regional comparison. Understanding how regions compare to the OECD Member and partner country averages and how individual countries compare to their regional averages can provide richer context and facilitate further peer learning and improvement. Regional examples in this report are focus on Europe and the LAC region as PII country coverage is representative in those regions. Table 1.1 shows the regional classification of the 62 countries participating in the PII.

**Table 1.1. Regional classification: Countries included in the analysis**

| Asia-Pacific  | Europe  | Latin America and the Caribbean  | Middle East and Africa   | North America                                     |
|---|---|--|--|---|
| <p><b>OECD Members:</b> Australia, Japan<sup>1</sup>, Korea, New Zealand</p> <p><b>OECD partner countries:</b> Armenia, Indonesia, Kazakhstan, Thailand</p> | <p><b>OECD Members:</b> Austria, Belgium, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Netherlands, Norway, Poland, Portugal, Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye, United Kingdom</p> <p><b>OECD partner countries:</b> Bosnia-Herzegovina, Bulgaria, Croatia, Kosovo*, Moldova, Romania, Serbia, Ukraine</p> | <p><b>OECD Members:</b> Chile, Colombia, Costa Rica, Mexico</p> <p><b>OECD partner countries:</b> Argentina, Bolivia, Brazil, Dominican Republic, Ecuador, Guatemala, Honduras, Paraguay, Peru</p> | <p><b>OECD Members:</b> Israel</p> <p><b>OECD partner countries:</b> Jordan, Morocco, Seychelles, Zambia</p> | <p><b>OECD Members:</b> Canada, United States</p> |

\* This designation is without prejudice to positions on status, and is in line with United Nations Security Council Resolution 1244/99 and the Advisory Opinion of the International Court of Justice on Kosovo's declaration of independence.

1. Japan did not provide data in 2025.

### Box 1.3. The OECD Public Integrity Indicators

The majority of the data used throughout this Outlook is taken from the following datasets in the Public Integrity Indicators (PIIs) and refers to 2025 or the latest year available:

- Quality of anti-corruption and integrity strategic framework (data first published in 2021 and updated in 2023 and 2025; partner-country data was published in 2024 and 2025).
- Accountability of public policymaking, covering lobbying, conflict of interest, public information and political financing (data first published in 2022 and updated in 2025; partner-country data was published in 2024).
- Integrity of justice and disciplinary systems (data first published in 2026).

All PII data presented in this report was extracted from the OECD Public Integrity Indicators database on 10 March 2026.

Across these datasets, a total of 254 standard criteria and 9 numerical indicators have been defined to measure the effectiveness of laws, regulations, procedures and institutions, along with their alignment with OECD and other international legal instruments. In addition to these checklist-type indicators, the PIIs also include more outcome-oriented indicators drawing on administrative data and surveys, such as levels of trust in parliament or the government.

The PIIs rely on primary administrative data provided and validated by governments rather than perceptions, expert assessments and proxies. They therefore avoid many of the pitfalls of other indexes, including changing attitudes to incumbent governments or the influence of foreign interference over citizens' perceptions.

The PIIs are available through an online data portal and the OECD Data Explorer:

- [Datasets | OECD Public Integrity Indicators](#)
- [OECD Data Explorer • Public Integrity Indicators](#)

Overall, these criteria produce objective, actionable data to help decision makers understand the strengths and weaknesses in their integrity systems, offer benchmarks to support improvements, and enable peer learning between OECD Member and partner countries.

### Note

<sup>1</sup> The average implementation gap across all areas is calculated as the difference between the average of area averages for regulations and the average of area averages for practice in Figure 1.1. This is done to give equal weight to each area, as the number of criteria within each area differs.



# 2 STRATEGY

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More countries are adopting a strategic approach to anti-corruption for the first time. However, many other countries are allowing gaps between their strategies' reporting periods, creating strategic vacuums which can undermine the effectiveness of their anti-corruption efforts. Where countries have retained an active strategic framework, its quality and implementation have generally improved in recent years, but for other countries there remains scope to strengthen the design and implementation of their strategies. Improvements include that countries' strategies could better target high-risk areas. Implementation rates could be tracked to determine whether strategies are supporting desired outcomes. And outcome-level indicators and evaluation techniques to gauge implementation could be better used.

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## Introduction

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A strategic approach to integrity allows governments to identify challenges, establish priorities and objectives, define specific actions for achieving desired outcomes, set responsibilities and build consensus around objectives and activities. It also facilitates effective implementation through monitoring and evaluation processes based on clear measurements of success. In short, a strategic approach, usually through the development of strategic documents, can support a country in strengthening a coherent and comprehensive integrity system if a whole-of-government approach is taken.

This strategic approach to corruption is particularly relevant in the face of the evolving and increasingly complex challenges which governments face in relation to organised crime, fraud and integrity in public procurement explored later in this report. Adoption of one or several strategic documents aiming at reducing corruption and promoting integrity by political leaders is an expression of commitment and political will. Involvement of non-state actors in the design, implementation and monitoring strengthens legitimacy, reach and therefore impact of the strategy.

A high-quality strategy document does not guarantee lower levels of corruption on its own. Achieving lower levels of corruption is a long-term outcome that is rarely visible within a single strategy period. This is in part because corruption is often measured using perceptions-based data that does not capture actual experiences or integrity improvements, at least not in the short to medium term. Anti-corruption and integrity strategy monitoring and evaluation systems have generally struggled to demonstrate how improving integrity of institutions translate into better service delivery or reduced waste and fraud. Strengthening a results-oriented and risk-based approach will help make these links more explicit, and thereby lend greater credibility to integrity reforms and a better business case to secure scarce resources. This would require that activities and outputs are actually delivered in practice and that objectives are sufficiently targeting improvements in specific sectors, services or processes.

Constructing a meaningful theory of change that explains how strategy outputs can realistically lead to better societal outcomes is essential, as is reliable data for the specific segments of the population or government bodies that reforms target.

This chapter examines countries' strategic approaches to anti-corruption and integrity, and trends in recent years. It finds that:

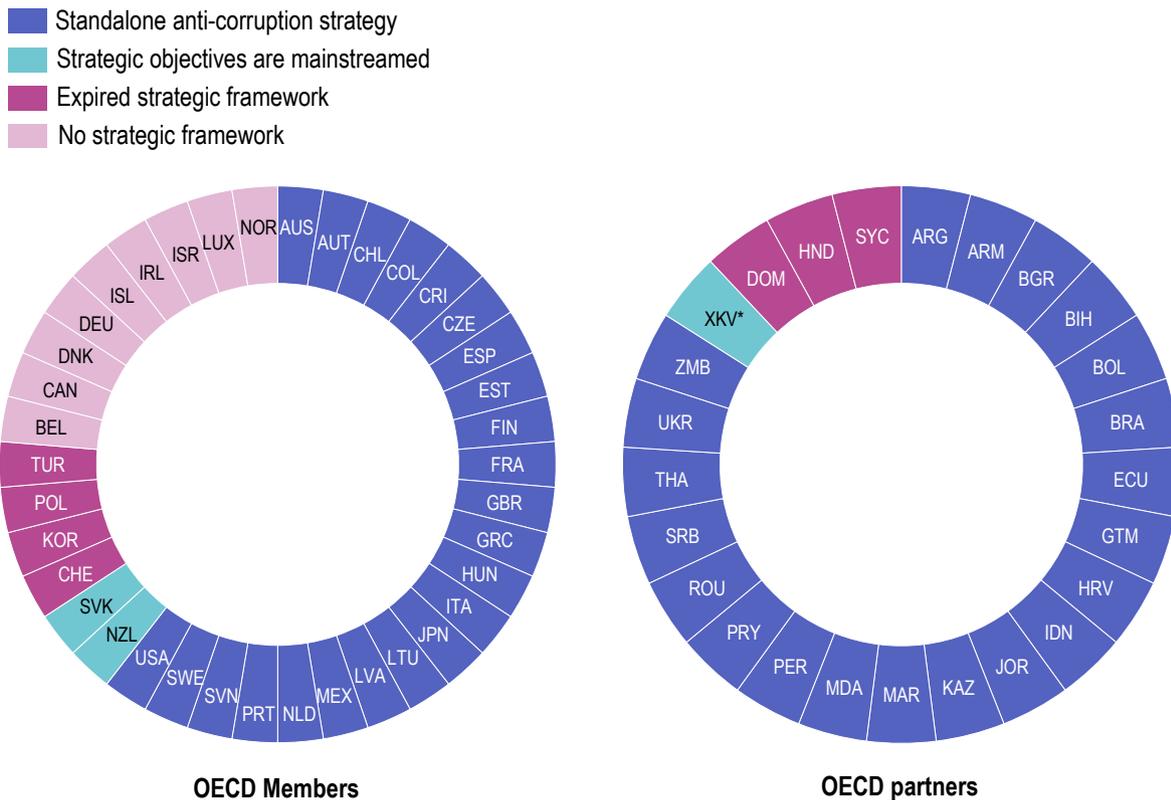
- More countries continue to adopt first-generation strategies but periods of strategic vacuum are frequent over time, undermining reform progress and implementation
- The design and implementation of strategies could generally be strengthened, but has improved for OECD Member countries that did not let their strategies expire
- Well-designed strategies tend to have better implementation rates, but only 1 in 4 OECD Member countries track implementation in practice
- Strategies are still rarely targeting high-risk areas
- Less than half of countries make use of outcome-level indicators and evaluation to demonstrate the concrete advantages of integrity improvements.

### More countries are adopting first-generation strategies, but periods of strategic vacuum undermine progress

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Adopting strategic objectives on anti-corruption and integrity is becoming increasingly common practice around the world, including in OECD Member countries. 25 OECD Member countries (66%) and 22 OECD partner countries (88%) have a national, strategic framework in place that was adopted at the highest level of government. The 2024 Anti-Corruption and Integrity Outlook noted a wave of countries that adopted their first strategy: Costa Rica, Finland, France, Switzerland, and the United States. Chile, Greece, Guatemala, Spain, and Italy have now also adopted their strategies at the highest level of government.

**Figure 2.1. Most countries have a strategic approach to anti-corruption**



Note: Data for country values for strategic approach were based on the following seven criteria: “Strategic objectives are established for mitigating public integrity risks in human resource management, including violations of public integrity standards”, “Strategic objectives are established for mitigating public integrity risks in public financial management, including reducing fraud and financial mismanagement”, “Strategic objectives are established for mitigating public integrity risks in internal control and risk management”, “Strategic objectives are established for mitigating public integrity risks in public procurement”, “Strategic objectives are established for reducing fraud and other types of corruption across the public sector”, “Strategic objectives are established to mitigate public integrity risks in the private sector, public corporations, state-owned enterprises or public-private partnerships”, “Strategies for any of the following sectors have at least one first-level objective aimed at mitigating public integrity risks: (a) infrastructure, (b) housing, (c) health, (d) education, (e) taxation, (f) customs.”

Strategies are mainstreamed when strategic objectives are found in one or several different policy documents, and there is no standalone anti-corruption strategy. This figure is elaborated according to the latest available data. The latest data comes from 2025 for OECD Member countries, and from 2023 for OECD partner countries, except for Brazil, Guatemala, and Thailand, whose data is for 2025. The latest data for Bosnia and Herzegovina, Hungary, Serbia and Sweden, is 2024.

The Slovak Republic and Switzerland have adopted a new anti-corruption strategy in 2026.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

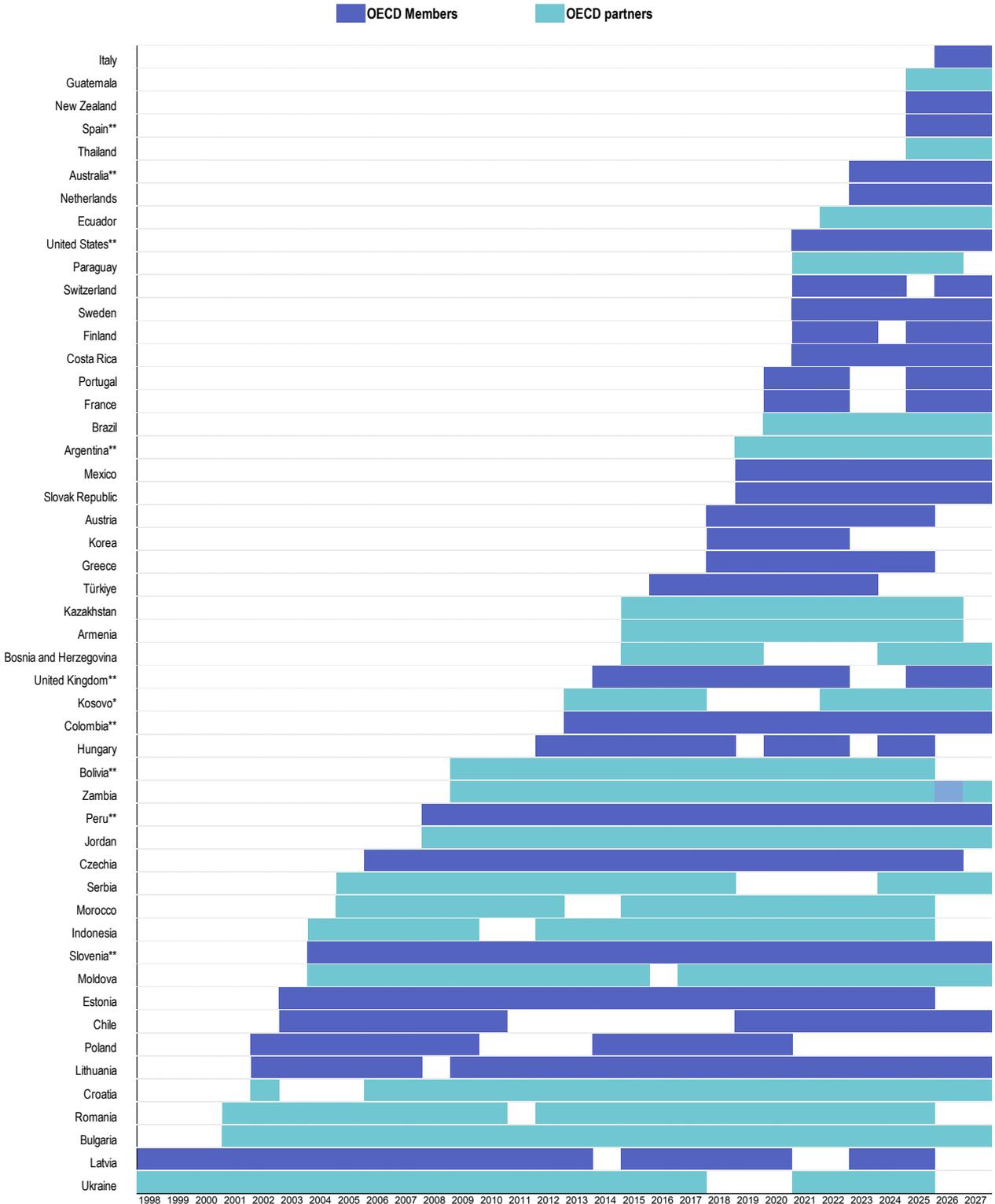
StatLink <https://stat.link/kvy2hz>

Continued and sustained political commitment is essential for integrity reforms to take root and bring sustained results. However, gaps between strategic cycles undermine the effectiveness of anti-corruption strategies as a tool for reform. Of the four OECD Member countries whose strategies had expired by the end of 2025 (Switzerland, Korea, Poland, and Türkiye), two have been expired for more than three years, but even in cases where updated strategies are adopted, gaps between iterations are common (Figure 2.2). Such gaps risk

stalling reform progress, especially since measures included in anti-corruption strategies are often not tracked or implemented on time (see the implementation rate of activities in Figure 2.6. Gaps may therefore result in reforms that are incomplete and abandoned, leading to an approach which is not only ineffective but also wasteful. This can lower confidence in anti-corruption and integrity efforts, a perverse effect of the original intention of adopting the strategy.

## Figure 2.2. Countries are increasingly adopting their first anti-corruption and integrity strategy, but gaps between strategies are frequent

Timeline of anti-corruption and integrity strategic frameworks for OECD Member and partner countries



Note: The bars represent the periods in which countries had anti-corruption and integrity strategic objectives in place. Countries marked with an asterisk (“\*\*”) do not have dedicated timeframes for their current anti-corruption strategies. The cut-off point for this figure is 2027, but some strategies’ timeframes go beyond this year. For Chile and Greece this timeline includes strategic documents that have not been adopted at the level of government. The countries adopted their first strategic document at the level of government at the years 2023 (Chile) and 2022 (Greece).

The Slovak Republic and Switzerland have adopted new strategies in 2026, which are included in the figure. The latest year assessment for Moldova, Ecuador, and Jordan is 2023, but research conducted by the OECD Secretariat has identified updates in the countries' strategic frameworks. These new strategies are included in the figure. Ukraine has extended the implementation period for its State Anti-Corruption Programme 2023-2025 (SAP) until the date of entry into force of its next SAP, which is currently under development. Data not provided for Japan.

Source: OECD Public Integrity Indicators database (as of 10 March 2026) and research conducted by the OECD Secretariat.

### The design and implementation of strategies could generally be strengthened, but have improved for OECD Member countries that did not let their strategies expire

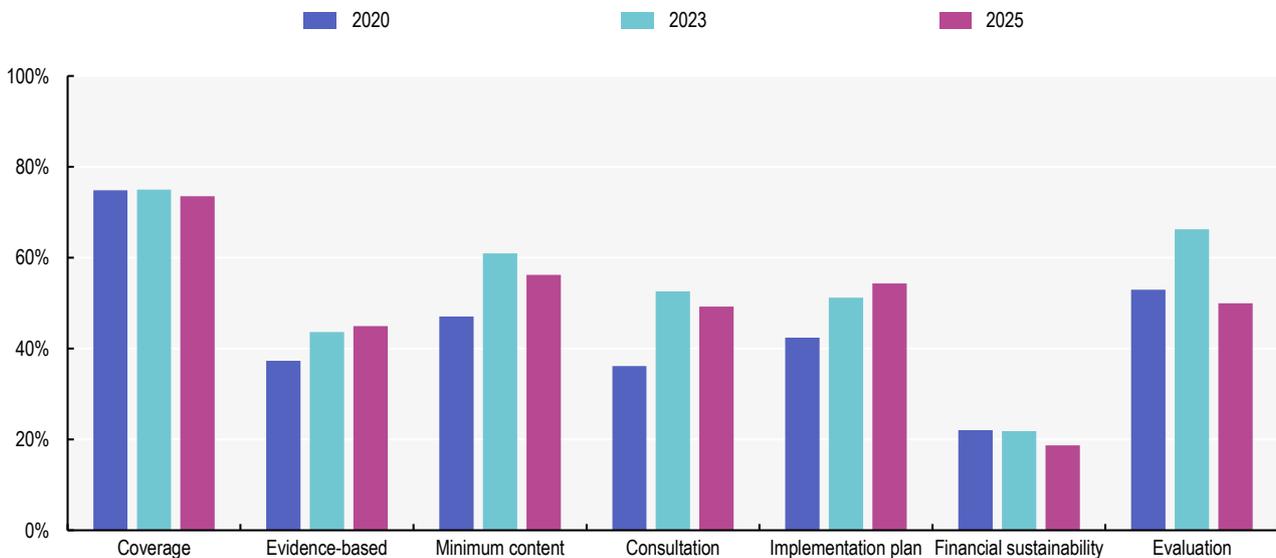
The quality of strategies differs substantially across countries, both in terms of design and implementation. Figure 1.1 in the Overview chapter shows that across the PIIs, the quality of anti-corruption and integrity strategies is comparatively low. There has been no progress on OECD average indicator values because the expiration of several strategies had a significant negative impact and cancelled out improvements made by other countries.

For those OECD Member countries that have not let their strategies expire, several indicators on the quality of

strategies have gradually improved over the past five years (Figure 2.3). While average indicator values on financial sustainability and use of evaluation have declined, strategies are becoming more evidence-based, with better guidance for successful implementation, and consultations with stakeholders have improved. Improvements made by countries to their strategies were most significant for the following three PII criteria:

- All strategies include a situation analysis, including identification of existing public integrity risks
- All action plans reference administrative data sources from existing public registries
- Strategic objectives are established for reducing fraud and other types of corruption across the public sector.

**Figure 2.3. Strategies in OECD Members that have not expired are becoming more evidence-based, with better guidance for successful implementation and better consulted with stakeholders**



Note: The OECD average for each year is calculated only for countries that had relevant strategic objectives in place in that year. To ensure comparability between years, only countries that had strategic objectives in place in at least two of the years were included in the calculations. The averages therefore cover the following countries: Australia, Austria, Chile, Colombia, Costa Rica, Czechia, Estonia, Finland, France, Greece, Hungary, Latvia, Lithuania, Mexico, the Netherlands, Portugal, the Slovak Republic, Sweden, Türkiye, the United Kingdom and the United States. Data for Hungary and Sweden comes from 2024 instead of 2025. The y axis presents the average "strength of strategic framework" criteria fulfilled by OECD Member countries by year for those countries with a strategic framework in force since 2020

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

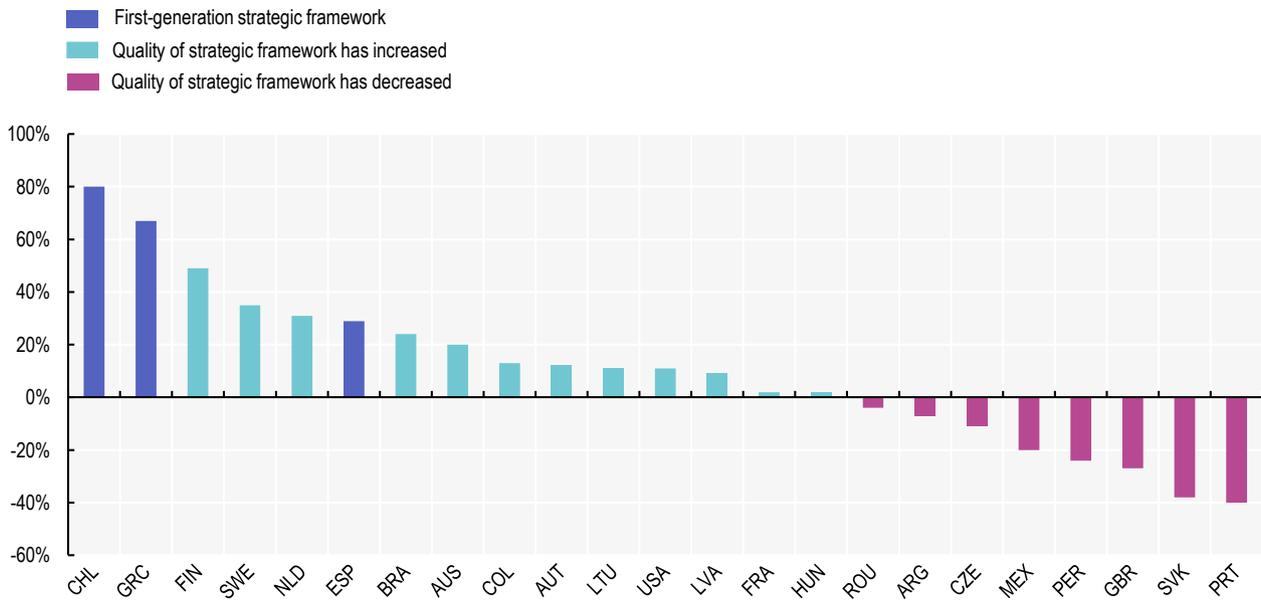
StatLink  <https://stat.link/9b4vpj>

Continuity between strategies is not enough to ensure quality. Even among the countries that have had a strategic framework in place since 2020, progress is unequal. New strategies in Chile, Greece and Spain drove much of the improvement, while Finland, Sweden and the Netherlands saw the most improvement between

successive iterations of their strategies (Figure 2.4). By contrast, a decline is observed in eight countries. Within this group, the most pronounced regressions concern evaluation practices and the adequacy of the implementation plan, which decreased, on average, by 29% and 22%, respectively.

### Figure 2.4. Progress by individual countries since 2020

Percentage change in the strength of strategic frameworks from 2020 to 2025 among OECD Member and partner countries with frameworks in place in both years



Note: The 'strength of strategy' is based on the number of criteria fulfilled in the PII's relating to strategic framework, excluding the implementation rate. The columns represent the difference between the qualities of the strategic frameworks between 2020 and the latest year of assessment.

Only countries that had validated data in 2020 and up-to-date strategic frameworks during the latest assessment year are included. For all OECD Member countries and Brazil the latest assessment was conducted in 2025, except for Hungary and Sweden which comes from 2024. The latest assessment for Argentina, Peru, and Romania was conducted in 2023.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

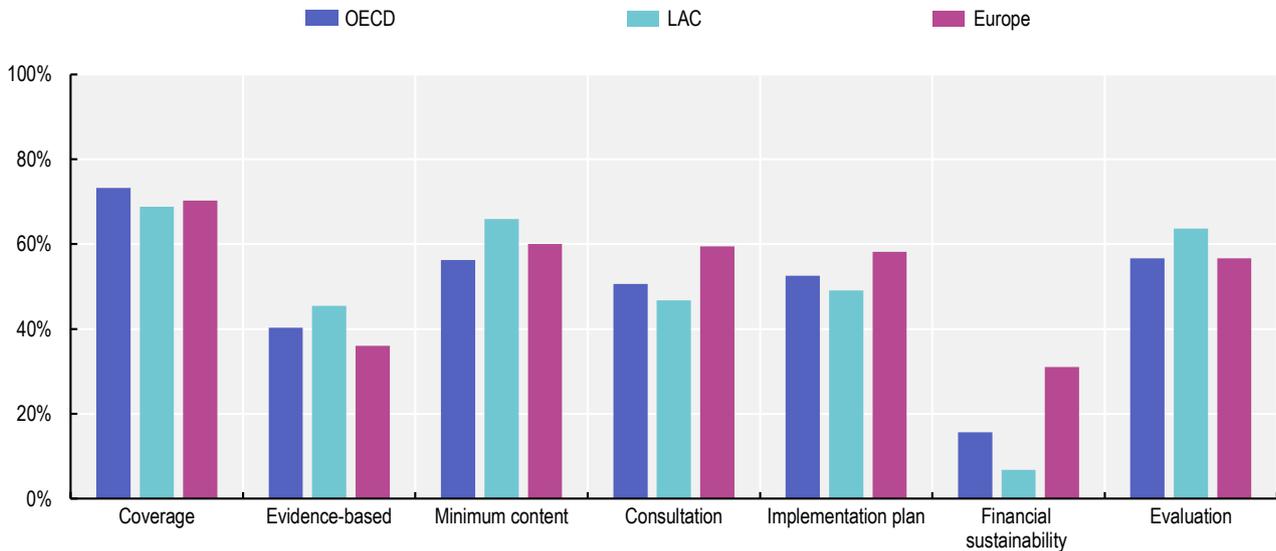
StatLink  <https://stat.link/60gruk>

LAC countries tend to perform well on the two indicators measuring (a) the use of evidence to inform strategies and (b) the use of evaluation to guide implementation and inform future strategic objectives, but not so well on financial sustainability. European countries consistently introduce consultation processes for their strategies with

civil society and other state bodies, craft strong implementation plans and ensure financial sustainability. Future efforts to further improve strategic approaches may therefore benefit not only from intra-regional exchanges but the exchange of good practices at a global level (Figure 2.5).

## Figure 2.5. Exchange of good practices at the global level can help countries improve their strategies

Average values by region, latest available data



Note: The bars represent the average of countries with relevant, up-to-date strategic objectives in place during the latest year of assessment. The averages do not consider countries without a strategic framework. The latest year of assessment is 2025 for OECD Member countries as well as Brazil, Guatemala and Thailand. The latest year of assessment for Hungary, Sweden, Serbia and Bosnia and Herzegovina is 2024. The latest year of assessment for all other countries is 2023.

Regional composition is per Table 1.1 in the Overview chapter.

Data not provided for Japan.

**How to read:** In the latest year of assessment, European countries with an anti-corruption strategic framework in place fulfilled 58% of the criteria related to the implementation plan of their strategies, on average.

Source: OECD Public Integrity Indicators database (as of 10 March 2025).

StatLink  <https://stat.link/is3zvj>

### Well-designed strategies tend to have better implementation rates, but only 1 in 4 OECD Member countries track implementation in practice

Countries with high-quality strategies tend to combine evidence-based strategic objectives with a strong focus on monitoring implementation. Where implementation is not tracked, progress toward intended outcomes is undermined. Yet, despite the widespread adoption of strategic frameworks, monitoring remains the exception rather than the norm. Although anti-corruption strategies have mushroomed globally since the adoption of the United Nations Convention Against Corruption many countries with anti-corruption strategies still do not account for the level of implementation. Of the 46 countries with an anti-corruption strategy in place, only 21 (46%) track the implementation of planned activities. In 2020, 60% of OECD Members with a strategic

framework did not track the implementation rate of their strategies. In 2025, this rate was 67%. The situation is better in OECD partner countries, where 36% of countries do not track implementation. Reporting on whether planned activities were carried out and outputs delivered is not just a matter of accountability to citizens on how public funds are spent and whether the strategy is on track. Figure 2.6 shows that the top overall performers are more likely to also track the annual implementation rate of their action plans. Countries that design high-quality strategies tend to track implementation and have higher-than-average implementation rates.

Where implementation rates are monitored, there is large variation across countries as to whether planned activities and outputs are actually delivered (Figure 2.6), but those with well-designed strategies and stronger institutions generally perform better. The average implementation rate for countries with a strategic

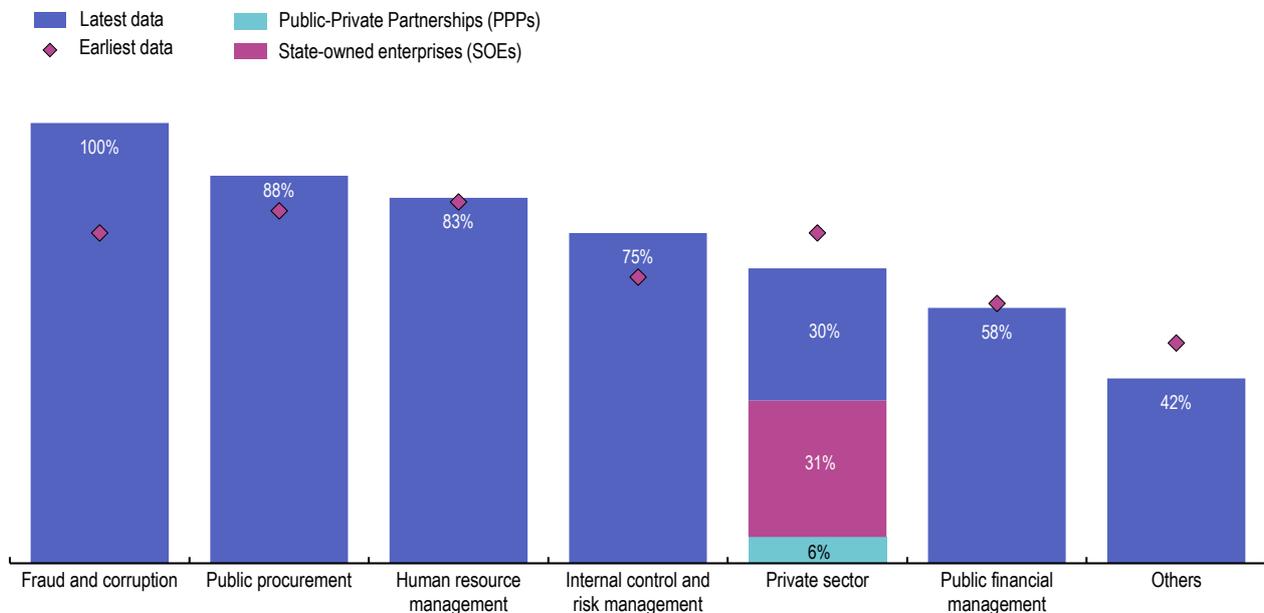


limited engagement may leave important integrity risks at the interface between the public and private sectors unaddressed. Countries in Latin America and the Caribbean (LAC) often promote business integrity and could therefore serve as inspiration for how to take a whole-of-society approach to anti-corruption and integrity. Nine out of eleven countries with a strategic framework in place include measures addressing integrity risks in the private sector, state-owned enterprises, and public-private partnerships.

Countries that successfully identify their risk sectors can develop more tailored and effective strategic objectives, but there are few signs that policymakers are making greater use of the strategies to prioritise high-risk sector or emerging integrity risks. Less than half of OECD Member and partner countries with an up-to-date

strategic framework have introduced sector-based objectives in areas such as infrastructure, housing, education, taxation, and customs, and the trend is slightly negative over the past two years. Sector-specific goals also help address emerging risks and act on lessons learned from past crises. For instance, out of 46 countries with a strategy, ten have established objectives for the healthcare system, an area which was in the spotlight from an anti-corruption perspective following the COVID-19 crisis where a substantial amount of public funds were lost to fraud and corruption (see the fraud prevention chapter for examples of public sector fraud in the healthcare system). Only 3 countries (Slovenia, the United States, and Ukraine) tackle integrity risks in the defence sector as part of their strategic objectives despite the increase in public spending in this sector and the many integrity risks involved.<sup>1</sup>

**Figure 2.7. OECD Member countries could better target high-risk areas and sectors, including the private sector**



Note: The columns represent the percentage of OECD Member countries with a strategic approach to anti-corruption that fulfil the criteria on different areas, according to the latest data. The latest data for all OECD Member countries is from 2025, except for Sweden and Hungary, which is from 2024. The earliest data for all OECD Member countries is 2020.

The criterion "Private sector" covers all objectives relating to business integrity and public-private co-operations, including state-owned enterprises and public-private partnerships. The subsections in the "Private sector" column show the percentage of countries fulfilling that criterion that include objectives specifically on state-owned enterprises and public-private partnerships, according to the latest data.

Data for 'Other areas' are based on country values for the criterion "Strategies for any of the following sectors have at least one first-level objective aimed at mitigating public integrity risks: (a) infrastructure, (b) housing, (c) health, (d) education, (e) taxation, (f) customs".

Data not provided for Japan.

**How to read:** In 2025, 67% of OECD Member countries with an anti-corruption strategic framework included objectives tackling integrity risks in the private sector. Out of those, 31% focused specifically on state-owned enterprises.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink <https://stat.link/a81vj7>

Strategic priorities for anti-corruption and integrity in OECD Member and partner countries generally follow similar trends. However, while internal control and risk management remain key areas of focus for OECD Member countries, they receive less attention in OECD partner countries. Only seven (32%) OECD partner countries establish strategic objectives on this area. Strengthening these systems in OECD partner countries could help support a more risk-based approach and thus improve the overall effectiveness of their anti-corruption efforts.

### **Less than half of countries make use of outcome-level indicators and evaluation to demonstrate the concrete advantages of integrity improvements**

Regardless of what areas strategic objectives on anti-corruption and integrity cover, such objectives are unlikely to have an impact without a coherent theory of change that links outputs to the intended outcomes. Drawing on a wide range of data sources when developing the strategic approach helps ensure the prioritisation of objectives is evidence-based. Measuring and evaluating the impact of strategic objectives then helps ensure not only that these objectives and their supporting activities are having their intended effect, but also that those responsible for developing the objectives have thought through what the intended effect is (OECD, 2020<sup>[14]</sup>). Therefore, effective strategies identify not only the expected output of a given activity but also its expected outcomes and impact that demonstrates to citizens and businesses that integrity improvements lead to concrete advantages for them. Setting target values for these outcomes can further clarify the expected impact. Once the implementation period is complete, a formal evaluation of the results can help take stock of lessons learned that can be used for the next strategy,

and such an evaluation is more effective when it assesses impact against pre-defined indicators (OECD, 2020<sup>[14]</sup>).

Few countries comprehensively diagnose the most relevant corruption risks and assess the impact on their strategic objectives. As shown in Table 2.1, out of the 46 OECD Member and partner countries that have relevant strategic objectives in place, 28 relied on at least four types of data to inform their approach. The most used sources of data among OECD Member and partner countries were indicators from international organisations or research institutions and public research documents from international organisations or academia (both used in 25 countries), while business and employee surveys were the least used source of data (only used in 6 and 7 countries respectively). This suggests that insights from surveys could be better utilised when developing anti-corruption strategies and estimating the impact of certain measures.

While 28 countries have defined measurable indicators of success, nine countries measure only outputs, which leaves just around half (20) of countries with relevant strategic objectives that are measuring outcomes in concrete terms. Finally, of these 20 countries, 13 have set target values for their outcome-level indicators. Just 17 countries have an end of term evaluation planned as a formal activity. The fact that less than half (37%) of countries evaluate the results of their strategic objectives indicates that countries have generally not yet invested in building the monitoring and evaluation systems that can document the concrete advantages of integrity improvements through reliable data, outcome-level indicators and methodologically strong evaluations. Anti-corruption authorities have traditionally seen such functions as a necessary cost to track implementation, promote co-ordination and be transparent to the public about progress. Going forward, however, these are increasingly essential functions to make the case that scarce public funds are well invested in curbing the most significant corruption risks.

