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Marina Nistotskaya, Hayden Buker, Marcia Grimes,
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Marina Nistotskaya

Hayden Buker

Marcia Grimes

Anna Persson

Michelle D'Arcy

Bo Rothstein

Adea Gafuri

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to

The Expert Group for Aid Studies (EBA)

Marina Nistotskaya (Principal Investigator) is Professor of Political Science at the University of Gothenburg, and former director of the Quality of Government Institute. Her research focuses on state capacity, democracy, and public goods provision, appearing in journals such as Journal of Political Economy, Governance, Journal of Public Administration Research and Theory, and Journal of European Public Policy among others.

Hayden Buker is an MA student in political science at the University of Gothenburg.

Marcia Grimes is Professor of Political Science at the University of Gothenburg. Her research focuses on the role of civil society in combating corruption, appearing in journals like the American Review of Public Administration, the Journal of Politics, Political Research Quarterly, and European Journal of Political Research.

Anna Persson is Associate Professor of Political Science at the University of Gothenburg. Her research focuses on corruption, state capacity, and public goods provision. Persson's work has been published in Governance, Comparative Politics, and Perspectives on Politics.

Michelle D'Arcy is Associate Professor of Political Science at Trinity College Dublin. Her research examines the effect of political institutions on development, with a focus on developing countries, particularly Kenya. D'Arcy's research has been published in Journal of Political Economy, African Affairs, Journal of Eastern African Studies, and European Journal of Political Research, among others.

Bo Rothstein is Professor Emeritus at the University of Gothenburg, and the founder of the Quality of Government Institute. A distinguished social scientist, Rothstein has extensively published on issues like corruption, social trust, and the quality of government. He has also co-authored the EBA report Making Development Work: The Quality of Government Approach.

Adea Gafuri is a Post-Doctoral Research Fellow at The Swedish Institute of International Affairs. Her research examines the impact of financial initiatives on democratization, appearing in Democratization, Studies in Comparative International Development and East European Politics.

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Foreword by EBA

Corruption poses a serious threat to social and economic development by undermining the rule of law, distorting economies, and eroding public trust in institutions. Over the past 15 years, Sida has undergone a transformation in its approach to anti-corruption, pivoting from a focus on safeguarding Swedish funds to also tackling corruption as a fundamental threat to development itself. Departing from this shift, EBA set out to evaluate the potential of Sida's work to contribute to reducing corruption as a development obstacle in partner countries. The evaluation has been conducted by a team of researchers tied to the Quality of Government Institute at the University of Gothenburg.

The evaluation draws on a broad palette of data sources, including academic scholarship, surveys, extensive documentation and interviews, and field studies in Kenya, Serbia, and Georgia. The authors find that Sida has come a long way in developing a comprehensive, evidence-based approach to countering corruption as a development obstacle. The incorporation of anti-corruption in government strategies has also increased significantly. The authors find, however, that work remains in translating Sida's approach and policies into practice. Sida program officers display active engagement in anti-corruption and a deep understanding of local contexts. Yet, their knowledge of Sida's approach varies and they face challenges in incorporating anti-corruption concerns into their demanding workloads and in conceptualizing theories of anti-corruption change, hindering maximal impact and the attribution of outcomes to interventions.

The authors offer recommendations for strengthening Sida's anti-corruption policies, including leveraging policy expertise, integrating anti-corruption objectives into all aspects of development cooperation, and prioritizing anti-corruption as a fundamental perspective. They moreover argue for a sustained commitment to

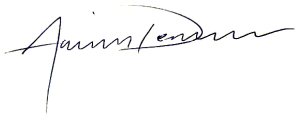
combatting corruption as a critical obstacle to development as Swedish aid undergoes reorganization.

We hope that this report will find its audience among Sida, the Swedish Ministry for Foreign Affairs, and embassies, as well as the broader international community of anti-corruption stakeholders, including governments, international organizations, civil society organizations, and others committed to anti-corruption. We also believe that the report can form a valuable resource for evaluators, researchers and students interested in international development anti-corruption.

The study has been conducted with support from a reference group chaired by Anders Pedersen, member of EBA.

The authors are solely responsible for the content of the report.

Stockholm, October 2024



Torbjörn Becker, EBA Chair

Anders Pedersen, EBA

Sammanfattning

Denna rapport presenterar den första systematiska utvärderingen av Sidas insatser för att motverka korruption som utvecklingshinder i partnerländer. Sedan början på 2000-talet har Sida genomgått en omfattande förändring i sitt förhållningssätt till korruption då man börjat fokusera på korruption som ett utvecklingshinder i partnerländerna. Detta nya "utvecklingsperspektiv" löper parallellt med det befintliga "riskperspektivet", som syftar till att skydda svenska biståndsmedel från korruption.

Denna utvärdering av Sidas arbete med att minska korruptionen i partnerländerna tar avstamp i Sidas ökade fokus på korruption som utvecklingshinder. Även om komplexa sociala och politiska problem såsom korruption i mångt och mycket trotsar enkla lösningar så är vår utgångspunkt att antikorruptionspolicy som bygger på aktuell kunskap ökar chanserna att bidra till minskad korruption. Utöver en sådan samklang mellan policy och kunskap vilar en framgångsrik kamp mot korruptionen för Sidas del på alla de tjänstemän och samarbetspartners som verkar i partnerländerna, och som ofta har ett betydande handlingsutrymme. Om utsänd personal följer den övergripande policyn och samtidigt ser till att denna anpassas till den lokala kontexten och rådande ekonomiska, sociala och politiska förutsättningar så kommer Sida ha en större chans att motverka korruptionen. Utvärderingen vilar således på antagandet att Sidas möjligheter att faktiskt bidra till minskad korruption i partnerländerna beror på graden av kunskap som finns gällande effektiv korruptionsbekämpning och på personalens förmåga att omsätta denna kunskap i praktik.

Rapporten ställer två huvudsakliga frågor för att dra slutsatser om Sidas förutsättningar att minska korruption i partnerländer:

- Är Sidas övergripande angreppssätt för att minska korruption i partnerländerna i linje med den samlade kunskapen om hur korruption bäst kan bekämpas?

- Är Sidas arbete för att minska korruptionen i specifika partnerländer förenligt med Sidas övergripande policy och förändringsteori och anpassat efter landkontexterna?