**Table 2.1. The use of outcome-level indicators, targets and evaluations could improve**

Status of selected criteria for countries with relevant strategic objectives in place

|                        | Use of data in strategy development | Output-level indicators | Outcome-level indicators | Target values for outcome-level indicators | Evaluation planned (dedicated activity) |
|------------------------|-------------------------------------|-------------------------|--------------------------|--|---|
| Australia              |                                     |                         |                          |  |   |
| Austria                |                                     | ✓                       | ✓                        | ✓  | ✓                                       |
| Chile                  | ✓                                   | ✓                       | ✓                        | ✓  |   |
| Colombia               | ✓                                   | ✓                       |                          |  |   |
| Costa Rica             | ✓                                   | ✓                       | ✓                        | ✓  |   |
| Czechia                |                                     |                         |                          |  | ✓                                       |
| Estonia                | ✓                                   |                         |                          |  |   |
| Finland                |                                     | ✓                       |                          |  |   |
| France                 | ✓                                   | ✓                       |                          |  |   |
| Greece                 |                                     | ✓                       | ✓                        |  | ✓                                       |
| Hungary                | ✓                                   | ✓                       |                          |  | ✓                                       |
| Italy                  |                                     | ✓                       |                          |  | ✓                                       |
| Latvia                 | ✓                                   | ✓                       | ✓                        | ✓  | ✓                                       |
| Lithuania              | ✓                                   |                         | ✓                        | ✓  | ✓                                       |
| Mexico                 | ✓                                   |                         | ✓                        | ✓  |   |
| Netherlands            | ✓                                   |                         |                          |  |   |
| New Zealand            | ✓                                   | ✓                       | ✓                        |  | ✓                                       |
| Portugal               |                                     |                         |                          |  |   |
| Slovak Republic        |                                     |                         |                          |  |   |
| Slovenia               | ✓                                   |                         |                          |  | ✓                                       |
| Spain                  |                                     |                         |                          |  |   |
| Sweden                 | ✓                                   |                         |                          |  |   |
| United Kingdom         | ✓                                   |                         |                          |  |   |
| United States          | ✓                                   |                         |                          |  |   |
| <b>OECD Members</b>    | <b>15 (63%)</b>                     | <b>11 (46%)</b>         | <b>8 (33%)</b>           | <b>6 (25%)</b>                             | <b>9 (38%)</b>                          |
| Argentina              | ✓                                   | ✓                       |                          |  |   |
| Armenia                | ✓                                   | ✓                       |                          |  | ✓                                       |
| Bolivia                |                                     | ✓                       | ✓                        | ✓  |   |
| Bosnia and Herzegovina | ✓                                   |                         |                          |  | ✓                                       |
| Brazil                 |                                     |                         |                          |  |   |
| Bulgaria               |                                     | ✓                       | ✓                        |  | ✓                                       |
| Croatia                | ✓                                   | ✓                       | ✓                        | ✓  | ✓                                       |
| Ecuador                |                                     |                         |                          |  |   |
| Guatemala              | ✓                                   |                         | ✓                        | ✓  |   |
| Indonesia              |                                     |                         | ✓                        |  | ✓                                       |
| Jordan                 |                                     | ✓                       | ✓                        |  |   |
| Kazakhstan             | ✓                                   | ✓                       |                          |  |   |
| Kosovo*                | ✓                                   | ✓                       | ✓                        | ✓  | Not validated                           |
| Moldova                | ✓                                   | ✓                       | ✓                        |  | ✓                                       |
| Morocco                |                                     | ✓                       | ✓                        |  |   |
| Paraguay               |                                     |                         |                          |  |   |
| Peru                   | ✓                                   |                         |                          |  |   |
| Romania                |                                     | ✓                       |                          |  | ✓                                       |
| Serbia                 | ✓                                   | ✓                       | ✓                        | ✓  |   |

|                      | Use of data in strategy development | Output-level indicators | Outcome-level indicators | Target values for outcome-level indicators | Evaluation planned (dedicated activity) |
|----------------------|-------------------------------------|-------------------------|--------------------------|--|---|
| Thailand             | ✓                                   |                         | ✓                        | ✓  |   |
| Ukraine              | ✓                                   | ✓                       | ✓                        | ✓  | ✓                                       |
| Zambia               | ✓                                   |                         |                          |  |   |
| <b>OECD partners</b> | <b>13 (59%)</b>                     | <b>13 (59%)</b>         | <b>12 (55%)</b>          | <b>7 (32%)</b>                             | <b>8 (36%)</b>                          |
| <b>Global</b>        | <b>28 (61%)</b>                     | <b>24 (52%)</b>         | <b>20 (43%)</b>          | <b>13 (28%)</b>                            | <b>17 (37%)</b>                         |

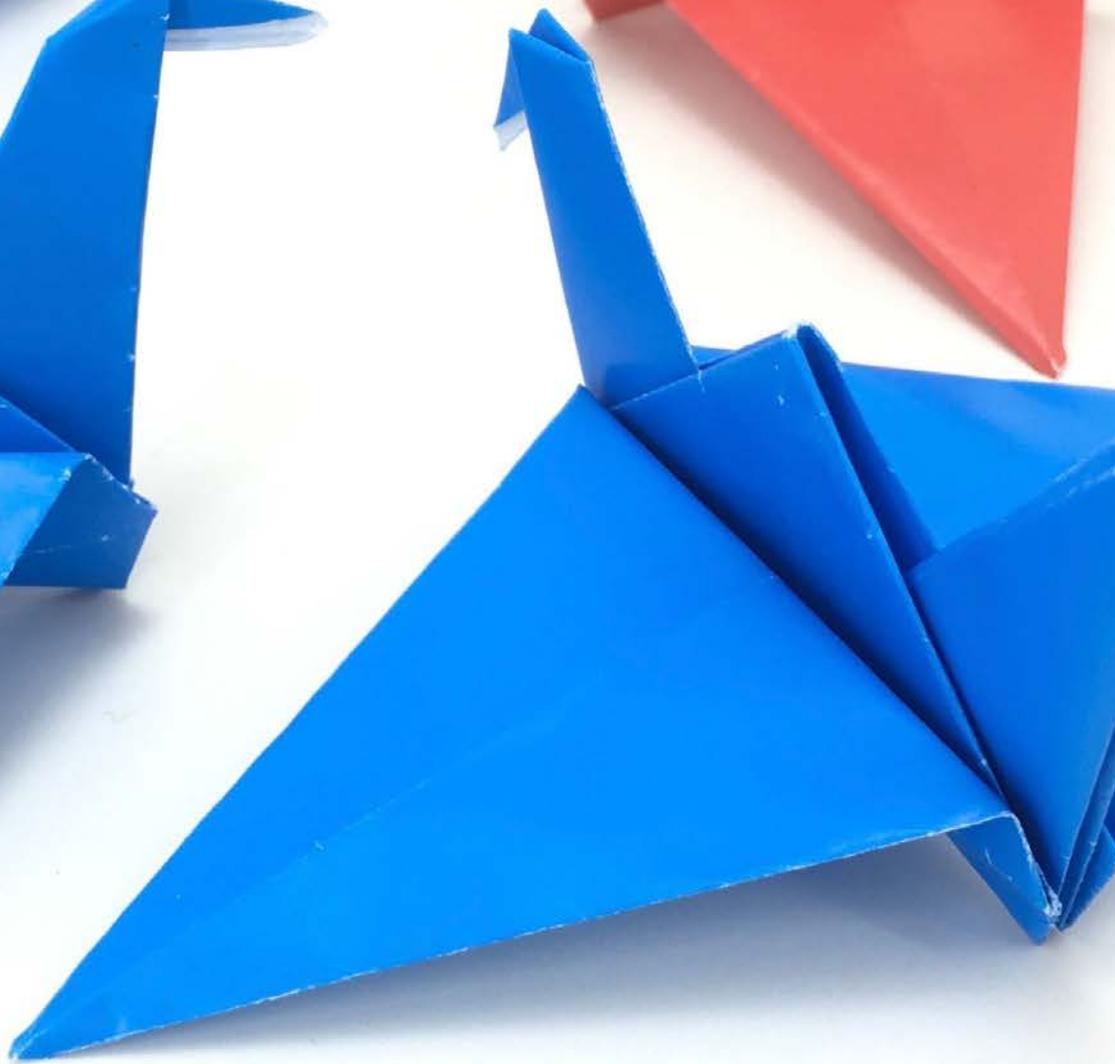
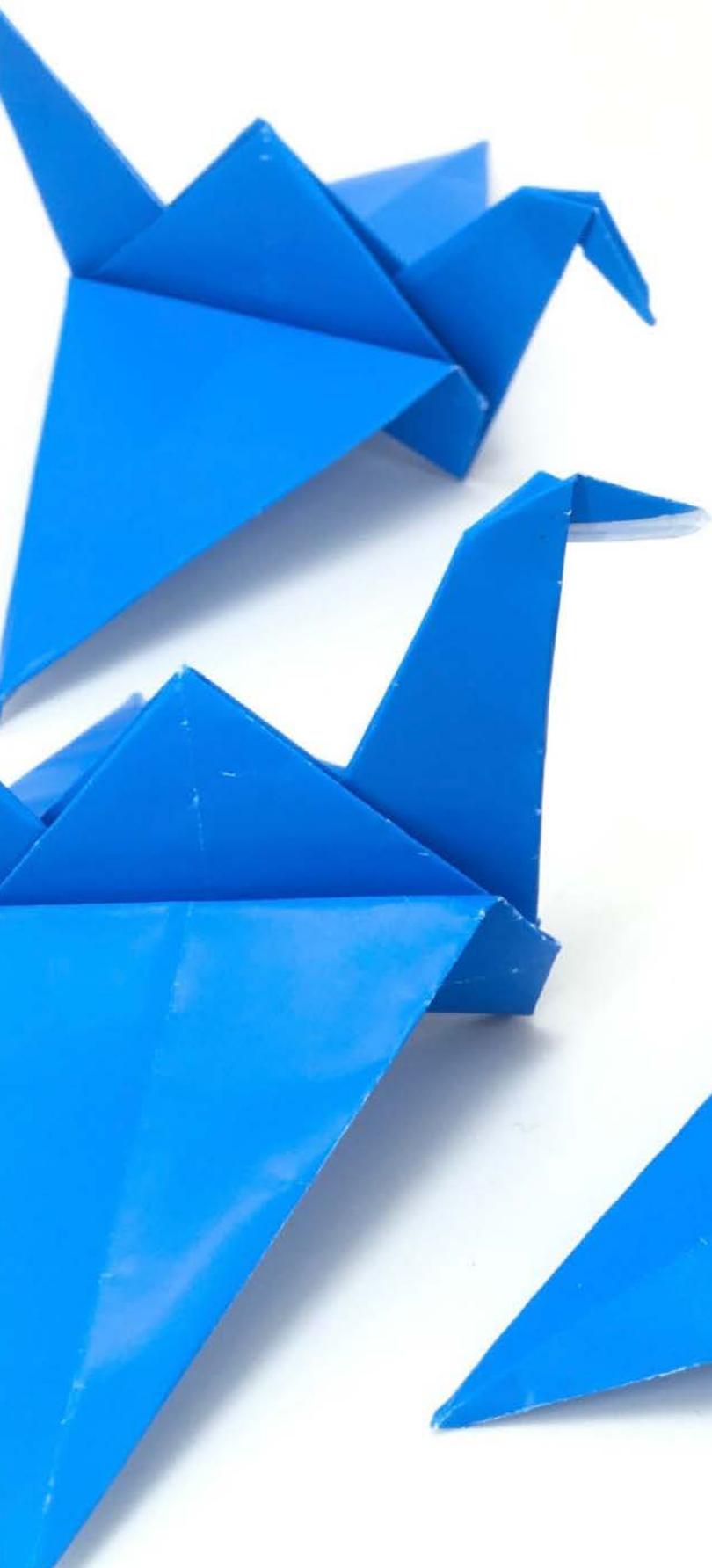
Note: The table includes countries that had relevant strategic objectives in place during the latest round of assessments: for OECD Member countries, data is taken from 2025, and for OECD partner countries from 2023. Data for Sweden, Hungary, Bosnia and Herzegovina, and Serbia is from 2024. Data for Brazil, Guatemala and Thailand is from 2025. The relevant criteria are “Each existing strategy refers to at least 4 out of the following 8 sources of information related to public integrity: (a) indicators from international organisations or research institutions, (b) employee surveys, (c) household surveys, (d) business surveys, (e) other survey data, such as user surveys, or polls from local research institutions, (f) data from public registries (e.g. law enforcement, audit institutions, national statistics office), (g) published research documents from national or international organisations or academia (e.g. articles, reports, working papers, political economy analysis) and (h) commissioned research”, “All strategies contain outcome-level indicators for the public integrity objectives”, “All strategies set target values for all outcome-level indicators” and “Current strategies all have an end-of-term evaluation listed as an activity in their action plan”. There is no criterion on output-level indicators, but the OECD counted the number of countries with such indicators based on information in completed assessments and further review of relevant strategic objectives. Finland’s economic crime strategy contains outcome-level indicators, but its anti-corruption strategy does not. Romania’s anti-corruption strategy contains outcome-level indicators for each activity but not each objective. Zambia has an evaluation report scheduled for its anti-corruption strategy but not its public financial management strategy. Data not provided for Japan.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

## Note

<sup>1</sup> The OECD Secretariat analysed the 46 anti-corruption strategic frameworks in place to find primary-level strategic objectives related to integrity risks in the defence sector.





# 3 LOBBYING

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Lobbying safeguards prevent asymmetric or undue influence over policymaking and help ensure that knowledge and expertise inform policymaking in a way which supports the public interest and stable, competitive markets. Despite wider adoption of lobbying regulations in recent years, however, the quality of these regulations remains among the lowest in OECD Member and partner countries' integrity systems. One key contributor is declining beneficial ownership transparency. In practice, measures to enhance the transparency of lobbying activities, including lobbying registers, could improve. And while countries with lobbying registers generally maintain appropriate enforcement and compliance mechanisms, measures to monitor lobbying activities could be strengthened.

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## Introduction

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Lobbying and seeking to influence government decisions are a necessary component of democratic life and an essential part of the public policy process. When carried out within a clear, transparent, and integrity-based framework, it can contribute valuable expertise that helps governments take more informed public decisions, design better public policies, adopt more proportionate and effective regulations, and ultimately deliver more effective, fair and trusted policy outcomes (OECD, 2010<sub>[15]</sub>).

However, in the absence of adequate safeguards, lobbying can result in unequal access and advantages for certain groups, as well as opportunities for opaque or manipulative practices, resulting in asymmetric or undue influence over public decision making (OECD, 2010<sub>[15]</sub>). Such influence can lead to biased or poorly informed decisions, weakening prosperity through inefficient resource use, reduced productivity, and increased inequalities, and, in some cases, generating harmful outcomes in critical policy areas such as health and consumer protection (OECD, 2021<sub>[16]</sub>). Where policymaking is shaped primarily by special interests, necessary regulations to address market failures may be abandoned, while excessive regulation may be adopted to protect incumbents, thereby reducing competition, distorting innovation incentives, dampening economic growth, and limiting job creation (Dellis and Sondermann, 2017<sub>[17]</sub>).

Ultimately, unchecked lobbying and influence practices can also negatively affect public trust. In OECD Member countries, scepticism about the integrity of high-level political officials and concerns about the presence of undue influence remain high: the 2023 *OECD Survey on Drivers of Trust in Public Institutions* showed that on average, 49% of people predict that a high-level political official would grant a political favour in exchange for the offer of a well-paid private sector job, while 43% say it is likely that the national government would accept the demands of a corporation promoting a policy beneficial to their industry but harmful to the society as a whole (OECD, 2024<sub>[18]</sub>).

This chapter assesses the strengths and areas for improvement in countries' lobbying frameworks and finds that:

- Despite a wider adoption of regulatory frameworks defining lobbying and establishing sanctions for breaches of standards for transparency and integrity in lobbying, declining beneficial ownership transparency has limited overall progress on regulation, leaving lobbying among the least regulated public integrity areas across the OECD and beyond.
- Lobbying registers and other transparency measures continue to provide only limited effective transparency, reflecting persistent implementation challenges.
- Countries with lobbying registers generally have enforcement and compliance mechanisms in place, but stronger monitoring remains essential to ensure lobbying frameworks can more effectively contribute to mitigating undue influence risks.

### Despite wider adoption of regulatory frameworks specific to lobbying, lobbying remains among the least regulated public integrity areas across the OECD and beyond, including due to declining beneficial ownership transparency

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Governments have the primary responsibility to establish a coherent, comprehensive, and enforceable regulatory framework that strengthens transparency and integrity across all stages of the policy cycle (OECD, 2010<sub>[15]</sub>). When effective, such a framework recognises lobbying and other forms of influence as legitimate forms of political participation and promotes fairness and equity in the exercise of influence, while upholding citizens' rights to understand the origins and drivers of policy choices that affect them.

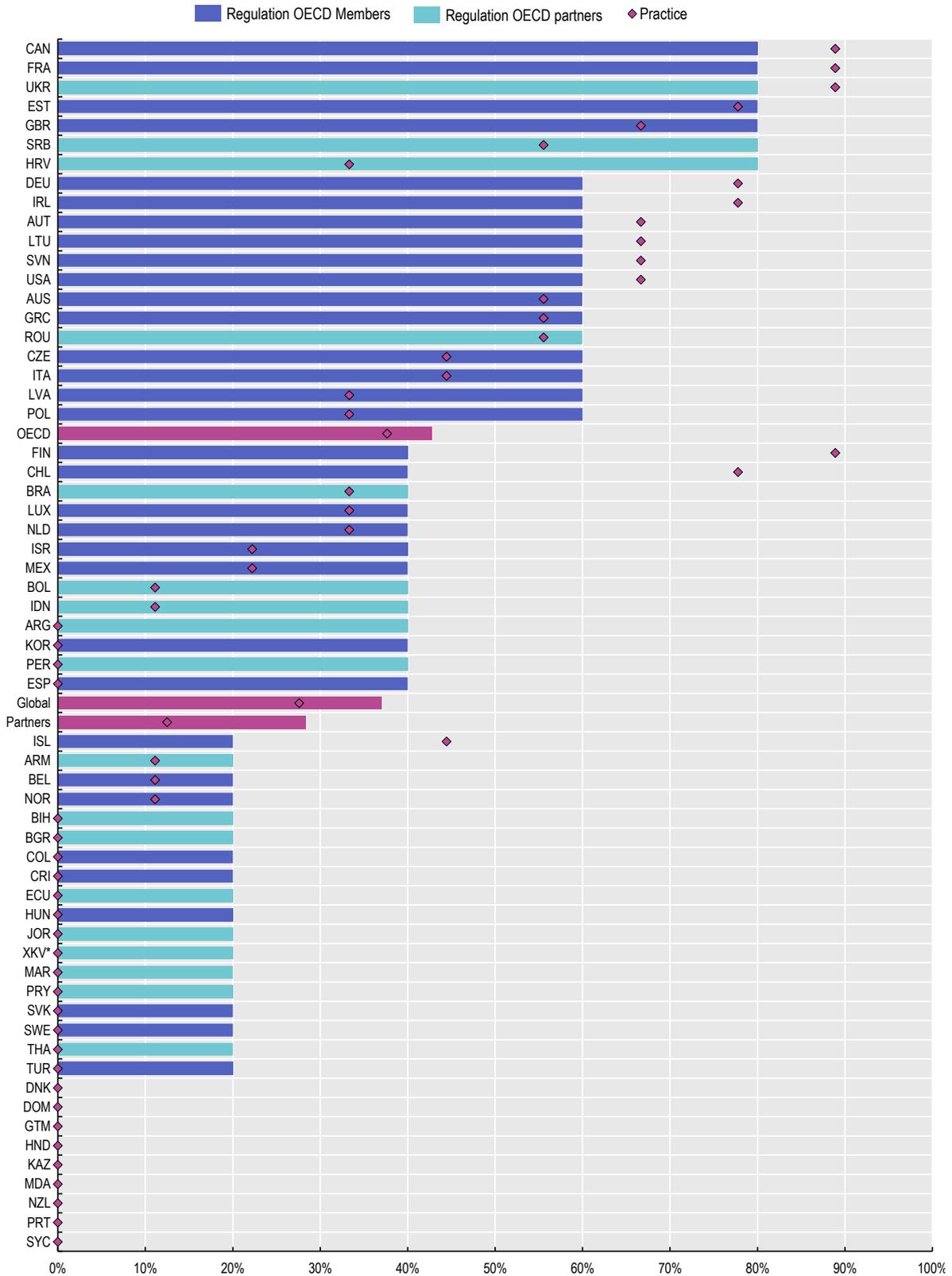
In OECD Member countries, what has traditionally been called “lobbying” – communications between lobbyists and public officials to influence public decision-making processes – is generally regulated through dedicated frameworks that define “lobbying” and “lobbyists”, establish the associated transparency and integrity requirements, as well as sanctions proportional to the severity of the offence. National approaches nonetheless vary considerably in both the terminology used (e.g. “interest representation”, “management of interests”, “public relations” or “advocacy”) and the form and scope of regulatory frameworks, reflecting different administrative and political traditions.

Beyond clear definitions of lobbying and lobbyists, a comprehensive regulatory framework on lobbying should also include, *inter alia*, pre- and post-public employment rules for both lobbyists and public officials, as well as robust beneficial ownership transparency requirements. Indeed, even where lobbyists are clearly defined and subject to transparency requirements, the identity of a legal entity may not reveal its beneficial owner or the ultimate beneficiaries of lobbying activities,

underscoring the need for public disclosure of adequate, accurate and up-to-date ownership and beneficial ownership information (OECD, 2010<sub>[15]</sub>). Similarly, without adequate safeguards, transitions between the public and private sectors may give rise to undue influence, highlighting the need for integrity measures that balance beneficial mobility with the protection of the public interest (OECD, 2003<sub>[19]</sub>; OECD, 2020<sub>[14]</sub>).

On average, OECD Member countries meet 43% of the OECD criteria on lobbying regulation, down slightly from 44% in 2022, indicating no overall progress in strengthening lobbying regulatory frameworks, as discussed in the following paragraphs. Only 7 countries (4 OECD Member countries and 3 OECD partner countries) meet at least 80% of OECD criteria on the quality of lobbying regulations, and only 20 (one-third of the countries in the dataset) meet 60% or more (Figure 3.1). Overall, this indicates that coherent and comprehensive frameworks for managing lobbying and influence remain underdeveloped across many OECD Members and partner countries.

**Figure 3.1. Regulatory frameworks on lobbying remain underdeveloped in most countries, 2025**



Note: Data not provided for Japan and Switzerland.

**How to read:** In 2025, Canada fulfilled 80% of criteria on regulation and 89% on practice.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

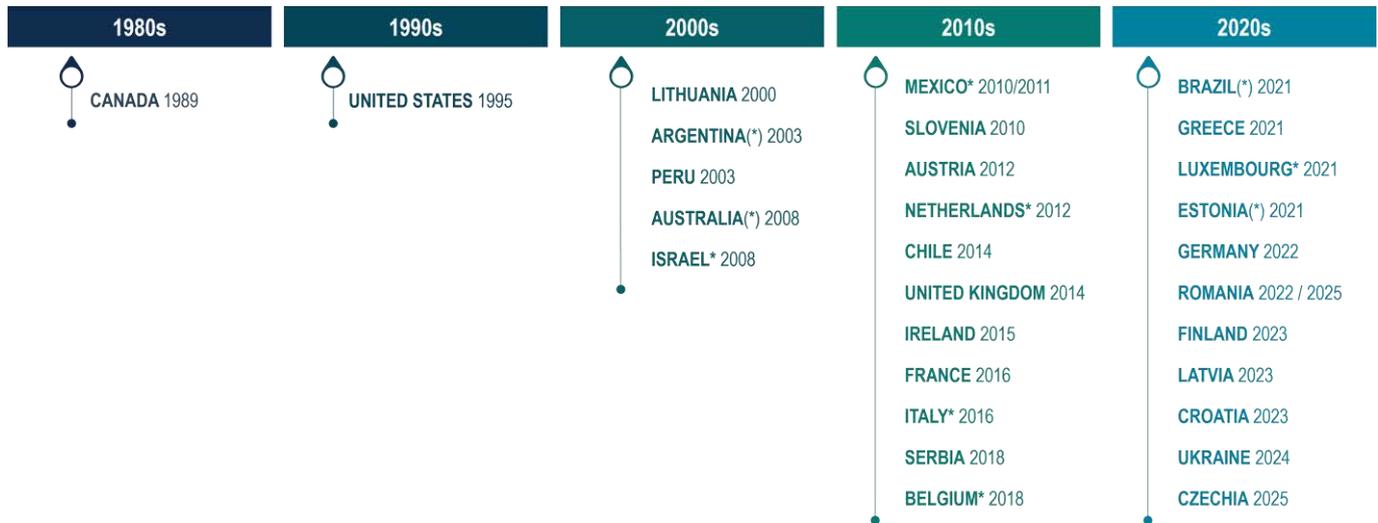
The most notable progress has been in the number of countries adopting regulatory frameworks defining lobbying and establishing sanctions for breaches of standards for transparency and integrity in lobbying proportional to the severity of the offence. In 2022, about half of OECD Member countries (52%) had formally defined lobbying activities and the actors considered as lobbyists (OECD, 2024<sub>[20]</sub>). Since then, several countries have made efforts to strengthen transparency and integrity in lobbying by establishing or upgrading their regulatory frameworks. Now, 61% of OECD Member countries and 29% of OECD partner countries have formal definitions of lobbying activities (Figure 3.2). This represents a total of 29 countries where lobbying activities are defined in the regulatory framework, including which actors are considered as lobbyists (48% of countries). In Poland, while lobbying activities are defined in the regulatory framework, the framework does not clearly specify which actors are considered lobbyists. Conversely, in Iceland, while “lobbyists” are defined in the Act on Protection against Conflicts of Interest in Government Offices, the Act does not clearly define what constitutes lobbying. As a result,

these countries do not fully meet the criteria regarding lobbying definitions in the regulatory framework, although both operate a lobbying register, as discussed in the following section.

All but 11 of the 29 countries with ‘lobbying’ and ‘lobbyist’ defined in the regulatory framework (except Argentina, Belgium, Brazil, Estonia, Finland, Israel, Luxembourg, Latvia, the Netherlands, Peru and Romania), as well as Korea and Poland, representing 47% of OECD Member countries and 13% of OECD partner countries, have defined sanctions for breaches of transparency and integrity standards in lobbying that are proportionate to the severity of the offence. While Korea does not define lobbying activities in its regulatory framework, the Improper Solicitation and Graft Act (2016) prohibits certain forms of lobbying that seek to induce the unlawful handling of specific duties, such as obtaining preferential treatment in recruitment or promotion, altering admissions or evaluation outcomes, or influencing investigations or audits, and establishes corresponding sanctions for such conduct.

**Figure 3.2. An increasing number of countries are adopting lobbying regulatory frameworks**

Countries with a regulatory framework on lobbying establishing definitions of “lobbying” / “lobbyist”



Note: Data is based on country values for criterion “Lobbying activities are defined in the regulatory framework, including which actors are considered as lobbyists”. Countries marked with an \* regulate lobbying exclusively through parliamentary rules of procedure, under which lobbyists must register to access one or both houses of Parliament. Countries marked with a (\*) limit lobbying regulation to decrees or administrative schemes applying only to the executive branch. All other countries primarily regulate lobbying through primary legislation, either in dedicated lobbying laws or broader integrity and transparency laws. These approaches are not mutually exclusive, as primary legislation is sometimes complemented by branch-specific rules, such as parliamentary codes of conduct or additional access requirements. Data not provided for Japan and Switzerland.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

In response to the growing volume of lobbying and influence activities carried out on behalf of foreign state interests (including foreign governments, political organisations, and state-affiliated actors), a growing number of countries are also adopting regulatory frameworks that specifically define lobbying and influence activities conducted on behalf of foreign state interests, operating alongside existing lobbying regimes (OECD, 2021<sup>[16]</sup>; OECD, 2024<sup>[21]</sup>). Examples include Australia's Foreign Influence Transparency Scheme Act 2018 operating alongside the Lobbying Code of Conduct established in 2008; France's foreign influence transparency scheme established in 2024 complementing the lobbying framework established in 2017; the United Kingdom's Foreign Influence Registration Scheme introduced in 2023 complementing the lobbying regime established in 2024; and the United States' Foreign Agents Registration Act of 1938 operating alongside the Lobbying Disclosure Act 1995. This evolution reflects a growing recognition of the importance of transparency and accountability in public decision making, regardless of whether influence is exercised by domestic or foreign actors, including foreign state-linked interests.

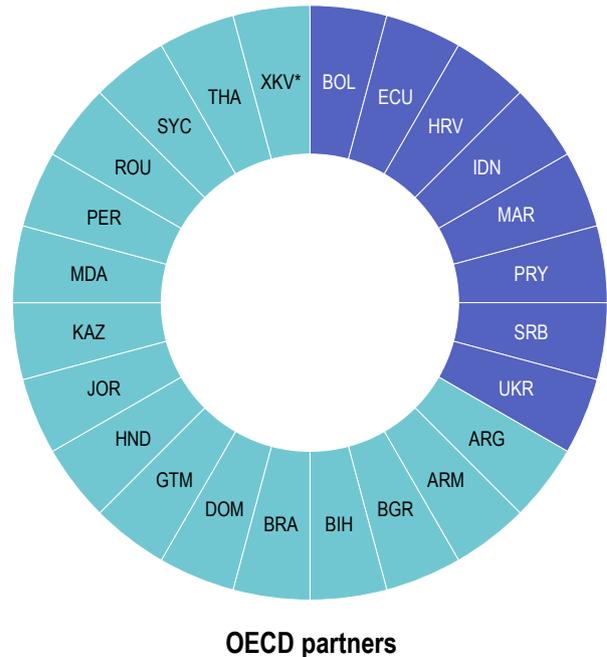
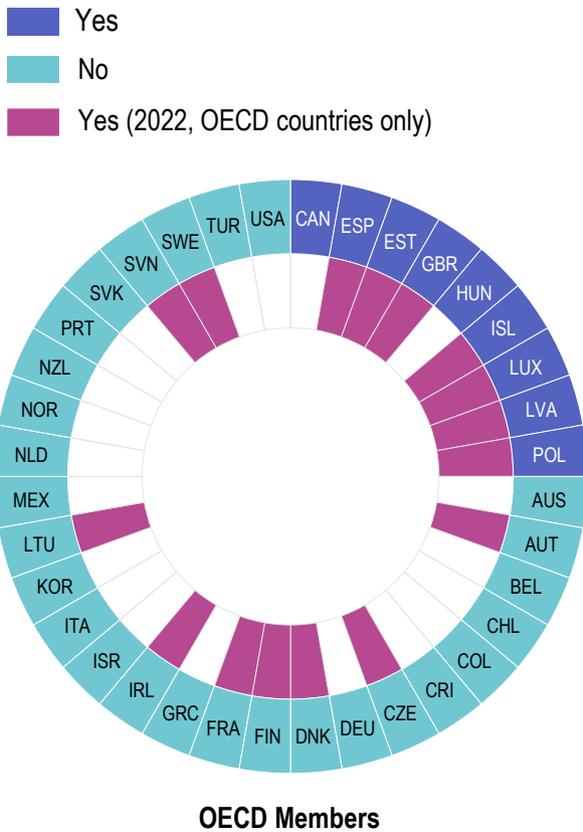
However, different regions take different approaches. 56% of countries assessed in Europe have defined lobbying activities in their regulatory framework, including 44% through primary legislation. In the LAC region, Chile and Peru are the only countries to regulate lobbying through primary legislation, while others, including Argentina, Brazil and Mexico, have introduced

partial frameworks limited to a single branch of government. In other regions adoption of a lobbying framework is patchier, underscoring the need for continued efforts globally to enact and strengthen appropriate legislation.

In addition, progress in this area has been offset by a net decline in rules requiring the public disclosure of beneficial ownership information. In 2022, 48% of OECD Member countries had requirements to disclose company ownership information to identify beneficial owners, establish central registers and make this information publicly accessible; this share has since fallen to 25% (a decline of 23 percentage points), with only 9 OECD Member countries mandating such regimes. The decline has been concentrated in the European Union (from 73% to 28%, representing a decline of 45 percentage points), reflecting the judgment of the Court of Justice of the European Union annulling the provision of the Fifth Anti-Money Laundering Directive (AMLD5) requiring unrestricted public access to beneficial ownership registers, on the grounds that it did not adequately balance transparency objectives with the protection of fundamental rights to privacy and personal data.<sup>1</sup> In accordance with this judgement Article 12 para. 1 of the Sixth Anti-Money Laundering Directive (AMLD6) states that access to beneficial ownership information shall be granted to the public only in case of a legitimate interest. Public disclosure requirements nonetheless remain in place in several OECD partner countries: of the 17 countries with such rules, 8 are OECD partner countries (Figure 3.3).

### Figure 3.3. Beneficial ownership transparency has weakened across the OECD

Countries with beneficial ownership rules that make mandatory the disclosure of company data to identify owners of corporations, establish a central register, and make information accessible to the public



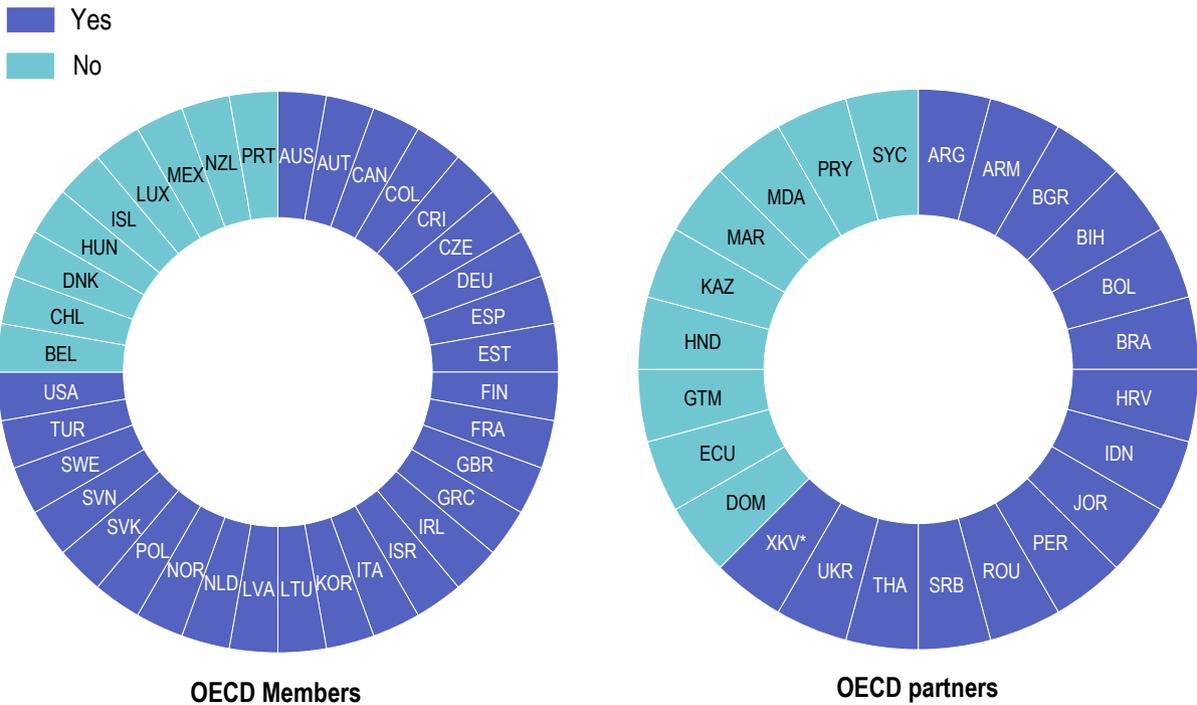
Note: Data based on country values from the criteria “Beneficial ownership rules make mandatory the disclosure of company data to identify owners of corporations, establish a central register, and make information accessible to the public”. 2022 data cover OECD Member countries only. Data was not available for Belgium, Colombia, Germany, Hungary, Italy or New Zealand in 2022. Data was not available for OECD partner countries in 2022. Data not provided for Japan and Switzerland in 2025. Source: OECD Public Integrity Indicators database (as of 10 March 2026).

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Cooling-off periods for public officials, designed to mitigate conflicts of interest when individuals move from public office to private-sector roles in government-regulated sectors, are in place in 42 countries covered by the PIIs (70%). Cooling off periods apply in 79% of assessed European countries and 46% of assessed LAC countries. Notably, the share of OECD Member countries with cooling-off periods for public officials has increased. For example, in 2025 an Act was passed in the Netherlands that introduced cooling-off periods for Ministers. Similarly, OECD partner countries like Romania strengthened its legislative framework in November 2025 by adopting a unified, detailed and enforceable regime governing pre- and post-employment restrictions for current and former public officials, aimed at preventing conflicts of interest and strengthening public sector integrity. Some countries with long-

standing cooling-off regimes have also strengthened their frameworks to explicitly address foreign interference risks when senior public officials transition to the private sector, particularly where prospective employers may have links to foreign powers. In France, for example, the High Authority for Transparency in Public Life (HATVP) oversees the post-public employment of senior officials, assessing the compatibility of their private activities for three years after leaving office, a period that has been extended in 2024 to five years where foreign influence risks are identified (OECD, 2024<sup>[21]</sup>). The near absence of cooling-off periods for lobbyists, with Estonia, France and Romania as the sole exceptions, points to a significant regulatory gap in addressing conflicts of interest arising from lobbyists’ entry into public institutions they previously sought to influence.

**Figure 3.4. Countries with cooling-off periods for public officials**



Note: Data based on country values from the criteria “Cooling off periods for public officials are established in the regulatory framework”. Data not provided for Japan and Switzerland.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

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Taken together, these trends confirm that lobbying remains one of the least regulated areas of public integrity across the OECD and beyond. While European countries generally perform well in establishing lobbying regulatory frameworks that define lobbying, progress has been undermined by a sharp decline in rules on beneficial ownership transparency within the European Union. By contrast, OECD partner countries continue to lag behind on lobbying definitions, although some are making advances in beneficial ownership transparency and cooling-off periods. Overall, despite an increase in the number of countries adopting regulatory frameworks that define lobbying, 39% of OECD Member countries and 71% of OECD partner countries still lack a legal definition, and when the broader regulatory ecosystem is considered, including cooling-off periods and beneficial ownership disclosure, progress in strengthening regulatory safeguards against undue influence remains limited.

As lobbying and influence become increasingly digital, complex and global, countries will also need to adapt their legal definitions of lobbying to an evolving

influence landscape in which both actors and techniques are rapidly diversifying. Indeed, traditional closed-door interactions are increasingly complemented, and sometimes overtaken, by integrated digital campaigns that shape narratives and information environments. Often powered by artificial intelligence, these campaigns enable messages to be targeted, amplified and adjusted at scale, making online visibility as consequential as connections to decision makers. While this transformation has lowered barriers to participation and allows a more diverse range of interest groups to have their voices heard, it has also heightened risks of deception and the manipulation of public opinion through largely unregulated online networks (OECD, 2021<sup>[16]</sup>). The growing number of countries adopting targeted regulatory schemes to address lobbying and influence conducted on behalf of foreign state interests, or adapting post-employment rules to explicitly account for such risks, also highlights foreign state-linked influence as a pressing area of reform. When carried out covertly or deceptively, such activities can significantly affect domestic and foreign policy, economic interests,

electoral processes and national security, and may lead to foreign interference (OECD, 2024<sup>[21]</sup>; OECD, 2021<sup>[16]</sup>).

As such, even jurisdictions with comparatively advanced systems would benefit from regularly reviewing and updating their frameworks to keep pace with evolving influence tactics and ensure that regulatory arrangements are sufficiently robust to address both long-standing and emerging threats, including those posed by foreign state actors and algorithmically amplified lobbying campaigns, thereby sustaining public trust in public decision making (OECD, 2010<sup>[15]</sup>).

### **Lobbying registers and other transparency measures continue to provide only limited effective transparency, reflecting persistent implementation challenges**

Once a regulatory framework is in place, a critical step in enhancing transparency in lobbying is the establishment of mechanisms and tools that allow public officials, businesses and civil society to understand who has sought to influence public decision making and on what issues. These mechanisms should ensure that relevant and timely information on key aspects of lobbying activities is disclosed, thereby strengthening public oversight of the information, advice and interests shaping policymakers' decisions (OECD, 2010<sup>[15]</sup>). Transparency can be achieved through a range of complementary approaches. In most OECD Member countries, the primary responsibility for disclosure lies with lobbyists, who are required to register and report their activities through a lobbying registry. As also explored in the transparency of public information chapter, an alternative or additional model places the disclosure obligation on public officials, requiring them to report meetings with lobbyists, whether through open agendas, dedicated registers, or internal reporting requirements to their superiors. Public decision-making process footprints, which refer to documentation that details the stakeholders who sought to influence the decision or were consulted in its development, and show

what inputs into the particular public decision making process were submitted and what steps were taken to ensure inclusiveness of stakeholders in the development of the regulation, are an additional avenue for transparency. When used together, these approaches can contribute to a fuller and more accessible picture of influence on public decision making (OECD, 2021<sup>[16]</sup>; OECD, 2010<sup>[15]</sup>).

In 2025, 67% of OECD Member countries (compared with 55% in 2022) and 21% of OECD partner countries (Brazil, Croatia, Romania, Serbia and Ukraine) had a publicly available register providing information on lobbying activities. This increase in the number of OECD Member countries with a register reflects the growing number of countries that have introduced regulatory frameworks on lobbying. New or newly reported registers include those in Czechia, operational since 2025; Finland, operational since 2024; Croatia, operational since 2024; and Germany, operational since 2022. Romania made disclosures in its lobbying register mandatory for certain categories of public officials in the executive and legislative branches through key reforms introduced in 2024 and 2025.

Having a lobbying register in place does not, in itself, guarantee adequate transparency, given significant variation in the scope and quality of these registers. A first step towards ensuring that lobbying registers provide meaningful transparency is to establish disclosure requirements that capture how lobbying occurs in practice. However, many existing registers, including those introduced recently, still do not disclose sufficient information. Among the 24 OECD Member countries and 5 OECD partner countries with an operational register, all require the disclosure of the lobbyist's name and/or organisation. However, only 17 require information on the type of lobbying activities conducted. Even fewer countries require disclosure of the specific legislative or regulatory initiatives targeted, with only 12 including this information, despite its fundamental importance for understanding how public policies are influenced. Similarly, only 7 countries require disclosure of lobbying budgets or related expenditures (Figure 3.5).

Figure 3.5. Characteristics of lobbying registers by country

| Available information |                 |                  |                    |                     | 12 OECD countries        |                 |
|-----------------------|-----------------|------------------|--------------------|---------------------|--------------------------|-----------------|
|                       | Lobbyist's name | Type of lobbying | Target legislation | Budget and expenses |                          |                 |
| Finland               | ✓               | ✓                | ✓                  | ✓                   | Colombia                 | Norway          |
| France                | ✓               | ✓                | ✓                  | ✓                   | Costa Rica               | Portugal        |
| Germany               | ✓               | ✓                | ✓                  | ✓                   | Denmark                  | Slovak Republic |
| United States         | ✓               | ✓                | ✓                  | ✓                   | Korea                    | Spain           |
| Canada                | ✓               | ✓                | ✓                  | ✗                   | Hungary                  | Sweden          |
| Chile                 | ✓               | ✓                | ✓                  | ✗                   | New Zealand              | Türkiye         |
| Ireland               | ✓               | ✓                | ✓                  | ✗                   | <b>Data not provided</b> |                 |
| Lithuania             | ✓               | ✓                | ✓                  | ✗                   | 2 OECD countries         |                 |
| Luxembourg            | ✓               | ✓                | ✓                  | ✗                   | Japan                    | Switzerland     |
| Slovenia              | ✓               | ✓                | ✓                  | ✗                   |                          |                 |
| Austria               | ✓               | ✓                | ✗                  | ✓                   |                          |                 |
| Estonia               | ✓               | ✓                | ✗                  | ✗                   |                          |                 |
| Greece                | ✓               | ✓                | ✗                  | ✗                   |                          |                 |
| Italy                 | ✓               | ✓                | ✗                  | ✗                   |                          |                 |
| United Kingdom        | ✓               | ✓                | ✗                  | ✗                   |                          |                 |
| Australia             | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Belgium               | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Czechia               | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Iceland               | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Israel                | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Latvia                | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Mexico                | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Netherlands           | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Poland                | ✓               | ✗                | ✗                  | ✗                   |                          |                 |
| Available information |                 |                  |                    |                     | OECD partner countries   |                 |
| 5 partner countries   |                 |                  |                    |                     |                          |                 |
|                       | Lobbyist's name | Type of lobbying | Target legislation | Budget and expenses |                          |                 |
| Romania               | ✓               | ✓                | ✓                  | ✓                   | Argentina                | Jordan          |
| Ukraine               | ✓               | ✓                | ✓                  | ✓                   | Armenia                  | Kazakhstan      |
| Brazil                | ✓               | ✗                | ✗                  | ✗                   | Bolivia                  | Kosovo*         |
| Croatia               | ✓               | ✗                | ✗                  | ✗                   | Bosnia and Herzegovina   | Moldova         |
| Serbia                | ✓               | ✗                | ✗                  | ✗                   | Bulgaria                 | Morocco         |
|                       |                 |                  |                    |                     | Dominican Republic       | Paraguay        |
|                       |                 |                  |                    |                     | Ecuador                  | Peru            |
|                       |                 |                  |                    |                     | Guatemala                | Seychelles      |
|                       |                 |                  |                    |                     | Honduras                 | Thailand        |
|                       |                 |                  |                    |                     | Indonesia                |                 |

Note: Data based on country values from the criteria "Information disclosed by lobbyists in the register includes their name, organisation, domain of intervention, and type of lobbying activities", "Information disclosed by lobbyists in the register include budget/expenses for lobbying activities, and pieces of legislation and regulation targeted" and "The lobby register is accessible online". In Czechia, the register is designed to include more detailed information on lobbying activities. However, as the first statements on lobbying activities were submitted in January 2026, the register does not yet contain this information, which is reflected in the table.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

Therefore, notwithstanding the continued increase in the number of countries with lobbying registers since 2022, many registers do not yet deliver meaningful transparency on who is lobbying, on behalf of whom, on what topic, and how. This limits their ability to enable stakeholders, including government authorities, civil society organisations, businesses, the media and the public, to fully grasp the scope and depth of these activities. Insufficient disclosure of the concrete aspects of lobbying, particularly the specific policy or legislative targets, may also create incentives for more opaque or manipulative practices, especially where registrants are required to disclose little more than their identity and, where applicable, that of their client.

This challenge is compounded by weakening transparency on who ultimately benefits from lobbying. As regulatory requirements to disclose beneficial ownership have eroded, implementation has thus declined across the OECD: the share of OECD Member countries operating a beneficial ownership register accessible to the public fell from 42% to 17% in 2025, leaving only 5 EU countries with an operational register, while 25% of OECD partner countries currently operate a publicly accessible beneficial ownership register for corporate entities.

While the limited progress in the scope of information disclosed by long-standing lobbying registers is partly understandable, since expanding disclosure requirements often requires legislative reform, this underscores the importance of regularly reviewing the functioning and impact of existing legal frameworks. Periodic reviews can help identify gaps and support timely improvements to transparency requirements. At the same time, countries that are currently designing their lobbying frameworks have an opportunity to embed more robust disclosure obligations from the outset to ensure that disclosure requirements enable effective transparency regarding who is lobbying and on whose behalf, the objectives and policy decisions targeted, and the nature of communications with public officials or the lobbying techniques used (OECD, 2010<sup>[15]</sup>).

A second key element of an effective lobbying register is the availability of user-friendly and innovative registration platforms for all actors required to disclose lobbying information. In this respect, all but 5 countries with an operational lobbying register have established registration tools that provide step-by-step guidance to

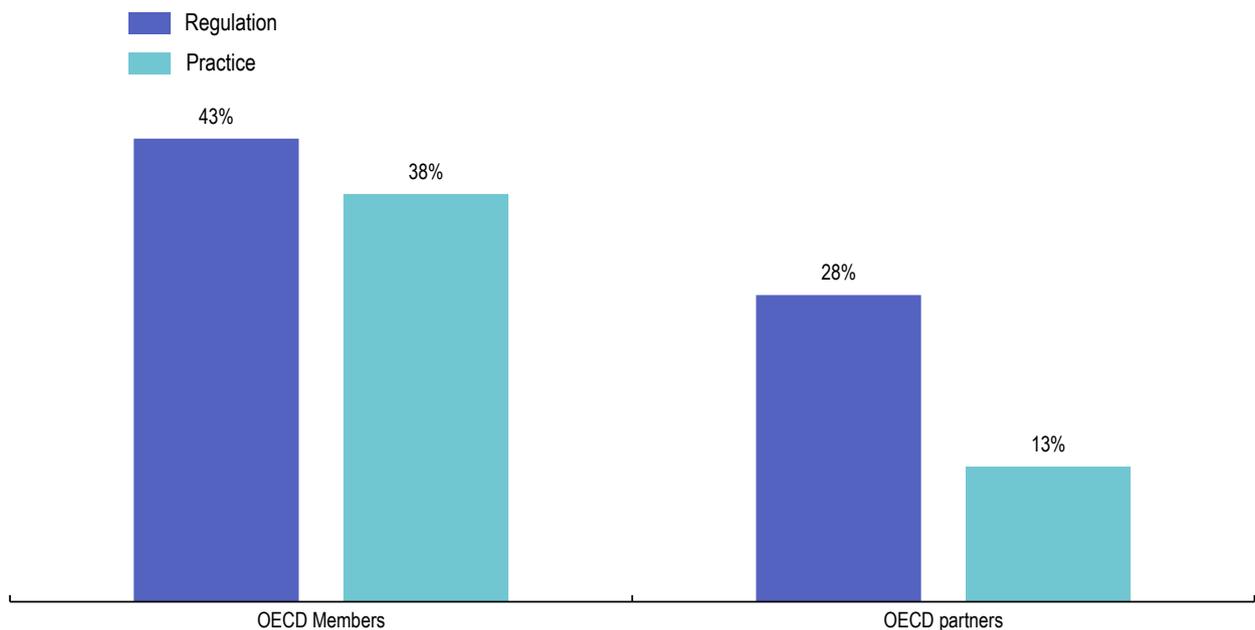
support registrants (with the exception of Belgium, Latvia, Iceland, Poland and Croatia). This represents a total of 56% of OECD Member countries, with an increase of 6 percentage points since 2022, and 17% of OECD partner countries. This increase aligns with the 12% increase in the availability of lobbying registers and suggests a positive trend whereby newly established registers in Czech Republic, Croatia, Finland and Ukraine place particular emphasis on the usability of registration systems, a particularly important consideration, as user-friendly tools reduce compliance burdens for registrants and improve the consistency and quality of the data collected. In turn, better-structured data enhances the ability of registers to deliver meaningful transparency. Experience from countries with operational registers indicates that remaining gaps may be addressed through measures that ease compliance, including linking registration systems to existing databases, automating data entry where possible, and allowing registrants and public officials to select standardised options, for example through the use of drop-down menus, thereby improving both usability and the quality of the data collected.

Third, once disclosure requirements and registration platforms are in place, another key element of an effective lobbying register is the ability to centralise and publish information through a public portal that facilitates the access and interpretation of large volumes of data collected through registration systems. While such portals may take different forms, they should move beyond static lists or large single disclosures that provide limited insight into lobbying dynamics or their impact on public decision making. To be effective, these portals should function as shared information ecosystems for citizens, lobbyists and public officials, with the objective of maximising the usability and value of disclosed data. In practice, this requires enabling users to search, filter and sort information by key criteria, such as the lobbyist's name, the company or organisation represented, the policy area or domain of intervention, and the specific legislative or regulatory initiatives targeted. At present, only 11 countries offer such functionalities, and several registers still rely on formats that do not meet open data standards, such as downloadable PDF files. There is therefore scope for further improvements in data visualisation, searchability and categorisation across many existing lobbying registers.

In practice, weaknesses in lobbying registers are reflected in persistently low implementation scores across OECD Member countries. On average, OECD Member countries meet 38% of the criteria on lobbying implementation, a level that has remained broadly stable since 2022 (35%), while OECD partner countries only meet 13% of the criteria on lobbying implementation (Figure 3.6). Countries demonstrating strong implementation in practice are typically those with

robust lobbying registers. Canada, France, Finland and Ukraine, for example, fulfil nearly 90% of implementation-related criteria, reflecting comparatively high levels of lobbying transparency. By contrast, countries with weak or non-existent registers exhibit the largest implementation gaps. At a regional level, Europe maintains a 7 percentage point implementation gap, while LAC has a 14 percentage point implementation gap.

**Figure 3.6. Implementation gaps vary between OECD member and partner countries**



**How to read:** As measured against OECD standards on lobbying, OECD Member countries fulfil on average 43% of criteria for regulations and 38% for implementation. The implementation gap (i.e. the difference between criteria fulfilled on regulation and on practice), is therefore 5%.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

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Beyond lobbying registers, 12 countries publish open agendas for ministers online, providing information on whom ministers meet and the subject of those meetings. Open agendas can serve as an alternative or complement to lobbying registers. In practice, several countries have adopted both approaches, including Lithuania, Luxembourg and the Netherlands, creating opportunities for cross-checking disclosed lobbying activities with the timeline of meetings held between public officials and interest representatives. As with lobbying registers, open agenda disclosures are most effective when they provide meaningful detail, including information on the issues discussed, the objectives

pursued by lobbyists and the policy or legislative matters targeted.

However, when used as an alternative rather than a complement to lobbying registers, open agendas offer only a partial view of lobbying activity, as they capture meetings but no other important channels of influence, such as written communications, grassroots lobbying, social media campaigns or the funding of third-party organisations. This reinforces the importance of establishing a coherent and complementary ecosystem of transparency tools for lobbying and influence, in which data can, to the extent possible, be centralised or cross-checked across different disclosure mechanisms.

## Countries with lobbying registers generally have enforcement and compliance mechanisms in place, but stronger monitoring remains essential

Transparency requirements cannot achieve their objective unless regulated actors comply with them and they are properly enforced by oversight entities. They also need to be accompanied by strong integrity standards of behaviour for lobbyists and/or public officials, as lobbying and influence are typically an example where public officials and lobbyists may face ethical dilemmas in cases where there are no clear legal 'right' or 'wrong' answers or where there may be conflicts between different values or principles. As such, both integrity rules and effective oversight mechanisms are a core component of a well-functioning lobbying framework (OECD, 2010<sup>[15]</sup>).

Several countries have established minimum expected standards through lobbying laws, codes of conduct, or guidelines governing interactions between public officials and external parties. However, such standards remain limited in scope and adoption. Currently, only 14 countries, including one partner country (Ukraine), have a code of conduct regulating interactions between public officials and lobbyists that is supported by practical examples illustrating high-risk or undesirable behaviours and situations. For OECD members, this figure has remained stable since 2022, with two additions: Finland, which adopted *Recommendations for good lobbying practice* in 2024, and Norway, following its 2025 update of the *Handbook for Political Leadership*, which introduced a definition of lobbying, clarified the responsibilities of political leaders in their interactions with lobbyists, and provided concrete examples to support ethical decision making. In Ukraine, the Lobbying Law was supplemented by Rules of Ethical Conduct for lobbyists, adopted in 2024. Apart from Norway, all other countries that have established a code of conduct setting minimum expected standards for lobbying are countries that have formally defined lobbying in their regulatory frameworks and/or established a lobbying register.

Among countries that have established a lobbying register, all but 7 (Belgium, Israel, Italy, Luxembourg, Mexico, the Netherlands and Latvia) have designated a supervisory function within central government to

oversee transparency in lobbying activities. Countries that lack designated supervisory functions typically operate partial lobbying registers limited to the legislative branch, where registration requirements are primarily linked to access to parliamentary premises, disclosure is not systematically verified, and enforcement mechanisms are absent or weak.

However, for lobbying regulatory frameworks to be effective and breaches to be identified, supervisory bodies need adequate powers and resources to verify the completeness and accuracy of disclosed information and to investigate potential breaches. In practice, 13 OECD Member countries (representing 54% of those with a lobbying register in place) and one OECD partner country (Serbia) reported that the supervisory authority had conducted at least one investigation into non-compliance with lobbying rules or incomplete or inaccurate disclosures during the most recent full calendar year. In jurisdictions that did not fulfill the criteria, this may reflect the recent entry into force of the framework or the limited mandate of the supervisory function, which is sometimes confined to administering the lobbying register rather than actively monitoring compliance. In such cases, oversight bodies may lack the authority or resources to verify whether disclosures are submitted on time, whether lobbyists are properly registered, or whether the information provided is accurate and complete.

Operational independence from ministerial control is also a key feature of an effective lobbying regulatory framework, yet it is not consistently ensured in countries that have established supervisory functions. In some jurisdictions, responsibility for administering lobbying registers and investigating potential breaches rests with line ministries, which does not enable effective independence of oversight. As such, strengthening lobbying regulations and registers entails ensuring the existence of an oversight function, whether vested in a single institution or shared across several bodies, that is adequately resourced and operationally independent. Experience across countries suggests that when functions related to investigation and the imposition of sanctions are able to operate with a degree of independence, oversight bodies are better placed to monitor compliance, enforce rules on lobbying and influence activities, and support effective implementation. Independent oversight is also essential to ensure impartial enforcement and to provide credible

responses, including corrective measures or redress where appropriate, to breaches of lobbying regulations (OECD, 2010<sup>[15]</sup>).

Countries that fulfil the above criteria tend to demonstrate stronger implementation and smaller gaps between regulation and practice. Overall, the best-performing countries, with the smallest implementation

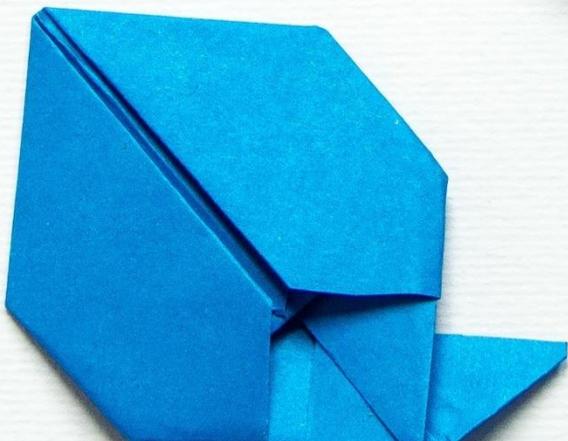
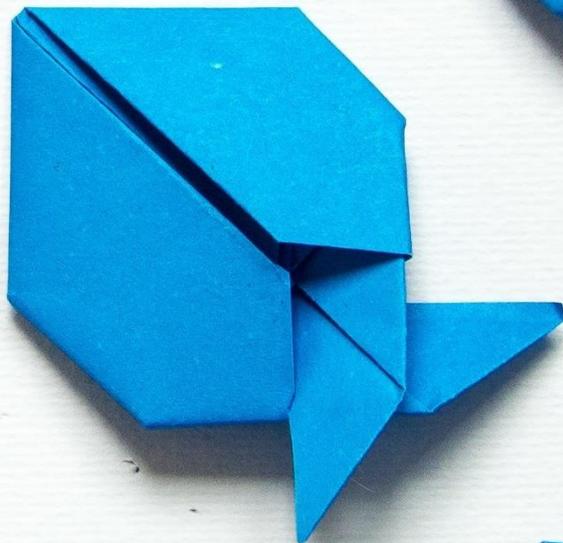
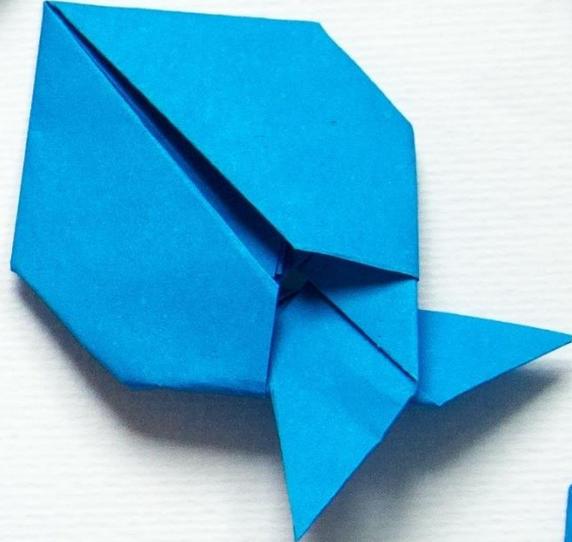
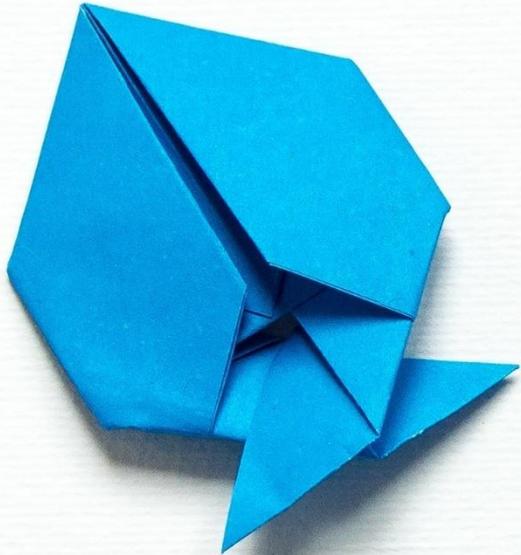
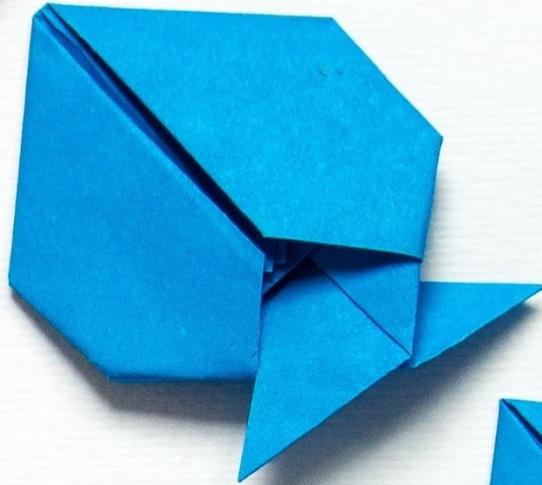
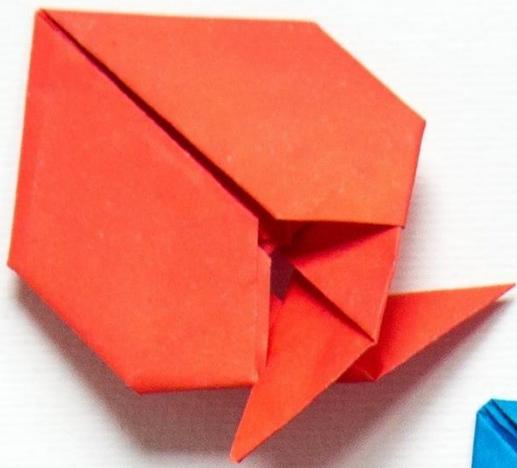
gaps are those that have adequately defined lobbying in their regulatory frameworks, supported by objective and proportionate sanctions for breaches of transparency and integrity rules and by cooling-off periods, and that have also established comprehensive lobbying registers, clear integrity standards, and supervisory bodies with the capacity to enforce regulations, and monitor and promote effective implementation.

## Note

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<sup>1</sup> Judgment of 22 November 2022, WM and Sovim SA v Luxembourg Business Registers, C-37/20 and C-601/20, ECLI:EU:C:2022:912.





# 4 CONFLICT OF INTEREST

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Conflict-of-interest management ensures public office holders continue to serve citizens and businesses' interests. While countries' conflict-of-interest regulations are generally strong, an implementation gap remains in countries' conflict-of-interest systems. Oversight authorities could improve monitoring of at-risk officials' disclosure of interests and/or assets and office holders' movement in and out of public entities to better understand whether safeguards are working in practice. Improving conflict-of-interest management is not just about layering process over existing mechanisms. Taking a risk-based approach can help focus efforts on those office holders most exposed to corruption risks. Countries could also enhance institutional capacity, improve verification procedures, make recommendations for resolving conflicts before they cause harm, and use appropriate sanctions for breaches.

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## Introduction

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A conflict of interest involves a conflict between the public duty and private interests of a public official, in which the public official has private capacity interests that could improperly influence the performance of their official duties and responsibilities (OECD, 2003<sub>[19]</sub>). While not corruption per se, conflicts of interest that are not properly mitigated can undermine the integrity of public officials and the decisions they make, weakening trust in government. Managing conflicts of interest helps ensure stakeholders' fair and adequate access to policymakers and policymaking processes and holds public officials to account for their decisions (OECD, 2020<sub>[14]</sub>).

An effective conflict-of-interest system provides public officials with the guidance to proactively identify and manage situations where actual, potential or perceived conflicts of interest may arise. This includes establishing clear tools and processes for submission and verification of declared interests, outlining effective, proportionate and enforced sanctions for policy breaches, and taking a risk-based approach to enforce the policy to ensure effective implementation that is not overly burdensome to both public officials and oversight entities (OECD, 2003<sub>[19]</sub>). Conflict-of-interest safeguards are a cornerstone of public integrity systems and can support an open and transparent government, and transparency and integrity in lobbying and influence as well as political finance activities.

This chapter shows that:

- While conflict-of-interest regulations are generally strong, the implementation gap for conflict of interest persists for OECD Members and is even greater for OECD partner countries.
- Authorities in many countries could improve monitoring of whether at-risk officials are disclosing their interests and/or assets.
- To strengthen the efficiency and effectiveness of conflict-of-interest safeguards, countries can take a more risk-based approach for verification of declarations, and more frequently issue recommendations and use sanctions.
- While most countries have rules on revolving door they could be more consistently tracked to better mitigate conflict-of-interest risks.

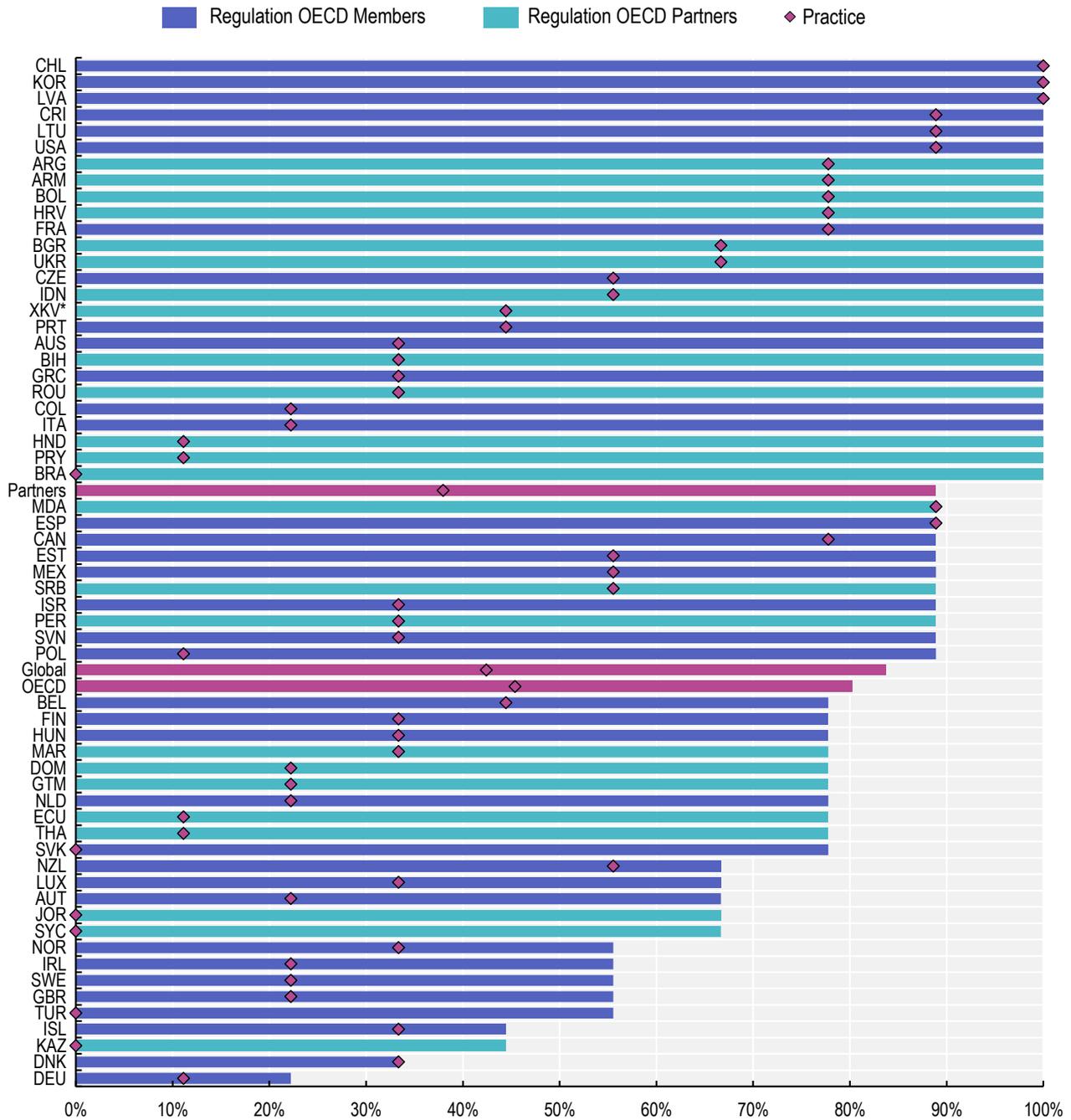
## While conflict-of-interest regulations are generally strong, the implementation gap for conflict of interest persists for OECD Members and is even greater for OECD partner countries

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Most countries have strong regulatory frameworks to prevent conflicts of interest, but the responsible institutions lack the powers or capacity to oversee and enforce the rules. Having strong regulations but inadequate implementation can undermine public confidence in anti-corruption efforts and could be perceived as window-dressing. Management of conflict of interest has one of the largest implementation gaps across all the areas covered in this Outlook. Globally, in 2025, countries fulfil on average 85% of criteria on the strength of conflict-of-interest regulations but only 42% of criteria on practice. This leaves a global implementation gap of 43 percentage points (Figure 4.1). There are three main causes of this gap across all countries: (1) lack of verification of declarations; (2) lack of recommendations from public authorities to resolve conflicts of interest; and (3) failure to submit declarations in practice. Greater use of electronic submission and taking a more risk-based approach to verification could help countries address these causes. The sections below further explain the causes and how countries can close the implementation gap.

For OECD Member countries, the implementation gap stands at 35 percentage points in 2025, reflecting no change since 2022. OECD Member countries that have shown the greatest improvement in reducing the implementation gap between 2022 and 2025 are Costa Rica and Mexico. In both cases, this progress relates to improving and publishing the declaration submission rates for public officials and taking a more risk-based approach to verifying declarations. OECD partner countries have a wider gap in general, because they have more comprehensive regulatory frameworks to mitigate conflict-of-interest risks (fulfilling 89% of criteria on regulations), but in practice, implementation lags behind the OECD average (meeting 38% of criteria).

**Figure 4.1. Strong regulations but weak practice undermines the effectiveness of conflict-of-interest systems**



Note: Data not provided by Japan and Switzerland.

**How to read:** On average, in 2025 Poland fulfilled 89% of criteria on regulation and 11% on practice. OECD member countries are represented by dark blue bars. OECD partner countries are represented by light blue bars. Member, partner and global averages are represented by red bars. Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/qi5lcg>

## Authorities in many countries could improve monitoring of whether officials in at-risk positions are disclosing their interests and/or assets

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Senior elected and non-elected officials and officials in at-risk positions are often subject to increased scrutiny and oversight to mitigate potential integrity breaches, due to their position and level of influence (OECD, 2020<sup>[14]</sup>). Clear and proportionate procedures for public officials to identify and manage interests and/or assets may consider the functions occupied, levels of seniority and exposure to potential corruption risks.

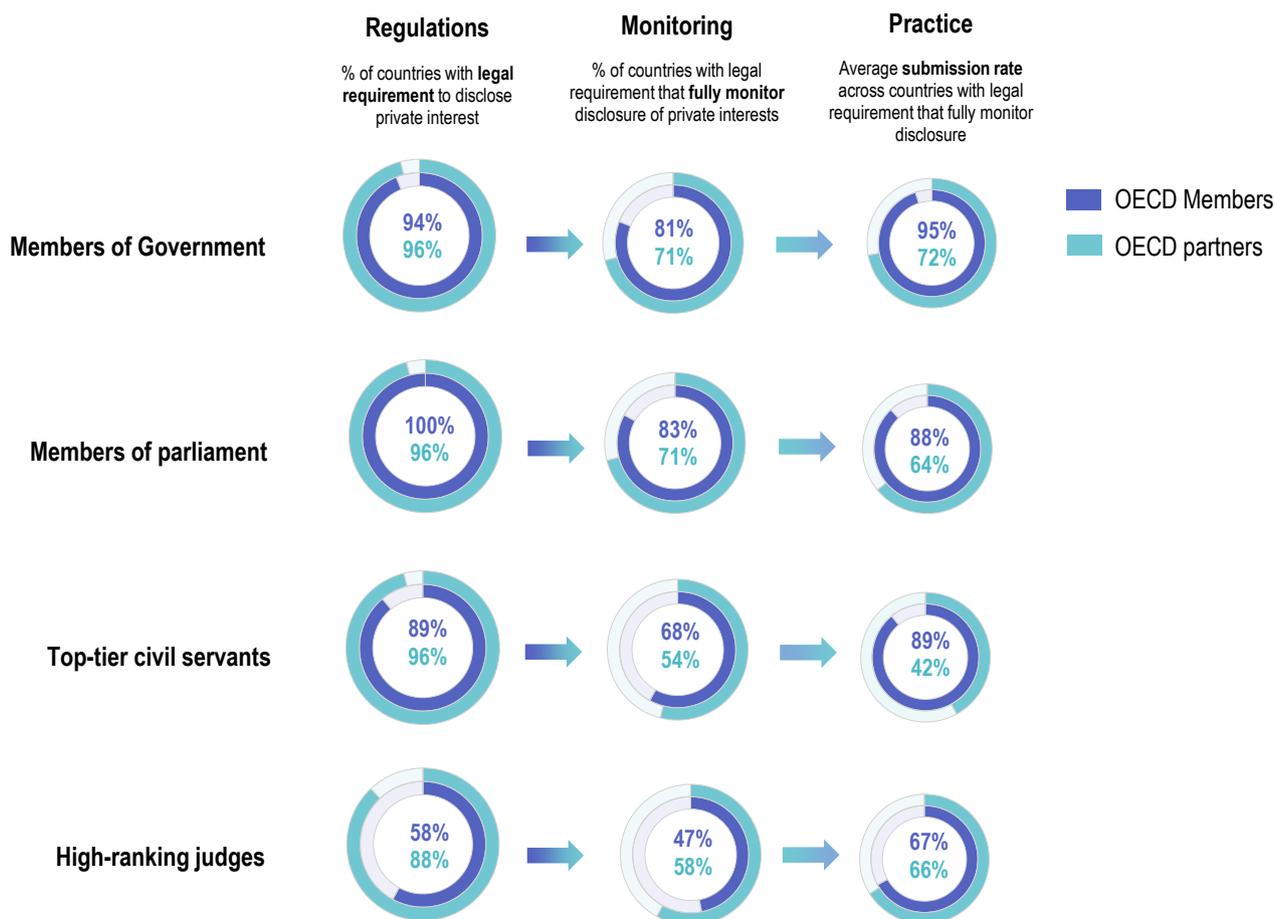
The PIIs analyse five categories of high-level public officials in relation to implementation of conflict-of-interest regulations via submission of interest and/or asset declarations: members of the Government, members of parliament (MPs), members of the highest judicial bodies, public employees in a high-risk position and any newly appointed or re-appointed top-tier civil servant of the executive branch.

In terms of regulations, ministers (members of government) are almost universally obliged to declare their assets and/or interests globally (Figure 4.2). Legal requirements for MPs to submit interest declarations are also adopted in virtually all countries. Newly appointed or re-appointed top-tier civil servants are required to make disclosures in all countries, except Austria, Denmark, Germany, Kazakhstan and Sweden.

In practice, even if regulations are generally well-established monitoring is inconsistent (Figure 4.2). If declarations are published, the submission rate of declarations for at-risk officials is publicly available. However, as shown in the public information chapter, less than half of countries publish the declarations (in accordance with national privacy restrictions, which can differ depending on the type of office holder). In such cases, central monitoring of the submission rates can promote accountability of public office holders and ensure implementation of regulations. It also enables cross-cutting analysis of trends for preventive and enforcement purposes. When a responsible authority is mandated to monitor submissions, submission rates of responsible officials' declarations are generally high.

One common challenge across all countries is the lack of monitoring of disclosures of newly appointed or re-appointed top-tier civil servants. OECD partner countries require more categories of officials to declare, but less frequently monitor whether the disclosures of officials are done in practice. High-ranking judges in OECD Member countries least often submit their declarations. In OECD partner countries, top-tier civil servants least often submit. Demonstrating leadership by example is essential for all senior public officials to maintain public confidence in their own integrity and the integrity of the executive, legislative and judicial branches of government (OECD, 2003<sup>[19]</sup>).

**Figure 4.2. Regulations are well-established but submission is often not monitored in practice**



Note: Data for regulations is based on criteria values for “Any member of government / member of parliament / member of the highest bodies of the judiciary must submit an interest declaration, as a minimum upon entry and any renewal or change in public office” and “Any newly appointed or reappointed top-tier civil servant of the executive branch must submit an interest declaration”. Data for monitoring and practice are based on statistics collected to calculate the criteria values for “The submission rate of interest declarations from: members of the Government is 100% for the past six years / members of parliament is at least 90% for the past six years / members of the highest bodies of the judiciary is at least 80% for the past four years / newly appointed or reappointed top-tier civil servants of the executive branch is at least 80% for the past four years.”

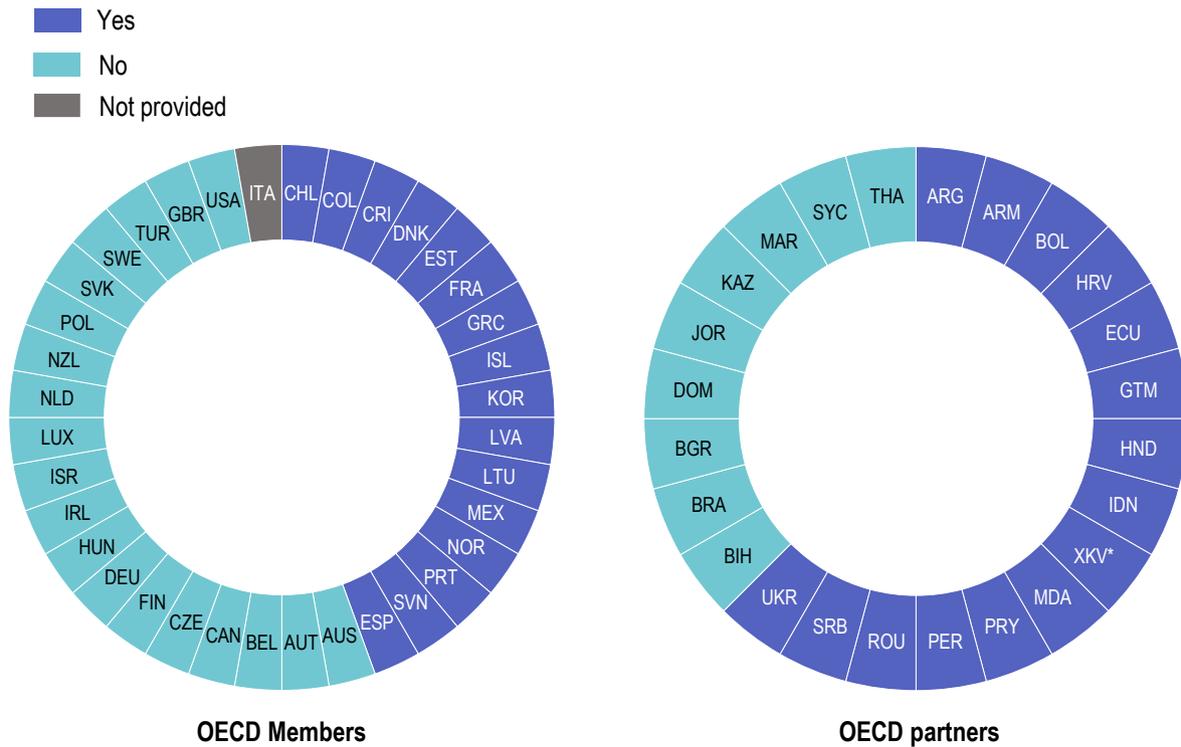
**How to read:** In OECD Member countries, members of government (Ministers) are legally required to disclose private interests in 94% of OECD Member countries. Among these 94% of countries, the disclosure of private interests is fully monitored in 81% of countries. Among these 81% of countries, the average submission rate of interest disclosures by members of government is 95%. In OECD partner countries members of government (Ministers) are legally required to disclose private interests in 96% of OECD partner countries. Among these 96% of countries, the disclosure of private interests is fully monitored in 71% of countries. Among these 71% of countries, the average submission rate of interest disclosures by members of government is 72%.

Source: OECD Public Integrity Indicators database (as of 10 March 2026)

Digital interest disclosure systems are increasingly being adopted by governments to streamline submission of declarations, more so in OECD partner than Member countries. Currently, 63% of OECD partner countries use a digital platform to submit interest and/or asset disclosures, compared with 44% of OECD Member countries (Figure 4.3). An electronic system simplifies the submission process by making the declaration form more user-friendly, reduces errors, facilitates further analysis and verification of declarations, and improves

data management and security (OECD, 2023<sup>[22]</sup>). Electronic submission proves statistically significant for high submission rates for the category of newly appointed or re-appointed top-tier civil servants. Enabling electronic submission of declarations that facilitates automatic updates and analysis of red flags, as well as interoperability between systems for data collection and verification, could facilitate monitoring and early identification of conflicts of interest.

**Figure 4.3. Countries which have a digital platform for asset / interest disclosures**



Note: Data not provided by Japan and Switzerland.  
 Source: OECD Public Integrity Indicators database (as of 10 March 2026)

StatLink <https://stat.link/ogbjws>

**To strengthen the efficiency and effectiveness of conflict-of-interest safeguards, countries can take a more risk-based approach for verification of declarations, and more frequently issue recommendations and use sanctions**

Conflict-of-interest regulations establish clear rules and responsibilities for public officials to manage and prevent conflicts of interest. However, strict regulations that are not supported with equally robust and consistent monitoring and verification procedures risk undermining the conflict-of-interest framework (OECD, 2020<sup>[14]</sup>). 97% of OECD Member countries and 75% of OECD partner countries have regulations that define circumstances and relationships that can lead to conflict-of-interest situations and establish the obligation to manage them, which shows strong commitment to preventing undue influence in the policymaking process. The more public officials that are required to submit, the

more resources are needed to maintain the system. If financial resources are not sufficient, countries face trade-offs between a wide scope in regulations and investments in the needed verification, detection, investigation and sanctioning measures that give teeth to the system. A risk-based approach focusing on those officials most at risk, combined with the use of digital tools, helps countries faced with scarce resources prevent backlogs of unverified declarations. This also provides public officials with the support they need to act in accordance with the rules and strengthens enforcement.

In 2025, only 21% of countries (25% of OECD Member countries and 17% of OECD partner countries) verified at least 60% of declarations filed during the latest two full calendar years. This indicates that responsible authorities globally face challenges in verifying declarations. A risk-based approach to submission and verification that ensures reporting requirements are proportionate to officials' risk profile and that institutional capacity is targeted toward verifying high-risk declarations can

reduce the administrative burden of verification. Furthermore, using digital tools for automatic checks and red flags can provide a cost- and time-efficient solution to detect incorrect or missing information, allowing for effective investigations and ensuring that inaccurate or false information is not published.

Issuing recommendations to concerned officials on how to resolve an actual or perceived conflict-of-interest situation can help prevent a conflict-of-interest situation from turning into an integrity breach. However, only 31% of countries (28% of OECD Member countries and 33% of OECD partner countries) did so within 12 months of detecting a conflict-of-interest situation. Costa Rica has developed several good practice verification models, including cross-checking public officials' sworn declarations with external databases and uncovering irregularities in high-risk sectors through monitoring, which has triggered detection of conflicts of interest and led to recommendations being issued.

Preventive measures are key, but an effective system also makes use of sanctions that are proportional to the offence and are applied fairly, objectively and in a timely manner. Indeed, a proportional sanctions regime ensures that enforcement is not arbitrary and that serious breaches are met with appropriate deterrents. Most countries (75% of OECD Member countries and 83% of OECD partner countries) have defined proportional sanctions for breaches of conflict-of-interest provisions. However, just over 1 in 3 OECD Member countries (39% in 2025) and half of OECD partner countries (50%) issue sanctions of different proportions in case of breaches in practice.

## While most countries have rules on revolving door they could be more consistently tracked to better mitigate conflict-of-interests risks

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An effective system to manage pre- and post-public office and employment risks and other conflict-of-interest situations includes designing rules and procedures that mitigate risks, such as cooling-off periods, subject-matter limits, time limits, disclosure of post-term engagements by holders of at-risk positions, including abroad, and prohibiting any use of "insider" information after such officials leave the public sector (OECD, 2010<sub>[15]</sub>).

In 2025, 75% of OECD Member countries have established cooling-off periods for public officials in regulations, an increase from 70% in 2022. Cooling-off periods are less established outside the OECD, present in 63% of OECD partner countries. However, even where regulatory requirements exist, few countries track post-employment restrictions of ministers and senior civil servants in practice (Table 4.1). This monitoring gap means that authorities may not know whether their regulations are being observed in practice. It also leaves the conflict-of-interest framework vulnerable to misuse or abuse, as there is no accountability mechanism to ensure public officials' private interests (such as the prospect of employment in a sector they regulate) do not interfere with their official duties. This can result in undue influence on government policies if not properly regulated, leading to risks of conflicts of interest and regulatory capture (OECD, 2021<sub>[16]</sub>). Establishing rules is insufficient if oversight entities do not monitor whether the rules are being followed in practice (OECD, 2021<sub>[16]</sub>).

**Table 4.1. Countries tracking office holders' movement into sectors they formerly regulated**

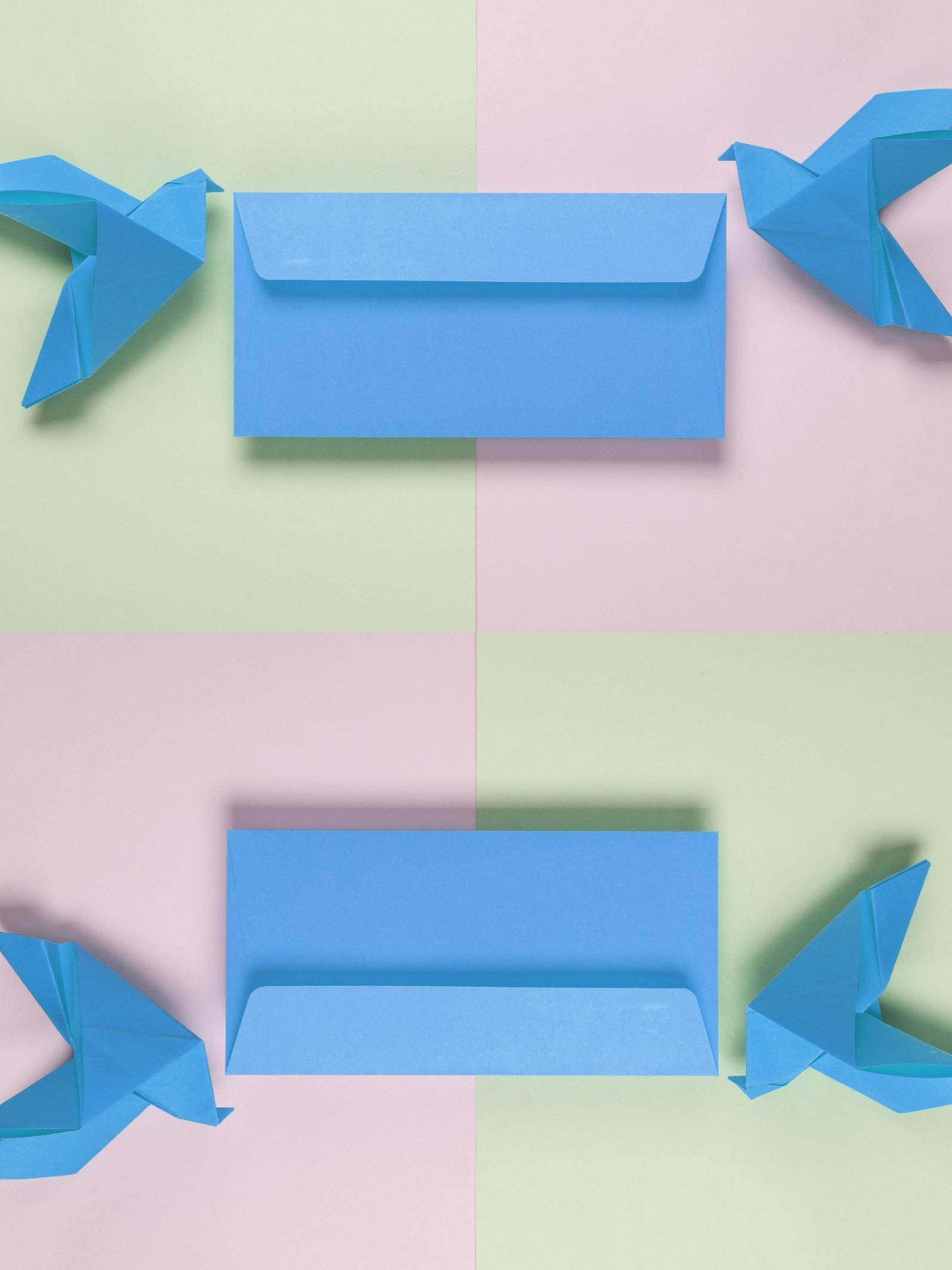
|                        | Countries tracking office holders' movement into sectors they formerly regulated |  |  |
|------------------------|--|--|--|
|                        | Regulation for cooling off periods for public officials?                         | Post-employment integrity for ministers tracked? | Post-employment integrity for top-officials tracked? |
| Australia              | ✓  | ✗  | ✗  |
| Austria                | ✓  | ✗  | ✗  |
| Belgium                | ✗  | ✗  | ✗  |
| Canada                 | ✓  | ✗  | ✗  |
| Chile                  | ✗  | ✗  | ✗  |
| Colombia               | ✓  | ✗  | ✗  |
| Costa Rica             | ✓  | ✗  | ✗  |
| Czechia                | ✓  | ✗  | ✗  |
| Denmark                | ✗  | ✗  | ✗  |
| Estonia                | ✓  | ✗  | ✗  |
| Finland                | ✓  | ✗  | ✗  |
| France                 | ✓  | ✗  | ✗  |
| Germany                | ✓  | ✗  | ✗  |
| Greece                 | ✓  | ✗  | ✗  |
| Hungary                | ✗  | ✗  | ✗  |
| Iceland                | ✗  | ✗  | ✗  |
| Ireland                | ✓  | ✗  | ✗  |
| Israel                 | ✓  | ✓  | ✗  |
| Italy                  | ✓  | ✗  | ✗  |
| Korea                  | ✓  | ✗  | ✗  |
| Latvia                 | ✓  | ✗  | ✗  |
| Lithuania              | ✓  | ✓  | ✓  |
| Luxembourg             | ✗  | ✗  | ✗  |
| Mexico                 | ✗  | ✗  | ✗  |
| Netherlands            | ✓  | ✗  | ✗  |
| New Zealand            | ✗  | ✗  | ✗  |
| Norway                 | ✓  | ✓  | ✓  |
| Poland                 | ✓  | ✗  | ✗  |
| Portugal               | ✗  | ✗  | ✗  |
| Slovak Republic        | ✓  | ✗  | ✗  |
| Slovenia               | ✓  | ✗  | ✗  |
| Spain                  | ✓  | ✓  | ✓  |
| Sweden                 | ✓  | ✗  | ✗  |
| Türkiye                | ✓  | ✗  | ✗  |
| United Kingdom         | ✓  | ✓  | ✓  |
| United States          | ✓  | ✗  | ✗  |
| <b>OECD Members</b>    | <b>75%</b>   | <b>14%</b>                                       | <b>17%</b>   |
| Argentina              | ✓  | ✗  | ✗  |
| Armenia                | ✓  | ✗  | ✗  |
| Bolivia                | ✓  | ✗  | ✗  |
| Bosnia and Herzegovina | ✓  | ✗  | ✗  |
| Brazil                 | ✓  | ✓  | ✓  |
| Bulgaria               | ✓  | ✗  | ✗  |
| Croatia                | ✓  | ✗  | ✗  |
| Dominican Republic     | ✗  | ✗  | ✗  |
| Ecuador                | ✗  | ✗  | ✗  |
| Guatemala              | ✗  | ✗  | ✗  |

|                      | Countries tracking office holders' movement into sectors they formerly regulated |  |  |
|----------------------|--|--|--|
|                      | Regulation for cooling off periods for public officials?                         | Post-employment integrity for ministers tracked? | Post-employment integrity for top-officials tracked? |
| Honduras             | ✗  | ✗  | ✗  |
| Indonesia            | ✓  | ✓  | ✗  |
| Jordan               | ✓  | ✗  | ✗  |
| Kazakhstan           | ✗  | ✗  | ✗  |
| Kosovo*              | ✓  | ✓  | ✓  |
| Moldova              | ✗  | ✗  | ✗  |
| Morocco              | ✗  | ✗  | ✗  |
| Paraguay             | ✗  | ✗  | ✗  |
| Peru                 | ✓  | ✗  | ✗  |
| Romania              | ✓  | ✗  | ✗  |
| Serbia               | ✓  | ✓  | ✗  |
| Seychelles           | ✗  | ✗  | ✗  |
| Thailand             | ✓  | ✗  | ✗  |
| Ukraine              | ✓  | ✗  | ✗  |
| <b>OECD partners</b> | <b>63%</b>   | <b>17%</b>                                       | <b>8%</b>  |
| <b>Global</b>        | <b>69%</b>   | <b>16%</b>                                       | <b>13%</b>   |

**How to read:** In Greece, post-employment integrity is not tracked for ministers or for top-officials. There are regulations stating mandatory cooling-off periods for public officials.