Utvärderingen består av tre huvudkomponenter:

1. En litteraturöversikt som sammanställer den samlade kunskapen om hur korruption bäst bekämpas.
2. En omfattande analys av Sidas angreppssätt – policy, metoder, förändringsteorier, strukturer och organisation – för att motverka korruption som utvecklingshinder och av dess samstämmigheten med den samlade kunskapen om effektiv korruptionsbekämpning.
3. Fördjupade analyser av Sidas antikorruptionsarbete i partnerländer. Analysen baseras på fallstudier av arbetet och insatsportföljerna i tre olika samarbetsländer (Kenya, Serbien och Georgien) och bedömningar av relevans för och anpassning till den lokala kontexten samt samstämmighet med Sidas övergripande angreppssätt.

För att svara på dessa frågor använder vi oss av ett flertal olika metoder. Rapporten baseras dels på en omfattande litteratur-genomgång av den akademiska litteraturen på ämnet. Vi har utöver detta analyserat hundratals dokument, primärt från perioden 2016–2022, producerade av Sidas huvudkontor, utvecklings-samarbetesavdelningarna på Sveriges ambassader i partnerländer, samt Sveriges regering. Utöver detta baseras utvärderingen på insikterna från över hundra intervjuer som genomfördes år 2023, både med personal vid Sidas huvudkontor och i tre olika partnerländer – Kenya, Serbien och Georgien. Valet av länder grundades i ambitionen att fånga olika kontexter som Sida arbetar i, vilket ger en ökad möjlighet till generalisering. Utvärderingens resultat och slutsatser baseras även på en enkät riktad till de programansvariga vid utvecklingssamarbetesavdelningarna på Sveriges olika ambassader.

Utvärderingen bidrar med en stor mängd nya insikter kring Sidas möjligheter att minska korruptionen i partnerländerna. Dessa insikter bör vara av värde inte enbart för Sida, utan även för andra yrkesverksamma inom utvecklingssamarbete såväl i Sverige som utomlands, liksom för representanter för det civila samhället, forskare och universitetsstudenter inom fälten utvecklingssamarbete och korruption, samt för en bredare intresserad allmänhet.

Resultat från litteraturöversikten av den samlade kunskapen om hur korruption bäst kan motverkas

Denna del av rapporten syftar till att lägga grunden för utvärderingen genom en kartläggning och kritisk granskning av den akademiska litteraturen om korruption och korruptionsbekämpning. Fyra olika teoretiska ramverk lyfts fram som särskilt tongivande i diskussionen: principal-agent-teorin, collective action-teorin, development governance-teorin och det organisatoriska perspektivet. Denna del av rapporten beskriver också vad som kan förstås som ett paradigmskifte inom korruptionsforskningen – från en syn på korruption som ett individbaserat och avvikande beteende till en syn på korruption som ett collective action-problem och, på senare tid, ett djupt kontextberoende fenomen.

Sammanfattningsvis visar resultatet av kartläggningen att de fyra olika teoretiska perspektiven alla bidragit till ökad kunskap om korruption, och lyft fram ett antal olika strategier för att motverka den. Det finns därför ingen tydlig 'vinnare' i termer av empiriska belägg. Utifrån denna iakttagelse drar vi slutsatsen att ett kunskapsbaserat antikorruptionsarbete är ett arbete som på ett informerat och nyanserat sätt tar hänsyn till fördelarna och nackdelarna med respektive tillvägagångssätt. Vi drar vidare slutsatsen att ett relevant förhållningssätt till antikorruption tar hänsyn till den specifika kontexten, följer en tydlig logik eller förändringsteori, samt tar

hänsyn till hur antikorruptionsförändring kan ske genom endogena såväl som exogena faktorer.

Resultat från översikten och utvärderingen av Sidas antikorruptionsstrategi på organisations- och policynivå

Denna del av rapporten presenterar en analys av huruvida Sidas antikorruptionsstrategi (policy) är relevant i relation till den samlade kunskapsbasen. Analysen visar att Sidas antikorruptionsstrategi baseras på alla fyra teoretiska ramverk beskrivna i litteratur-översikten.

Sidas arbete tar sin utgångspunkt i förståelsen av korruption som ett utvecklingshinder och som ett system som genomsyrar alla delar av samhället. Sidas ansats grundar sig vidare på en förståelse av korruption som ett problem som bäst hanteras genom indirekta, kontextspecifika och förebyggande åtgärder, och genom att systematiskt integrera antikorruption i Sidas alla utvecklingsinsatser.

Analysen avslöjar dock att insikterna som härrör från collective action-teorin, development governance-teorin, samt det organisatoriska perspektivet inte är fullt lika tydliga och integrerade som insikterna som härrör från principal-agent-teorin. Utöver detta finns det även en viss otydlighet när det gäller de exakta vägarna genom vilka de förespråkade åtgärderna, särskilt indirekta strategiska interventioner och åtgärder för systematisk integrering, förväntas leda till minskad korruption. Detta utgör en risk för Sidas arbete vad gäller potentialen att faktiskt motverka korruptionen i partnerländerna.

När det gäller Sidas ambition att systematiskt integrera korruption som utvecklingshinder i alla sina strategier avslöjar analysen att även om fokuset på korruption som ett utvecklingshinder har ökat över tid så varierar graden och karaktären av integrationen av detta perspektiv avsevärt mellan de olika strategierna.

Resultat från den samlade översikten och utvärderingen av implementeringen av Sidas antikorruptionsstrategi i partnerländer

Resultaten av enkätundersökningen med programansvariga i partnerländer visar på deras aktiva och informerade engagemang i antikorruptionsarbetet. Arbetet i partnerländerna är överlag i linje med Sidas policy och anpassat till den lokala kontexten. Undersökningen identifierar dock också förbättringsmöjligheter, inklusive behov av vidareutbildning och bättre utnyttjande av Sidas antikorruptionsinfrastruktur och helpdeskresurser.

Fallstudierna av Kenya, Serbien och Georgien nyanserar många av resultaten från enkätundersökningen. De visar på en djup förståelse hos programansvariga för korruptionen i den lokala kontexten och dess betydelse för utveckling. De visar dock även på vissa brister i kunskaper om Sidas arbetssätt, användningen av den befintliga antikorruptionsinfrastrukturen och nivån på den interna dialogen. Antikorruption är inte den högsta prioriteten i deras dagliga arbete, vilket troligen avspeglar det faktum att antikorruption inte formellt sett är ett av Sidas integrerade perspektiv.