Note: In France, the High Authority for Transparency in Public Life (HATVP) does not have the means to collect information on the movement of ministers into sectors they formerly regulated, but movement is managed as part of the revolving doors control exercised by the HATVP. In Finland, while some ministries track movement, not all do and the value is "not tracking".

Source: OECD Public Integrity Indicators database (as of 10 March 2026)



# 5 POLITICAL FINANCING

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Political financing is a key part of functioning democracies. But not maintaining effective safeguards around political financing can produce harmful policy outcomes, biased and burdensome regulation, and the overrepresentation of certain interests in society and markets. While countries' regulations are generally strong, a significant implementation gap in many political financing systems persists. Political parties in many countries do not uphold reporting and transparency rules, indicating prohibited funding and malign influences over policymaking may remain undetected. Supervisory bodies could make better use of certified auditors to enhance oversight of parties' financial accounts. And although digitalisation and globalisation are changing the risks around political financing, many countries' laws are not adapting to the new risks and continue to omit key safeguards.

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## Introduction

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Many countries have held national-level elections since the publication of the 2024 Anti-Corruption and Integrity Outlook. In 2024, dubbed a ‘super-year’ for elections, voters headed to the polls in around 70 countries, representing around half the world’s population (OECD, 2024<sub>[20]</sub>; IDEA, n.d.<sub>[23]</sub>; Politics UK, 2025<sub>[24]</sub>). Many OECD Member countries were among this wider group, with several others holding their national elections in 2025. As other countries look forward to national-level elections in 2026, ensuring transparency and integrity in the financing of political parties and electoral campaigns will continue to be crucial for building dignified societies in which citizens feel served by their representatives and protecting market competition (OECD, 2017<sub>[11]</sub>).

Political financing allows individuals and entities to safeguard and advance their interests by channelling their support to the candidates and parties which best represent them. In turn, political financing is a necessary resource for candidates and parties to run for office and to promote ideas and manifestos, thereby facilitating competition in elections and greater choice for citizens and entities (OECD, 2016<sub>[25]</sub>).

However, where safeguards around the financing of political parties and electoral campaigns are not adequate money can become an instrument of undue influence and policy capture. In such circumstances, political financing can lead to the overrepresentation of narrow interests rather than those of wider society or markets, can reduce the quality and effectiveness of decision making in legislative and executive bodies, and can lead to biased, less effective or overly burdensome regulations which raise barriers to entry and reduce competition (OECD, 2016<sub>[25]</sub>; OECD, 2024<sub>[26]</sub>; Business at OECD, 2024<sub>[27]</sub>). In short, mismanaging political financing can produce worse democratic and economic outcomes for citizens and businesses.

This chapter explores countries’ systems for upholding integrity in political financing, and finds that:

- Many countries have strong regulations in place, but a significant implementation gap persists in countries’ political financing systems.

- Most countries have strong political financing reporting and transparency requirements, but political parties could better observe them.
- Political financing supervisory bodies could make better use of certified auditors in the oversight of parties’ accounts.
- Digitalisation and globalisation are changing and complicating political financing and campaigning faster than regulations are adapting.

## Many countries have strong regulations in place, but a significant implementation gap persists in countries’ political financing systems

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A strong regulatory framework is essential for ensuring integrity in the financing of political parties. Clear rules on prohibited and permissible donations can help to ensure a multiplicity of funding sources whilst reducing the risk of individual or undesirable interests gaining undue influence over political parties and candidates. Regulations on reporting, transparency and accountability support effective oversight of political financing and help to reassure citizens and markets that donors and recipients are working within the rules. Clear regulations on proper accounting processes, spending controls and expected conduct offer clarity to donors, parties and candidates on correct practice and lay the foundations for a culture of integrity around political financing (OECD, 2016<sub>[25]</sub>; OECD, 2020<sub>[14]</sub>).

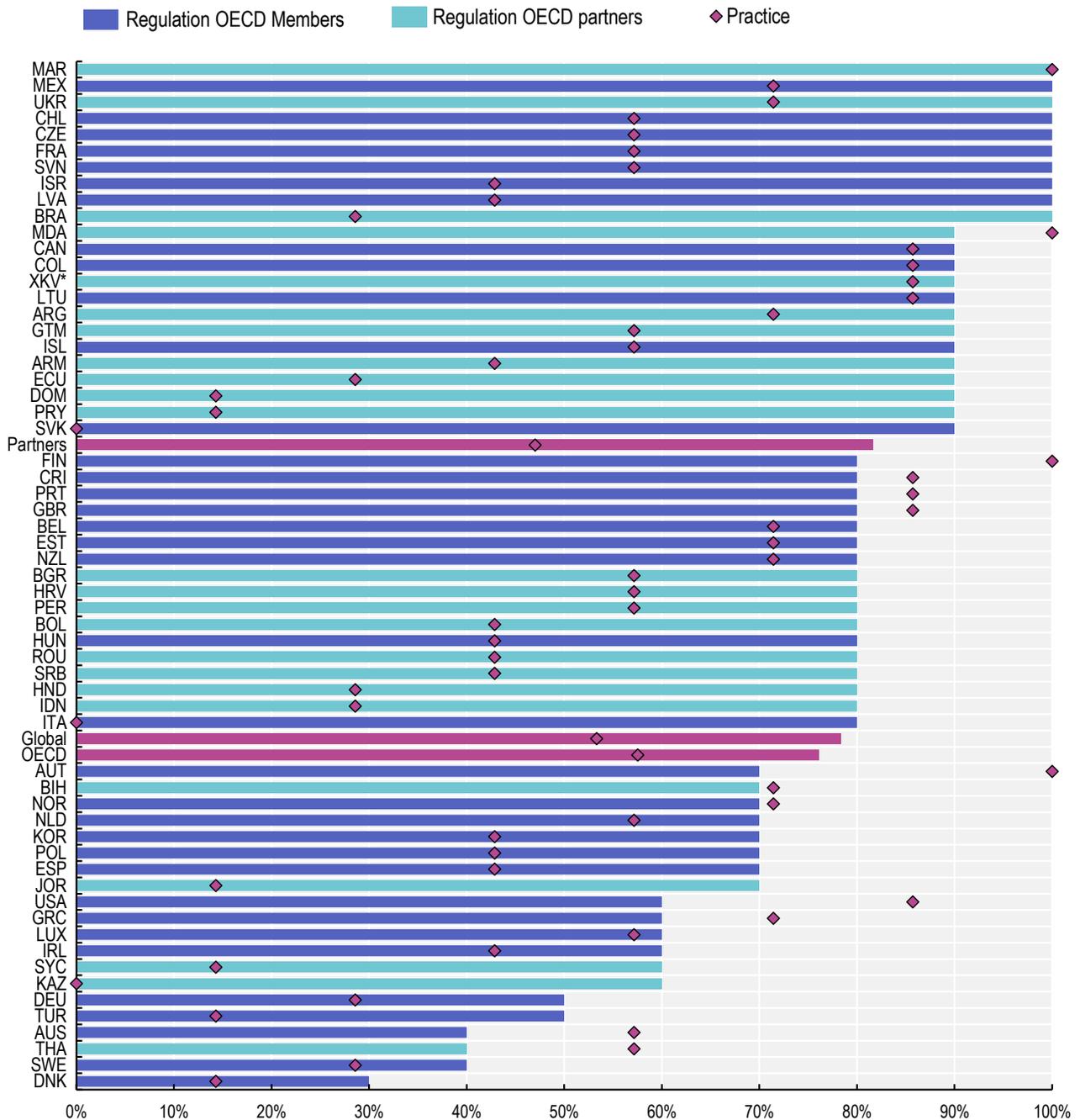
However, even the strongest regulatory frameworks must be supported by effective measures for implementation, such as the development of efficient and accessible reporting processes or the establishment of strong, independent oversight bodies with appropriate investigatory and enforcement powers. Without these implementation mechanisms rules around political financing rules can remain theoretical, allowing risks of corruption, bias and undue influence to go unresolved.

A persistent implementation gap continues to undermine the integrity of political financing systems among OECD Member and partner countries. Since 2022, the quality of political financing regulations in OECD Member countries has remained largely stable, with countries fulfilling an average 76% of OECD criteria on political financing regulations in 2025 compared to 73% in 2022 (OECD, 2024<sup>[20]</sup>). However, as in 2022, the overall quality of countries' regulations contrasts with their implementation in practice. OECD Member countries fulfil an average 58% of criteria on implementation of political financing regulations in 2025, the same as in 2022 (Figure 5.1). There is, therefore, an 18-percentage point implementation gap in OECD Member countries' political financing systems, indicating that the safeguards against undue influence over political parties and candidates set out in OECD Member countries' regulations are not being fully supported by relevant implementation measures. As set out in the following sections, this implementation gap is largely due to political parties in several countries not always observing reporting and transparency rules and

submitting financial reports to supervisory authorities late or not at all. In addition, supervisory authorities are taking different approaches to assessing political parties' financial accounts, but could be using certified auditors more effectively.

This implementation gap and the risks it leaves for competition and decision making is even more pronounced in OECD partner countries. Many partners have strong political financing regulations, more commonly than OECD Member countries banning donations from higher-risk sources such as anonymous donations, foreign states or enterprises, or publicly owned enterprises. However, partners are struggling more than OECD Member countries to support their regulations with implementing measures, especially in relation to reporting and transparency around political financing. As a result, OECD partner countries are carrying a 35-percentage point implementation gap, fulfilling an average 82% of OECD criteria on regulations and 47% on practice (Figure 5.1).

**Figure 5.1. An implementation gap in political financing persists in OECD Member countries and is wider in OECD partner countries**



Note: Data for 2025, or latest year available. Data not provided by Japan and Switzerland.

**How to read:** On average, in 2025 Argentina fulfilled 90% of criteria on regulation and 71% on practice. OECD member countries are represented by dark blue bars. OECD partner countries are represented by light blue bars. OECD member, partner and global averages are represented by red bars.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/pmnc1j>

## Most countries have strong political financing reporting and transparency requirements, but political parties could better observe them

A key reason for the implementation gap in countries' political financing systems is that reporting and transparency is lacking. Such mechanisms are crucial, as they provide citizens and markets with greater reassurance that safeguards are working, that parties and candidates are operating within the rules, and that the risks of undue influence are being mitigated (OECD, 2016<sup>[25]</sup>). Effective reporting of political financing is essential for proper oversight, as it enables responsible authorities to monitor compliance with the rules and to address wrongdoing. Transparent political financing builds trust in democratic processes by enabling scrutiny of donations and political relationships, and for authorities and public observers to build a picture of potential sources of influence over parties and candidates. This level of scrutiny is particularly important in the context of political donations from organised criminals seeking undue influence and foreign states and agents who may try to hide or disguise donations to undermine target countries' sovereignty or the stability of their markets (IDEA, 2025<sup>[28]</sup>).

However, fewer than two-thirds (58%) of criteria on practice are fulfilled on average by OECD countries, and fewer than half (47%) are fulfilled by OECD partner countries. Integrity frameworks supporting the

transparency of political parties' annual financial reports are well established and functioning effectively across OECD Member countries. Almost all countries (94%) legally require political parties to publish annual financial reports, including all contributions above a fixed ceiling. Demonstrating strong compliance in practice, political parties in a large majority of OECD countries (81%) have made their financial reports available to the public. However, integrity frameworks supporting the transparency of election campaigns could be strengthened in practice. Although, 94% of OECD countries require political parties and/or candidates to report their funding and expenses during electoral campaigns, these election campaign financial reports have been submitted within the timelines defined by legislation for the past two election cycles in only 39% of OECD countries (Table 5.1).

This discrepancy between regulations and practice is greater among OECD partner countries, where reporting and transparency remains low in practice. Although 79% of OECD partner countries require political parties to make their annual financial reports public, in practice, these financial reports are publicly available in only 58% of OECD partner countries. And while 92% of OECD partner countries require parties and / or candidates to report their finances during electoral campaigns, in only 33% of OECD partner countries have all political parties submitted accounts related to elections within the designated timelines for the past two electoral cycles (Table 5.1).

**Table 5.1. Political parties in OECD Member and partner countries are not all meeting transparency and reporting requirements**

|                        | Political parties must make financial reports public, including all contributions exceeding a fixed ceiling | Financial reports from all political parties are publicly available | Parties and/or candidates must report their finances (funding and expenses) during electoral campaigns | All political parties have submitted accounts related to elections within the timelines defined by national legislation for the past two election cycles |
|------------------------|---|---|--|--|
| Australia              | ✓   | ✓   | ✓  | ✗  |
| Austria                | ✓   | ✓   | ✓  | ✓  |
| Belgium                | ✓   | ✓   | ✓  | ✓  |
| Canada                 | ✓   | ✓   | ✓  | Not available  |
| Chile                  | ✓   | ✓   | ✓  | ✗  |
| Colombia               | ✓   | ✓   | ✓  | ✓  |
| Costa Rica             | ✓   | ✓   | ✓  | ✓  |
| Czechia                | ✓   | ✓   | ✓  | ✗  |
| Denmark                | ✓   | ✓   | ✗  | ✗  |
| Estonia                | ✓   | ✓   | ✓  | ✓  |
| Finland                | ✓   | ✓   | ✓  | ✓  |
| France                 | ✓   | ✓   | ✓  | Not available  |
| Germany                | ✓   | ✓   | ✓  | ✗  |
| Greece                 | ✓   | ✓   | ✓  | ✓  |
| Hungary                | ✓   | ✗   | ✓  | Not provided   |
| Iceland                | ✓   | ✓   | ✓  | ✗  |
| Ireland                | ✓   | ✓   | ✓  | ✗  |
| Israel                 | ✓   | ✗   | ✓  | ✗  |
| Italy                  | ✓   | ✗   | ✓  | ✗  |
| Korea                  | ✗   | ✗   | ✓  | ✓  |
| Latvia                 | ✓   | ✓   | ✓  | ✗  |
| Lithuania              | ✓   | ✓   | ✓  | ✓  |
| Luxembourg             | ✓   | ✓   | ✓  | ✗  |
| Mexico                 | ✓   | ✓   | ✓  | ✓  |
| Netherlands            | ✓   | ✓   | ✓  | ✓  |
| New Zealand            | ✓   | ✓   | ✓  | ✓  |
| Norway                 | ✓   | ✓   | ✓  | ✗  |
| Poland                 | ✓   | ✓   | ✓  | Not available  |
| Portugal               | ✓   | ✓   | ✓  | ✗  |
| Slovak Republic        | ✓   | ✗   | ✓  | Not provided   |
| Slovenia               | ✓   | ✓   | ✓  | Not provided   |
| Spain                  | ✓   | ✗   | ✓  | ✗  |
| Sweden                 | ✓   | ✓   | ✓  | ✗  |
| Türkiye                | ✗   | ✗   | ✗  | ✗  |
| United Kingdom         | ✓   | ✓   | ✓  | ✓  |
| United States          | ✓   | ✓   | ✓  | ✓  |
| <b>OECD Members</b>    | <b>94%</b>  | <b>81%</b>  | <b>94%</b>   | <b>39%</b>   |
| Argentina              | ✓   | ✓   | ✓  | ✗  |
| Armenia                | ✓   | ✓   | ✓  | ✓  |
| Bolivia                | ✓   | ✗   | ✓  | ✓  |
| Bosnia and Herzegovina | ✓   | ✓   | ✓  | ✗  |
| Brazil                 | ✓   | ✗   | ✓  | ✗  |
| Bulgaria               | ✓   | ✓   | ✓  | ✓  |
| Croatia                | ✓   | ✓   | ✓  | ✗  |
| Dominican Republic     | ✓   | ✗   | ✓  | ✗  |

|                      | Political parties must make financial reports public, including all contributions exceeding a fixed ceiling | Financial reports from all political parties are publicly available | Parties and/or candidates must report their finances (funding and expenses) during electoral campaigns | All political parties have submitted accounts related to elections within the timelines defined by national legislation for the past two election cycles |
|----------------------|---|---|--|--|
| Ecuador              | ✓   | ✗   | ✓  | ✗  |
| Guatemala            | ✓   | ✓   | ✓  | ✗  |
| Honduras             | ✓   | ✗   | ✓  | ✗  |
| Indonesia            | ✗   | ✗   | ✓  | ✗  |
| Jordan               | ✗   | ✗   | ✓  | Not available  |
| Kazakhstan           | ✗   | ✗   | ✗  | ✗  |
| Kosovo*              | ✓   | ✓   | ✓  | ✓  |
| Moldova              | ✓   | ✓   | ✓  | ✓  |
| Morocco              | ✓   | ✓   | ✓  | ✓  |
| Paraguay             | ✓   | ✗   | ✓  | ✗  |
| Peru                 | ✗   | ✓   | ✓  | ✗  |
| Romania              | ✓   | ✓   | ✓  | ✗  |
| Serbia               | ✓   | ✓   | ✓  | ✗  |
| Seychelles           | ✗   | ✗   | ✓  | Not provided   |
| Thailand             | ✓   | ✓   | ✗  | ✓  |
| Ukraine              | ✓   | ✓   | ✓  | ✓  |
| <b>OECD partners</b> | <b>79%</b>  | <b>58%</b>  | <b>92%</b>   | <b>33%</b>   |
| <b>Global</b>        | <b>87%</b>  | <b>70%</b>  | <b>93%</b>   | <b>36%</b>   |

Note: Data for 2025 or latest year available

How to read: France fulfilled the criterion “Political parties must make financial reports public, including all contributions exceeding a fixed ceiling” and did not fulfil the criterion “All political parties have submitted annual accounts within the timelines defined by national legislation for the past five years”. France also fulfilled the criterion “Parties and/or candidates must report their finances (funding and expenses) during electoral campaigns” and did not fulfil the criterion “All political parties have submitted accounts related to elections within the timelines defined by national legislation for the past two election cycles”.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

It is difficult to ascertain the reasons for parties not meeting their reporting requirements from supervisory bodies’ annual reports, but there are several possibilities. In both OECD Member and partner countries in many cases it appears that political parties have submitted late due to administrative or organisational error, rather than through trying to evade the rules. In other instances, it could be that the reporting system itself is overly burdensome or that deadlines for reporting are too tight and have led parties to miss deadlines. This possibility is borne out by several countries’ efforts to ease the burden on political parties and improve the effectiveness of financial reporting by introducing electronic reporting systems. One example is Ukraine’s POLITDATA platform which provides easier registration and submission of reports for political parties, and enhances authorities’ verification of reports through better comparison of data in parties’ historical submissions and across databases. Another reason not highlighted in annual reports, however, could be that some political parties feel less obligation to report due to oversight authorities’ perceived lack of authority or capability to oversee

reporting. Either way, the late or non-submission of reports impedes oversight authorities’ ability to check that political parties are working within the rules and that the risk of undue influence over political financing is being mitigated.

These low levels of reporting and transparency around political financing in OECD Member and partner countries is compounded by the availability of accessible data on parties’ accounts. In 67% of OECD Members are all financial reports available on a single online platform in a user-friendly format, while this is the case in 42% of OECD partner countries. Where data is not published in an accessible format which can be analysed by both responsible authorities and the public, discrepancies and breaches are harder to identify and to resolve (Transparency International, 2025<sup>[29]</sup>).

These shortcomings in reporting and transparency around political financing are leaving countries exposed to the risks of undue influence and policy capture and the effects which they can have on decision making and markets. Greater efforts to improve reporting and

transparency are therefore needed, including improving oversight bodies' verification of reporting and accounting, use of sanctions for breaches of reporting and transparency requirements, and better use of digital tools to facilitate transparent, accessible reporting. Doing so would help to ensure that decision making in legislative and executive branches continues to support trust, to maintain citizens' ability to engage with democratic processes, and to build stronger, more stable economies.

### **Political financing supervisory bodies could make better use of certified auditors in the oversight of parties' accounts**

Effective oversight bodies are an important means of translating political financing safeguards into practice as they play a central role in verifying and auditing parties' and candidates' accounts, and therefore in ensuring that parties and candidates are working within the rules. This process commonly includes checking that parties and candidates are recording their finances properly, assessing the permissibility of political donations, checking the appropriateness of political expenditure, and taking remedial action (including issuing sanctions) where breaches of the rules have occurred (OECD, 2020<sup>[14]</sup>; OECD, 2016<sup>[25]</sup>). To perform this function well, oversight bodies must ensure they have the appropriate skills and expertise to analyse and audit parties' and candidates' (often complex) accounts.

75% of OECD Member countries have an independent body with the mandate to oversee political financing, and their approaches to auditing political parties' accounts vary widely. Some countries (such as Mexico) use qualified administrators to audit parties' accounts who must fulfil a series of administrative, academic and professional requirements before appointment to such a role. Other countries (such as Czechia) employ accounting experts who verify the statements submitted by parties and candidates, which must have been

audited by an auditor prior to submission to the oversight body. And other countries (such as Estonia) use external auditors as part of special audits assigned by the supervisory body's decision making body. The most common approach to the audit of political parties' accounts, however, adopted by half of OECD members (50%), is for supervisory bodies to retain certified auditors on their payroll (Figure 5.2).

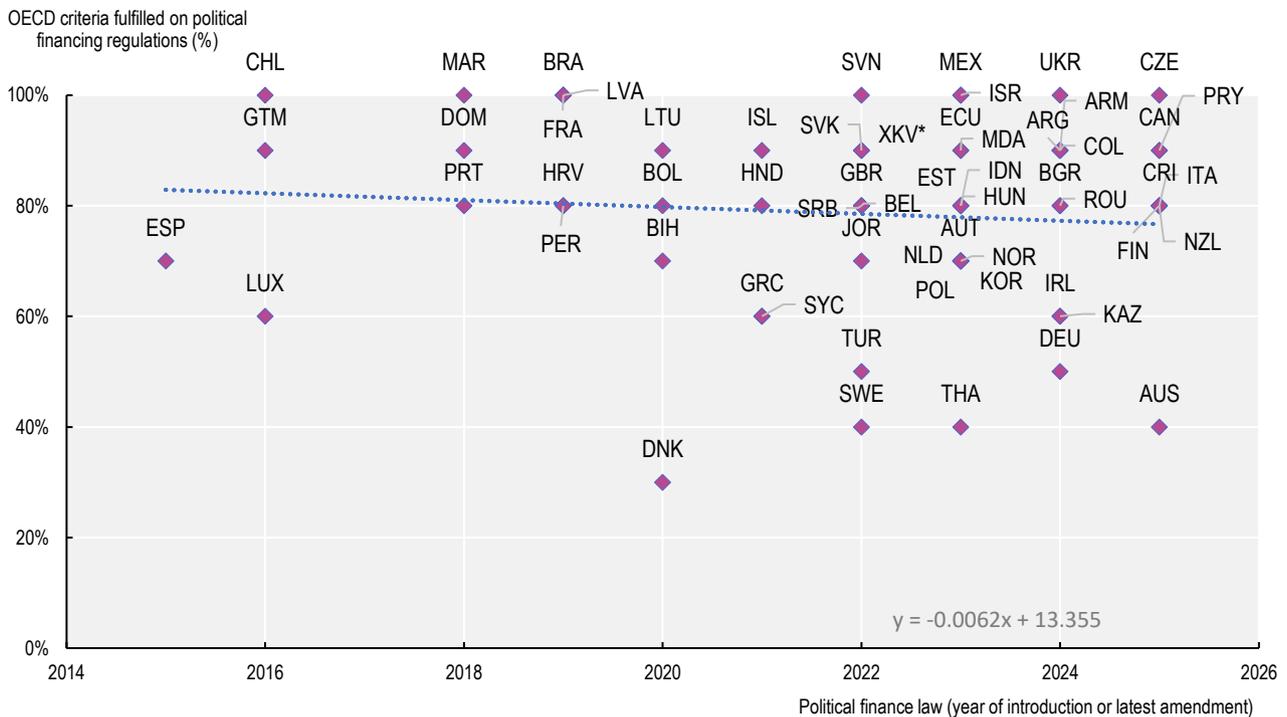
While countries' practices have therefore shown there are different solutions to auditing political parties' accounts, there are several advantages to this most common approach of supervisory bodies retaining certified auditors on their payroll. For example, for auditors to acquire certification they must retain a minimum level of expertise and adhere to a standardised audit methodology, which can improve the standard and consistency of oversight bodies' examination of political parties' accounts. In addition, and as explored in the chapter on "Organised crime and corruption", certification can also reduce auditors' susceptibility to external influence, as they are part of a professional network and have recourse to reporting and support channels through their professional memberships. Supervisory bodies retaining auditors on their payroll, as opposed to outsourcing audit functions, can also reduce susceptibility to outside influence, as auditors are then also subject to the regulatory safeguards underpinning the body's independence and to the body's standards of conduct. In addition, keeping certified auditors on the payroll can improve continuity between audits and institutional memory (OECD, 2024<sup>[30]</sup>). While it is not necessary for all OECD Member countries to adopt the same methodology, countries whose supervisory bodies do not retain certified auditors on their payroll may be missing out on these benefits as enjoyed by their peers. OECD partner countries could also consider the advantages of this approach, as of the 88% of partners which have an independent body overseeing political financing, in only 38% of countries does the oversight body have certified auditors on its payroll.



the case that only 53% of OECD Member countries ban anonymous donations to political parties or candidates, while 79% of partners do. In addition, 81% of OECD Members ban contributions from foreign states or enterprises, compared to 100% of partners, and 83% of OECD Member countries ban contributions from publicly

owned enterprises, compared to 100% of OECD partner countries. Where countries are reforming their political financing regulations but not improving the safeguards they offer, they remain vulnerable to risks of undue influence from undesirable and non-permissible sources of funding.

**Figure 5.3. Countries are updating their political financing regulations but safeguards around political financing are not necessarily improving**



Note: On average regulations passed or amended in 2025 fulfil around 6.2% fewer criteria than those passed or amended in 2015. Data not provided by Japan and Switzerland. In the case of the United States, the last amendment was in 2002 and they scored 60% for political finance regulations on the OECD PII criteria.

**How to read:** France's political financing regulation was last amended in 2019 and fulfils all 10 OECD criteria on the quality of political financing regulations.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/cuyw7s>

The risks of not introducing basic safeguards into political financing systems are particularly acute as the political financing landscape changes and becomes more complex due to digitalisation and globalisation. For example, political and electoral campaigners are increasingly using digital tools and social media to improve the sophistication and reach of their fundraising efforts. But while these new approaches can make fundraising efforts more effective, they introduce new integrity risks. Advantages include that online fundraising is often cheaper than traditional methods such as printed or broadcast media, and that social media algorithms allow highly targeted messaging to

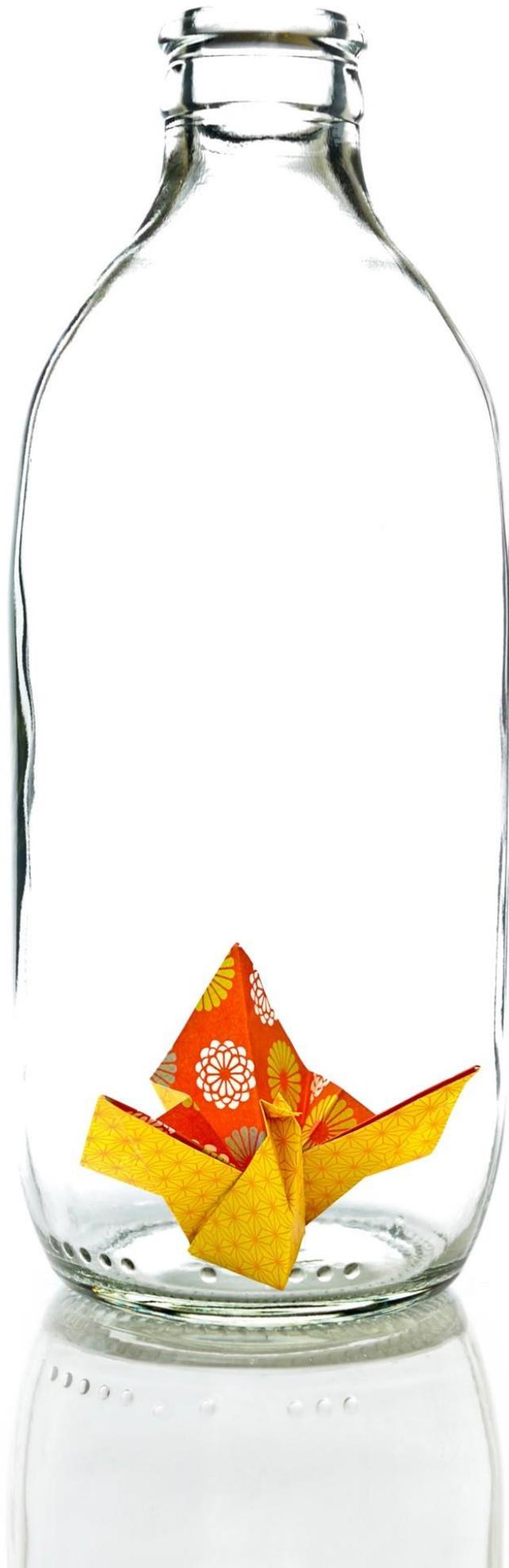
particular voter groups (or 'microtargeting'). The use of AI and big data analytics amplify these benefits, by enabling campaigners to rapidly generate tailored fundraising materials, based on advanced predictive analytics and behaviour modelling of potential donors' geographical locations, demographics, donation histories or interests (Wilfried Martens Centre for European Studies, 2024<sup>[31]</sup>; IDEA, 2025<sup>[32]</sup>; IDEA, 2025<sup>[28]</sup>). However, online fundraising can also obscure the true source and intermediaries of political donations, including through the use of online payment platforms, fundraising services or small, repeated donations which are difficult to trace individually. This increases

vulnerability to exploitation from malign or foreign agents looking to circumvent traditional prohibitions on donations and seeking to covertly influence elections and political debate in the target countries.

Political parties and candidates are also increasingly using social media influencers in their campaigns, reflecting influencers' growing role as a key source of information and news for citizens. In many Latin American, African and Southeast Asian countries social media provides people's main source of news (Reuters Institute, 2025<sup>[33]</sup>). This is particularly the case among young people, with one survey in Latin America finding that social media is the most important channel of information on politics for people aged 16 to 24 (Luminate, 2022<sup>[34]</sup>). Use of influencers can help political parties and campaigners reach new audiences, tailor their messages to specific groups, and clarify parties' and candidates' positions in accessible formats. These new channels, however, also enable politicians to rely more on media channels that often do not have the same financial transparency guidelines, leading to an increasingly obscure and fragmented media landscape. For instance, political financing regulations in some countries do not require parties and campaigners to

report their relationships with or expenditure on influencers, impeding transparency around an increasingly important part of their campaigning activity. In other countries, influencers' activity may fall into grey zones with regulators deciding case-by-case whether influencing activity counts as a natural person's freedom of expression or an in-kind political donation of a service (IDEA, 2025<sup>[32]</sup>).

In addition, use of illicit political and campaign funding is among the key tools for international organised criminals seeking to increase their influence, power and revenues. As explored further in the Organised crime and corruption chapter, international organised crime poses a growing threat to OECD Member and partner countries. By directing illicit funds to political parties and candidates, organised criminals try to influence decision makers in legislative and executive bodies, weaken law enforcement efforts, and influence regulatory processes to suit their own interests (IDEA, 2016<sup>[35]</sup>). These risks are particularly prevalent among parties and candidates with lower access to legitimate sources of funding, such as grassroots movements, or smaller or newer parties (IDEA, 2016<sup>[35]</sup>).



# 6 TRANSPARENCY OF PUBLIC INFORMATION

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Improving the transparency of public information can build citizens' and businesses' trust that governments are working in their interests, and can offer governments the opportunity to demonstrate the integrity and effectiveness of their work. Government transparency has remained consistently high though there remains scope to improve, particularly in OECD partner countries. Although countries' transparency regulations contain many standard requirements, many countries' data are still not open by default, meaning data which could enhance public sector automation and efficiency and support market entry, innovation and competition remains unavailable. Furthermore, integrity-related data are commonly not published. To help implement transparency rules, supervisory bodies could undertake inspections, issue sanctions where appropriate, and report on their activities.

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## Introduction

Fostering transparency through proactive disclosure and access to public information is a core element of functioning democracies and stable, predictable markets. Transparency provides citizens and businesses with insights into government spending and decision making, allowing them to understand how the government is working and to feel connected to and protected by those appointed to represent their interests. In doing so, transparency is a key factor in promoting confidence and trust in government processes and institutions. Indeed, while on average two-thirds of citizens participating in the 2024 OECD Trust Survey were satisfied with the availability of information on administrative services, making further information available was associated with a clear increase in the likelihood of high or moderately high trust in the civil service (OECD, 2024<sub>[8]</sub>). In addition, there is a positive correlation between the transparency of public information and higher levels of trust in countries where less than half of the population trust the government or are neutral (OECD, 2024<sub>[20]</sub>).

Transparency is characterised by the right to access information, or individuals' ability to seek, receive, impart and use information (OECD, 2022<sub>[36]</sub>). The OECD Recommendation on Open Government emphasises the disclosure of "clear, complete, timely, reliable and relevant public sector data and information" (OECD, 2017<sub>[37]</sub>). Similarly, the OECD Recommendation on Public Integrity promotes transparency and stakeholder engagement at all stages of the political process and policy cycle, in particular through:

- Advancing transparency and an open government, including ensuring access to information and open data, along with timely responses to requests for information.
- Granting all stakeholders – including the private sector, civil society and individuals – access in the development and implementation of public policies (OECD, 2017<sub>[11]</sub>).

This chapter explores countries' efforts to foster the transparency of public information, and finds that:

- Government transparency remains consistently high but could still improve, particularly in OECD partner countries.

- Countries' transparency regulations contain many standard requirements, but for many countries data are still not open by default.
- Data or information related to integrity remain less frequently published.
- Transparency could be further enhanced if supervisory bodies conducted inspections, issued sanctions and reported on their activities.

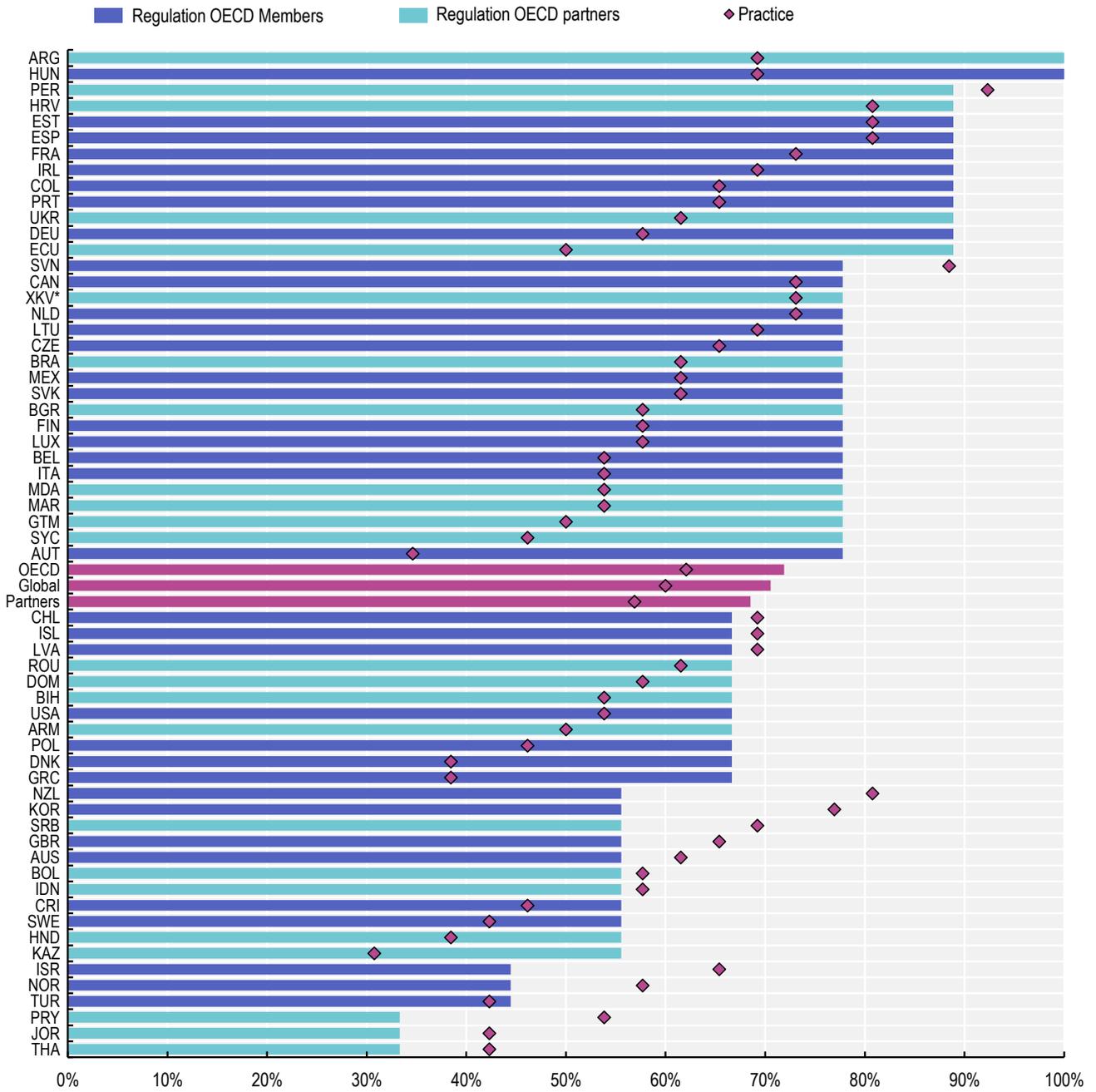
## Government transparency remains consistently high but could still improve, particularly in OECD partner countries

Providing greater access to public information supports public integrity by allowing citizens to gain insights into their governments' activities and by enabling oversight bodies and watchdog organisations to monitor conduct, detect possible corruption and raise red flags. This in turn incentivises public officials to behave with integrity and increases accountability in public policymaking and across the public administration. At the same time, fostering transparency allows governments to demonstrate the integrity of decision making and spending and to show the results and outcomes of government work by making relevant information publicly available.

OECD Member countries' transparency systems, including proactive disclosure and access to information, have remained largely consistent in the last few years. With the exception of one criterion,<sup>1</sup> which pulls the average up, the average number of OECD criteria on the quality of transparency regulations fulfilled by OECD Member countries has remained similar (at 72% of criteria fulfilled in 2025 compared to 62% in 2022). This consistency is also reflected in practice, where OECD Members fulfil 62% of OECD criteria (compared to 61% in 2022) on measures to implement transparency regulations (Figure 6.1). OECD partner countries fulfil an average 69% of OECD criteria on transparency regulations and 57% on implementation measures (Figure 6.1).

While OECD Member countries have maintained levels of transparency, there remains scope to improve the transparency of public information in all countries. As set out below, improvements could be made through the introduction of a stronger regulatory basis for open data, improving the availability of integrity-related datasets, and strengthening oversight of the transparency system.

**Figure 6.1. OECD Member countries' transparency systems have remained consistent in recent years**



Note: Data for 2025 or latest year available. Data not provided by Japan and Switzerland.

**How to read:** As measured against OECD standards on transparency and access to public information, Hungary fulfils 100% of criteria on regulation and 69% on practice, compared to the OECD average of 72% and 62%, respectively. OECD Member countries are represented by dark blue bars. OECD partner countries are represented by light blue bars. OECD, partner and global averages are represented by red bars.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/a0rx1k>

### Countries' transparency regulations contain many standard requirements, but for many countries data are still not open by default

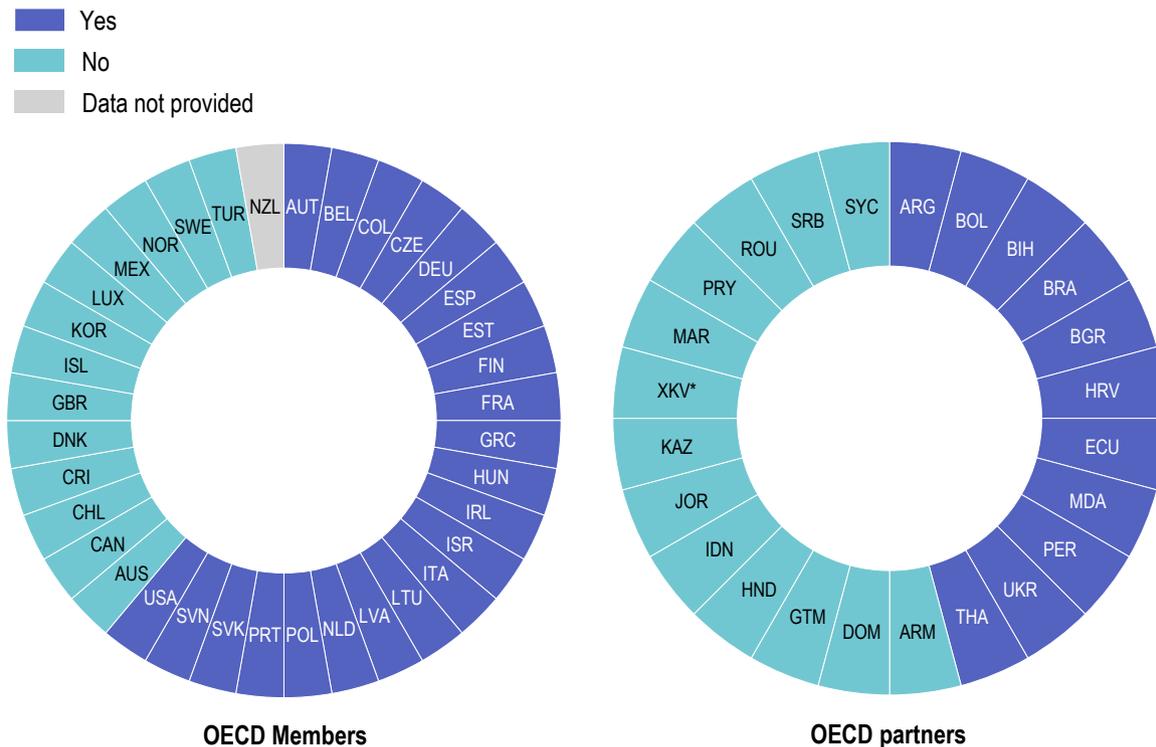
Many OECD Member and partner countries have developed strong rules both for the proactive disclosure of information and for facilitating requests for access to public information. As in other areas of countries' integrity systems, strong regulations provide clarity to both public institutions and citizens on what data and information should be made available, and can help both the public and oversight bodies to hold authorities to account if it is not. In terms of access to public information, in 81% of OECD Members and 79% of OECD partner countries the regulatory framework provides that all public institutions and individuals carrying out public duties are holders of public information, and that everyone has the right to access it. Similarly, in 83% of OECD Member countries and 83% of partners the permitted restrictions to access to public information are listed by law and are in line with the Tromsø Convention.<sup>2</sup> In 97% of OECD Members and 92% of

OECD partner countries there are statutory deadlines for processing requests for information. And the right to appeal to an independent body or the court against refusal or inactivity of an administrative body in response to an information request is ensured in all OECD Member and partner countries.

In terms of the proactive disclosure of data, a list of datasets and mandatory information to be disclosed is defined in the regulatory framework in 81% of OECD Member countries and 88% of OECD partner countries. This share has increased in recent years following the EU Open Data Directive (2019/1024) and the passage of its implementing act (2023/138), which established a list of datasets to be proactively published in all EU countries. More countries could introduce similar requirements to allow citizens and businesses to better understand their governments' activities.

However, many OECD Member and partner countries do not specify in primary legislation that government data are "open by default". Indeed, 61% of OECD Member countries have such a legislative requirement in place, and 46% of OECD partner countries do (Figure 6.2).

**Figure 6.2. Many governments do not require that government data are open by default**



Note: Data for 2025 or latest year available. Data for the criterion 'primary legislation specifies that Government data are "open by default" (except for specific cases defined in the regulatory framework)': "Yes" represents criterion fulfilled, and "No" represents criterion not fulfilled. Data not provided by Japan and Switzerland.  
 Source: OECD Public Integrity Indicators database (as of 10 March 2026).

As set out in the OECD Recommendation on Enhancing Access to and Sharing of Data, making government data open by default should be a key part of governments' broader open government strategies (OECD, 2021<sup>[38]</sup>). Doing so can encourage the use of digital tools and data in a collaborative manner, strengthening collective wisdom and intelligence creation. In line with international standards, it can be important to retain specific exceptions to open by default, and the appropriate degree of openness should be assessed by balancing the benefits of transparency against potential risks including related to privacy, security, and ethical considerations. Many countries, including Austria, Slovenia, the Slovak Republic, Czechia and Estonia, also include caveats around the burden which open data can create on public authorities.

However, there are several advantages to adopting an open by default approach. As well as increasing government transparency and the benefits it can have for public trust discussed above, adopting such an approach can also support evidence-based policymaking which can lead to the development of more informed and stronger public policy and legislation. Opening data up for use can also improve the efficiency of government processes, as it can reduce the reporting burden and lower operational costs by allowing public organisations to devote less time on routine or repetitive tasks which can instead be performed by automated decision making models (including AI). And opening data up for commercial utilisation can make market competition more balanced through improving access to intelligence and innovation, thereby facilitating competition and the emergence of new market players (ACSH, 2022<sup>[39]</sup>; OECD, 2020<sup>[40]</sup>). OECD Member and partner countries could therefore consider supplementing their transparency regulations with new provisions which provide for such an open by default approach.

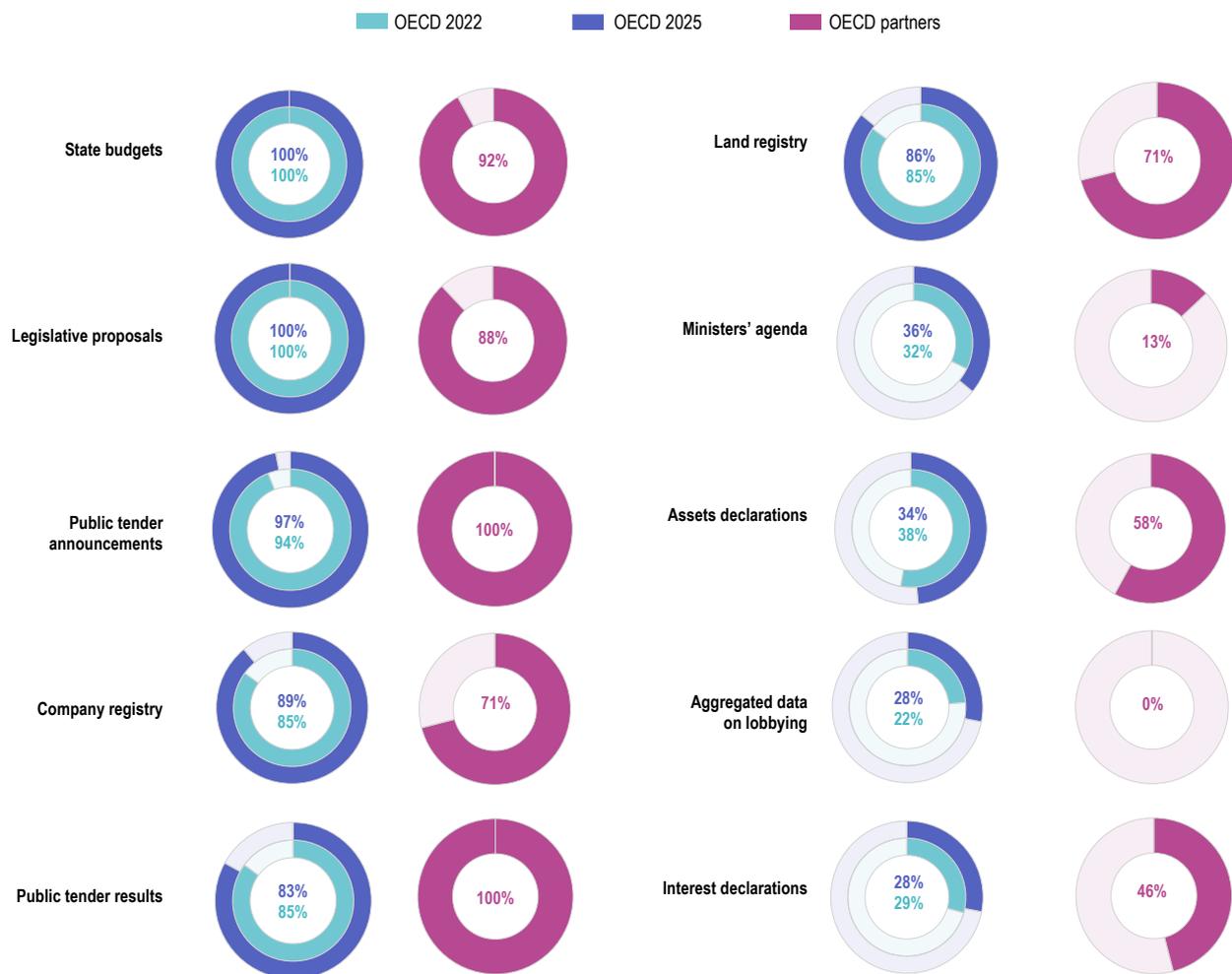
### **Data or information related to integrity remain less frequently published**

The benefits of strong transparency regulations are only realised if data is then made available in practice. Such

proactive disclosure of key public administrative data in practice is common for both OECD Member and partner countries. All OECD member countries publish all legislative proposals of the government sent to parliament (compared to 88% of partners). Likewise, all OECD Members and 92% of OECD partner countries publish their current state budget, 97% of OECD Members and all OECD partner countries publish announced public tenders, 92% of OECD Members and 71% of OECD partner countries publish consolidated versions of primary laws, 89% of OECD Members and 71% of OECD partner countries publish the company registry, and 86% of OECD Members and 71% of OECD partner countries publish the land registry (Figure 6.3).

However, other important data more specifically related to the promotion of integrity and the detection of corruption is less commonly available. In addition, while there have been minor changes in specific areas in such integrity-related datasets, OECD Member countries have not progressed on transparency in these areas in recent years.<sup>3</sup> In 33% of OECD Members (compared to 36% in 2022) and in 33% of OECD partner countries have all agendas of formal government sessions been published prior to the session within the latest calendar year. Similarly, as explored further in Chapter 3 on "Lobbying", in 36% of OECD Members (compared to 38% in 2022) and in only 13% of OECD partner countries are ministers' agendas made publicly available. Key aggregated data on lobbying is published by 28% of OECD Members (compared to 21% in 2022) and by no OECD partners. Likewise, key aggregated data on requests for information in any format is published by 39% of OECD Member countries and 25% of OECD partner countries. And finally, in 33% of OECD Members (compared to 30% in 2022) and 42% of OECD partner countries have the salaries of senior civil servants in all ministries been made available on ministries' websites or a government portal (Figure 6.3). Publishing this kind of integrity-related information allows citizens and businesses to better understand the range of influences over, and integrity of, public office holders and government decision making. Countries which are not making this data available could foster greater trust and confidence by making this data available.

**Figure 6.3. OECD Member and partner countries' proactive disclosure of data sets**



Note: Data for 2025 and 2022, or most recent year. Data not provided by Japan and Switzerland.

**How to read:** On average, in 2022 85% of OECD Member countries fulfilled the criterion on land registries. In 2025, 86% of OECD Member countries fulfilled the criterion on land registries. In 2025, 71% of OECD partner countries fulfilled the criterion on land registries. Percentage change between 2022 and 2025 reflects an increase in number of countries covered in 2025, rather than substantive policy change.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

### Transparency could be further enhanced if supervisory bodies conducted inspections, issued sanctions and reported on their activities

Another key area in which countries could enhance the implementation of their transparency systems is by improving supervisory functions. The nature of supervision varies between countries, but commonly takes the form of independent information commissions, agencies, or ombudsman bodies with a specific mandate for access to information; ombudsmen with a mandate

on access to information as one of several other topics (e.g. human rights, discrimination, gender); or a central government authority. In all cases, supervision is most effective when the responsible body can conduct inspections, issue sanctions for rule breaches, and report on their activities. In addition, supervisory bodies reporting on their activities enables citizens and businesses to better understand how far transparency regulations are being implemented and offers an incentive to public authorities to uphold the rules.

The majority of both OECD Members and partner countries have a supervisory body in place for public information issues, at 69% and 79% respectively. In

practice, around half of OECD Member countries' supervisory bodies (53%) carried out inspections within the last full calendar year to check whether public authorities are complying with their obligations on transparency of public information. The remaining countries' supervisory bodies either do not have the authority to make inspections (such as France), or they do not record in their annual reports whether or not inspections took place. Likewise, for OECD partner countries, 46% of supervisory bodies have carried out inspections in the last year, with the remaining bodies either not having the authority to do so (such as Jordan) or not publicly recording whether or not inspections took place. In a similar way, 22% of OECD Member countries' and 25% of OECD partner countries' supervisory authorities issued sanctions for non-compliance within the last full calendar year, with the remainder either not issuing them or not publicly recording whether or not sanctions were issued. In 53% of OECD Member countries a relevant public body has aggregated and published statistical data on requests

for access to information and related decisions for the past three years. Such reporting has happened in 50% of OECD partner countries (Table 6.1).

Many countries' supervisory bodies are therefore not providing a checking function on the extent of public authorities' compliance with public information rules, indicating they may not know whether the safeguards in their regulations are being implemented in practice, or using sanctions to correct breaches of the rules where they occur. Where supervisory authorities are not publishing whether they have undertaken this work, external parties are unable to verify levels of transparency and trust in government can be affected.

While it is not necessary to establish a single independent oversight body for public information, unlike for other areas of countries' integrity systems, there clearly remains scope for countries to enhance their current supervisory functions to improve transparency and build citizens' and businesses trust in their governments.

**Table 6.1. Countries' supervisory bodies may not be publicly reporting effectively, making inspections or issuing sanctions**

|             | A supervisory body responsible for public information issues is established  |  |   |
|-------------|--|--|---|
|             | Statistical data on requests for access to information and decisions have been aggregated and published by a relevant public body for the past three years | Inspections of compliance were conducted by the relevant supervisory body within the latest full calendar year | Sanctions for non-compliance were imposed by the relevant supervisory body within the latest full calendar year |
| Australia   | ✓  | ✓  | ✗   |
| Belgium     | ✓  | ✗  | ✗   |
| Canada      | ✓  | ✓  | ✓   |
| Chile       | ✓  | ✓  | ✓   |
| Colombia    | ✗  | ✓  | ✓   |
| Czechia     | ✗  | ✗  | ✗   |
| Estonia     | Not provided   | ✓  | ✓   |
| France      | ✓  | ✗  | ✗   |
| Germany     | ✗  | ✓  | ✗   |
| Hungary     | ✓  | ✓  | ✗   |
| Iceland     | ✗  | ✗  | ✗   |
| Ireland     | ✓  | ✓  | Not provided  |
| Israel      | ✓  | ✓  | ✗   |
| Italy       | ✗  | ✗  | ✗   |
| Korea       | ✓  | ✓  | ✗   |
| Luxembourg  | ✓  | ✓  | ✗   |
| Mexico      | ✓  | ✓  | ✓   |
| Netherlands | ✓  | ✓  | ✗   |
| New Zealand | ✓  | ✓  | ✗   |
| Portugal    | ✓  | ✓  | ✗   |
| Slovenia    | ✓  | ✓  | ✓   |

|                        | A supervisory body responsible for public information issues is established  |  |   |
|------------------------|--|--|---|
|                        | Statistical data on requests for access to information and decisions have been aggregated and published by a relevant public body for the past three years | Inspections of compliance were conducted by the relevant supervisory body within the latest full calendar year | Sanctions for non-compliance were imposed by the relevant supervisory body within the latest full calendar year |
| Spain                  | ✓  | ✓  | ✓   |
| Türkiye                | ✗  | ✗  | ✗   |
| United Kingdom         | ✓  | ✓  | ✓   |
| United States          | ✓  | ✓  | ✗   |
| <b>OECD Members</b>    | <b>53%</b>   | <b>53%</b>   | <b>22%</b>  |
| Argentina              | ✓  | ✓  | ✗   |
| Bolivia                | ✗  | ✗  | ✗   |
| Bosnia and Herzegovina | ✗  | ✗  | ✗   |
| Brazil                 | ✓  | ✓  | ✓   |
| Croatia                | ✓  | ✓  | ✓   |
| Dominican Republic     | ✗  | ✓  | ✗   |
| Ecuador                | ✗  | ✓  | ✗   |
| Guatemala              | ✓  | ✗  | ✗   |
| Honduras               | ✓  | ✗  | ✓   |
| Indonesia              | ✓  | ✓  | ✗   |
| Jordan                 | ✗  | ✗  | Not provided  |
| Kazakhstan             | ✗  | ✗  | ✗   |
| Kosovo*                | ✓  | ✗  | ✓   |
| Morocco                | ✗  | ✗  | ✗   |
| Peru                   | ✓  | ✓  | ✓   |
| Serbia                 | ✓  | ✓  | ✓   |
| Seychelles             | ✓  | ✓  | ✗   |
| Thailand               | ✗  | ✗  | ✗   |
| Ukraine                | ✗  | ✓  | ✗   |
| <b>OECD partners</b>   | <b>50%</b>   | <b>46%</b>   | <b>25%</b>  |
| <b>Global</b>          | <b>51%</b>   | <b>49%</b>   | <b>24%</b>  |

Note: Data for 2025 or most recent year. Data not provided by Japan and Switzerland. Austria, Denmark, Costa Rica, Finland, Greece, Latvia, Lithuania, Norway, Poland, Slovak Republic, Sweden, Armenia, Bulgaria, Moldova, Paraguay and Romania do not fulfil the criterion "A supervisory body responsible for public information issues is established". The OECD Member, partner and global averages include all countries which provided data for this criterion, though countries which did not fulfil the criterion are not included in the table.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

## Notes

<sup>1</sup> The increase in the number of criteria fulfilled on regulations is because the OECD now considers all countries which have transposed the EU Directive EU Directive 2019/1024 on open data and the re-use of public sector information and its implementing act Regulation 2023/138 to have fulfilled the criterion 'a list of datasets and mandatory information to be disclosed is defined in the regulatory framework'. This automatic fulfilment was not in place in 2022.

<sup>2</sup> The Tromsø Convention establishes minimum standards for the prompt and fair processing of requests for access to public documents by the public authorities holding the documents, as well as for domestic administrative remedies and appeals to independent bodies or courts in the event of refusal.

<sup>3</sup> Percentage change between 2022 and 2025 reflects an increase in number of countries covered in 2025, rather than substantive policy change.





# 7 INTEGRITY OF THE DISCIPLINARY SYSTEM

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Maintaining effective disciplinary systems is essential for building a strong, values-based culture of public integrity in the national civil service. Appropriate disciplinary procedures help civil servants understand standards of conduct and ensure they continue to act with integrity. While most OECD Member and partner countries have clear regulations on disciplinary procedures for civil servants, they could be better supported through stronger fairness guarantees. In addition, improved training on disciplinary investigations and use of digital tools could strengthen implementation of disciplinary measures in practice.

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## Introduction

Disciplinary systems are the necessary “teeth” of any country’s public integrity system and are among the principal means by which governments can ensure compliance and deter misconduct. If carried out in a fair, co-ordinated, transparent and timely manner, disciplinary mechanisms can promote confidence in the government’s public integrity system, strengthening its legitimacy over time and helping to instil integrity values in individuals, organisations and society (OECD, 2020<sup>[14]</sup>). The OECD Recommendation on Public Integrity calls on countries to ensure that enforcement mechanisms, including disciplinary measures for civil servants, apply fairness, objectivity and timeliness in the enforcement of public integrity standards (including detecting, investigating, sanctioning and appeal). The Recommendation also calls on countries to encourage transparency within public sector organisations and to the public about the effectiveness of the enforcement mechanisms, including disciplinary processes and the outcomes of cases, in particular through developing relevant statistical data on cases, while respecting confidentiality and other relevant legal provisions (OECD, 2017<sup>[11]</sup>).

Maintaining effective disciplinary frameworks in countries’ national civil service contributes to enforcing public integrity rules and standards. While they could be supported by other mechanisms to prevent corruption and build cultures of integrity, as explored further in other chapters, disciplinary frameworks are essential for safeguarding integrity and the rule of law in the civil service.

This chapter explores how the integrity safeguards of OECD Member and partner countries’ disciplinary measures for civil servants are performing. It shows that:

- While most OECD Member and partner countries have clear regulations on disciplinary procedures for civil servants, they could be better supported through stronger fairness guarantees,
- Improved training on disciplinary investigations and use of digital tools could strengthen implementation of disciplinary measures in practice.

### While most OECD Member and partner countries have clear regulations on disciplinary procedures for civil servants, they could be better supported through stronger fairness guarantees

Across OECD Member countries, legislation commonly sets out the basic disciplinary system for civil servants. In most OECD Member countries (97%), the disciplinary procedure is established in law, and most (84%) countries’ regulations define a disciplinary offence. In 81% of OECD Members, regulations establish a range of disciplinary sanctions for each type of disciplinary offence. There is a statute of limitations in 68% of OECD Members and 87% of OECD partner countries ranging on average from a period of 1 month to 3 years, with some countries reaching up to 7 and 10 years, depending on the severity of the disciplinary offence and the complexity of the case (Table 7.1).

**Table 7.1. Statute of limitations for disciplinary cases**

| Country             | Statute of limitations                           |
|---------------------|--|
| <b>OECD Members</b> |  |
| Australia           | No statute of limitations established in the law |
| Austria             | 6 months to 3 years                              |
| Belgium             | 6 months   |
| Canada              | No statute of limitations established in the law |
| Chile               | 4 years  |
| Colombia            | 5 years  |
| Costa Rica          | 1 month to 3 years                               |
| Czechia             | 1 year to 18 months                              |
| Denmark             | No statute of limitations established in the law |
| Estonia             | Data not provided                                |
| Finland             | No statute of limitations established in the law |

| Country              | Statute of limitations                           |
|----------------------|--|
| France               | 3 years  |
| Germany              | 2 to 7 years                                     |
| Greece               | 5 to 7 years                                     |
| Hungary              | Data not provided                                |
| Iceland              | Data not provided                                |
| Ireland              | No statute of limitations established in the law |
| Israel               | Data not provided                                |
| Italy                | No statute of limitations established in the law |
| Japan                | Data not provided                                |
| Korea                | 3 to 10 years                                    |
| Latvia               | 2 years  |
| Lithuania            | 1 to 6 months                                    |
| Luxembourg           | 3 years  |
| Mexico               | 3 to 7 years                                     |
| Netherlands          | No statute of limitations established in the law |
| New Zealand          | Data not provided                                |
| Norway               | No statute of limitations established in the law |
| Poland               | 4 years  |
| Portugal             | 3 to 18 months                                   |
| Slovak Republic      | 1 year   |
| Slovenia             | 1 to 6 months                                    |
| Spain                | 6 months to 3 years                              |
| Sweden               | 2 years  |
| Switzerland          | No statute of limitations established in the law |
| Türkiye              | 1 to 6 months                                    |
| United Kingdom       | Data not provided                                |
| United States        | No statute of limitations established in the law |
| <b>OECD partners</b> |  |
| Argentina            | 6 months to 2 years                              |
| Armenia              | 6 months to 3 years                              |
| Brazil               | 6 months to 5 years                              |
| Bulgaria             | 2 months to 1 year                               |
| Croatia              | 1 to 2 years                                     |
| Dominican Republic   | No statute of limitations established in the law |
| Ecuador              | 3 months   |
| Guatemala            | No statute of limitations established in the law |
| Honduras             | 2 months   |
| Indonesia            | No statute of limitations established in the law |
| Moldova              | 3 months to 2 years                              |
| Peru                 | 3 years  |
| Romania              | 6 months to 2 years                              |
| Serbia               | 6 months to 1 year                               |
| Ukraine              | 6 months to 1 year                               |

Note: The table presents data based on the following 31 OECD Member countries assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia, Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico, the Netherlands, Norway, Poland, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States. Data not provided for Estonia, Hungary, Iceland, Israel, Japan, New Zealand, and the United Kingdom. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

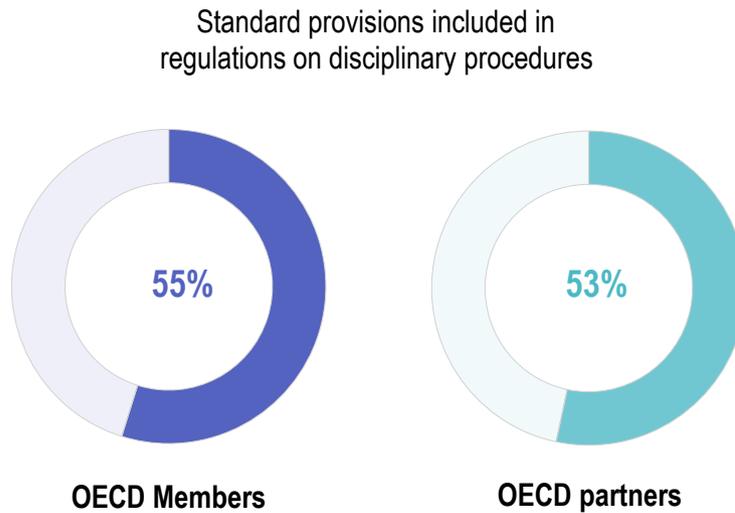
Source: OECD Public Integrity Indicators database (as of 10 March 2026).

In addition, the length of the statute of limitations for disciplinary cases can also be affected by the detection of a parallel criminal offence. In such cases, staff in charge of investigating cases are obliged to notify law enforcement if a disciplinary case involves suspected criminality in 74% of OECD Members and in 93% of OECD partner countries. Moreover, in 81% of OECD Members and 87% of OECD partner countries, regulations also establish the right to appeal a disciplinary decision before a judicial body.

In around half of OECD Member and partner countries, disciplinary procedures lack procedural fairness and objectivity safeguards, such as the presumption of

innocence, the right to access and contest evidence against the defendant, the right to a hearing prior to any resolution or decision, and the right to legal counsel (Figure 7.1). While some of these safeguards are considered core “criminal due process guarantees”, their application in the disciplinary system guarantee that sanctions are imposed fairly and lawfully. Given that in disciplinary procedures sanctioning decisions are reached by administrative bodies that are not always of judicial nature, procedural fairness guarantees protect both individuals and the integrity of the institution. Where countries do not currently have such guarantees in place, they could consider improving the fairness of civil service disciplinary systems by introducing them.

**Figure 7.1. Procedural fairness guarantees in disciplinary proceedings**



Note: The figure presents data based on the following 31 OECD Member countries assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia, Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico, the Netherlands, Norway, Poland, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States. Data not provided for Estonia, Hungary, Iceland, Israel, Japan, New Zealand, and the United Kingdom. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

**How to read:** 55% of OECD Members and 53% of OECD partner countries fulfil the criterion “6. Regulations on disciplinary procedure include provisions on (a) the presumption of innocence, (b) the right to access and contest evidence against the defendant, (c) the right to a hearing, prior to any resolution or decision issued, and (d) the right to legal counsel”.

Source: OECD Public Integrity Indicators database (as of 10 March 2026)

StatLink  <https://stat.link/ud8m5k>

## Implementation of disciplinary procedures could benefit from improved training on disciplinary investigations and use of digital tools

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In practice, the quality and integrity of disciplinary systems also depend on adequate investigative resources and skilled staff. Building the professionalism of officials handling disciplinary investigations through training ensures consistent implementation of disciplinary rules across government entities. Indeed, the lack of standardisation is particularly challenging in disciplinary procedures, which are mainly conducted in-house. Currently, 37% of OECD Members and 27% of OECD partner countries offer a relevant training programme to all staff conducting disciplinary investigations.

Digital tools, such as electronic case management systems, can further support procedural standardisation. Beyond operational efficiency, these tools provide the necessary technical infrastructure needed to systematically extract, aggregate and analyse data for statistical, transparency and prevention purposes. However, uptake remains limited. Currently, only 9

countries globally are using electronic case management systems at the central government level to manage disciplinary cases and proceedings. In practice, the lack of electronic systems hampers the proactive disclosure of data on the effectiveness of disciplinary enforcement, such as data on the number of initiated, concluded, or appealed disciplinary procedures against civil servants. Indeed, only 2 countries across OECD Members and partner countries publish this information.

Improving the use of digital technologies in disciplinary systems could help countries demonstrate their commitment to transparency within public sector organisations and to the public about the effectiveness of enforcement mechanisms and the outcomes of cases (OECD, 2017<sup>[11]</sup>). In addition, countries could leverage this data to identify key risk areas and feed indicators for monitoring and evaluating the effectiveness of the broader integrity enforcement regime and communicate outcomes to the public – contributing to greater accountability and trust in judicial institutions (OECD, 2020<sup>[14]</sup>). The introduction of digital tools as part of a broader strategic approach, including adequate capacity building and process adaptation, could enhance effectiveness and ensure the consistent and efficient use of these tools.



# **8**

## **INTEGRITY OF THE JUSTICE SYSTEM**

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Most countries maintain judicial and prosecutorial integrity safeguards to enable judges and prosecutors to enforce anti-corruption laws and regulations and ensure accountability for breaches. However, merit-based procedures for selecting, appointing and promoting judges and prosecutors could be improved to protect their integrity. Standards of conduct for judges and prosecutors are common, but implementation could be improved, especially around conflicts of interest. Reporting mechanisms for judicial and prosecutorial misconduct are generally implemented but countries could raise public awareness of them and train staff on handling reports.

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## Introduction

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Judges and prosecutors are key actors in enforcing laws and regulations and ensuring accountability for corruption crimes and breaches of anti-corruption policies. To carry out these roles effectively and uphold the rule of law, judges and prosecutors must have integrity and be impartial, honest and competent. Strong policies and processes are therefore needed to ensure meritocracy, and safeguard against undue influence and corruption within the justice system. Therefore, Principle 11 of the OECD Recommendation on Public Integrity calls on countries to ensure that enforcement mechanisms provide appropriate responses to all suspected violations of public integrity standards by public officials and all others involved in the violations. This includes ensuring that cases of corruption and integrity violations are decided objectively, fairly, and based on legal grounds and evidence (OECD, 2017<sup>[11]</sup>).

Moreover, integrity is a key driver of public trust in the justice system and, more broadly, of confidence in democratic institutions. When countries adopt and implement robust integrity frameworks, justice systems are more likely to be perceived as impartial and fair. Conversely, weaknesses in integrity safeguards can erode public confidence, regardless of formal legal guarantees. Indeed, evidence indicates that OECD Member countries fulfil on average 66% of OECD criteria on regulatory safeguards for judicial integrity, while more than half (54%) also have high or moderately high trust in the courts and judicial system (OECD, 2026<sup>[41]</sup>; OECD, 2024<sup>[8]</sup>).

This chapter explores how the integrity safeguards of OECD Member and partner countries' justice systems and disciplinary measures for civil servants are performing. It shows that:

- Basic safeguards for judicial and prosecutorial integrity are in place in the majority of countries, but stronger procedures for the selection, appointment and promotion of judges and prosecutors are needed in many countries to protect judicial independence and prosecutorial integrity.
- Standards of conduct for judges and prosecutors exist but implementation could be improved, particularly for managing conflicts of interest.
- Whistleblowing mechanisms for reporting judicial and prosecutorial misconduct, including corruption, are generally being implemented but could be improved through strengthened public awareness of existing reporting procedures, as well as training for staff handling reports.

## The basic safeguards for judicial and prosecutorial integrity are in place in the majority of countries, but stronger procedures for the selection, appointment and promotion of judges and prosecutors are needed in many countries to protect judicial independence and prosecutorial integrity

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Most OECD Member and partner countries have basic safeguards in place for judicial and prosecutorial integrity. OECD Member countries fulfill an average 66% of OECD criteria for regulations on judicial integrity and an equal share of criteria on prosecutorial integrity. OECD partner countries fulfill an average 75% of the regulatory criteria on judicial integrity and 63% for prosecutorial integrity. As shown in Table 8.1, countries commonly have regulations in place to establish:

- Constitutional safeguards for the independence of judges.
- Objective grounds for the dismissal of judges and prosecutors.
- Guaranteed tenure for judges until mandatory retirement age, the expiry of their term of office or dismissal from office.
- Circumstances and relationships that can lead to conflict-of-interest situations for judges and prosecutors outside public office, as well as sanctions for breaches of conflict-of-interest obligations depending on the severity of the violation.
- Circumstances where judges and prosecutors should recuse themselves, as well as procedures for deciding whether they should continue on the case or how the procedural conflict of interest should be resolved.
- Appeals against prosecutorial decisions regarding criminal investigations and against decisions to prosecute or not prosecute.

**Table 8.1. Key strengths in regulations for judicial and prosecutorial integrity**

|             |                                   | OECD Members fulfilling | OECD partner countries fulfilling |
|-------------|-----------------------------------|-------------------------|-----------------------------------|
| Judges      | Constitutional independence       | 100%                    | 100%                              |
|             | Grounds for dismissal             | 93%                     | 93%                               |
|             | Guaranteed tenure                 | 100%                    | 93%                               |
|             | Conflict-of-interest policies     | 77%                     | 73%                               |
|             | Recusals                          | 97%                     | 100%                              |
|             | Conflict-of-interest sanctions    | 77%                     | 87%                               |
| Prosecutors | Grounds for dismissal             | 93%                     | 73%                               |
|             | Conflict-of-interest policies     | 87%                     | 80%                               |
|             | Recusals                          | 90%                     | 93%                               |
|             | Conflict-of-interest sanctions    | 80%                     | 80%                               |
|             | Appeal of prosecutorial decisions | 83%                     | 60%                               |

Note: The table presents data based on the following 31 OECD Member countries assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia (judges), Costa Rica, Czechia, Denmark except for criterion 11.2.16), Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico (prosecutors), the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States (except for criteria on grounds for prosecutorial dismissal and appeal of prosecutorial decisions). Data not provided for regulation and practice criteria for Colombia (prosecutors), Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland, and the United Kingdom. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

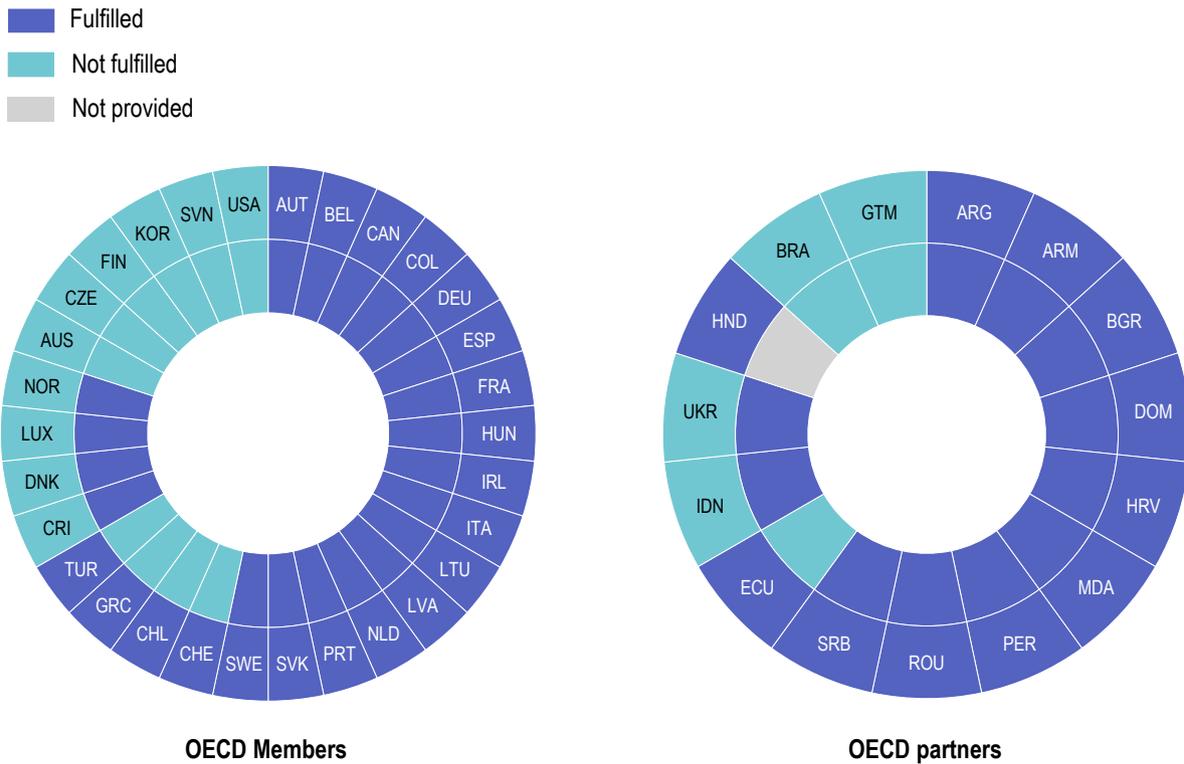
**How to read:** 93% of OECD Members and 93% of OECD partner countries have laws establishing objective grounds for the dismissal of judges.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

Moreover, most OECD Member and partner countries have a meritocratic judicial career progression system. Currently, 67% of OECD Members and 73% of OECD partner countries have laws establishing objective procedures for the selection and promotion of judges that include, as a minimum, exams or panel interviews. These procedures are implemented throughout the judicial career, including for senior judicial positions: only 7% of OECD Members and 20% of OECD partner countries do not apply merit-based procedures for the

selection of candidates to senior judicial positions. In practice, these procedures are generally conducted by an independent body in 67% of OECD Members and 73% of OECD partner countries (Figure 8.1). Challenges in safeguarding merit in selection and promotion procedures may also arise in countries where judges are elected. Countries can address these challenges by ensuring that objective merit-based criteria facilitate the selection of individuals based on integrity, competence and impartiality.

**Figure 8.1. Merit-based procedures for the selection and promotion of judges**



Note: The figure presents data based on the following 30 OECD Member countries assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia, Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States. Data not provided for Estonia, Iceland, Israel, Japan, Korea, Mexico (judges), New Zealand, Poland, and the United Kingdom. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

**How to read:** France fulfils the regulatory criterion “The law establishes merit-based, objective procedures for the selection and promotion of judges” (outer ring) and the practice criterion “An independent body conducts exams and interviews for the selection and promotion of judges based on merit and competence” (inner ring).

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/70clsa>

In comparison, only 43% of OECD Member countries and 40% of OECD partner countries have adopted regulations establishing merit-based and objective procedures that are implemented for all prosecutors. This lower performance in selection procedures of prosecutors can be attributed to the different institutional roles of judges and prosecutors, and the various legal traditions across countries. Whereas judges are in most countries fully independent and act as impartial adjudicators, prosecutors are in some cases positioned within the executive branch. By comparison, 10 OECD Member countries and 8 OECD partner countries do not have such procedures in place for senior prosecutorial positions, such as prosecutors general. While various models exist for the appointment of prosecutors general, a meritocratic selection of candidates for these senior positions can strengthen the integrity of the prosecution service as a whole by

ensuring that the selected persons have the necessary legal expertise and experience, as well as characteristics of integrity leadership to prevent risks of undue influence (OECD, 2020<sup>[14]</sup>). These skills are even more crucial in the prosecution of corruption crimes, which can be a politically sensitive issue. Especially in cases of high-level corruption, political actors may seek to exert illegal influence on investigations. In this context, regulatory frameworks governing the recruitment and promotion of those leading such investigations play a key role in providing guarantees for integrity and impartial, accountable decision making (OECD, 2024<sup>[18]</sup>; Council of Europe, 2024<sup>[42]</sup>; Council of Europe, 2019<sup>[43]</sup>). Beyond that, corruption cases often involve complex financial schemes requiring technical skills for their effective investigation. The detection of those schemes and the overall enforcement of anti-corruption systems relies on

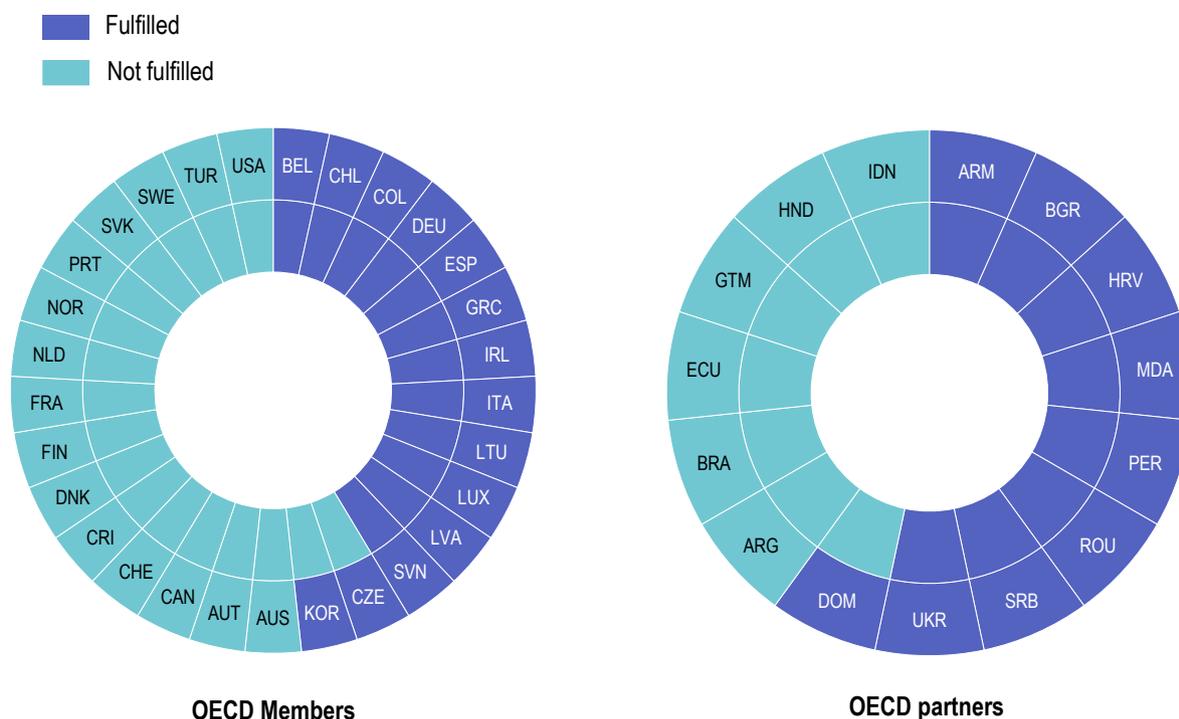
selecting senior prosecutors with demonstrated capacities in those areas.

Beyond merit, judicial integrity also depends on the independence of the bodies taking decisions on the appointment and promotion of judges. Such bodies can ensure independence by operating autonomously from the executive and the legislative, for example through transparent criteria for the selection, appointment and removal of their members. To avoid risks of corporatism these bodies may have a mixed composition, but international standards, such as the Council of Europe's 2010 recommendation on judicial independence, stress that not less than half of members should be judges elected by their peers (Council of Europe, 2010<sup>[44]</sup>).

While several countries (23 OECD Member and 12 partner countries) have established advisory bodies with

a key role in recruitment and promotion procedures, only a few have adequate safeguards in place to ensure the internal independence and integrity of their decisions. Currently, 47% of OECD Member countries appoint judges based on the recommendations of an independent body that operates autonomously from the executive and legislative branches of government, and whose members are selected through non-partisan processes with clear criteria for their appointment and removal. This is similar in OECD partner countries, where 53% also base decisions on judicial appointments on the recommendations of independent bodies. The share of OECD Member countries that involve independent bodies in decisions on promotion is even lower at 40%. Among OECD partner countries, 60% of these currently consider recommendations of independent bodies in promotion decisions (Figure 8.2).