Landstudierna visar också att programansvariga saknar en tydlig bild av de förändringsteorier som ligger till grund för insatserna på landnivå. Denna brist har betydande konsekvenser för möjligheten att utvärdera Sidas program. Utan en sammanhängande förändrings-teori försvåras möjlighet att förstå om eller hur befintliga insatser faktiskt har lett till förändring. Utvärdering och uppföljning försvagas därmed eftersom det försvårar möjligheten att spåra förändring och identifiera problemen i de fall då bidrag inte ledde till önskad effekt. Detta förvårar vidare systematiskt lärande om effektiva antikorruptionsstrategier. Otydligheten kring de underliggande förändringsteorierna som antikorruptionsarbetet vilar på är en stor

utmaning för effektiviteten i Sidas antikorruptionsarbete. Att ta itu med dessa utmaningar är väsentligt för att fullt ut förverkliga potentialen i strategier för att minska korruptionen i partnerländerna.

Vid bedömningen av förutsättningarna för Sidas arbete att bidra till minskad korruption i partnerländer är det nödvändigt att utgå från en realistisk och ödmjukt ansats. Att motverka korruption där den är utbredd och systemisk är en enorm utmaning. Detta beror på att institutionaliserad korruption är ett extremt motståndskraftigt och anpassningsbart system som skickligt hittar sätt att kringgå alla försök att motverka den. Mot denna bakgrund är det av störst vikt att vara medveten om att någon särskild antikorruptionsinsats från en enskild organisation, inklusive Sida, inte bör förväntas leda till en omedelbar och revolutionerande förändring av den övergripande korruptionsnivån.

I denna rapport har vi utvärderat Sidas antikorruptionsarbete utifrån en bedömning av relevans i relation till den samlade kunskapsbasen och till specifika landkontexter samt utifrån den interna koherensen i Sidas arbete. En tydlig anpassning till den samlade kunskapen och en hög nivå av koherens i Sidas arbete indikerar stor potential att faktiskt bidra till en minskning av korruptionen i partnerländerna. Genom likriktning och konsekvens i ansatsen och utförandet har Sida en chans att bygga en effektiv institutionell grund för antikorruption, inspirera andra givare, samt bidra till att inspirera till kollektivt handlande, vilket är nödvändigt för att stödja anti-korruptionsarbetet i ett land.

Vår huvudsakliga slutsats är att Sidas arbetssätt tydligt bygger på den samlade kunskapen om korruption, även om vissa luckor fortfarande kvarstår. Sida har gjort betydande framsteg när det gäller integrering av antikorruption som en del av svenskt internationellt biståndsarbete på policynivå. Programansvariga och partnerorganisationer vittnar om betydelsen av Sidas nya perspektiv, även om utmaningar kvarstår med att integrera den i en situation som kännetecknas av en hög arbetsbelastning och ett flertal styrsignaler och prioriterade områden.

Sida har dock ett arbete framför sig för att omsätta sitt utvecklingsperspektiv i praktiken. Djupgående fallstudier visar att implementeringen av antikorruption på landnivån ofta möts av motstånd på grund av en begränsad förståelse av förändringsteorier, men även på grund av en uppfattad brist på prioritering av antikorruption jämfört med andra prioriterade områden och perspektiv, såsom fattigdom, konflikt och miljö och klimat.

Rekommendationer

Korruption utgör ett stort hinder för hållbar utveckling inom alla områden. Mot bakgrund av detta och slutsatserna ovan är vår rekommendation att Sida trappar upp sitt redan lovvärda arbete ytterligare för att motverka korruption som ett hinder för utveckling genom att:

- Stärka policy: Uppdatera och förfina policyn för att integrera relevant kunskap från den senaste forskningen för att förbättra utformningen och effektiviteten av antikorruptionsarbetet;
- Utnyttja policyexpertis: Använd Sidas policyexpertis för att stödja landprogram i att utforma skräddarsydda antikorruptions-strategier och -interventioner;
- Integrera antikorruption: Inkorporera antikorruptionsmål i alla delar av svenska strategier för internationellt utvecklings-samarbete för att säkerställa ett enhetligt och heltäckande synsätt;
- Prioritera antikorruptionsarbete: Uttala antikorruption som ett officiellt perspektiv på internationellt utvecklingssamarbete för att motverka nedprioriteringen av antikorruptionsarbetet bland personal och för att mildra riskperspektivets överordnade ställning.

Dessa rekommendationer är av särskild vikt i en tid av betydande omprioritering och omorganisation i det svenska biståndet (Ministry for Foreign Affairs, 2023). Korruption som ett hinder för utveckling

figurerar i den nya strategin men inte som ett prioriterat område. Vår utvärdering uppmanar den svenska regeringen att bygga vidare på och utöka Sidas unika kompetens som ett föredöme i anti-korruptionsarbetet inom det internationella biståndssamfundet. Sidas antikorruptionsarbete har bidragit till att förhindra utnyttjandet av makt och förtroende för otillbörlig vinning.

Att nedprioritera Sidas antikorruptionsinsatser innebär en betydande risk för att korruptionen utvecklas i en riktning som innebär att den blir ännu svårare att bekämpa. Detta skulle signalera en reträtt för dem som gynnas av korruption och undergräva Sidas mål att förbättra villkoren för människor som lever i fattigdom och förtryck.

Summary

This report delivers the first systematic assessment of Sida's efforts to reduce corruption as a development obstacle in partner countries. Since the early 2000s, Sida has undergone a significant transformation in its approach to combating corruption. Recognizing corruption as a critical impediment to development, Sida has shifted its strategy from solely safeguarding Swedish funds assigned for international development cooperation (the "risk perspective") to tackling corruption as a fundamental obstacle to development itself in partner countries (the "development perspective").

Against this backdrop, this report undertook the task of evaluating Sida's efforts to contribute to reducing corruption in partner countries. We recognize that complex social problems like corruption defy simple policy solutions. However, a policy grounded in the current knowledge of what works in anti-corruption and why stands a better chance of success. Furthermore, achieving development cooperation policy goals hinges on the implementation efforts of Sida staff on the ground, who possess considerable discretion in interpreting and applying these policies. If Sida staff at embassies in partner countries comply with the main provisions of the anti-corruption approach and also support interventions that are sensitive to the economic, social, political economy, and capacity conditions in which they are implemented, the anti-corruption efforts are more likely to succeed in reducing corruption. Therefore, the potential of Sida's anti-corruption approach to reduce corruption in partner countries is higher when the core policy provisions are in line with the accumulated knowledge on effective anti-corruption and implemented effectively by the personnel operating in the field.

To draw conclusions about Sida's potential to reduce corruption in partner countries, the evaluation addresses two main questions:

- Is Sida's overall approach – policies, theories of change, structures, and organization – to reducing corruption in partner countries relevant in relation to the accumulated knowledge on how anti-corruption change occurs?
- Are Sida's on-the-ground efforts to reduce corruption in partner countries consistent with the tenets of Sida's policy and organizational approaches, and relevant to the contextual circumstances of partner countries?

The evaluation consists of three main components:

1. A literature review summarizing the accumulated knowledge about how anti-corruption change occurs.
2. A comprehensive analysis of Sida's approach to tackling corruption as a development obstacle and its coherence with current knowledge of what works in anti-corruption.
3. In-depth analyses of Sida's anti-corruption work in partner countries. The analyses are based on case studies of the work and portfolios of interventions in three partner countries (Kenya, Serbia, and Georgia) and assessments of the relevance for and adjustment to the local context and coherence with Sida's overall approach.

To address these questions, the evaluation employs a mixed-methods approach. It draws upon a comprehensive review of academic scholarship on anti-corruption change, as well as an analysis of hundreds of documents sourced from Sida's headquarters, development cooperation sections at embassies, and the Swedish government, primary for the period 2016 to 2022. The evaluation also includes an original online survey with program officers working at the development cooperation sections of Swedish embassies. In addition, the evaluation incorporates insights gathered from over a hundred interviews conducted in 2023 with relevant personnel at

Sida's headquarters and in three partner countries: Kenya, Serbia, and Georgia. These countries were selected in order to capture the divergent contexts in which Sida works, which allowed us to speak to the overall breadth of Sida's anti-corruption efforts as well as to their relevance to specific contexts.

Our analysis presents novel insights regarding the potential of Sida's anti-corruption efforts to contribute to reducing corruption in partner countries. These insights should be of use and value not only to Sida but also for other development cooperation professionals in Sweden and beyond, as well as for the wider global community of anti-corruption stakeholders, researchers and university students interested in development cooperation and corruption, and for an interested broader public.

Results from the literature review of the state-of-the-art knowledge on anti-corruption

This part of the report maps and critically reviews the existing scholarship on the nature of corruption and theories of anti-corruption change, establishing the foundation for the evaluation. It identifies four approaches that dominate scholarly discussion: principal-agent theory, collective action theory, the developmental governance (sectoral) approach, and the organizational approach. It also discusses a paradigmatic shift in corruption research, i.e. the transition from viewing corruption as individually deviant behavior to recognizing it as a collective action problem and, more recently, as a deeply context-dependent phenomenon.

While these approaches have all increased our knowledge about the nature of corruption and the potential means to counter it, there is no clear frontrunner in terms of empirical evidence of effectiveness in countering corruption. Therefore, the literature review concludes that a relevant approach to anti-corruption work is one that rests on

an understanding of the nature of corruption in the specific context, and which presents a logical, and sufficiently nuanced, narrative of how anti-corruption change may occur through both endogenous and exogenous actions.

Results from the comprehensive overview and evaluation of Sida's anti-corruption approach at the organizational and policy levels

In terms of relevance to the existing knowledge base, Sida's anti-corruption approach (policy) leverages all four pillars of the current knowledge base. Sida conceptualizes corruption as a social practice that permeates all spheres of society and as a development obstacle that is best addressed through indirect, context-specific, and preventative measures, and by systematically integrating anti-corruption into all of Sida's development efforts.

However, a degree of misalignment is detected in relation to the application of collective action theory and the insights from the developmental governance and organizational literatures. Additionally, there remains a degree of ambiguity regarding the precise pathways through which the advocated measures, particularly indirect, strategic interventions, and measures of systematic integration, engender anti-corruption transformation. This misalignment and ambiguity pose a risk to the policy's potential to contribute to reducing corruption in partner countries.

Regarding the integration of anti-corruption into Swedish international development cooperation at the policy level, the analysis reveals that, while there has certainly been an increase in focus on corruption as a development obstacle over time, the degree of the integration of this perspective varies significantly across the different strategies.

Results from the overview and in-depth evaluation of the implementation of Sida's anti-corruption approach in partner countries

The results of the large-N survey with Sida program officers in partner countries revealed their active and informed engagement in anti-corruption efforts. The work is generally aligned with Sida's policy and adapted to local contexts. The survey, however, also identifies areas for improvement, including the need for further training and better utilization of Sida's anti-corruption infrastructure and help desk resources.

The three in-depth case studies of the anti-corruption efforts in Kenya, Serbia, and Georgia add nuance to the large-N survey results. They revealed that while program officers have a deep understand of local corruption contexts and acknowledge its critical importance, there are notable gaps in their awareness of Sida's approach, their use of the existing anti-corruption infrastructure, and the degree of internal dialogue. Anti-corruption is not a top priority in their daily work, likely due to the fact that it lacks official status as a fundamental perspective at Sida. Of even greater concern is the lack of clarity around the theories of change underpinning supported contributions. This hinders evaluation efforts, as it prevents attribution of change to interventions and impedes the systematic learning of effective (and ineffective) anti-corruption strategies in specific contexts. The lack of clarity regarding the underlying theories of change that drive the anti-corruption outcomes of their projects and programs is a major challenge for the potential of Sida's anti-corruption efforts. Addressing these challenges is essential to fully realizing the potential of strategies to reduce corruption in partner countries.

When assessing the potential of Sida's efforts to contribute to reducing corruption in partner countries, it is crucial to maintain a realistic and humble perspective. Fighting corruption where it is widespread and systemic is a colossal challenge. This is because institutionalized corruption is an example of an extremely resilient and adaptive system that adeptly navigates and circumvents any attempts to counter it. Given this, it is of the greatest importance to acknowledge that any particular effort by any specific organization, including Sida, to counter corruption should not be expected to lead to an immediate or revolutionary change in overall corruption levels in a country.

We assessed Sida's anti-corruption efforts based on their relevance in relation to the current knowledge base and the consistency between Sida's anti-corruption policies and their implementation in partner countries. The strong alignment of the anti-corruption approach with accumulated knowledge coupled with the consistency between Sida's policy and practice indicate that Swedish efforts have significant potential to reduce corruption in partner countries. This implies that Sida has a solid institutional foundation and is well-positioned to inspire other donors and foster the collective action necessary to combat corruption effectively.

Our main conclusion is that Sida's approach effectively incorporates accumulated knowledge on anti-corruption, despite some gaps. Significant progress has been made in integrating anti-corruption as a development obstacle into Swedish international development policy. While program officers and partner organizations recognize the importance of Sida's work, they face challenges in incorporating anti-corruption concerns into their demanding workloads, not the least due to multiple steering signals and thematic priorities, and in adapting these to the complex contexts in partner countries.