**Figure 8.2. Independent bodies advising on the appointment and promotion of judges across countries**



Note: The figure presents data based on the following 30 OECD Member countries assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia, Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States. Data not provided for Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland and the United Kingdom. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

**How to read:** Italy fulfils the criterion "Regulations establish that the appointment of judges is decided by an independent body" (outer ring) and the criterion "Regulations establish that the promotion of judges is decided by an independent body" (inner ring).

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

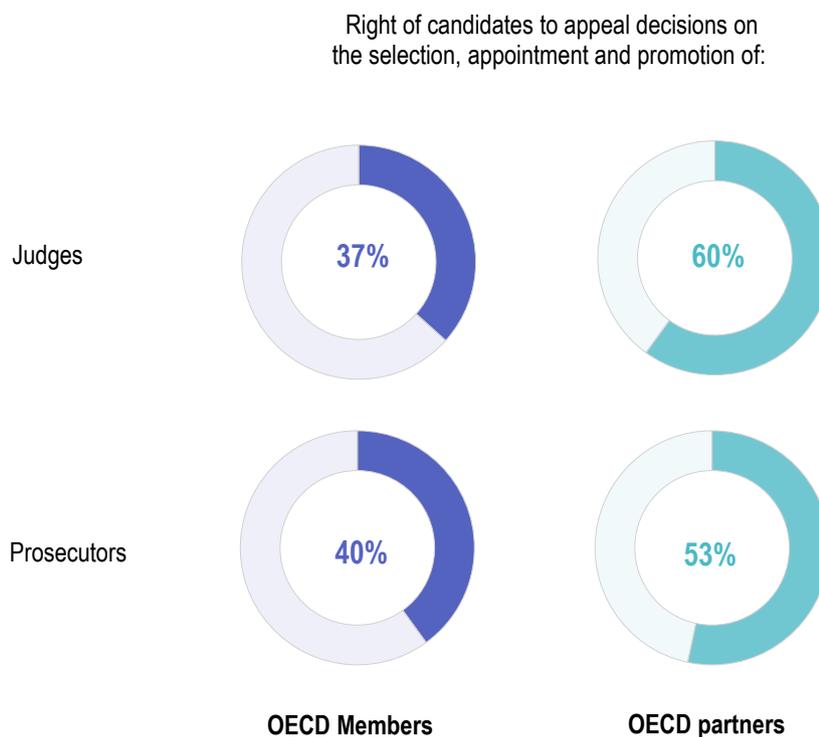
StatLink  <https://stat.link/rak8c5>

Taken together, such gaps could undermine the independence and impartiality of the justice system. Regulatory safeguards ensure that there are checks and balances, so that no branch of government or institution can exercise disproportionate influence over any other. For example, when decisions concerning judicial career progression are reached without the involvement of independent bodies, judges may be exposed to political pressure, leading to distorted judicial actions. Both judges and prosecutors hold considerable powers, which should be exercised lawfully and accountably. Therefore, merit-based decisions regarding their recruitment and promotion can avert potential risks of political patronage. Although actors may still attempt to unfairly influence the system, objective decision-making processes make it more difficult to appoint people to

positions when they do not qualify for them (OECD, 2020<sup>[14]</sup>).

Recourse mechanisms are another measure to ensure that the best qualified candidates are selected for judicial and prosecutorial positions, and that the relevant decisions are transparent and accountable. Without a possibility to challenge those decisions, corruption or favouritism can operate unchecked. Currently, judicial candidates have a right to appeal decisions on appointment and promotion in 37% of OECD Member and 60% of partner countries. When it comes to prosecutors, candidates can appeal selection and promotion procedures in 40% of OECD Member countries and 53% of OECD partner countries (Figure 8.3).

**Figure 8.3. Percentage of countries in which judicial and prosecutorial candidates have a right to appeal decisions on appointment and promotion**



Note: The figure presents data based on the following 31 OECD Member countries assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia (judges), Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico (prosecutors), the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States (judges). Data not provided for Colombia (prosecutors), Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland and the United Kingdom and the United States (prosecutors). Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

**How to read:** 43% of OECD Members and 46% of OECD partner countries fulfil the criterion “Regulations establish the right of candidates to appeal decisions on the selection, appointment and promotion of prosecutors”.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

StatLink  <https://stat.link/53fkd1>

## Standards of conduct for judges and prosecutors exist but implementation could be improved, particularly for managing conflicts of interest

Tailored standards of conduct and ethical behavior for judges and prosecutors can help officials navigate the ethical challenges specific to their positions. The majority of OECD Members and OECD partner countries have

established and publicly available standards. However, measures to facilitate implementation of the standards, including guidance and consultation mechanisms, are underutilised (Table 8.2). On average, 47% of OECD Member countries have established integrity advisory bodies for judges and 53% have established such bodies for prosecutors. In OECD partner countries, 53% have integrity advisory bodies in place for judges and 47% of OECD partner countries have established these bodies for prosecutors.

**Table 8.2. Standards of conduct for judges and prosecutors are in place but not all countries have established ethics advisory channels**

|                 | Standards of conduct and ethical behaviour are published and applicable to all judges | An ethics advisory body is operational within the judiciary with the responsibility to provide individual or peer group confidential ethical counselling | Standards of conduct and ethical behaviour are published and applicable to all prosecutors | An advisory body is operational within the public prosecution service with the responsibility to prevent and manage integrity risks related to potential conflicts of interest, violations of ethical and moral norms, gift policies and arbitrary decision making |
|-----------------|---|--|--|--|
| Australia       | ✗   | ✗  | ✓  | ✓  |
| Austria         | ✓   | ✓  | ✓  | ✗  |
| Belgium         | ✓   | ✗  | ✓  | ✗  |
| Canada          | ✓   | ✓  | ✓  | ✓  |
| Chile           | ✓   | ✗  | ✓  | ✓  |
| Colombia        | ✓   | ✗  | Not Provided   | Not Provided   |
| Costa Rica      | ✓   | ✓  | ✓  | ✓  |
| Czechia         | ✗   | ✗  | ✓  | ✗  |
| Denmark         | ✗   | ✗  | ✓  | ✗  |
| Estonia         | Not Provided  | Not Provided   | Not Provided   | Not Provided   |
| Finland         | ✗   | ✗  | ✓  | ✗  |
| France          | ✓   | ✓  | ✓  | ✓  |
| Germany         | ✓   | ✓  | ✓  | ✓  |
| Greece          | ✗   | ✗  | Not Provided   | ✗  |
| Hungary         | ✓   | ✗  | ✓  | ✗  |
| Iceland         | Not Provided  | Not Provided   | Not Provided   | Not Provided   |
| Ireland         | ✓   | ✓  | ✓  | ✗  |
| Israel          | Not provided  | Not provided   | Not provided   | Not provided   |
| Italy           | ✗   | ✗  | ✗  | ✗  |
| Japan           | Not Provided  | Not Provided   | Not Provided   | Not Provided   |
| Korea           | ✓   | ✓  | ✓  | ✗  |
| Latvia          | ✓   | ✓  | ✓  | ✓  |
| Lithuania       | ✓   | ✓  | ✓  | ✓  |
| Luxembourg      | ✓   | Not Provided   | ✓  | ✗  |
| Mexico          | Not Provided  | Not Provided   | ✓  | ✗  |
| Netherlands     | ✓   | ✗  | ✓  | ✓  |
| New Zealand     | Not Provided  | Not Provided   | Not Provided   | Not Provided   |
| Norway          | ✓   | ✗  | ✓  | ✗  |
| Poland          | Not Provided  | Not Provided   | Not Provided   | Not Provided   |
| Portugal        | ✓   | ✓  | ✓  | ✓  |
| Slovak Republic | ✓   | ✓  | ✓  | ✓  |
| Slovenia        | ✓   | ✓  | ✓  | ✓  |
| Spain           | ✓   | ✓  | ✓  | ✓  |
| Sweden          | ✓   | ✗  | ✓  | ✗  |

|                      |              |              |              |              |
|----------------------|--------------|--------------|--------------|--------------|
| Switzerland          | ✓            | ✗            | ✓            | ✓            |
| Türkiye              | ✓            | ✓            | ✓            | ✓            |
| United Kingdom       | Not Provided | Not Provided | Not Provided | Not Provided |
| United States        | ✓            | Not Provided | ✓            | ✓            |
| <b>OECD Members</b>  | <b>80%</b>   | <b>47%</b>   | <b>93%</b>   | <b>53%</b>   |
| Argentina            | ✗            | ✗            | ✗            | ✗            |
| Armenia              | ✓            | ✗            | ✓            | ✓            |
| Brazil               | ✓            | ✗            | ✓            | ✗            |
| Bulgaria             | ✓            | ✓            | ✗            | ✗            |
| Croatia              | ✓            | ✓            | ✓            | ✓            |
| Dominican Republic   | ✓            | ✓            | ✓            | ✗            |
| Ecuador              | ✓            | ✓            | ✓            | ✓            |
| Guatemala            | ✓            | ✗            | ✗            | ✗            |
| Honduras             | ✓            | Not provided | ✓            | ✗            |
| Indonesia            | ✓            | ✗            | ✓            | ✗            |
| Moldova              | ✓            | ✓            | ✓            | ✓            |
| Peru                 | ✓            | ✓            | ✓            | ✓            |
| Romania              | ✓            | ✓            | ✓            | ✓            |
| Serbia               | ✓            | ✓            | ✓            | ✓            |
| Ukraine              | ✓            | ✓            | ✓            | ✗            |
| <b>OECD Partners</b> | <b>93%</b>   | <b>53%</b>   | <b>87%</b>   | <b>47%</b>   |
| <b>Global</b>        | <b>87%</b>   | <b>50%</b>   | <b>90%</b>   | <b>50%</b>   |

Note: The table presents data based on the following 31 OECD Members assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia (judges), Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico (prosecutors), the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States. Data not provided for regulation and practice criteria for Colombia (prosecutors), Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland and the United Kingdom. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

**How to read:** In Canada, standards of conduct are published and applicable to all judges, and an ethics advisory body is operational within the judiciary. Canada has also published standards of conduct that are applicable to all prosecutors and an ethics advisory body that is operational within the public prosecution service.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

The majority of OECD Member (77%) and partner (73%) countries have conflict-of-interest policies in place for judges, whereas for prosecutors these averages are 87% and 80% respectively. However, only 5 countries (Latvia, Slovak Republic, Romania, Serbia and Ukraine) were able to demonstrate that responsible authorities with a mandate to oversee implementation of conflict-of-interest policies for judges have issued recommendations for resolution within 12 months for all cases of conflict of interest detected. The lack of data in this area suggests that countries do not monitor the timeliness of the resolution of conflicts of interest, which can undermine effective management.

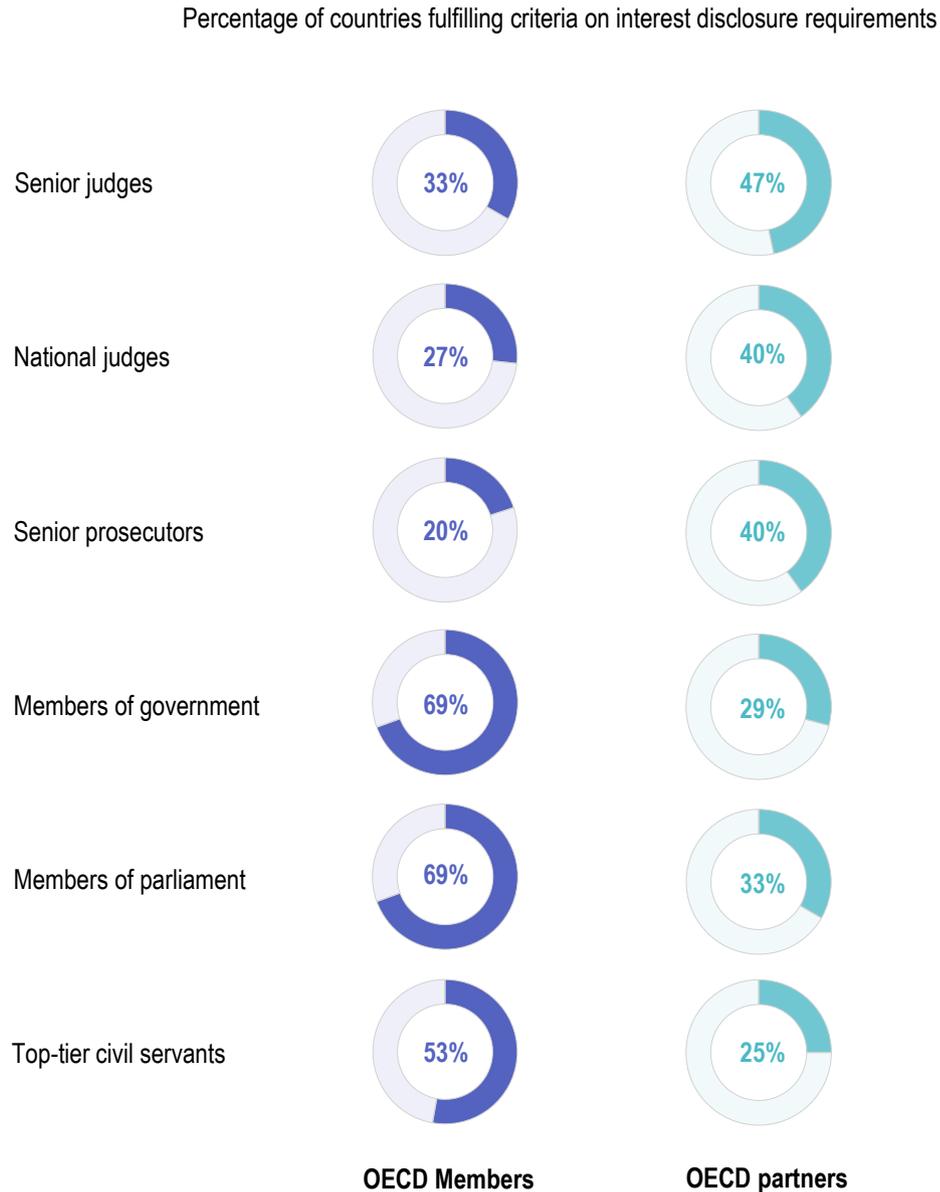
Interest disclosure requirements, one of the tools that countries can use to manage conflict-of-interest situations, are in place for senior judges in 53% of OECD Members and 100% of OECD partner countries, and in many countries (60% of OECD Members and 100% of

OECD partner countries) requirements for disclosing extend to all national judges. Members of the highest prosecutorial authorities are also required to disclose their interest in 60% of OECD Members and 93% of OECD partner countries. However, compliance with disclosure requirements remains lacking (Figure 8.4). For OECD Members, the submission rate of judicial and prosecutorial interest declarations is lower compared to other categories of public officials suggesting that compliance is more rigorously monitored with regards to members of government, parliamentarians and top-tier civil servants as opposed to judges and prosecutors. In addition, there is a need to strengthen verification of submitted interest declarations. Only 13% of OECD Members and an equal share of partner countries verify a substantial number of declarations submitted from judges (at least 60% of declarations). The situation is similar for prosecutors, with 13% of OECD Members and an equal share of partner countries verifying at least 60%

of submitted declarations. One explanation for this trend is that judges and prosecutors are less often subject to external oversight due to independence considerations. For example, in countries like Chile, the Czech Republic,

Portugal and Türkiye interest declarations of judges are submitted to judicial self-governance bodies or courts, which may not necessarily have the required financial expertise to conduct verifications.

**Figure 8.4. Judges and prosecutors exhibit lower rates of compliance with interest disclosure requirements**



Note: The figure presents data based on the following 31 OECD Members assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia (judges), Costa Rica, Czechia, Denmark, Finland, France (except for 11.4.6, 11.4.7 and 11.5.4), Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico (prosecutors), the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States (except for the criterion 11.4.7 on the submission rate of interest declarations from national judges). Data not provided for regulation and practice criteria for Colombia (prosecutors), Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland and the United Kingdom and the United States (prosecutors). Data for OECD partner countries are calculated based on the following 14 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine Data for Croatia was not provided.

**How to read:** In 33% of OECD Members and 47% of OECD partner countries more than 80% senior judges have submitted interest declarations in line with legal requirements.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

## **Whistleblowing mechanisms for reporting cases of judicial and prosecutorial misconduct are generally being implemented, but could be improved through strengthened public awareness of existing reporting procedures, as well as training on handling reports**

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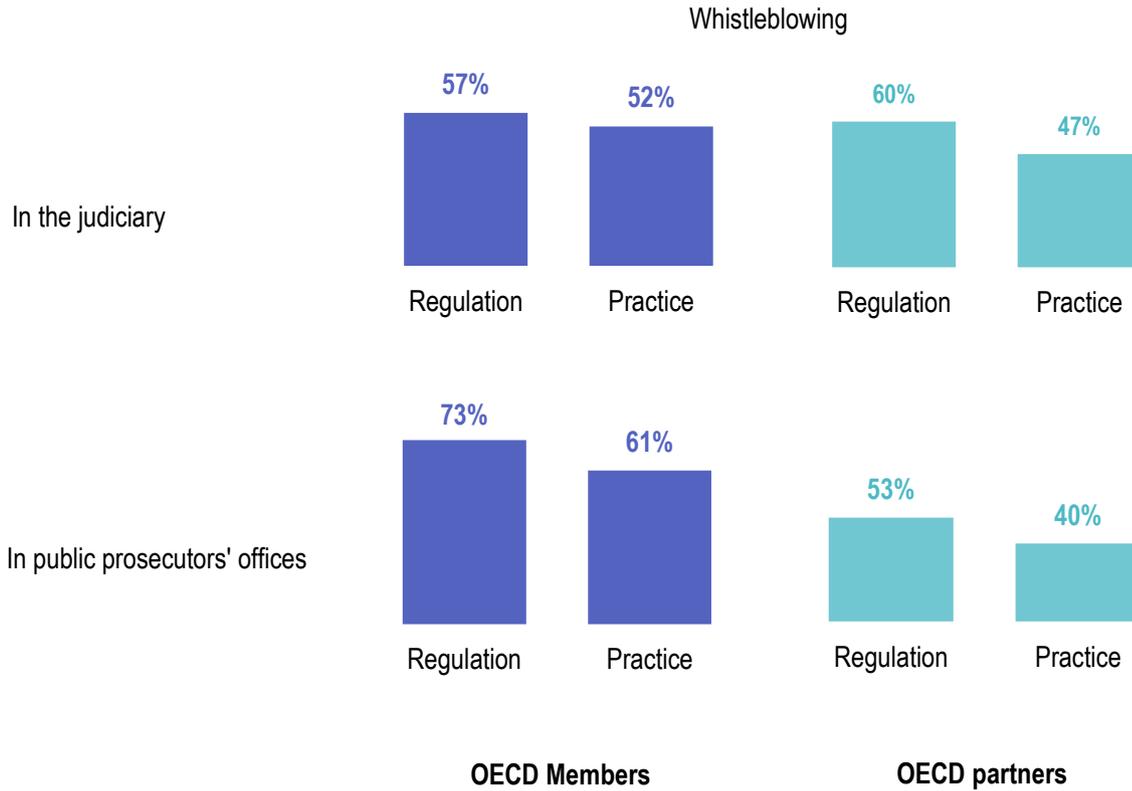
Mechanisms for reporting judicial and prosecutorial misconduct is not a novel concept, as complaints are a common trigger of disciplinary investigations across countries. However, persons reporting this type of misconduct under general disciplinary complaints procedures do not necessarily enjoy legal safeguards ensuring confidentiality or protection from retaliation. To strengthen protection, countries are implementing whistleblower protection frameworks in the judiciary and the prosecution services. In many countries (e.g. Austria, Denmark, Costa Rica, Germany and Peru), protection measures are provided in general whistleblower protection laws and regulations applying to the whole public sector, whereas countries like the Czech Republic, Finland, Sweden and Slovenia have further tailored implementation through dedicated guidance and policies for the judiciary and prosecutors. Internal reporting channels for whistleblowers in the judiciary are currently established in regulations in 57% of OECD Members and in 60% of OECD partner countries. While in practice, most OECD Members that regulate internal reporting channels are operationalising them, there is an implementation gap of 13 percentage points for OECD partner countries. Regarding the establishment of

internal whistleblowing channels in public prosecutors' offices (Figure 8.5), the implementation gap for OECD Members is 12 percentage points, and 13 percentage points for OECD partner countries. In turn, protection against retaliation for whistleblowers reporting judicial misconduct is provided in the law in 57% of OECD Members, and in 47% of OECD partner countries.

Clear and comprehensive whistleblower protection frameworks complemented by effective communication can inform judges and prosecutors, but also users of the justice system, about reporting procedures, their rights and the resources available to them (OECD, 2020<sup>[14]</sup>). However, few countries implement measures to strengthen awareness regarding the protection of whistleblowers reporting judicial and prosecutorial misconduct. On average, only 39% of OECD Members and 27% of OECD partner countries maintain government portals providing information on reporting procedures and whistleblowers' rights.

The effectiveness of reporting mechanisms also depends on the capacity of staff handling reports, which requires technical skills to ensure confidentiality. Proper confidentiality measures protect the whistleblower's identity, reduce the risk of retaliation and promote a culture of openness encouraging others to come forward. Nurturing this culture of openness is even more important in hierarchical organisational structures such as the judiciary and the prosecution service. Yet opportunities for mandatory training on confidentiality for staff handling reports in courts and public prosecutors' offices is limited in OECD countries and close to non-existent across partners countries (Figure 8.6).

**Figure 8.5. Implementation gaps in the establishment of internal whistleblowing channels in OECD Members and OECD partner countries**



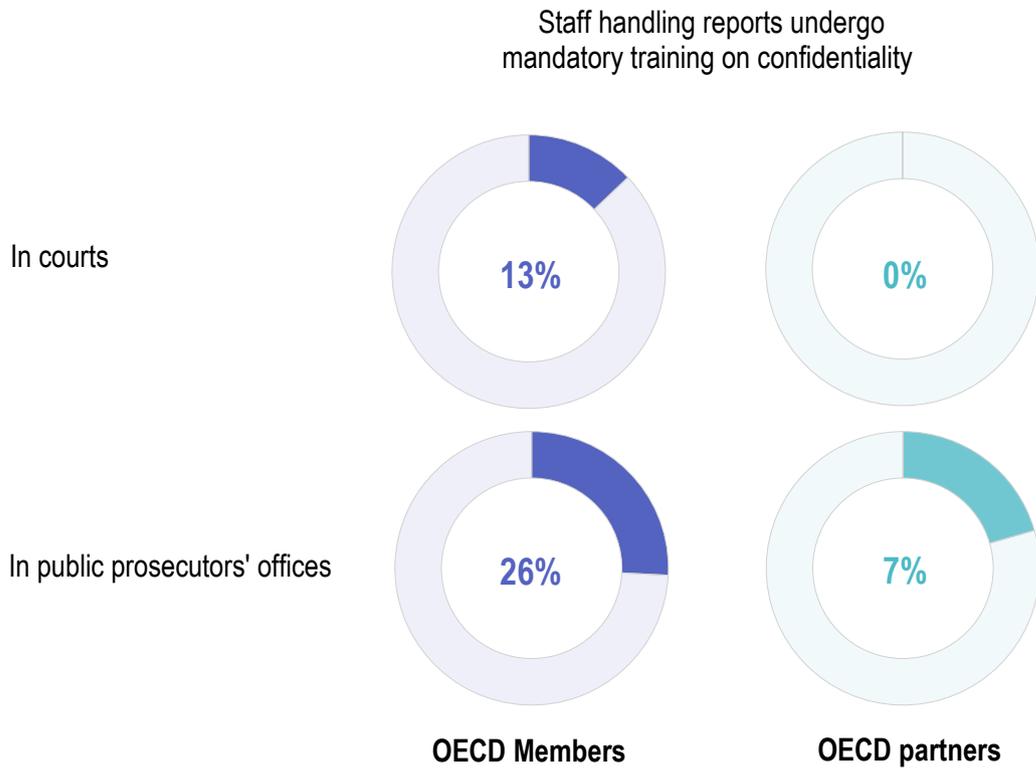
Note: The figure presents data based on the following 31 OECD Members assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia (judges), Costa Rica, Czechia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico (prosecutors), the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and United States (prosecutors). Data not provided for regulation and practice criteria for Colombia (prosecutors), Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland, the United Kingdom and the United States (judges). Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia, and Ukraine.

**How to read:** 57% of OECD Members have regulations establishing internal reporting channels for whistleblowers in the judiciary and in 52% of OECD Member countries these internal reporting channels exist in practice.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

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**Figure 8.6. Percentage of countries with available confidentiality training for staff handling reports on judicial and prosecutorial misconduct**



Note: The figure presents data based on the following 31 OECD Members assessed in 2025: Australia, Austria, Belgium, Canada, Chile, Colombia (judges), Costa Rica, Czechia, Denmark (judges), Finland, France, Germany, Greece, Hungary, Ireland, Italy, Korea, Latvia, Lithuania, Luxembourg, Mexico (prosecutors), the Netherlands, Norway, Portugal, the Slovak Republic, Slovenia, Spain, Sweden, Switzerland, Türkiye and the United States (judges). Data not provided for regulation and practice criteria for Colombia (prosecutors), Denmark (prosecutors), Estonia, Iceland, Israel, Japan, Mexico (judges), New Zealand, Poland, the United Kingdom and the United States. Data for OECD partner countries are calculated based on the following 15 countries assessed in 2025: Argentina, Armenia, Brazil, Bulgaria, Croatia, Dominican Republic, Ecuador, Guatemala, Honduras, Indonesia, Moldova, Peru, Romania, Serbia and Ukraine.

**How to read:** 26% of OECD Members and 7% of partner countries fulfil the criterion “Staff handling reports in public prosecutors’ offices undergo mandatory training on confidentiality”.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

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# Focus chapters



# 9 FRAUD PREVENTION

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Countries are strengthening their anti-fraud functions at the strategic, institutional and operational level to support existing integrity safeguards in the face of increasing fraudulent activity. While many governments have basic safeguards in place, such as embedding anti-fraud and corruption in internal control and risk management, most countries lack a systemic approach for improving the coherence, targeting and effectiveness of their anti-fraud efforts. There is increasing recognition of the potential of emerging technologies, such as AI, to fight increasingly complex and transnational fraud schemes. Overall, as governments seek public sector efficiencies, investing in fraud prevention will be more cost-effective than dealing with its consequences.

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## Introduction

Governments are facing growing pressure to restore public finances while increasing spending on strategic priorities amid tight fiscal constraints and rising levels of global public debt. (OECD, 2025<sup>[45]</sup>) Safeguarding public resources from waste and abuse, including fraud, has therefore never been more important. However, resources for protecting public funds are often not ringfenced and anti-fraud functions are asked to “do more with less” in periods of fiscal austerity. Paradoxically, even when presenting a high return on investment, governments may scale down anti-fraud spending.

Measurement of fraud losses and savings gained from preventive efforts are rapidly improving. Still, most countries do not have reliable data on the share of public funds that are lost to errors, irregularities and fraud instead of improving public services. In those countries that collect such data, a clear trend is emerging: the scale and nature of fraud are rapidly evolving. The Association of Certified Fraud Examiners’ (ACFE) latest Global Fraud Survey showcased that organisations are estimated to lose 5% of funds globally to occupational fraud each year (over USD 5 trillion in losses) (Association of Certified Fraud Examiners (ACFE), 2024<sup>[6]</sup>) In several countries, fraud has become the most prevalent and fastest growing type of crime in recent years:

- In New Zealand, fraud is amounted to 29% of all crimes committed, according to data from the New Zealand Crime and Victims Survey in 2024
- According to the Swedish National Council for Crime Prevention, fraud is the category of crime that increased the most in 2023. (New Zealand Government, 2023<sup>[46]</sup>); (Sveriges Riksbank, 2024<sup>[47]</sup>)

Fraudsters are using technology and transnational networks to increase the scale and sophistication of their methods. To effectively respond to this threat, governments are increasingly shifting the dial from agency-specific interventions to a systematic, whole-of-government approach to counter fraud, where resources and expertise are co-ordinated across different agencies and levels of government. Furthermore, investing in capacity-building, digitalisation and the use of data analytics, including artificial intelligence (AI) to address fraud, as well as ensuring the interoperability of systems and cross-agency data sharing, is imperative for timely

fraud prevention, detection, and response. There is a growing recognition that, given the speed and complexity of modern-day fraud, investing in preventive tools to stop the fraud before it occurs is more cost-effective than the traditional “pay-and-chase” approach, which focuses primarily on investigating individual cases of large-scale fraud. This focus chapter finds that:

- The funds lost to public sector fraud are substantial, and increasing
- While governments have basic safeguards in place, most countries lack a strategic framework to address fraud
- Investments in emerging technologies and AI are key to counter increasingly complex and transnational fraud schemes
- While governments often rely on traditional enforcement methods, there is an increasing understanding that investing in fraud prevention is more cost-effective than dealing with the consequences once fraud has occurred.

### What is fraud?

There is not a single, universally accepted legal definition of “fraud” that applies globally, with countries’ criminal laws describing fraud in different ways and to varying degrees of specificity. However, there are certain core elements in defining fraud across jurisdictions, namely that fraud uses deception (knowing misrepresentation of the truth or concealment of a fact) to achieve a financial or other material gain, and that it causes a detriment to a person or organisation (UNODC, 2024<sup>[48]</sup>); (OECD, 2020<sup>[49]</sup>).

Fraud can be:

- **Internal** – the use of one’s occupation for personal enrichment through the deliberate misuse or misapplication of the employing organisation’s resources or assets. Fraud may, but does not always, include abuse of public office; fraud is characterised by intentional deception or misrepresentation intended to secure financial or personal gain, or to cause loss to another party.
- **External** – carried out by individuals or entities outside an organisation, with the intent to deceive or exploit the system for financial or other illicit gains.

- **Targeted towards an individual** – such as through identity theft or phishing scams.
- **Targeted towards an organisation** – such as embezzlement or financial statement fraud when committed internally, or social welfare fraud, inflated invoices from external vendors, or theft of intellectual property or customer information when committed externally (ACFE, 2025<sup>[50]</sup>).

Fraud in the public sector could involve an individual or entity using false information with the intention of obtaining government funds, information, goods or services to which they are not entitled, or to use for other than the intended purpose. For example, social benefit programmes are typically vulnerable to fraud due to the high volume of transactions, complex eligibility criteria and reliance of self-reported information which can be difficult to verify, such as income or employment status. This creates opportunities for fraudsters to exploit loopholes, misrepresent their circumstances, or fabricate documents to receive benefits they are not entitled to (OECD, 2020<sup>[49]</sup>).

The Association of Chartered Certified Accountants (ACCA) has conducted extensive research on the

prevalence and materiality of fraud in the public sector, notably as part of a recently conducted global survey from over 30 roundtable discussions with risk and finance professionals across sectors and regions. According to the study “*Combatting Fraud in a Perfect Storm*”, procurement fraud, abuse of authority fraud, third-party fraud, expense fraud and cyberfraud are some of the most prevalent types of fraud in the public sector. In parallel, procurement fraud, other insider fraud, bribery & corruption, third-party fraud and expense fraud were the most material (i.e. have the largest impact) on the public sector. (Association of Chartered Certified Accountants (ACCA), 2025<sup>[51]</sup>).

Furthermore, growing risks of serious and organised crime to commit widespread, systematic fraud poses further threats to governments, not least by exploiting government programmes and procurement systems, but also in the form of co-ordinated scams or targeted cyber-attacks. According to Europol, fraud constitutes the most rapidly expanding sector in organised crime, targeting a broad spectrum of victims, including individuals, public and private sector organisations, and their data (Europol, 2025<sup>[52]</sup>).

## Box 9.1. Examples of internal and external fraud schemes in the public sector

### Benefit and welfare fraud

This could involve deliberately misrepresenting circumstances or failing to disclose a change in circumstances to qualify for benefits the claimant is not entitled to (e.g. undeclared income or partner) or applying for multiple welfare benefits from different programmes without disclosing that similar benefits are received elsewhere (double dipping).

### Grant fraud

When individuals or entities knowingly misrepresent or fail to disclose information to obtain or misuse public funds awarded through grants.

### Synthetic identity fraud

Fraudsters, including organised criminal networks, can create synthetic identities using a combination of real and falsified data to gain access to public services (e.g. collecting multiple benefit cheques or submitting fraudulent health care claims), including with the help of AI.

### Third-party provider fraud

Service providers could submit fraudulent invoices or claims for services that were never rendered, or for goods and services that do not meet program standards.

### **Cyber fraud**

When individuals or entities target public organisations through co-ordinated scams or attacks to obtain sensitive information for profit, for example intellectual property or customer information.

### **Tax fraud, including cross-border VAT fraud**

Where an individual or entity deliberately misrepresents income or falsifies documents to avoid paying tax or pay less tax than required. This could range from an individual committing tax evasion to multiple entities, including organised criminal groups, engaging in e.g. VAT carousel fraud (where goods are acquired free of VAT and resold on the domestic market inclusive of VAT, and the VAT is not paid to the national authorities).

### **Procurement fraud**

When individuals or entities manipulate the procurement process or procure low quality items, issue false invoices or receive kickbacks for referring contract work to related parties.

### **Double Funding**

When a single cost for a single activity is publicly funded by multiple instruments, such as an entity receiving public funding from more than one agency to purchase a single item.

### **Fraudulent expenditure claims**

When individuals of a public sector organisation use false receipts to seek reimbursement for a business expense that was not incurred or inflates the actual cost of the expense.

Source: Adapted from (OECD, 2020<sup>[49]</sup>); (The World Bank, 2017<sup>[53]</sup>); (Directorate-General for Taxation and Customs Union, n.d.<sup>[54]</sup>); (Robert Mungai, 2024<sup>[55]</sup>) (European Court of Auditors, 2024<sup>[56]</sup>) (European Commission, 2021<sup>[57]</sup>)

## **The funds lost to public sector fraud are substantial, and increasing**

Measuring the true financial scale of fraud remains a challenge in many countries, but tools are improving to estimate losses due to fraud. There are now credible examples from the public sector to estimate the financial impact of fraud in government schemes, which indicate that the actual cost of fraud is much higher than the levels of detected fraud (Box 9.2). This provides a

powerful impetus for governments to reinforce measures to counter fraud. Yet, the cost of fraud is not just financial. Fraud diverts taxpayers' money away from essential government services, resulting in fewer, substandard, or less safe services delivered to those who need it the most. Ultimately, fraud in the public sector can erode citizens' trust in government institutions, create opportunities for further exploitation, decrease legal compliance and increase the public's tolerance for fraud (International Public Sector Fraud Forum, 2020<sup>[58]</sup>) (Department for Work & Pensions, 2023<sup>[59]</sup>).

## Box 9.2. Examples of financial losses to public sector fraud (external and internal)

### UK Cabinet Office, National Audit Office and Public Accounts Committee

According to a Cabinet Office review of around 50 fraud and error measurements, public bodies are estimated to lose between 0.5 and 5% of their spending to fraud and related loss, which amounts to GBP 31 billion to 48 billion annually (approximately USD 42.3 billion to 65.5 billion annually). The UK National Audit Office conducted an overview of the impact of fraud and error on public funds, where it estimated that fraud and error cost taxpayers between GBP 55 billion and 81 billion (approximately USD 75 billion and 111 billion) in 2023-2024.

The COVID-19 Bounce Back Loan Scheme involved business entities fraudulently abusing government subsidies in the form of loans that they were not eligible for, amounting to an estimated loss of GBP 4.9 billion (approximately USD 6.6 billion, over 10% of the loans provided).

### US Government Accountability Office and Department of Justice

The US Government Accountability Office (GAO) estimated that the amount of fraud in unemployment insurance (UI) programs during the COVID-19 pandemic was likely between USD 100 billion and USD 135 billion (11% and 15% of the total amount of unemployment insurance benefits paid during the pandemic).

The Department of Justice's National Health Care Fraud Takedown in 2025 showed USD 14.2 billion in intended loss from several health care fraud schemes, including the involvement of transnational criminal organisations which were alleged to have submitted over USD 12 billion on fraudulent claims to Medicare, the United States' health insurance program.

### Australia's Institute of Criminology

According to a census prepared by the Australian Institute of Criminology, where responses were collected from 157 Australian Government entities, Commonwealth entities reported external fraud losses of approximately AUD 105 million (approximately USD 67 million) in 2023-2024. However, the estimated financial loss to fraud in Australia is AUD 5 billion to 25 billion (approximately USD 3.2 billion to USD 16 billion) per year.

### European Public Prosecutor's Office

The 2025 annual report of the European Public Prosecutor's Office (EPPO) stated that, at the end of 2024, the damage resulting from fraud and other crimes against the EU budget was estimated to be approximately EUR 25 billion (an increase of 22.5% compared to the previous year). More than half of the estimated damage was linked to cross-border VAT fraud, which included the systematic involvement of criminal organisations.

### Occupational fraud in government organisations

The ACFE carries out the largest global study on occupational fraud each year. The global study includes data from 138 countries and territories and 22 major industry categories from public, private and non-for-profit organisations around the globe. According to its latest report (published in 2024), the median loss due to fraud in government organisations was approximately USD 150 000, whereas the average loss was approximately USD 2.3 million. Median losses were largest at the national level of government.

Source: (National Audit Office, 2024<sup>[60]</sup>); (UK Parliament, 2022<sup>[61]</sup>); (United States Government Accountability Office, 2023<sup>[62]</sup>); (U.S. Department of Justice - Office of Public Affairs, 2025<sup>[63]</sup>); (Merran McAlister and Samantha Bricknell, 2025<sup>[64]</sup>); (International Public Sector Fraud Forum, 2020<sup>[58]</sup>); (European Public Prosecutor's Office, 2025<sup>[65]</sup>); (Association of Certified Fraud Examiners (ACFE), 2024<sup>[6]</sup>)

The rapidly evolving nature of fraud is exacerbated by emerging risks such as rapid developments in technology, where artificial intelligence is increasingly used by individuals and criminal organisations to commit fraud. Furthermore, fraud can no longer be regarded as a purely domestic issue, as shown by the rising levels of cross-border VAT fraud in the European Union. According to the 2025 annual report from EPPO, fraud and other crimes against the EU budget have increased by 22.5% compared to the previous year, with more than half of the estimated damage linked to the systematic perpetration of cross-border VAT fraud by criminal organisations (European Public Prosecutor's Office, 2025<sup>[65]</sup>); (OECD, 2024<sup>[66]</sup>).

### **While governments have basic safeguards in place, most countries lack a strategic framework to address fraud**

Governments are increasingly adopting dedicated frameworks to fight fraud, although strategic approaches vary amongst countries. Currently, 33% of OECD Member and partner countries with a national anti-corruption and integrity strategic framework have a dedicated focus on countering fraud.<sup>1</sup> A growing number of countries are also choosing to adopt stand-alone national, sectoral and organisational anti-fraud strategies. In the European Union, the adoption of national anti-fraud strategies is partially driven by Regulation (EU) 2021/1060, which stipulates that Member States must ensure the legality and regularity of expenditures related to EU funds, and to take all necessary measures to prevent, detect, correct and report any irregularities, including fraud. The Regulation is one example of several EU requirements which require (or strongly encourage) member states to adopt effective anti-fraud measures to protect EU funds. While

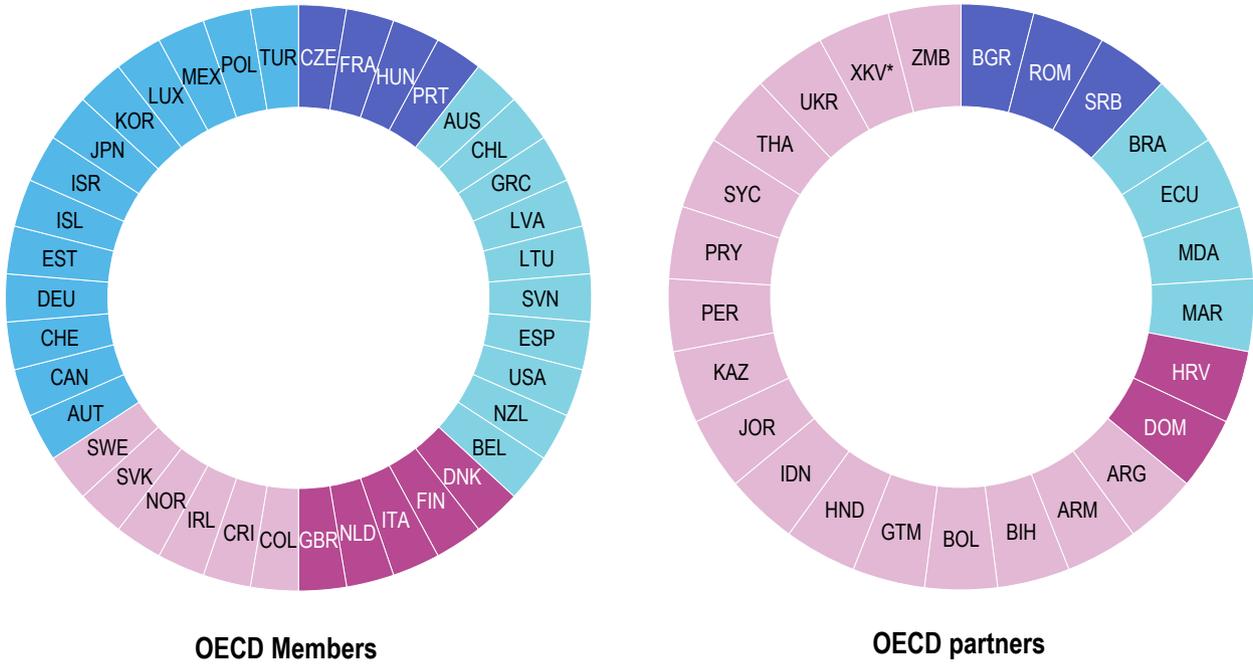
EU countries maintain the flexibility to cover national funds within their anti-fraud strategy, the majority of them only cover a small share (which are typically related to EU funds). The EU continues to promote a whole of government approach by recommending that all EU member states adopt a national anti-fraud strategy. This will ensure the relevant national stakeholders take a shared approach and coordinate cooperation with the EU. (European Commission, 2025<sup>[67]</sup>)

Out of 63 OECD Member and partner countries, seven countries (11%) have national, comprehensive anti-fraud strategies in force, and nineteen countries (30%) have strategies adopted at the level of an individual ministry or agency (labelled "organisational-level strategies"). Another ten countries (16%) have anti-fraud strategies for a specific sector of the economy (e.g. Agriculture), an area of public spending (e.g. welfare benefits), or a dedicated funding scheme (e.g. the EU RRP funds). Thirty-four countries (54%) have neither of these types of anti-fraud strategies in place (Figure 9.1).<sup>2</sup>

Adopting a strategic approach to counter fraud can offer significant benefits, not least by allowing governments to co-ordinate resources and expertise across multiple levels of government to mitigate wasteful spending and duplication of efforts across government departments. Prioritising efforts and resources through a risk-informed approach also empowers governments to act preventatively and allocate resources to where it matters the most, while effective monitoring and evaluation mechanisms can help governments determine whether approaches to fight fraud are cost-effective. Ultimately, adopting a strategic framework to counter fraud signals a high-level commitment to the public, which can build trust in institutions and increase accountability. Given the rising and rapidly evolving risk of fraud – including transnational fraud – investing in strategic frameworks and international co-operation will be key to counter fraud effectively with a focus on prevention.