In conclusion, Sida still has work to do, particularly in translating its development perspective into practice. The in-depth case studies show that country-level implementation of anti-corruption approaches often encounters resistance due to a limited

understanding of theories of change and a perceived lack of prioritization of anti-corruption efforts compared to other issue areas, such as poverty, conflict, and climate.

Recommendations

Corruption constitutes a major hindrance to sustainable development across all sectors. In light of this and the findings presented above, our recommendation is that Sida intensifies its already commendable efforts to combat corruption as an obstacle to development by focusing on the following areas:

1. Strengthen policy: update and refine the policy to incorporate relevant knowledge and the latest insights, enhancing the design and effectiveness of anti-corruption interventions.
2. Leverage policy expertise: deploy Sida's policy expertise to support country offices in crafting tailored anti-corruption strategies and interventions.
3. Integrate anti-corruption: incorporate anti-corruption objectives into all aspects of Swedish international development cooperation strategies to ensure a unified and comprehensive approach.
4. Prioritize anti-corruption efforts: officially designate anti-corruption as a fundamental perspective in Swedish development cooperation to counteract the deprioritization of anti-corruption efforts and mitigate the domination of the risk perspective.

These recommendations are especially important during this period of substantial reorganization of Swedish aid (Ministry for Foreign Affairs, 2023). Although the goal of reducing corruption features in a new strategic direction for Swedish development cooperation, it is not one of its priorities. Our evaluation calls the Swedish government to build on and expand Sida's unique expertise as a paragon of anti-corruption efforts within the international development cooperation

community. Sida's anti-corruption efforts have helped prevent the exploitation of public authority and trust for personal gain.

Scaling back Sida's anti-corruption efforts risks allowing the modus operandi of corruption to evolve beyond our comprehension, hindering effective countermeasures. This would signal a retreat to those benefiting from corruption and undermine Sida's goal of improving conditions for people living in poverty and oppression.

1 Introduction

Corruption stands as a formidable obstacle to development, eroding the very foundations upon which a thriving society is built – human rights, peace, democracy, economic growth, health, and other human well-being outcomes (Dimant & Tosato, 2018; Gründler & Potrafke, 2019; Holmberg et al., 2009; Rose-Ackerman & Palifka, 2016; Rothstein, 2011b). The explicit link between corruption and peaceful, prosperous, and inclusive societies underscores the pivotal importance of anti-corruption efforts in advancing development objectives. This recognition has propelled anti-corruption efforts to the forefront of the global development agenda, as evidenced by the inclusion of "Substantially reduce corruption and bribery in all their forms" into the Global Sustainable Development Goals (SDG 16.5).

The commitment to combat corruption in partner countries has long been on the agenda of the Swedish International Development Cooperation Agency (Sida), dating back to the early 2000s, well before the adoption of the SDGs in 2015. Over the last two decades, these efforts have undergone significant evolution in both scope and character. The expansion in scope is evident in the increased allocation of Swedish funds to anti-corruption organizations and institutions (OECD DAC code 15113). Disbursements to this category of aid surged from zero SEK in 2003 to 138 MSEK in 2023 (Sida, 2024). It is worth noting that this figure represents only a portion of the financial resources dedicated to anti-corruption. In practice, funds allocated to anti-corruption work extend beyond this code, especially after 2016, encompassing various indirect strategic contributions and measures under the systematic integration of anti-corruption efforts. This reflects a more substantial investment in combating corruption as a developmental obstacle, despite still representing only a small fraction of total Swedish development cooperation funds.

Since the adoption of the SDGs in 2015, Sida has taken up the mission of countering corruption as an obstacle to development in partner countries (hereafter referred to as "the development perspective") with renewed vigor. A pivotal shift occurred in 2016 when Sida openly acknowledged "the negative consequence of corruption on development" and instructed all staff to take this new development perspective on corruption into account in their work and to integrate anti-corruption into all aspects of Sida's operations (Sida, 2016, 1). The development perspective was intended to complement rather than replace the existing risk perspective, which primarily aimed at safeguarding Swedish aid funds from corruption.

The development perspective emerged from the significant and intellectually influential work by Molly Lien, who in 2011 was appointed as Sida's first designated anti-corruption policy specialist, and James Donovan. Lien and Donovan started a working group focused on anti-corruption issues. This group collaborated with several leading scholars in the field, ultimately driving Sida's adoption of the development perspective. This perspective was first introduced in Sida's official documents in the 2013 "Guidance on Addressing Corruption in Strategies". In 2016, Sida's Unit for Thematic Support (TEMA), which had included anti-corruption specialists since 2014, produced a brief guidance document on corruption as a development obstacle (Lien, 2024).

In 2016, the Anti-Corruption Cluster, a dedicated organizational unit at Sida's headquarters, featuring three full-time senior policy officer positions and tasked with the development and oversight of the anti-corruption efforts, was established. In 2017, the development perspective was integrated into the vulnerability analysis of Sida's contributions. This was followed by the adoption of various operational documents, such as the Guidance for Sida's Work with Corruption as a Development Obstacle (Sida, 2021) and the Action Plans for Preventing and Mitigating Corruption (Sida, 2020). In addition, new rules for managing contributions were formulated, including the introduction of the computer-based contributions

management system TRAC, featuring a dedicated anti-corruption assessment section with help text.

In light of these developments, the assessment of Sida's potential to contribute to reducing corruption in partner countries emerged as a matter of significant importance. This report presents the findings of a study commissioned by the Expert Group for Aid Studies (EBA), which evaluates Sida's efforts to reduce corruption in partner countries. The report maps Sida's anti-corruption approach, evaluates the extent to which this approach is in line with current knowledge of what works in anti-corruption, provides a comprehensive overview of the implementation of the approach by Swedish development cooperation staff in partner countries, and assesses the coherence and relevance of their anti-corruption efforts. Thus, it presents the first systematic analysis of Sida's anti-corruption efforts in partner countries and establishes a benchmark for future evaluations.

The study employs a mixed-methods design, combining an extensive overview and analysis of Sida's anti-corruption approach with two complementary empirical investigations (a large-N survey and case studies) focusing on Sida's anti-corruption efforts on the ground. It draws upon a comprehensive review of academic scholarship on anti-corruption change and analyzes hundreds of pertinent documents sourced from Sida's headquarters, development cooperation sections at embassies, and the Swedish government. These documents span the period 2016–2022. Additionally, the study incorporates insights obtained from over a hundred interviews conducted with relevant personnel at Sida's headquarters and in three partner countries in 2023. Furthermore, it includes an original online survey of program officers (POs) working in the development cooperation sections of embassies. Through these rigorous methods, the study has generated novel insights into the potential of Sida's anti-corruption efforts to contribute to reducing corruption in partner countries.