**Figure 9.1. Anti-fraud strategies in OECD Member and partner countries**

- Standalone anti-fraud strategy
- Anti-fraud objectives found within the anti-corruption strategic framework
- Sectoral strategy
- Organisational-level strategy
- No standalone anti-fraud strategy



Note: The categories of anti-fraud strategies are not mutually exclusive, and countries can have several types of strategies at once. However, for visualisation purposes, only one type of strategy is displayed per country, giving preference to national-level strategies. For example, a country that has a standalone national anti-fraud strategy and anti-fraud objective(s) found within the anti-corruption strategic framework is only displayed once, for the former category.

Organisational-level strategies tackle fraud in the activities of a public agency. Sectoral strategies refer to strategies tackling a sector of the economy or an area of public spending at the national level. No up to date (as of 2025), publicly available standalone anti-fraud strategies could be found for the following OECD Member countries: AUT, CAN, CHE, DEU, EST, ISL, ISR, JPN, KOR, LUX, POL, TUR; and OECD partner countries: ARG, ARM, BIH, BOL, GTM, HND, IDN, JOR, KAZ, PER, PRY, SYC, THA, UKR, XKV\*, ZMB.

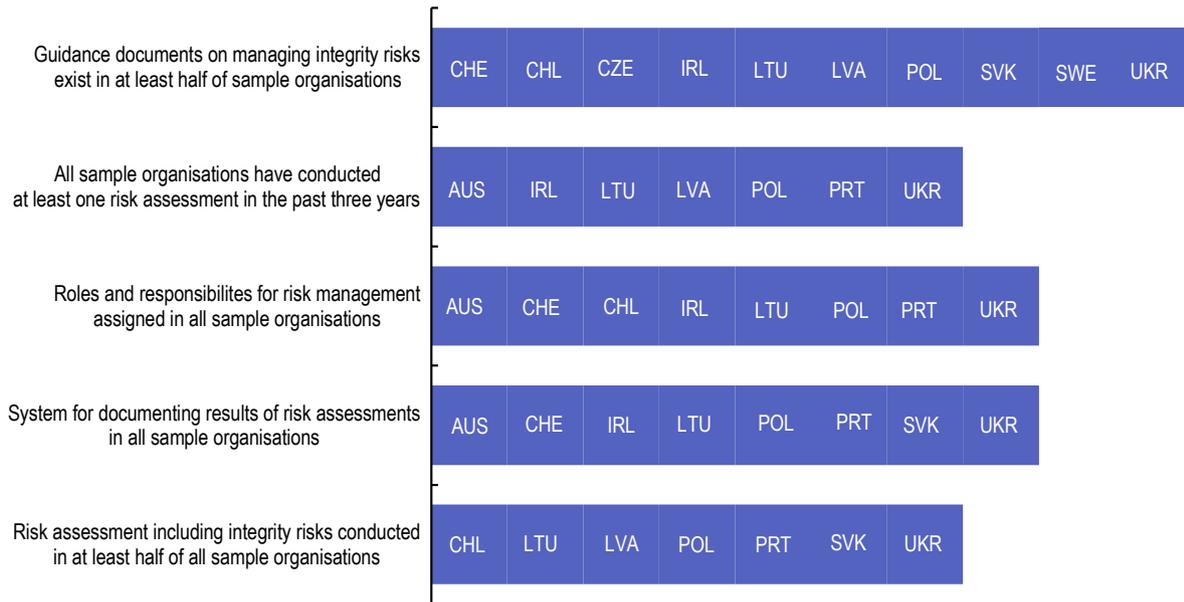
Source: OECD Public Integrity Indicators database (as of 10 March 2026) and research conducted by the OECD Secretariat.

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The 2024 Anti-Corruption and Integrity Outlook showed that countries generally have strong internal control, corruption risk management regulations in place, with room for improvement for those on internal audit. These regulations address the basics of fraud prevention. 72% of countries had guidelines in place on fraud and corruption prevention as part of their internal control systems. 73% of countries explicitly addressed fraud and corruption risks in their risk management frameworks. However, this area has one of the largest

implementation gaps, meaning that high-quality regulations do not always get implemented according to plan. For example, only seven countries could document a consistent use of risk assessments in practice in all ministries and large central government agencies. And only eight countries conducted risk assessments with a focus on integrity risks in at least half of line ministries and large central government agencies. Only Lithuania, Latvia, Poland, Portugal, and Ukraine fulfilled both of these PII criteria (Figure 9.2).

**Figure 9.2. Integrity risk management is often not practiced universally**



Note: Data is taken from the following criteria: "Guidelines on fraud and corruption prevention are available and part of the IC system", "All sample organisations have conducted at least one risk assessment exercise in the past 3 years", "Roles and responsibilities for risk management and for managing integrity risks have been assigned in all budget organisations, in line with the regulatory framework", "All sample organisations have established a system for documenting the results of risk assessments, including as a minimum creating risk profiles or risk registers", and "Risk assessments for at least half of sample organisations identify integrity risks". The following countries did not answer this portion of the questionnaire: CAN, CRI, ESP, JPN, KOR, LUX, MEX, NLD, USA, PER  
 Data not provided: BEL, COL, DEU, FRA, GBR, HUN, ISL, ISR, ITA, NZL  
 Source: OECD Public Integrity Indicators database (as of 20 October 2025).

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## Investments in emerging technologies and AI are key to counter increasingly complex and transnational fraud schemes

While countries are increasingly recognising the potential of AI to fight fraud, the adoption of emerging technologies and AI among integrity actors is generally low, with many AI initiatives still in the exploratory or pilot phase. (European Commission, 2025<sup>[68]</sup>) In a study conducted by the OECD in 2024 on the stage of

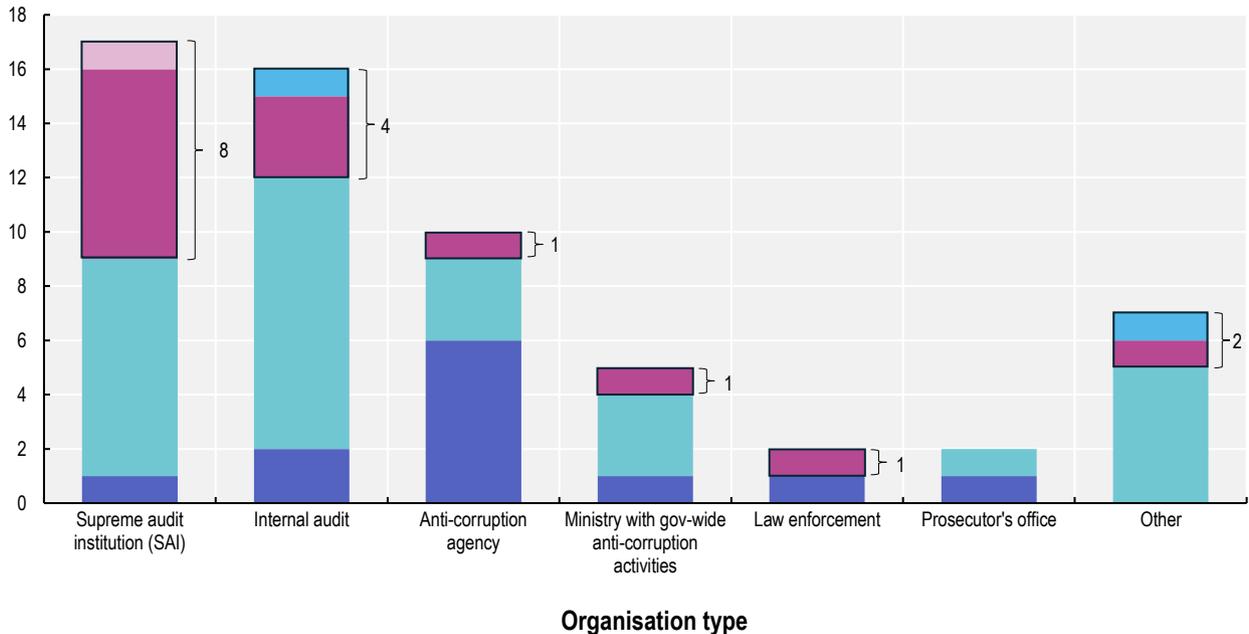
generative AI and Large Language Models (LLM) used by integrity actors (such as anti-corruption agencies, supreme audit institutions (SAIs), internal audit and other oversight bodies), approximately 50% (30 out of 59 organisations from 39 countries) of the surveyed organisations reported that they did not use generative AI in their operations, but were exploring potential use cases. (Ugale and Hall, 2024<sup>[69]</sup>) While there is an increase in the number of institutions engaging with AI-supported tools, these remain mostly pilot projects (Figure 9.3).

**Figure 9.3. Stage of generative AI and LLM use by type of organisation**

Which of the following options best describes the maturity of your institution's use of Gen AI and LLMs specifically, as a sub-domain of AI?

- No activity
- Exploratory stage
- Development stage
- Intermediate stage
- Advanced stage

Number of organisations



Source: (Ugale and Hall, 2024<sup>[69]</sup>).

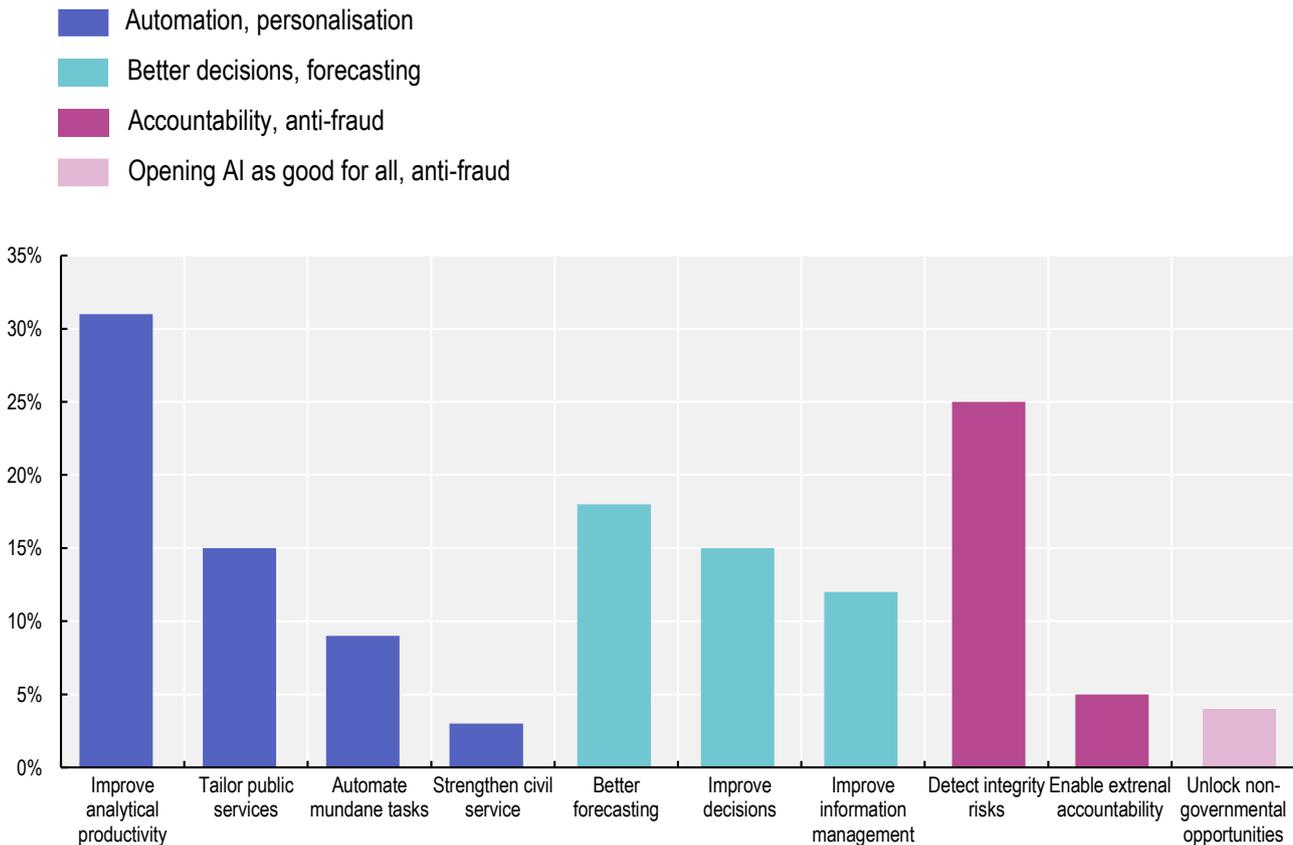
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The OECD’s report on ‘*Governing with Artificial Intelligence*’ presents further insights into the state of play and way forward in core government functions’ use of AI. The report builds on the analysis of over 200 AI use cases, of which 57% support automated, streamlined or tailored processes and services. While the roles of integrity actors such as SAIs or internal audit bodies typically cover both fraud and corruption risks in their

areas of work, one of the main potential applications of AI for integrity actors lies in detecting fraudulent activities, as AI algorithms excel at applying statistical techniques to identify outliers, patterns, transactions and behaviours that deviate from established norms and that warrant further human investigation (OECD, 2025<sup>[70]</sup>) (Figure 9.4).

**Figure 9.4. Specific benefits of AI use cases**

% of use cases per benefit, collected in 2025



Note: The benefits in this figure are not mutually exclusive (that is, one use case can yield more than one type of benefit). Thus, the sum of potential benefits observed is greater than the total number of use cases.

Source: (OECD, 2025<sup>[70]</sup>).

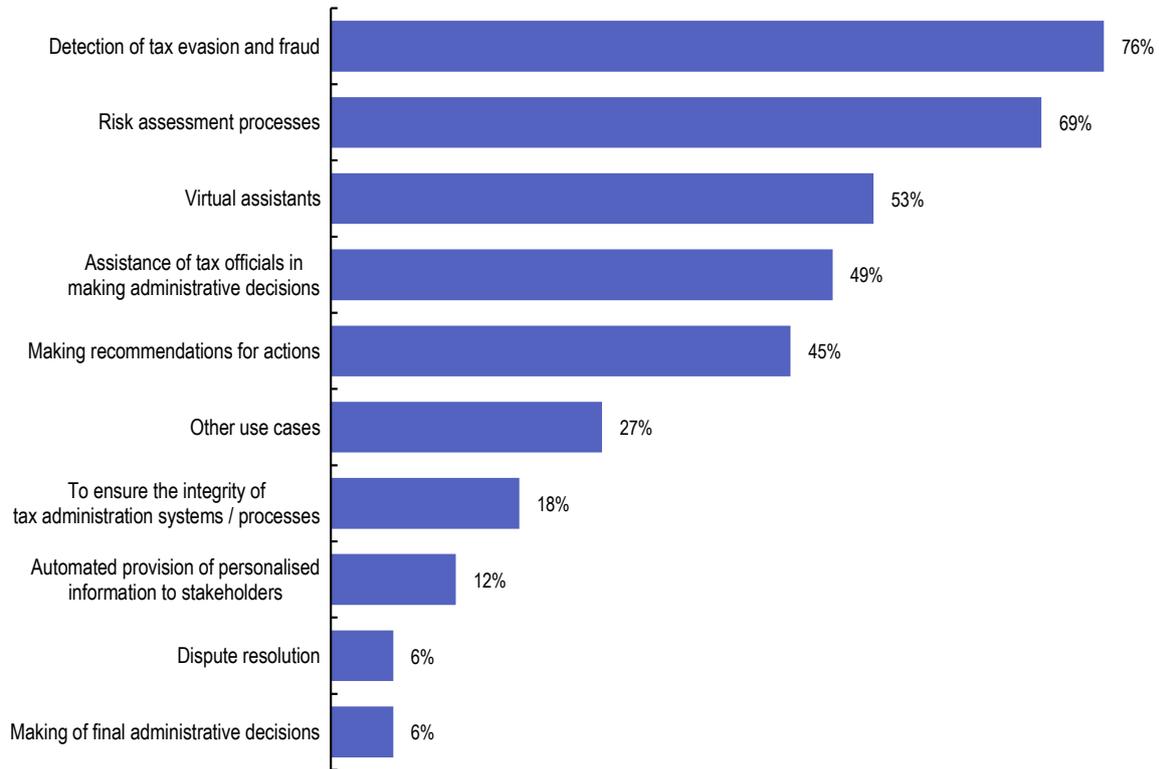
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For instance, the OECD Inventory of Tax Technology Initiatives (ITTI) survey illustrated that the main area of application of AI in tax administrations of OECD Member countries was for the detection of tax evasion and fraud. In this field, AI is often used to detect hidden patterns of behaviour or new connections between transactions,

assets or taxpayers within the data sources held by tax administrations, but is increasingly also applied to unstructured sets of data (such as handwritten documents) to detect tax evasion or non-compliance (OECD, 2025<sup>[70]</sup>) (Figure 9.5).

## Figure 9.5. AI deployments across OECD Members who use AI in tax administration

How is AI being used in tax administration?



Note: 29 of the 38 OECD Members report using AI in tax administration in the 2024 Inventory of Tax Technology Initiatives.

Source: (OECD, 2025<sub>[70]</sub>); OECD Data Explorer - Inventory of Tax Technology Initiatives 2024 (<https://oe.cd/dx/ITTI2024>).

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Yet, significant implementation challenges to successfully scale up AI initiatives in public integrity and oversight remain. Some of these challenges relate to shortages in relevant skills and experience, including not only technical skills for its safe application but also capabilities in data governance, change management and leadership. Another constraint is the lack of high-quality data and restricted access to relevant information. In particular, the ability to cross-reference and analyse data is often hindered by fragmented or non-interoperable data systems, oftentimes compounded by regulatory barriers related to data protection, privacy or security concerns. Finally, a key challenge to the wider adoption of AI in integrity institutions is the absence of robust impact measurement frameworks, which makes it difficult to demonstrate the return on investment of AI solutions to prioritise further investment in such tools (OECD, 2025<sub>[70]</sub>).

Investments in emerging technologies, including AI, are key to diagnose and target increasingly complex and transnational fraud schemes. Moving forward, effective use of AI in government contexts relies on robust transparency and accountability mechanisms to ensure that AI-driven decisions are explainable, traceable and appropriately documented. Approaches could involve developing platforms for exchanging best practices in the use and adoption of AI across institutions, providing actionable guidance and frameworks for implementing AI, and ensuring that data operations can be streamlined for enhanced communication and integration between systems. In addition, systematic documentation of outputs and reporting on the impact of AI supports the ongoing refinement of AI systems and approaches, while helping to demonstrate the value of further investment in such technologies to enhance counter fraud efforts (OECD, 2025<sub>[70]</sub>).

### Box 9.3. Advances in the use of emerging technologies and AI to fight fraud

#### Fraud Risk Assessment AI Accelerator

The UK Public Sector Fraud Authority in the United Kingdom has developed an AI powered tool that allows public officials to generate draft Fraud Risk Assessments (FRAs) using Large Language Models (LLM). The tool outputs fraud risks by actor, action, and outcome based on the input material uploaded, such as guidance documents or government grant scheme briefs. This allows qualified fraud risk assessors to use the application to develop an initial FRA.

#### Detecting fraudulent activities and irregularities with AI

The OECD's *'Governing with Artificial Intelligence'* report highlights several initiatives using AI to identify anomalies and behaviours that deviate from established norms, including:

- A proof-of-concept developed by the OECD and Spain's General Comptroller (IGAE) using advanced analytics and machine learning to detect corruption or fraud risks.
- The use of Machine Learning Algorithms by the **European Court of Auditors (ECA)** to check the transparency register of the European Commission and identify outliers as part of an audit on EU lobbying activities, with the purpose of isolating a risk-based sample for analysis by auditors
- **Brazil's** use of a tool to analyse daily purchasing and procurement processes to uncover risk areas and inconsistencies, where unusual patterns trigger an alert that suspends the purchase and enables further inquiry.
- The use of AI to identify patterns in claims that could suggest fraud and error in the **United Kingdom's Department of Work and Pensions**, so that the claims can subsequently be reviewed by relevant teams within the department.

#### The use of data analytics and machine learning by Portugal's Tribunal De Contas

With support from the OECD and NOVA University Lisbon, the Tribunal de Contas developed and refined a risk assessment methodology, including the development of a data-driven risk model to undertake audit assessments. The initiative aims to improve the Tribunal de Contas' identification of risks and the early detection of irregularities through advanced data analysis and machine learning. The methodology developed marks a significant milestone in the Tribunal de Contas' digital transformation, refines its audit selection process and increases the effectiveness and efficiency of the public procurement system.

Source: (Cabinet Office, 2025<sup>[711]</sup>) (OECD, 2025<sup>[70]</sup>); (Hlacs and Wells, 2025<sup>[72]</sup>)

## While governments often rely on traditional enforcement methods, there is an increasing understanding that investing in fraud prevention is more cost-effective than dealing with the consequences once fraud has occurred

It is difficult to make the case for investing in reducing a problem that is not measured. Prioritising limited resources towards investments in counter fraud tools such as anti-fraud strategies, data analytics and AI requires governments to showcase the return on investment (ROI) in adopting such measures. Yet, many countries lack internally recognised methodologies to measure fraud rates and consequently to establish a baseline to showcase the ROI on counter fraud tools. As a result, reactive responses such as “pay-and-chase” approaches, where detected fraud is investigated and attempts to recover funds lost to fraud are initiated, may be more accepted due to the tangible savings generated by investigations. Establishing a well-defined measurement and evaluation framework to assess the contributions of counter fraud efforts, including AI, is therefore essential to determine whether investments in counter fraud efforts are cost-effective and subsequently enable further investments in such efforts.

Some countries are undertaking efforts to demonstrate a higher ROI through fraud prevention measures. Estimating the financial impact of fraud establishes a baseline which can help inform whether approaches to tackling fraud are cost-effective. For example, some public agencies report fraud estimates (attempting to put a value on the total extent of fraud in an area) using statistical sampling, modelling, and benchmarking to demonstrate the value of fraud prevention efforts, whereas others set annual targets for fraud reduction or prevention measures to facilitate the measurement of fraud. In addition, evaluating the non-financial impact of anti-fraud efforts and frameworks can support risk owners to determine the effectiveness of existing measures and adapt as needed. The United States Government Accountability Office recently published a

technical appendix setting out approaches to evaluate effectiveness of fraud risk management in federal programs, which includes practical examples of evaluation approaches for each component of the fraud risk management framework, including on how to perform ROI calculations and measure cost savings from fraud prevention (UK National Audit Office, 2025<sup>[73]</sup>); (OECD, 2020<sup>[49]</sup>); (U.S. Government Accountability Office, 2026<sup>[74]</sup>).

Governments’ efforts to showcase the ROI of fraud prevention indicates an increasing understanding that investing in fraud prevention is more cost-effective than dealing with its consequences. In the United Kingdom, a new failure to prevent fraud offence came into force as of 1 September 2025. The new offence is a part of a wider government ambition to reduce fraud and encourage organisations to build an anti-fraud culture and move towards implementing prevention procedures, similar to the failure to prevent bribery legislation introduced in 2010. Under the new offence, large organisations (public and private) incorporated or formed by any means in the United Kingdom, or bodies incorporated and partnerships formed outside the United Kingdom but with a UK nexus, may be held criminally liable where an employee, agent, subsidiary, or other “associated person” commits a fraud with the intention to benefit the organisation or its clients and the organisation did not have reasonable fraud prevention procedures in place. Relevant organisations will have defence if they can demonstrate that they have reasonable procedures in place to prevent fraud, or that it was not reasonable in all the circumstances to expect the organisation to have any prevention procedures in place (Home Office, 2025<sup>[75]</sup>).

Similarly, Portugal introduced a law in 2021, which came into force in 2024, obliging large and mid-size companies to take preventive actions on corruption and *related offences* (*Regime Geral de Prevenção da Corrupção*, RGPC), the latter of which includes fraud-adjacent misconduct such as embezzlement or subsidy fraud. Preventive actions include conducting a risk assessment and creating and implementing a prevention plan (Presidency of the Council of Ministers, 2021<sup>[76]</sup>).

## Box 9.4. Advances in fraud loss measurement and fraud prevention savings

### International Public Sector Fraud Authority (IPSFF) Framework on Fraud Loss Measurement

The IPSFF has developed a framework setting out key principles and processes for conducting Fraud Loss Measurement (FLM) exercises within public sector organisations. The framework:

- Broadly defines the objectives of Fraud Measurement and specifically defines the objectives and purpose of FLM exercises.
- Describes the steps required to plan a FLM exercise.
- Explains the statistical sampling knowledge and the techniques required to undertake a FLM exercise.
- Explains how to identify and describe how to use evidence to test for fraud.
- Describes how estimation and measurement are used in FLM exercises.
- Describes the importance of stakeholder engagement and reporting in FLM exercises.

The framework is intended to be used by counter fraud functions across all public sector organisations, with a view to support counter fraud professionals to conduct FLM exercises that produce credible estimates of the levels of fraud and error related to a specific government program, activity or function.

### Forthcoming IPSFF Framework on Fraud Prevention Savings

The IPSFF is currently developing a Fraud Prevention Savings Framework, which sets out key principles and credible approaches to estimating and quantifying the financial and non-financial benefits of fraud prevention and compliance activities, as well as how to validate and communicate the results. The framework:

- Outlines how fraud prevention is a key part of achieving the optimal cost-effective level of fraud control.
- Sets out different types of preliminary activities that can help with measuring fraud prevention savings.
- Identifies the types of savings that can be attributed to different types of fraud prevention and compliance activities.
- Provides models and approaches for:
  - a. developing counterfactuals
  - b. estimating the effect of an intervention
  - c. quantifying the resultant savings
- Provides advice on how to communicate results to key decision makers.
- Outlines governance arrangements to provide a level of assurance that approaches are robust and consistent.
- Explains when and why to undertake a retrospective measurement and review.

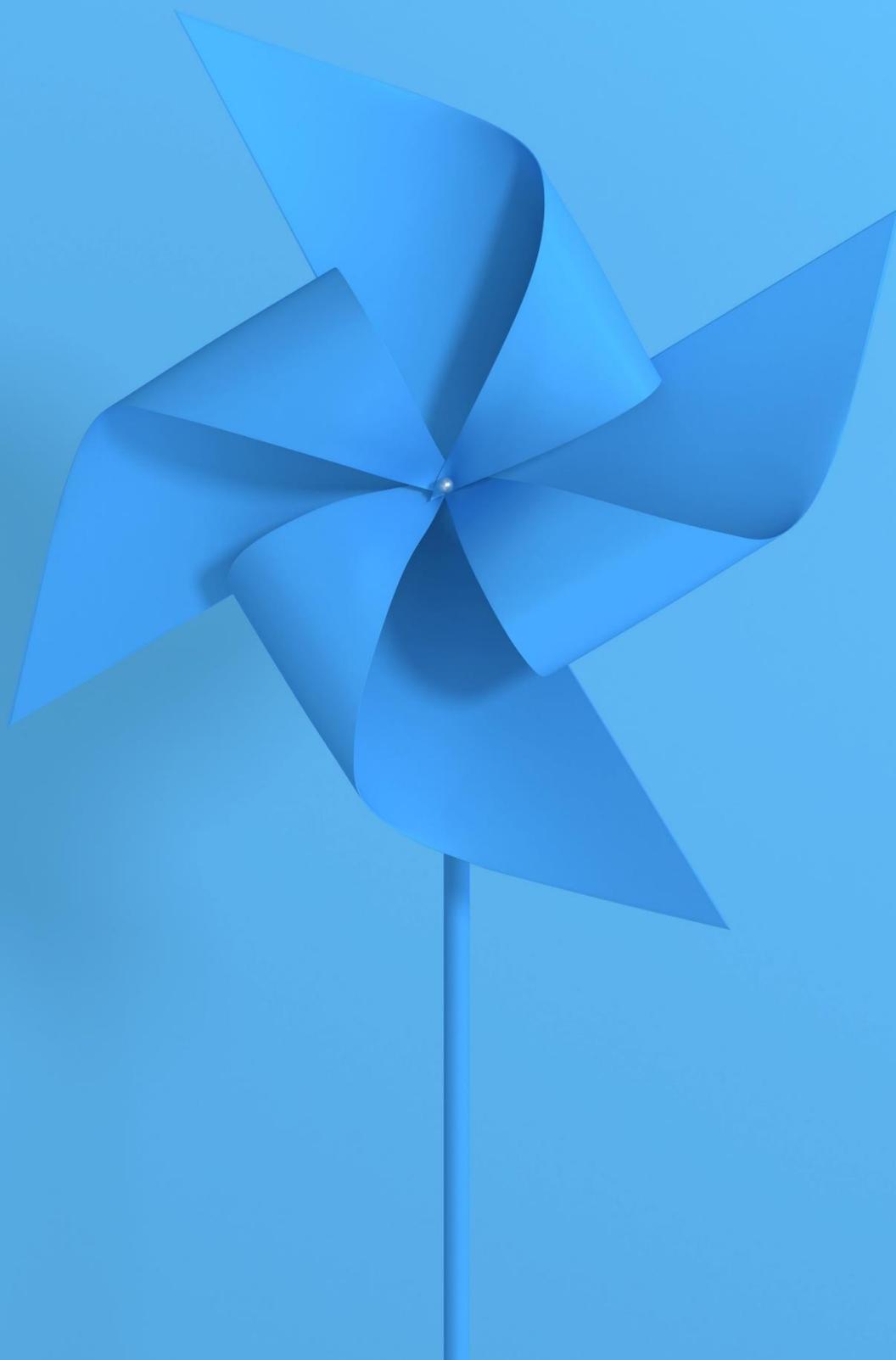
Source: (International Public Sector Fraud Forum, 2025<sup>[77]</sup>)

## Notes

<sup>1</sup> This percentage refers to countries that include objectives with an explicit anti-fraud focus in their national anti-corruption and integrity strategic framework (15 out of 46 countries).

<sup>2</sup> This data is based on up to date (as of 2025), publicly available standalone anti-fraud strategies at the national level.





# 10 INTEGRITY IN PUBLIC PROCUREMENT

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The complexity of procurement processes and transactions, the sums involved, the close interactions between the public and private sectors, and the global and fragmented nature of procurement supply chains increase the risk of corruption. OECD Members generally have legal provisions in place for upholding integrity in public procurements. However, efforts to promote integrity beyond the public sector to suppliers, including enhancing supply chain transparency or integrity certifications, could be advanced. Developing a risk-based approach to integrity in public procurement can increase the efficiency and impact of interventions and reduce the burden of implementing integrity regulations on public entities. And digital technologies, particularly better data governance and interoperability, could be better used to manage integrity risks.

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## Introduction

Public procurement is a core government function through which governments and state-owned enterprises buy goods, services and works to deliver public services such as health, transport, education, and defence. In OECD Member countries, public procurement accounts for approximately 13% of GDP (OECD, 2025<sup>[12]</sup>). Sound public procurement is essential to ensure that public funds are spent efficiently, transparently and in the interest of the public. This chapter finds that in OECD Member and partner countries:

- Provisions and mechanisms to ensure the integrity of the public procurement system are well established in the related regulatory frameworks
- Efforts to promote integrity among suppliers could be advanced
- Developing targeted tools to address risks would contribute to strengthening integrity in public procurement
- Harnessing digital technologies for proactive integrity risk management in public procurement offers considerable potential, but adoption remains limited

### *Why is public procurement a high-risk area and what integrity breaches occur?*

Public procurement involves many transactions, significant financial interests, complex procedures and promotes close interactions between the public and private sector. These features create exposure to different risks including **integrity breaches like corruption, fraud, conflict of interest, mismanagement and collusion** (OECD, 2025<sup>[78]</sup>).

Risks can materialise across different sectors and throughout the whole procurement cycle:

- In the pre-tendering phase, risks include informal agreements on contracts, technical specification tailored to a favoured company or unjustified use of non-competitive procedures.

- During the tendering phase, collusion among bidders and personal interests in the evaluation process are clear examples.
- During the post-award phase, risks include sub-standard delivery, collusion with supervising officials, and providing invoices for goods and services not supplied (OECD, 2016<sup>[79]</sup>).

### *What is the economic impact of integrity breaches in public procurement?*

Integrity breaches in public procurement impose both direct and indirect cost for governments and society. Direct costs include low-quality outputs, higher than market prices and delays. Although precise quantification is challenging, studies estimate that 8-25% of global public investment may be lost to mismanagement and corruption (Fazekas, Sberna and Vannucci, 2022<sup>[7]</sup>). Within the EU-27, the cumulative cost of corruption risk in public procurement between 2016 and 2021 has been estimated at around EUR 29.6bn (European Parliamentary Research Service, 2023<sup>[80]</sup>).

Indirect costs include reduced market competitiveness and innovation, barriers to market entry and hampered foreign investment. Integrity failures in critical sectors such as medical supplies and infrastructure can compromise public safety and even endanger lives. Waste of taxpayer money and poor performance erode citizens' trust in government; however, this effect is hard to estimate as only 8% of OECD Member countries measure this impact (OECD, 2025<sup>[12]</sup>).

### *What is the integrity principle in the OECD Recommendation on Public Procurement?*

The OECD Recommendation on Public Procurement (2015), with its twelve principles, recognises the need to safeguard integrity across government and the public procurement system. It includes a dedicated integrity principle (OECD, 2015<sup>[81]</sup>). This principle aligns with the OECD Recommendation on Public Integrity, which provides a whole-of-government framework for promoting a culture of integrity across the public sector and the whole-of-society.

### Box 10.1. Integrity Principle of the OECD Recommendation on Public Procurement

In this principle, the OECD calls governments to:

- i. Require high standards of integrity for all stakeholders in the procurement cycle. [...]
- ii. Implement general public sector integrity tools and tailor them to the specific risks of the procurement cycle as necessary. [...]
- iii. Develop integrity training programmes for the procurement workforce. [...]
- iv. Develop requirements for internal controls, compliance measures and anti-corruption programmes for suppliers, including appropriate monitoring. [...]

Source: (OECD, 2015<sup>[81]</sup>)

As the twelve principles of the Recommendation are intertwined, in addition to the “integrity principle” other principles – transparency, access, e-procurement, capacity, risk management, and accountability – also play a key role in safeguarding the integrity of the public procurement system and strengthen the delivery of effective and efficient public services.

#### ***What integrity red flags are currently used in public procurement?***

A number of institutions are adopting public procurement indicators to flag potential integrity risks. These metrics typically track occurrences like single bidding, the use of non-competitive procedures such as the use of negotiated procedures without publication, or unjustified contract modifications. While these indicators can reflect a range of challenges, such as market structure or the capacity of the public procurement workforce, they can also signal integrity breaches. The relationship between these indicators and integrity breaches is therefore complex and oversimplification could lead to ineffective policy responses. These indicators should be viewed in light of the country context or sector and should prompt institutions to make further investigation to determine the root causes of the red flag and the appropriate policy response.

For example, data suggests that single bidding rates, which measure the proportion of contracts awarded

when the only response to a call for tender came from a single bidder, have increased in Europe for above threshold contracts in the last decade (European Commission, 2025<sup>[82]</sup>; European Court of Auditors, 2023<sup>[83]</sup>). Causes for this can include limited supplier pools, complex or restrictive tender design, geographic constraints, and insufficient supplier outreach. They can also, however, indicate potential breaches of competition rules, favouritism and fraudulent behaviour, particularly in cases where a market is competitive and should therefore be composed of multiple potential bidders.

Data on single bidding, the use of negotiated procedures without publication, or contract modifications is readily available in most procurement datasets, and when triangulated with other indicators can therefore be a useful tool for a wide range of stakeholders such as anti-corruption and integrity authorities, public procurement authorities and Supreme Audit Institutions to identify risks. An adequate policy response to the poor performance of different procurement indicators and to addressing the systematic drivers of limited competition requires understanding their causes. Based on the assessment, policy responses can therefore include enhanced integrity measures, along with better market analysis, simplified procedures, improved tender design, and proactive supplier engagement.

## Provisions and mechanisms to ensure the integrity of the public procurement system are well established in the related regulatory frameworks

Binding integrity provisions and mechanisms embedded in the related legislations and regulatory frameworks establish common standards for suppliers and public buyers and reduce loopholes and discretionary interpretation. While these provisions alone cannot prevent integrity breaches, they create the conditions for systematic prevention and detection (OECD, 2020<sup>[14]</sup>).

The type of integrity provisions and mechanisms that are implemented in the public procurement regulatory framework can differ based on which type of integrity breaches it is aimed to address. In line with the OECD Recommendation on Public Procurement, all stakeholders in the procurement cycle should adhere to high integrity standards. For this reason, provisions in legal framework that focus on specific stakeholders in the procurement cycle are very common. For instance, the 2024 OECD survey on the implementation of the Recommendation shows that pertaining individual public procurement officers working at public buyers, almost all countries (95% or 38 out of 40) have provisions in place that seek to prevent officials' private interests from affecting public procurement decisions. More generally, most countries (85% or 34 out of 40) have established integrity principles for the public procurement workforce, for instance having integrity principles explained in the code of conduct. However, there can still be diversity to what extent such provisions are applied. A generic code of conduct for civil servants can leave ambiguities in its application to public

procurement (OECD, 2025<sup>[84]</sup>). Therefore, some countries like Korea and Greece, use a dedicated procurement specific code of conduct (OECD, 2025<sup>[85]</sup>; OECD, 2025<sup>[12]</sup>).

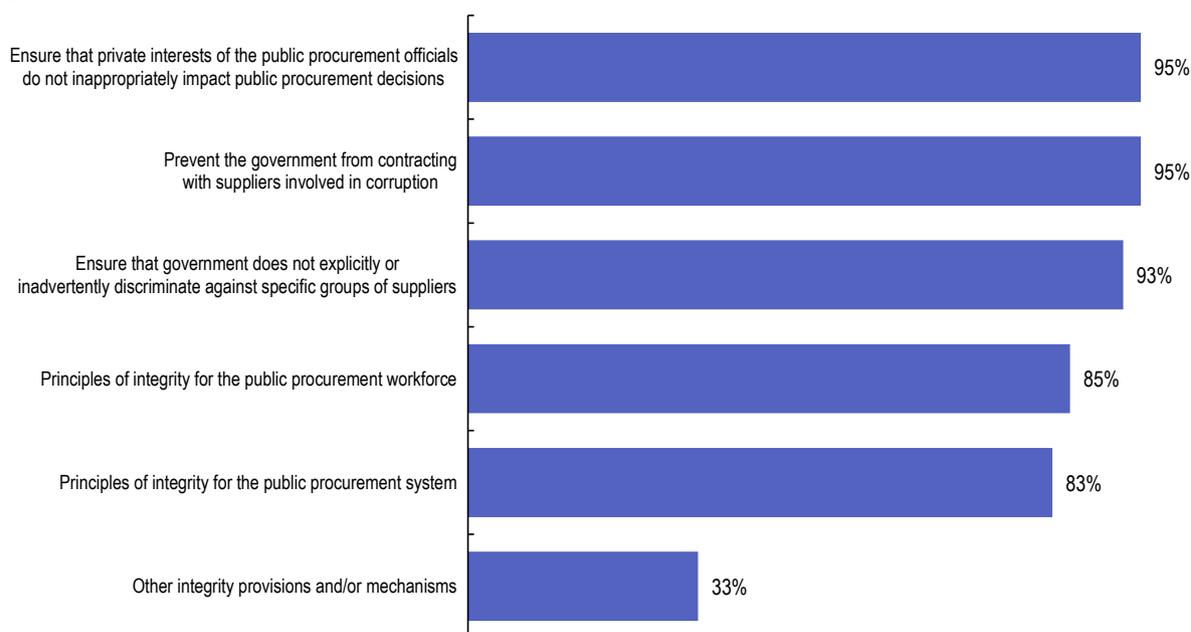
Integrity standards for the private sector are also common, reflecting the high integrity risks at the public-private interface and the need for a whole-of-society approach. Within OECD Member and partner countries 95% (38 out of 40) provide for the exclusion (or debarment) of suppliers involved in corruption from public contracting as a sanction for breaches of integrity-related obligations. To promote fair treatment of suppliers and reduce bias or prejudice in public procurement 93% (37 out of 40) countries have provisions that ensure government does not explicitly or inadvertently discriminate against specific groups of suppliers, most often embedded directly in the public procurement legislation (OECD, 2025<sup>[12]</sup>).

Finally, integrating and clearly explaining the integrity principles in the relevant regulatory documents is a fundamental step towards ensuring integrity across public procurement activities as it lays the foundation of a common understanding of what is understood as unethical behaviour. While less common than provisions targeted at individual stakeholders, this is also widely adopted approach, with 83% (33 out of 40) of OECD Member and partner countries having established such provisions, with numerous countries having a dedicated section within their public procurement law that outlines the integrity principle (OECD, 2025<sup>[12]</sup>).

Figure 10.1 provides an overview of provisions and/or mechanisms to manage threats to integrity included in the public procurement regulatory framework in OECD Member and partner countries in 2024.

## Figure 10.1. Provisions and/or mechanisms to manage threats to integrity included in the public procurement regulatory framework, 2024

Percentage of countries



Note: Data is shown for 40 Respondents. "Other integrity provisions and/or mechanisms" include for instance mandatory confidentiality, asset declarations, observers involved in the public procurement procedures, conflict of interests assessments; bidder integrity programmes.

Source: (OECD, 2025<sub>[12]</sub>).

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### Efforts to promote integrity among suppliers could be advanced

Suppliers are critical stakeholders in managing integrity risks throughout the public procurement cycle, which is why efforts to strengthen integrity in public procurement need to extend beyond public buyers to the entire supply chain. Ensuring that suppliers act responsibly and integrate integrity frameworks throughout supply chains into their practices adds a valuable approach to tackling integrity risks. The complex, global, and fragmented nature of public procurement supply chains makes them vulnerable to costly breaches, including human and labour rights violation and environmental risks. Strengthening (business) integrity measures helps reduce operational, financial, legal, and reputational risks and builds resilience. Moreover, integrity risks such as collusion, bid rigging, and bribery can be concealed by the supply chain.

In combatting these issues, integrity measures contribute to achieving best value for money over the entire life cycle, especially when considering

environmental externalities (OECD, 2022<sub>[86]</sub>). Persistent challenges in achieving this include a siloed system where supply chain management is not being integrated with anti-corruption work; diverse and unclear standards and expectations leading to a lack of a level playing field, and a lack of high-quality data on corruption and other integrity breaches in supply chains, leading to knowledge gaps (Bozzay et al., 2025<sub>[87]</sub>). For suppliers, investing in integrity efforts enhances their attractiveness to public buyers, improves internal operational efficiency, and mitigates reputational risks. Accordingly, suppliers can view integrity initiatives not merely as compliance obligations, but as strategic tools that support market access, strengthen competitiveness and contribute to long-term business sustainability.