This report primarily targets international development cooperation professionals in Sweden and globally. The report is also expected to be of interest to the wider global community of anti-corruption stakeholders, including policymakers in Sweden and abroad, international and supranational government organizations, international and local civil society organizations, and other individuals and organizations committed to combating corruption and advancing sustainable development. Furthermore, it serves as a valuable resource for researchers and university students interested in the broader field of international development cooperation and, specifically, in anti-corruption.

1.1 Aim and research design

The evaluation's overarching question is "What is the potential of Sida's efforts to contribute to reducing corruption in partner countries?" We set out to assess this potential by, first, examining the alignment of the conceptual and theoretical underpinnings of Sida's anti-corruption approach and policy with the accumulated knowledge about anti-corruption change. A clear alignment with the current knowledge would indicate a high potential for Sida's approach to contribute to reducing corruption in partner countries, all other things being equal. Second, this potential will be revealed through an assessment of Sida's anti-corruption efforts on the ground from the point of view of consistency with the tenets of anti-corruption policy and its relevance to the contextual circumstances of partner countries. High adherence to the policy by personnel from the development cooperation sections at embassies and a high degree of relevance of supported contributions to existing contextual preconditions and priorities would indicate a high potential for Sida's approach to contributing to reducing corruption in partner countries, all other things being equal.

In order to address this overarching objective, the study relies on a multifaceted research design, including the following components:

- **A literature review**: we mapped and critically reviewed the existing scholarship on the nature of corruption and theories of anti-corruption change.
- **A policy mapping**: we mapped the conceptual and theoretical underpinnings of Sida's anti-corruption approach (policy), focusing on the development perspective.
- **A policy assessment**: based on an evaluation of the alignment of the anti-corruption policy with the current knowledge base and an assessment of the extent of the integration of an anti-corruption perspective into the different strategies for Swedish development cooperation, we assessed the potential of Sida's policy to contribute to reduced corruption in partner countries.
- **An organizational mapping**: we mapped the organization of Sida's anti-corruption work, including its anti-corruption infrastructure and operational documents and tools.
- **An original survey**: we conducted an original survey with staff at the development cooperation sections at Swedish embassies in partner countries to glean a broad picture of the implementation of the provisions of the anti-corruption policy, including difficulties faced by staff in the implementation of the anti-corruption policy.
- **Case studies**: we conducted case studies in three partner countries (Kenya, Serbia, and Georgia) to attain an additional angle of the implementation of the anti-corruption approach on the ground and to understand the relevance and coherence of the practical anti-corruption efforts.

1.2 Scope and delimitations

Given the expansive and multifaceted nature of Sida's efforts to combat corruption in partner countries, it becomes imperative to define the scope and boundaries of our study.

First, there are inherent and persistent challenges involved in measuring both corruption (Andersson & Heywood, 2009; Charron et al., 2014) and aid effectiveness in general (Doucouliagos & Paldam, 2009; Tierney et al., 2011), as well as the effects of aid on corruption (Charron, 2011). Therefore, the focus of this study does not lie on the direct and immediate effects of Sida's anti-corruption efforts on corruption levels in countries where Sweden conducts development cooperation. Rather, the study centers on the potential of Sida's anti-corruption efforts to contribute to reducing corruption. Our approach to assessing this potential is based on the alignment of Sida's anti-corruption policy with the current knowledge base and the alignment of the anti-corruption efforts on the ground adhere to this policy and to contextual conditions. We posit that when Sida's anti-corruption policy is well-aligned with the state-of-the-art in anti-corruption thinking and effectively implemented by the assigned personnel, the potential for reducing corruption is higher, all other factors being equal.

Second, Sida's anti-corruption efforts encompass both policy work and the oversight of nearly four hundred contributions containing anti-corruption components. However, what this study refers to as "Sida's anti-corruption policy" differs from a policy in the conventional sense as understood within the Swedish political community (Towns et al., 2023, 32–33). Formally, policies – comprising a set of goals and principles to guide action in a specific area – are the domain of elected state officials (politicians). State organizations, staffed by non-elected officials (bureaucrats), may concretize and operationalize a policy, but they do not establish broad goals and principles. The government's goal of reducing corruption in partner countries, given its status as a significant

obstacle to development, was articulated in its 2016 directive to Sida (Sida, 2016). Sida has subsequently concretized and operationalized this government directive through various documents and tools. Collectively, these documents constitute Sida's anti-corruption approach, which encompasses both conceptual and operational elements. At the conceptual level, Sida's approach reflects beliefs about the nature of corruption and theories of anti-corruption change. For the purposes of this study, we refer to these conceptual and theoretical underpinnings as Sida's anti-corruption policy. The operational framework of the approach encompasses various documents and tools designed to assist implementing personnel in partner countries in translating principles into practice and achieving policy goals.

Third, although our study examines whether such anti-corruption efforts are aligned with the objectives of the Swedish government's relevant development cooperation strategies and contextual conditions of the partner countries, the main emphasis is on how Sida's anti-corruption policy is put into practice (implementation) by Swedish development cooperation staff in partner countries (referred to as "personnel on the ground").

Fourth, and relatedly, the study focuses on Sida's anti-corruption efforts in countries where Sweden engages in development cooperation (bilateral relations). The important anti-corruption work that Sida conducts in global and regional fora was beyond the scope of this report.

Fifth, our primary sources of information were the documents and testimonies supplied by professionals involved in Swedish international development cooperation. Although we cross-referenced many of these accounts with external sources, such as scholars, journalists, politicians and other individuals with expertise in anti-corruption in partner countries, it is important to note that no objective measures are available to mitigate subjectivity. Therefore, readers are encouraged to bear this in mind while reviewing the report.

Sixth, the primary objective of the study is to offer a comprehensive overview of Sida's anti-corruption endeavors in partner countries, focusing on the broader landscape rather than delving into every minute detail. Consequently, certain aspects of Sida's anti-corruption efforts may not receive exhaustive coverage in the report. For instance, specific anti-corruption interventions, measures, or the operational methods of personnel in selected embassy case studies are not extensively detailed. Additionally, the report does not undertake a comparative analysis of Sida's anti-corruption efforts with those of other donors. Nevertheless, efforts were made to capture other major donors' perspectives and perceptions of the role and relevance of Swedish anti-corruption efforts (see Appendix B.4).

Finally, it is worth noting that this report is the outcome of many hundreds of hours of close reading of documents and engagement with individuals at Sida's headquarters, embassies, and in partner organizations.

2 The nature of corruption and anti-corruption change

This chapter provides a review of the current literature on anti-corruption change in order to delineate the parameters of the state-of-the-art. Its primary objective is to elucidate the prevailing perspectives on the nature of corruption and theories of anti-corruption change. Drawing on this knowledge base, the study will evaluate the conceptual and theoretical foundations of Sida's anti-corruption approach and, thereby, assess the potential of Sida's anti-corruption efforts to contribute to reducing corruption in partner countries.

The questions of how anti-corruption change occurs and how it can be sustained have been the subjects of extensive debate over the past decades. Since the mid-1990s, when James Wolfensohn, the president of the World Bank, labeled corruption as "a cancer" and "a major barrier to sound and equitable development" (Wolfensohn, 1996), anti-corruption measures have been at the center of numerous domestic reforms and bi/multilateral development cooperation programs. Despite these efforts, the outcomes of the global anti-corruption drive have been disappointingly unsatisfactory (Hanna et al., 2010; Johnston, 2005, 2012; Mungiu-Pippidi, 2015; Persson et al., 2013; Rothstein & Tannenberg, 2015). This has prompted several new waves of systematic thinking about effective pathways out of corruption (Heywood, 2017; Khan et al., 2020; Khan & Pallavi, 2022; Marquette & Peiffer, 2018; Persson et al., 2013). The aim of this chapter is to systematize and critically review the main theoretical approaches to anti-corruption change.

We identified and reviewed four theoretical frameworks regarding anti-corruption change, including their ontological positions on the nature of corruption and the key anti-corruption agent(s), their logical narratives of how certain interventions (stemming from broad theoretical propositions) bring about the desired change (theory of

change), and the accompanying empirical studie.[1] This section discusses each of the theoretical frameworks – principal-agent theory (PAT), corruption as collective action (CAP), developmental governance, and the organizational literature – one by one in separate subsections and concludes with a discussion on the state of the art of the literature on anti-corruption change and what it contributes to the development cooperation community.

Box 1: How is corruption defined?

The prevailing definition of corruption as "an individual act of abuse of public authority for private gain" derives from Joseph Nye's conception of corruption as "behavior which deviates from the formal duties of a public role because of private-regarding (personal, close family, private clique) pecuniary or status gains; or violates rules against the exercise of certain types of private-regarding influence" (Nye, 1967, p. 419). This "public office" definition of corruption, confining it to acts within public authority, has remained a dominant definition in the literature (Aidt, 2003; Jain, 2001; Mauro, 1995; Persson et al., 2013; Rose-Ackerman, 1978; Shleifer & Vishny, 1993; Treisman, 2000). While upheld for a long period of time by most international organizations, such as the World Bank, which defines corruption as "abuse of public office for private gain" (World Bank, 2020), major anti-corruption actors, such as the European Union, Transparency International, or The Swedish International Development Cooperation Agency (Sida), have broadened their definitions. They now characterize corruption as follows: "the abuse of entrusted power for private gain" (European Parliamentary Research Service, 2022), "the abuse of entrusted

[1] The review of empirical studies presented here is systematic, but it does not adhere to the guidelines of the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA). 96 papers published in online databases, such as Scopus, Google Scholar, Web of Science and Microsoft Academic, between 2010 and 2023 were initially retrieved. Additional relevant publications were retrieved through snowballing.

power or influence for personal or political gain" (USAID, 2022), and "an abuse of power, trust or position for improper gain" (Sida, 2021, 3). In essence, contemporary definitions recognize that corruption extends beyond the public sector to involve the private sphere. However, our review of the anti-corruption scholarship reveals that corruption is predominantly conceptualized as an act in which the power of public office is used to contravene the formal "rules of the game" and to create distributive outcomes different from those intended by the formal rules (Aidt, 2003; Robbins, 2000).

Definitions are important because they form the foundation of theories, which are the systematic explanatory frameworks of a group of facts or phenomena. For example, when corruption is conceptualized as an individual act and a deviation from the formal duties of a public office, the resulting explanations center around the atomistic cost-benefit calculus of individuals and the efficiency loss associated with the delegation of authority, as seen in principal-agent theory (PAT). Scholars who view corruption as a collective action problem (CAP) – a conflict between the preferences of individual members of society and the benefits of society as a whole – develop theories of anti-corruption change with a focus on altering individual expectations about the behavior of other members of society.

The latest literature on anti-corruption change refrains from generic definitions of corruption (Heywood, 2017; Khan & Pallavi, 2022), instead taking "different types and modalities of corruption" as their point of departure (Heywood, 2017, 21). This approach avoids taking a specific theoretical stance upfront, providing scholars with the flexibility to apply various explanatory narratives of anti-corruption change.

2.1 Principal-agent theory

Principal-agent theory (PAT) is a theoretical framework developed to address the so-called principal-agent (PA) problem – the conflict of interests between two individuals/entities in a situation where authority is delegated. In this situation, one party or entity (the principal) grants the power to make decisions or take actions on their behalf to another party or entity (the agent). The basic assumption of PAT is that of a misalignment of interests between the principal and the agent, hence there is always a risk of the agent making decisions or taking actions inconsistent with the interests of the principal. This risk is further amplified by the following two factors pertinent to the PA relationship: (1) the agent knows more than the principal (asymmetry of information) and (2) has a degree of freedom (discretion) to make decisions or take actions without consulting with the principal, based on their own knowledge and expertise. These two "built-in" properties of the PA relationship provide incentives for the agent to act on their own preferences instead of the interests of the principal. In order to reduce "agency loss", the principal has two primary strategies: *ex ante*, to hire the "right" agent – those whose interests are closest to those of the principal – or to provide incentives (monetary or otherwise) to the agent so that their preferences become aligned with those of the principal; and *ex post* to contrive mechanisms to monitor (and punish, if needed) the agent.