The integrity principle in the OECD Recommendation on Public Procurement explicitly states how the high integrity standards applied to public-sector employees could be expanded to all stakeholders in the procurement cycle including private sector suppliers. To this end, 93% (37 out of 40) of OECD Member and partner countries report having some initiative and/or measure in place to promote supplier integrity. In

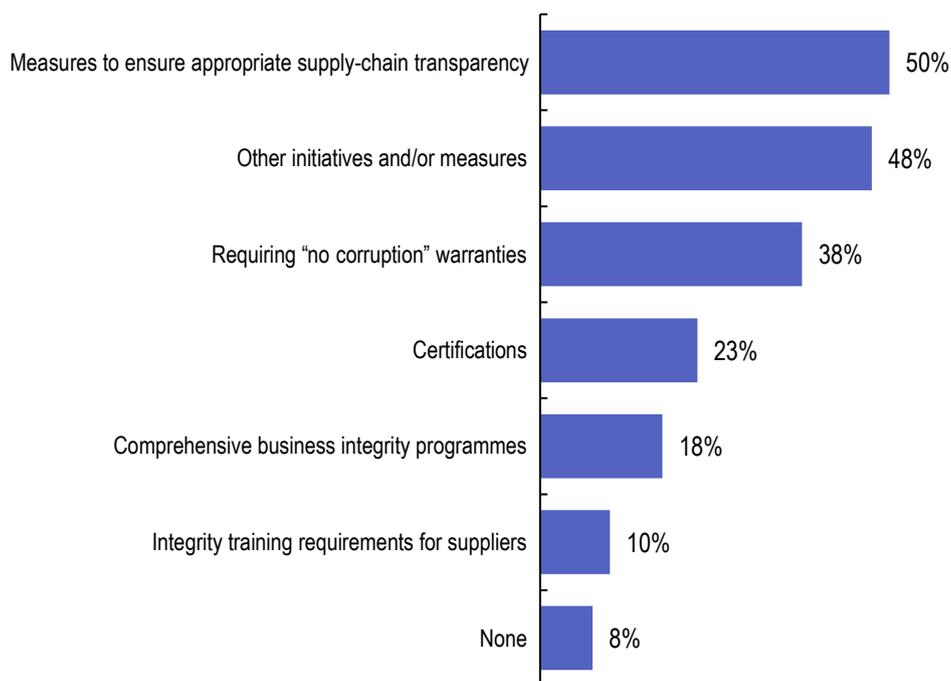
particular, long supply chains can pose the risk of integrity breaches or unethical practices being performed on the supplier side that are not directly apparent to public buyers. To combat this, half of the countries (20 out of 40) have measures in place to ensure suppliers have appropriate supply chain transparency, such as due diligence requirements – so that public buyers can see how suppliers manage risks upstream (OECD, 2025<sup>[12]</sup>).

Other common measures in this area are “no corruption” warranties or specific integrity certifications. A “no corruption” warranty is a contractual clause or declaration which the supplier must sign stating that they have not engaged in corrupt practices and will comply with integrity standards. These types of warranties have not been widely implemented as only 37% (15 out of 40) of countries stated using them. Formal integrity and non-corruption certifications like

the ISO certification are only used by 23% of OECD Member and partner countries. One of the few, Peru incorporates the ISO 37001 certification on the use of an Anti-bribery Management System, which is in place to prevent, detect and respond to possible integrity breaches related to bribery. Bidders with such a system receive an additional score in the evaluation. Moreover, seven countries have efforts in place to promote the suppliers adopting their own comprehensive business integrity programmes and four countries have included integrity training requirements for suppliers. 48% (19 out of 40) have stated to have other initiatives and/or measures in place to promote integrity among suppliers. Such a measure is for example article 29 of Law 9986 in Costa Rica, which establishes the obligation to submit a sworn statement with the bid, declaring exemption from the prohibition regime, under penalty of committing perjury (OECD, 2025<sup>[12]</sup>).

**Figure 10.2. Efforts to promote integrity among suppliers, led either by the public or private sector, 2024**

Percentage of countries



Note: Other initiatives and/or measures include for instance supplier codes of conduct and model anti-bribery/conflict-of-interest clauses; mandatory integrity declarations, due-diligence questionnaires; guidance by anti-corruption/competition bodies, dedicated integrity/compliance offices and anonymous reporting portals. Source: (OECD, 2025<sup>[12]</sup>).

## Developing targeted tools to address risks would contribute to strengthening integrity in public procurement

Public procurement is exposed to interlinked digital, financial, reputational, social and environmental risks. Dedicated risk management strategies and tools can strengthen the resilience, the efficiency and the integrity of the procurement system. 30% of OECD Member and partner countries (12 out of 40) have developed a strategy specifically for managing public procurement risks. A few other countries have integrated public procurement into a broader public sector risk management strategy (28% or 11) (OECD, 2025<sup>[12]</sup>). Positively aware of its relevance, 13% of countries (or 5 out of 40) are in the process of developing a risk management strategy.

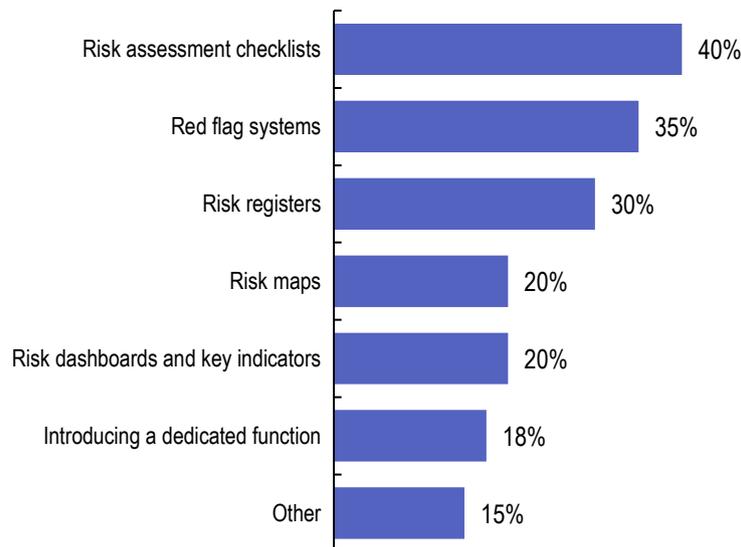
Different tools can be used to implement the risk management strategy in public procurement (see Figure 10.3). Most OECD Member and partner countries (70% or 28 out of 40) have developed at least one tool to manage risks in public procurement. Among the tools used, risk assessment checklists, which are useful to support the identification of risks are the most common (40% or 16 countries) followed by red flag systems (35% or 14 countries) which can help indicate when risks should be further investigated or escalated to decision makers. Red flags for integrity can include complaints from bidders, unusual bid patterns, repeated awards to the same contractor, etc. For example, Hungary's Red Flags tool is an open-source tool designed to

automatically screen tender notices and documents in the EU online Official Journal, Tenders Electronic Daily (TED). The tool flags potentially risky procedures using 40 indicators, including red flags for integrity, e.g., omission of the definition of compulsory grounds for exclusion, short time limit for tendering/participation, the duration of the evaluation, and a low number of tenders received (OECD, 2025<sup>[88]</sup>).

While not yet mainstream, more advanced tools are an emerging trend. Only 30% of OECD Member and partner countries (12 out of 40) use risk registers to maintain a shared understanding of risks between stakeholders, ensure the tracking and assessment of risks, record decisions of how risks will be treated, verify that responsibilities for risks have been assigned to the most appropriate risk owner, and provide a holistic view of risks that can be evaluated against the entity's overall risk appetite and risk management thresholds (OECD, 2023<sup>[89]</sup>). Similarly, risk maps or risk dashboards and key indicators<sup>1</sup> are only used by 20% (8) of OECD Member and partner countries each. They can provide a simple snapshot of major risks, the treatment actions, and the risk owners (OECD, 2023<sup>[89]</sup>). Early adopters illustrate the potential of such tools. For example, the Korea ON-line E-Procurement System (KONEPS) includes Korea's Bid Rigging Indicator Analysis System (BRIAS), which analyses data elements including bidding price, the number of participants, and the procurement method, and applies an algorithm that generates a potential bid-rigging risk score. If the score exceeds a certain threshold, this signals the need to collect more information on the procurement (OECD, 2025<sup>[12]</sup>).

## Figure 10.3. Tools implemented for the management of public procurement risks, 2024

Percentage of countries



Note: Data is shown for 40 Respondents.

Source: OECD (2024), Survey on Public Procurement.

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### Harnessing digital technologies for proactive integrity risk management in public procurement offers considerable potential, but adoption remains limited

Digital transformation of the public procurement function – particularly better data governance and interoperable systems – enables more proactive, evidence-based integrity management across the public procurement cycle (OECD, 2025<sup>[90]</sup>).

By systematically analysing patterns – such as unusual win rates by certain suppliers, persistently low competition in otherwise-competitive sectors or regions or a buyer’s preference for certain suppliers in contract allocation – digital technologies, such as data analytics and machine learning aid in identifying high-risk tenders and target oversight and investigative resources. Integrating procurement data with financial disclosures and beneficial ownership information can further strengthen detection (OECD, 2025<sup>[88]</sup>).

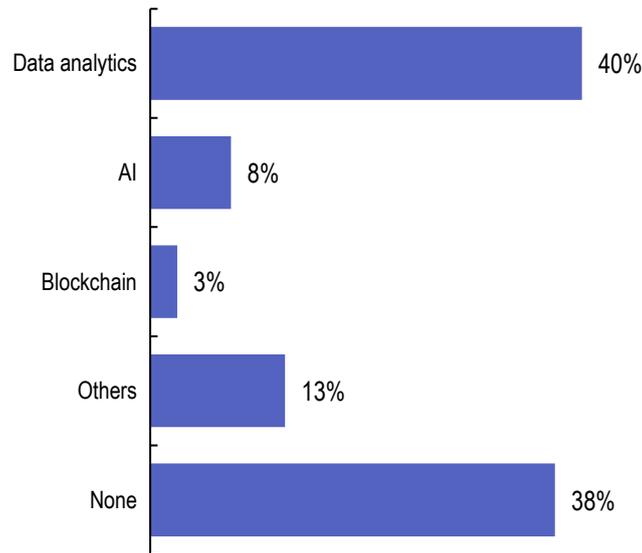
Across OECD Member and partner countries, only half of the countries use digital technologies such as data analytics, AI or blockchain to identify, analyse, and monitor integrity risks in public procurement. Among the digital technologies used, data analytics remains the

most common (40% or 16 out of 40). AI can be used effectively to identify integrity risks. In public procurement, AI is also emerging, with 8% (3 out of 40) of the countries employing AI to identify, analyse, and monitor integrity risks. Beyond identifying anomalies in existing data, AI’s predictive capacities can flag potential risks and irregularities and optimise public procurement processes. For example, academic work using hyperforests models (advanced machine learning models) on 1.54 million public contracts taken from the Mexican CompraNet (2013-2020) could with 88% accuracy identify corrupt contracts and with 94% could predict non-corrupt ones (Aldana, Falcón-Cortés and Larralde, 2022<sup>[91]</sup>).

Blockchain is rarely used for integrity risk management in public procurement, though it offers a robust and proactive solution (Ayebofo, Anomah and Amofah, 2025<sup>[92]</sup>). It can store all public procurement data and ensure that bidders have access to the same information, thus enhancing transparency and management of fraudulent activities within the system. Only Peru reported an application using blockchain to register purchase orders from electronic catalogues to enhance transparency. Box 10.2 illustrates examples of how OECD Member and partner countries use digital technologies to manage integrity risks in public procurement.

## Figure 10.4. Digital technologies used to identify, analyse, and monitor integrity risks in public procurement, 2024

Percentage of countries



Note: Data is shown for 40 Respondents. Other digital technologies include anonymous reporting portals, tools to screen public registers for conflict-of-interest, and automated due-diligence tools.

Source: OECD (2024), Survey on Public Procurement.

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### Box 10.2. Examples of how digital technologies are being used by OECD Member and partner countries to manage integrity risks in public procurement

#### Italy

The National Anti-Corruption Authority (ANAC) is developing territorial level public procurement and context risk indicators to measure corruption risks and to promote transparency and integrity in public procurement. ANAC is integrating multiple data sources, designing methodologies for calculation and validation of indicators. The work is focusing on an open approach to risk analysis: open data, open software, and open knowledge.

#### Portugal

The Court of Auditors (Tribunal de Contas, TdC), the national Supreme Audit Institution in Portugal, is a key player in the public procurement system safeguarding it from different threats and ensuring its efficiency. To enhance TdC's audit activities, OECD Member and partner countries at NOVA University of Lisbon supported the TdC in developing a data- and AI-driven risk assessment methodology for its audit selection for public procurement. At the core of this initiative was the need to map risks and data sources, examine the digital maturity of the TdC to conduct such work, and assess the quality of potential databases that could be used for building a new risk methodology.

**Brazil**

In Brazil, the Comptroller General's Office developed ALICE, a tool that uses AI and robotic process automation tool to detect fraud risks in real time. Alice has generated a significant positive impact in strengthening the practice of identifying integrity risks in Brazil and fighting corruption in public procurement. Between 2019 and 2022, its alerts led to the suspensions or cancellations of bids totalling around EUR 1.5 billion (equivalent) and shortened average audit times from 400 days to just eight days.

**Peru**

In 2019, Perú Compras, the Central Purchasing Body of Peru, began registering purchase orders from Electronic Catalogues on blockchain. Each purchase order and its respective bids are recorded on multiple servers (nodes), which ensures the availability and immutability of data. Each purchase order has a QR code that can be read with any smartphone, linking to the original PDF file to verify the authenticity of the document.

Source: (OECD, 2025<sup>[12]</sup>), (OECD, 2025<sup>[70]</sup>), (Central de Compras Públicas, 2020<sup>[93]</sup>).

**Note**

<sup>1</sup> A risk map/matrix is a tool for classifying and visualising risks based on their likelihood and severity which supports strategic and operational decision making. Risk dashboards and key indicators can help continuously track risk indicators and procurement performance to detect emerging risks and ensure mitigation measures are effective.





# 11 ORGANISED CRIME AND CORRUPTION

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Organised crime is a significant threat to the global economy and societies across the world, with organised criminals increasingly seeking to gain undue advantage by using corruption to infiltrate the legal economy and public services and fraud to appropriate public funds.. In response, countries must introduce coherent strategic frameworks which account for the connections between corruption and organised crime, address governance gaps, weaknesses and inefficiencies which organised criminals can exploit, and improve cross-government and international co-operation. As part of this upgraded, more strategic approach, countries should build upstream resilience against organised crime by improving prevention tools and enhancing the integrity of public institutions, particularly in vulnerable sectors like licencing, borders, planning and procurement.

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## Introduction

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Organised crime presents a significant threat to the global economy and societies across the world, with recent estimates suggesting that its global costs amount to as much as 5% of annual global GDP (UNODC, 2025<sup>[13]</sup>). The 2024 OECD Survey on Drivers of Trust in Public Institutions highlighted that an average of 30% of people across the 30 participating countries name crime and violence among the top three issues facing their country (OECD, 2024<sup>[8]</sup>). Criminal networks are increasingly exploiting global supply chains, cross-border money laundering schemes, and digital tools to diversify and expand their activities. As a result, tackling the growing threats of organised crime which used to be a priority for a few OECD Member and partner countries has now become one for most, if not all.

Organised crime groups use corruption, coercion and the exploitation of legitimate business and government structures to increase their influence across the private and public sectors, as well as within wider society. Corruption helps capture public service provision, defraud the state, obstruct justice and unduly influence the policy cycle, particularly at the local level. Although many countries are taking action to counter organised crime, its link with corruption could be better understood and addressed.

This chapter assesses how a stronger and more strategic response to organised criminals' reliance on corruption and exploitation of institutional vulnerabilities is needed

from governments, the private sector, and society at large. Without it, organised crime will continue to weaken the integrity of public and private sectors, the cost to economies will increase, and the stability and effectiveness of democratic institutions will be undermined. This chapter finds that:

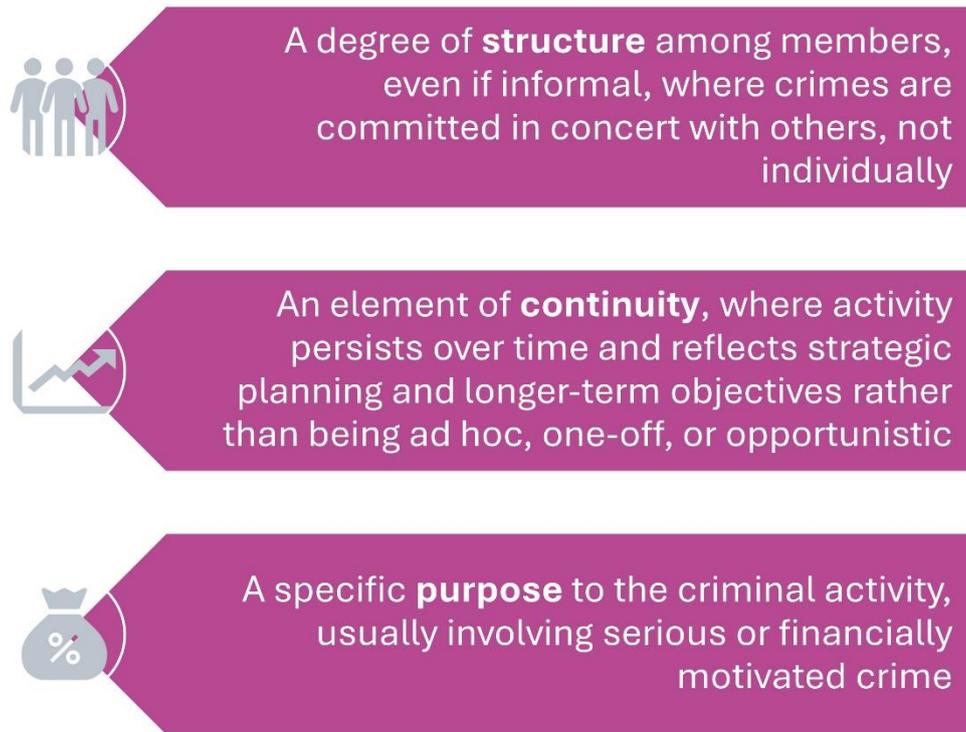
- Organised criminals are increasingly seeking to gain undue advantage by using corruption to infiltrate the legal economy and public services, and fraud to appropriate public funds
- More countries could strengthen their strategic frameworks and improve interinstitutional co-operation to tackle the corruption threat posed by organised crime
- Countries could build resilience against organised crime by enhancing the integrity of public institutions in particular those vulnerable to it

### **Organised criminals are increasingly seeking to gain undue advantage by using corruption to infiltrate the legal economy and public services, and fraud to appropriate public funds**

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While definitions of organised crime vary between OECD Member and partner countries, they generally emphasise the presence of three characteristics: structure, continuity and purpose (Figure 11.1).

**Figure 11.1. Characteristics of organised crime definitions in OECD Member and partner countries**



Source: OECD elaboration

These core elements remain consistent, but their reach, complexity and impact are increasing due to globalisation and digitalisation. These developments have, for instance, enabled criminals to reach victims across jurisdictions and to move money through complex financial schemes with minimal traceability. Dark markets and crypto currencies have made illicit goods and services more available and enabled more effective sharing of knowledge and resources among criminal actors. Online communications platforms, including social media, offer opportunities for organised criminals to network, organise and collaborate, in many instances without fear of detection due to encryption and anonymity.

As a result, the cost of organised crime is growing. Organised crime has a deep economic impact, costing the global economy an estimated 2-5% of global annual GDP, or between USD 800 billion and USD 2 trillion every year (UNODC, 2025<sup>[13]</sup>). These costs are reflected in country and regional-level estimates (albeit based on slightly different methodologies), with the cost of organised crime estimated at 2% of GDP in the United Kingdom, 3.5% in the LAC region, and up to 4% in

Australia which is considering its indirect costs to society. In addition to this economic impact, organised crime also carries a high societal cost, with organised criminals undermining the rule of law and trust in public institutions through manipulating procurements, defrauding the state, obstructing justice, or establishing informal service provision and governance systems which are not accountable to those living in them. It can even have an impact on national security, where the line between organised crime and politically motivated disruption becomes blurred and criminal groups provide logistics, intelligence sources, funding channels, or disinformation services to hybrid threat actors (Europol, 2025<sup>[52]</sup>).

To support and scale their activities, organised crime groups are increasingly using corruption in their business models and targeting certain areas of the public and private sectors. Indeed, 71% of organised crime groups which were reported to Europol in 2024 engage in corruption, up from 60% in 2021 (Europol, 2024<sup>[94]</sup>) (Europol, 2021<sup>[95]</sup>). While corruption has always been part of the toolbox of criminal networks, this upward trend may reflect both the spatial and sectoral expansion of

organised crime activities, as well as the increasing number of intermediaries that they can target within the public and private sectors.

Unlike with other forms of corruption, however, the incentives offered by organised criminals are often larger and reinforced by threats, intimidation and violence, and their targets often differ from more traditional forms of corruption. This combination of tactics increases targets' susceptibility to corruption and hinders detection and enforcement, including by reducing targets' willingness to engage with law enforcement agencies. The use of corruption in this way is particularly prevalent in illegal, high-profit markets such as drugs, trafficking and prostitution, where organised criminals target public officials and private sector workers working in customs, borders, logistics, local government and law enforcement to facilitate their illicit activity and gain advantage over their competitors (Europol, 2025<sup>[52]</sup>). Ultimately, corruption by organised criminal groups can go beyond, by trying to unduly influence political systems and capture political office holders, particularly at the local level. Recent research in Sweden has shown that around 10% of surveyed national, regional and municipal-level politicians had experienced threats or violence from serious organised crime groups during their time in office (Brå, 2023<sup>[96]</sup>). As such, corruption has become an important tool for criminal groups to consolidate power, strengthen their licit and illicit business interests and gain market advantages.

Beyond targeting the public sector and capturing political decision making, criminal networks are also increasingly infiltrating the licit economy. While legal, corporate, and financial actors can serve as gatekeepers that help prevent and detect crime, they can also become enablers for organised crime – whether knowingly or unknowingly – by helping to conceal, transfer or launder illicit assets. Professional enablers that may use their expertise to help clients commit crimes include tax professionals, legal service providers, accountants, financial advisors, company formation agents, registered agents, notaries, business trustees, financial institutions, and trust and corporate service providers. Beyond the legal and financial sectors, other corporate sectors are also prone to organised crime activities, knowingly or unknowingly, as well as voluntarily or coerced. Criminal organisations tend to use legal business structures as multipurpose platforms for criminal activities and money laundering. While all

sectors are at risk, common targets include construction and real estate, cash-intensive businesses, such as hospitality, and logistics, namely transport and import/export companies (Europol, 2025<sup>[52]</sup>).

### **Countries need coherent strategic frameworks and better cross-government and international co-operation to tackle the corruption and integrity threats posed by organised crime**

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Modern organised crime is characterised by less centralisation, more networking and greater engagement across groups pursuing common criminal objectives. At different points in the criminal process, criminals can operate in or provide services to several different networks. These increasingly complex crime-as-a-service models and the enlistment or corruption of public officials, legitimate business, and even civilians into organised criminal activity can extend the influence of organised crime groups into the private sector and wider society. These dynamics make tackling organised crime more complex, demanding a correspondingly sophisticated and coherent response from governments. Without such co-ordination, efforts risk becoming fragmented and less effective, allowing criminals to exploit gaps between disconnected government responses (Europol, 2021<sup>[95]</sup>).

To that end, international co-operation has been critically important to countries' efforts to counter organised crime. Such efforts have evolved significantly since INTERPOL's creation in 1923. Key milestones include the establishment of the Financial Action Task Force (FATF) in 1989 to address illicit financial flows, and the near-universal ratification of the UN Convention against Transnational Organized Crime (UNTOC) by 194 countries since 2000. Major international cooperation instruments, like UNODC, INTERPOL, EUROPOL, EPPO and the OECD Anti-Bribery Convention facilitate law enforcement co-ordination, intelligence-sharing, and anti-corruption measures. Civil society organisations, such as the Global Initiative Against Transnational Organised Crime, contribute research and monitoring capabilities.

Despite this progress, significant challenges persist. Trust deficits between jurisdictions, divergent legal standards, limited data collaboration and uneven implementation

of international frameworks hinder effective co-operation, particularly in lower-capacity countries. Criminal networks exploit these gaps and regulatory inconsistencies to evade enforcement across borders. To that end, identifying ways to strengthen international engagement will help build countries' resilience to criminal infiltration. The increasing complexity and diversity of criminal activities also point to the opportunity to increase international co-operation in areas such as anti-corruption, tax transparency, responsible business conduct, and governance, which will offer novel approaches and bring additional perspectives to respond to the emerging challenges posed by organised crime.

For their part, governments' strategic frameworks should respond to organised criminals' increasing complexity by

promoting co-ordination and co-operation between public agencies, particularly between anti-corruption authorities and those tackling organised crime. Not doing so risks leaving countries exposed to fragmentation, duplication, and inefficiency, as policy responses are less likely to be co-ordinated between responsible government actors, and separating anti-corruption and anti-organised crime efforts creates artificial distinctions that do not reflect how criminal organisations operate. However, while 24 OECD Members have an anti-corruption strategy, only eight contain strategic objectives related to tackling organised crime. Similarly, only 29% of OECD Members include strategic objectives to address corruption in their national strategies against organised crime (Table 11.1).

**Table 11.1. Alignment of OECD Member countries' anti-corruption and organised crime strategies**

|             | Anti-Corruption strategy with a dedicated approach to tackling organised crime | Anti-organised crime strategy with a dedicated approach to tackling corruption |
|-------------|--|--|
| Australia   | ●  | ●  |
| Austria     | ●  | ○  |
| Belgium     | ○  | ○  |
| Canada      | ○  | ○  |
| Chile       | ●  | ●  |
| Colombia    | ●  | ●  |
| Costa Rica  | ●  | ●  |
| Czechia     | ●  | ●  |
| Denmark     | ○  | ●  |
| Estonia     | ●  | ○  |
| Finland     | ●  | ●  |
| France      | ●  | ○  |
| Germany     | ○  | ●  |
| Greece      | ●  | ○  |
| Hungary     | ●  | ○  |
| Iceland     | ○  | ○  |
| Ireland     | ○  | ●  |
| Israel      | ○  | ○  |
| Italy       | ●  | ○  |
| Japan       | *  | ○  |
| Korea       | ○  | ○  |
| Latvia      | ●  | ○  |
| Lithuania   | ●  | ○  |
| Luxembourg  | ○  | ○  |
| Mexico      | ●  | ●  |
| Netherlands | ●  | ●  |

|                 | Anti-Corruption strategy with a dedicated approach to tackling organised crime | Anti-organised crime strategy with a dedicated approach to tackling corruption |
|-----------------|--|--|
| New Zealand     | ◐  | ●  |
| Norway          | ○  | ○  |
| Poland          | ○  | ○  |
| Portugal        | ◐  | ○  |
| Slovak Republic | ◐  | ○  |
| Slovenia        | ◐  | ○  |
| Spain           | ◐  | ●  |
| Sweden          | ●  | ●  |
| Switzerland     | ○  | ○  |
| Türkiye         | ○  | ○  |
| United Kingdom  | ●  | ●  |
| United States   | ●  | ●  |
| ○               | No anti-corruption or organised crime strategy                                 |  |
| ◐               | Strategy in place but no cross-reference                                       |  |
| ●               | Strategy in place which includes cross-reference                               |  |
| *               | Data not available   |  |

**How to read:** The figure shows the alignment of OECD Member countries' anti-corruption and anti-organised crime strategies, by highlighting the incorporation of anti-organised crime objectives into anti-corruption strategies, and the presence of anti-organised crime strategies incorporating anti-corruption measures. For example, Australia has an active anti-corruption strategy and an anti-organised crime strategy, though they do not cross-reference one another.

Source: OECD Public Integrity Indicators database (as of 10 March 2026).

A strategic approach to tackling organised crime and corruption goes beyond cross-references between strategic documents and includes a collaborative process for strategy development and implementation. As OECD Member countries have recognised, such processes should be based on proactive consultation across public authorities involved in tackling corruption and organised crime, including law enforcement, financial intelligence units, border management, and

anti-corruption authorities, along with engagement with the private sector and civil society (Box 11.1). As the strategy chapter notes, while there is no need to duplicate strategic planning across different strategic frameworks, aligning across strategies through consultation and co-ordinated planning enables the most coherent and effective responses to the most complex problems.

### Box 11.1. 2025 Finnish Strategy and Action Plan to Combat Organised Crime

On 17 October 2023, Finland's Ministry of Justice appointed a working group involving a range of public sector authorities working on issues related to organised crime to prepare a strategy and the associated action plan to combat organised crime. In its deliberations, the working group made broad use of information held by the authorities and pursued close co-operation with the numerous ongoing Government Programme projects on related topics. The resulting strategy to combat organised crime, running from 2025-2030, has the following goals:

- co-operation among the key actors is effective and established
- the proceeds of crime to offenders have decreased, criminal activities have become more difficult to pursue, and the risks entailed have grown greater
- organised crime infiltration into the basic structures of society has been prevented
- people who are particularly vulnerable to crime are better protected.

This strategy places prevention at the centre of Finland's work, by prioritising tackling proceeds of crime, supporting exit from crime and criminal groups, and enhancing co-operation between the government and the education sector.

Importantly, the strategy contains a strong focus on the risks of corruption generated by organised crime by starting a government-wide research process to understand the current levels of undue influence of public officials and potential prevention measures.

To support this work, the strategy establishes ongoing collaboration between actors across all levels of governance in Finland, including various ministries, local government actors and ports, as well as with European Union institutions.

Source: Finnish Ministry of Justice (2025), Government Resolution on a strategy and action plan to combat organised crime (2025-2030).

In addition to promoting cross-government strategic alignment, building resilience to organised crime will demand coherent multi-level governance frameworks that connect national strategies with the operational realities of subnational authorities, including port authorities, local governments and municipalities, as well as local enforcement agencies. This connection is critical because subnational authorities often represent the point of engagement between the government and organised criminal operations. Given their control over administrative procedures (such as local permitting processes, zoning or construction approvals), public service delivery (such as waste-management and policing), and logistical hubs such as ports or airports, officials at these levels can often be important intermediaries in organised criminal groups' illicit business operations and money laundering activities, making them prime targets for bribery or coercion. This risk is exacerbated since subnational authorities often have fewer resources and less-developed oversight mechanisms, including lower internal auditing or control

capacity, creating gaps and opportunities for criminal networks to exploit.

Building resilience to organised crime therefore demands clear roles and responsibilities, effective co-ordination across levels of government, and robust integrity mechanisms that align local capacity with national policy objectives. Aligning national and subnational strategic planning can help to mitigate these risks by bringing national-level insights, resources, and capabilities to bear on risks at the subnational level. Given the shared experiences and threats faced by subnational authorities, furthermore, promoting international collaboration across port authorities, municipal, and national government officials with relevant experience will be an important component of building state capacity. Enabling subnational authorities to access specialised expertise, share effective practices, and build peer networks will foster cross-border co-ordination in a way that addresses inherently transnational criminal networks.

## Countries could build resilience against organised crime by enhancing the integrity of public institutions

Tackling organised crime and its use of corruption is a core responsibility of law enforcement agencies, in terms of detection, investigation, and enforcement on one side, as well as with respect to prevention and building resilience to the threats posed on the other side. This prevention role can be indirect, including through the deterrent effect of law enforcement actions or officers' physical presence in certain locations. It can also be direct, including through risk analysis and awareness raising activities. Providing sufficient resources, developing domestic and international information sharing, and building technological skills will all be key to improving law enforcement agencies' reactive and prevention roles relating to the increasingly disparate and complex threat from organised criminal networks in the coming years.

Enhancing integrity in public institutions can supplement law enforcement efforts and build upstream resilience to criminal actors' efforts to use corruption to influence decision making processes and divert public services to facilitate their illegal activities. Such measures can include vetting procedures and integrity checks, which identify corruption risk upon employees' entry into roles and periodically throughout their employment. These checks must be balanced with personal privacy and data protection principles. However, they can reveal signs of possible connections with organised crime, such as higher-risk personal relationships between employees and external parties or unusual financial transactions and unexplained wealth. They can also help to identify employees' potential vulnerabilities to exploitation by organised criminals due to, for example, financial hardship. Vetting procedures and integrity checks are therefore an important tool for public authorities to identify and manage actual and potential influence from organised crime.

Additionally, strong conflict of interest and asset declaration systems can also be a useful tool to reveal where individuals could – or have – benefitted from illicit relationships with organised criminals. Taking a risk-based approach to managing asset and interest declarations can help authorities identify possible anomalies among those employees for whom relationships with, or undue influence from, organised

criminals could be most harmful to the public interest. Such at-risk office holders include elected officials (as explored further in Chapter 5 on "Political financing") and those holding senior, decision making roles. It also includes those working in sectors of particular interest to organised criminals such as licencing, borders, planning, logistics, or public procurement (as explored further in Chapter 10 on "Integrity in public procurement"). There is scope for countries to strengthen requirements for officials in at-risk roles to submit asset or interest declarations, with 64% of OECD Members and 69% of all countries assessed through the Public Integrity Indicators having such a requirement in place. As also explained in Chapter 4 on "Conflict of interest", regulatory requirements for asset and interest declarations should be supported by appropriate implementation measures, including effective oversight and verification processes, the appropriate use of sanctions for breaches, and targeted awareness raising materials. Such measures also reduce the risk that employees' self-declarations may be inaccurate or untruthful, helping authorities gain a clearer picture of the potential influences over office holders and to put appropriate mitigation measures in place.

Effective processes for reporting wrongdoing, including whistleblowing channels, are another important tool for authorities to identify the possible influence of organised crime. Creating open cultures in which employees feel able to raise concerns and talk about attempted or actual influence by organised crime is crucial to authorities' ability to mitigate the risks of influence which otherwise may remain covert. Offering effective whistleblower protections, which allow employees to raise concerns related to organised crime to appropriate authorities without fear of reprisals, is also vital.

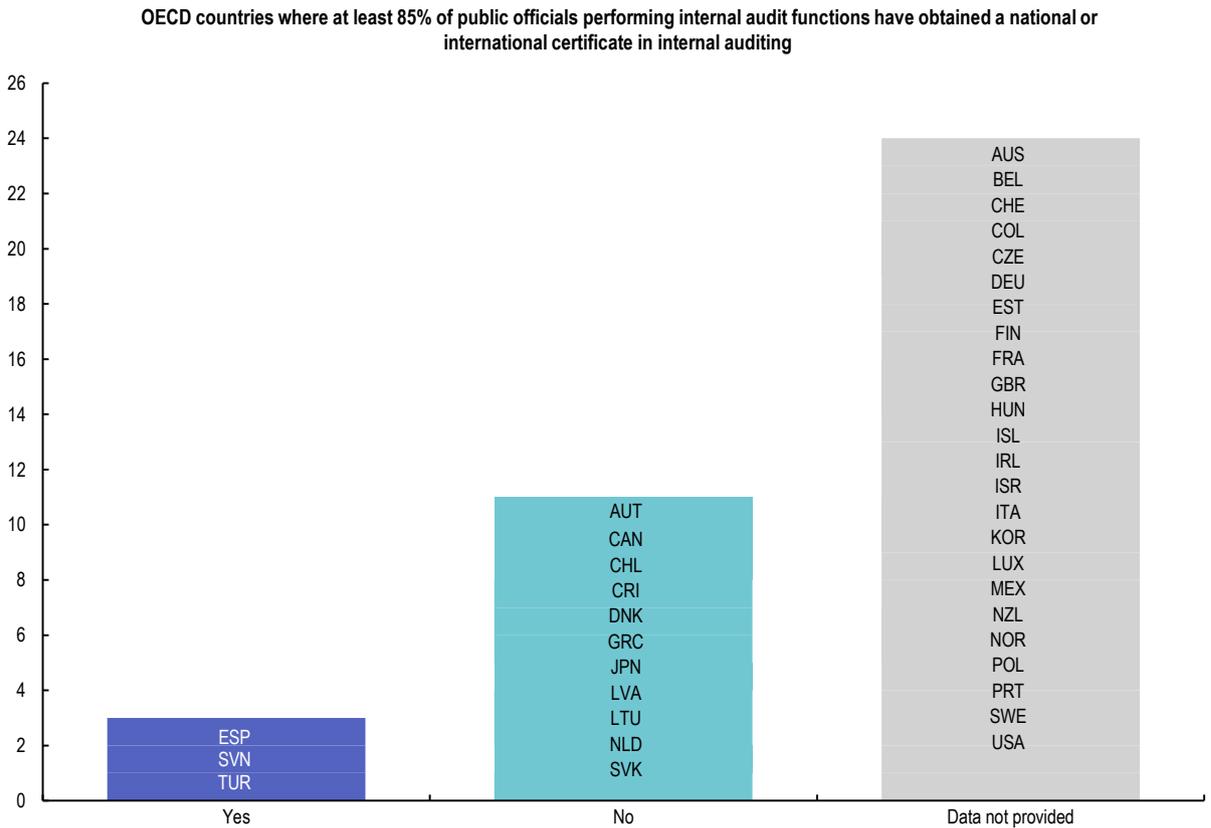
Strong risk management and internal control systems are also important tools for authorities to mitigate the risk of organised crime-related corruption. Corruption risk management processes can help authorities identify the source and quantify exposure to corruption risks, including related to organised crime, and to put appropriate mitigations in place. Internal control provides assurance that public resources are applied efficiently, effectively and in line with their intended purpose, and can therefore help to identify where organised criminals may be seeking to divert resources and services to facilitate their activities. 70% of OECD

Members have issued guidelines on fraud and corruption prevention as part of their internal control systems, and 71% of countries explicitly address these risks in their risk management framework. Further gains could be made by highlighting organised crime in these frameworks as a key driver of corruption risk, particularly in sectors such as licencing or public procurement.

Automating compliance processes, digitalising administrative procedures and strengthening internal control measures can also provide greater checks on decision making and identify areas of exposure to influence from organised criminals. Certifying auditors can improve both the effectiveness of internal audit as a means of identifying the influence of organised crime, and the resilience of internal auditors to the undue influence of organised criminals. On the one hand, certified auditors adhere to professional standards and robust audit methodologies, enabling them to identify patterns associated with fraud, collusion, and misuse of funds, all common features of organised crime schemes. Certified auditing also enhances prevention by providing assurance that corruption controls are working and,

where they are not, identifying how integrity systems' resilience to corruption and organised crime can be improved. On the other hand, subjecting auditors to external accreditation introduces an important institutional safeguard that interferes with the operating space of organised criminal networks. Through proper accreditation, auditors become bound by professional standards, external oversight, and independent disciplinary mechanisms, which can make them harder to manipulate or intimidate and more likely to report such influence attempts, including to law enforcement and professional standards bodies. Using certified auditors in both the public and private sectors can therefore raise the risk and consequences of detection, meaning criminal actors' cost-benefit calculation shifts. More countries could reap these benefits in their public institutions. Although many OECD Members have a certification scheme for internal audit professionals in place at the national level, in only three OECD Member countries have at least 85% of public officials performing internal audit functions obtained a national or international certificate (Figure 11.2).

**Figure 11.2. OECD Member countries' use of certified internal audit at the national level**



Source: OECD Public Integrity Indicators database, October 2025.

StatLink  <https://stat.link/a2gj0v>

Several OECD Member countries have recognised the value of nurturing upstream resilience to organised crime through developing public integrity, particularly in higher-risk sectors such as local governance, and are working to address systemic vulnerabilities before they can be exploited by organised criminals (Box 11.2). Overall, nurturing preventative, upstream resilience can help to reduce the opportunities for organised crime

groups to use corruption as a tool to advance their interests and gain undue advantage. In support of enforcement action, strengthening integrity at every level of government and with non-government partners can make it harder for criminal groups to take hold within societies, to infiltrate and challenge the authority of the state, and to skew markets and gain undue economic advantage (UNODC, 2021<sup>[97]</sup>).

### **Box 11.2. Countries are developing their work to build upstream resilience to organised crime**

Several OECD Member countries are taking steps to enhance their upstream resilience to organised crime-related corruption. For example:

- Australia's 2018 National Strategy to Fight Transnational, Serious and Organised Crime provides a holistic approach to addressing organised crime, including: drawing on all tools of government to use the right intervention at the right time; strong partnerships across government and civil society; and enhanced capability through appropriate skills and technology.
- The 2025 Finnish strategy and action plan to combat organised crime includes effective co-operation across stakeholders and the prevention of organised crime infiltration into the basic structures of society as two of its strategic objectives.
- Sweden's 2024-2027 Action Plan Against Corruption and Undue Influence introduces a range of measures to reduce the increased risks of corruption in Swedish society due to the growing threat of organised crime. The Action Plan focuses several of these measures at improving resilience to corruption and organised crime at the subnational level, which Swedish authorities have identified as being particularly vulnerable to the influence of organised criminals.
- The Netherlands is developing its concept of subversive crimes to include not just the prosecution of criminals through more law enforcement powers, but also an increased focus on reinforcing societal resilience and mobilising both the public and private sectors against organised crime.

Source: OECD elaboration

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# Country abbreviations

| OECD Member countries  |     |                 |      |
|------------------------|-----|-----------------|------|
| Australia              | AUS | Japan           | JPN  |
| Austria                | AUT | Korea           | KOR  |
| Belgium                | BEL | Latvia          | LVA  |
| Canada                 | CAN | Lithuania       | LTU  |
| Chile                  | CHL | Luxembourg      | LUX  |
| Colombia               | COL | Mexico          | MEX  |
| Costa Rica             | CRI | Netherlands     | NLD  |
| Czechia                | CZE | New Zealand     | NZL  |
| Denmark                | DNK | Norway          | NOR  |
| Estonia                | EST | Poland          | POL  |
| Finland                | FIN | Portugal        | PRT  |
| France                 | FRA | Slovak Republic | SVK  |
| Germany                | DEU | Slovenia        | SVN  |
| Greece                 | GRC | Spain           | ESP  |
| Hungary                | HUN | Sweden          | SWE  |
| Iceland                | ISL | Switzerland     | CHE  |
| Ireland                | IRL | Türkiye         | TUR  |
| Israel                 | ISR | United Kingdom  | GBR  |
| Italy                  | ITA | United States   | USA  |
| OECD partner countries |     |                 |      |
| Argentina              | ARG | Jordan          | JOR  |
| Armenia                | ARM | Kazakhstan      | KAZ  |
| Bolivia                | BOL | Kosovo*         | XKV* |
| Bosnia and Herzegovina | BIH | Moldova         | MDA  |
| Brazil                 | BRA | Morocco         | MAR  |
| Bulgaria               | BGR | Paraguay        | PRY  |
| Croatia                | HRV | Peru            | PER  |
| Dominican Republic     | DOM | Romania         | ROU  |
| Ecuador                | ECU | Serbia          | SRB  |
| Guatemala              | GTM | Seychelles      | SYC  |
| Honduras               | HND | Thailand        | THA  |
| Indonesia              | IDN | Ukraine         | UKR  |

# Anti-Corruption and Integrity Outlook 2026

## Harnessing the Integrity Advantage

Integrity is a strategic asset for governments and businesses. It protects democracies against corruption, fraud and waste, supports growth and fair competition, and improves trust and engagement with public institutions. The *Anti-Corruption and Integrity Outlook 2026* assesses the strengths and gaps in 62 OECD Member and partner countries' integrity systems, and finds that, despite recent progress, implementation of integrity measures remains uneven. It provides recommendations and explores tools for mitigating evolving risks related to fraud, public procurement and organised crime.



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