Historically, systematic analysis of corruption began with the application of PAT in the 1980s (Klitgaard, 1988; Rose-Ackerman, 1978), and until now, PAT has remained one of the main theoretical approaches to combating corruption. PAT-based approaches see corruption as a problem of delegation of authority (mostly as delegation from politicians to bureaucrats, but also from citizens to elected politicians) and attribute the root cause of corruption to the inherent difference of interests between the parties involved. This first-order risk of corruption is further amplified by asymmetry of information and agent discretion. Based on the premise that

individuals are self-interested, rational, and utility-maximizing, the theory emphasizes the possibility of influencing individual calculations (to engage in corruption or not) through the manipulation of incentives. Such an understanding of the nature of corruption informs anti-corruption measures. PAT-based anti-corruption measures aim to tweak the agent's calculations through incentives in such a way that (1) the interests of the agent are as close to those of the principal as possible, and (2) the agent refrains from acting on their "morally hazardous" preferences.[2]

In the wake of the "anti-corruption movement" by major international organizations in the mid-1990s (Charron, 2011), most anti-corruption efforts by donors have followed PAT's prescriptions (Gans-Morse et al., 2018; Johnson et al., 2012). In 2019, a systematic review of approaches to the control of corruption suggested that "global anti-corruption strategies are still dominated by a principal-agent model" (Prasad et al., 2019, 99). PAT-based anti-corruption interventions include, but are not limited to fostering transparency in government (including open government and open government data initiatives and laws on freedom of information and conflict of interests/financial disclosure); media support; the adoption of ICT tools in government (for example, in procurement); the strengthening of monitoring mechanisms, including strengthening the independence and capacity of the judiciary and audit institutions, and the support of civil society anti-corruption watchdogs; designing corruption-proof regulatory regimes; civil service reforms aimed at reducing bureaucratic discretion and improving remuneration; and improvements in the processes of corruption detection and punishment through, for instance, the establishment of independent anti-corruption agencies.

[2] The premise of misaligned interests implies that perfect alignment between the principal and the agent is unattainable. Consequently, one could not expect to fully eradicate corruption but merely to control it.

The empirical evidence base of PAT-based anti-corruption measures is large, yet the findings do not provide unequivocal support for this approach. Certain PAT-informed interventions, such as top-down monitoring (Di Tella & Schargrodsky, 2003; Gans-Morse et al., 2018; Honig et al., 2022; Mugellini et al., 2021; Olken, 2007) and credible enforcement of regulations (Fisman & Miguel, 2007; Olken, 2007) have shown a strong corruption-reducing effect. However, key PAT-derived anti-corruption measures, such as anti-corruption agencies (Gans-Morse et al., 2018; Persson et al., 2013; UK Department for International Development, 2015), higher wages (Di Tella & Schargrodsky, 2003; Gans-Morse et al., 2018; Meyer-Sahling et al., 2018), or increased government transparency (Bannister & Connolly, 2011; Bauhr & Grimes, 2014; Grandía et al., 2016; Gans-Morse et al., 2018; Johnston, 2020; Peiffer & Alvarez, 2016) do not consistently yield the anticipated outcomes.

For example, while a systematic review by Cucciniello et al. (2017) provides robust empirical support for the idea that government transparency diminishes corruption, an influential study by Bauhr & Grimes (2014) argues that increased transparency in highly corrupt societies may demobilize citizens rather than ignite them to demand accountability, and their empirical analysis supports this contention. Similarly, research on the effects of anti-corruption awareness campaigns – a staple component of many initiatives since the United Nations Convention Against Corruption in 2004 mandated governments to "raise public awareness regarding the existence, causes, gravity, and threat posed by corruption" (Article 13) – suggests that such endeavors frequently fail to dissuade citizens from engaging in bribery (Cheeseman & Peiffer, 2022; Köbis et al., 2022, 2015; Köbis et al., 2020).

Furthermore, one of the most robust empirical findings in the literature – that meritocratic recruitment to bureaucracy lowers corruption (Dahlström et al., 2012; Rauch & Evans, 2000; Schuster et al., 2020) – stands in direct opposition to the logic of PAT. Rather than aligning the interests of the principal and the agent, meritocratic

recruitment does the opposite: it desynchronizes bureaucratic and political careers. This divergence of career preferences between elected politicians and meritocratically recruited bureaucrats reduces the likelihood of bureaucrats becoming tools for the abuse of public authority by politicians (Dahlström & Lapuente, 2017; Miller, 2000; Nistotskaya & Cingolani, 2016).

Many PAT-informed anti-corruption initiatives remain in need of empirical evaluation. To illustrate, a systematic literature review by Gans-Morse et al. concludes that "too few studies have been conducted to draw conclusions about the effectiveness of bottom-up monitoring for reducing corruption" (2018: 177). Similarly, although the proliferation of open government and open government data initiatives in the 2010s has been strongly motivated by the PAT logic of reducing information asymmetry between government and public (Attard et al., 2015; Wirtz & Birkmeyer, 2015), the anti-corruption effect of these initiatives remains understudied empirically.

The underwhelming results of PAT-informed anti-corruption measures can be attributed, in part, to an assumption prevalent in early corruption scholarship (Klitgaard, 1988; Rose-Ackerman, 1978) that the principal's preferences naturally align with the public interest.[3] However, if the principal is not "principled" then PAT-based solutions aimed at remedying corruption by aligning the agent's preferences with those of the principal, and imposing rigorous control over the agent's actions, are unlikely be effective in reducing corruption (Aidt, 2003; Persson et al., 2013; Teorell, 2007).

Another implication of the "principled principal" assumption is the implicit conceptualization of corrupt behavior as an anomaly and non-corruption as the norm. Consequently, the PAT-informed anti-corruption strategy is to "restore" societal integrity. However, with the acknowledgment that corruption is a rule of the game in many

[3] It's worth noting that the assumption of the principal being "principled" – i.e., inherently bearing the public interest – is not a fundamental tenet of PAT.

societies (Mungiu-Pippidi, 2006), it became evident that in such situations, a non-corrupt equilibrium cannot be restored; rather, it must be built from the ground (Mungiu-Pippidi, 2019). In other words, where corruption is not an isolated event but a phenomenon that permeates a social system as a whole (systematic corruption), PAT-based measures aimed at "controlling corruption" will not suffice. Where corruption is systematic, anti-corruption stakeholders are faced with a much larger goal – uprooting the corruption equilibrium.

In summary:

- PAT is the most established approach for the design of anti-corruption measures.
- PAT is based on the premises of individual rationality (atomistic and socially non-contingent risk-return calculus), misalignment of interests, and information asymmetry between the principal and agent.
- The theoretical extension of PAT to government corruption (Klitgaard, 1988; Rose-Ackerman, 1978) is based on the assumption of principled principals (that the principal's preferences are congruent with the preferences of the public at large) and corrupt behavior as the exception not the norm.
- Where corruption is a social norm, there are no "principled" principals who will enforce anti-corruption norms and, therefore, PAT-based measures are likely to be inadequate to make a meaningful change.
- There is a large empirical literature on PAT-based anti-corruption measures, but their effectiveness is not unequivocally supported by empirical evidence.

2.2 Collective action theory

The conceptualization of corruption as an entrenched social (informal) institution (also referred to as standard operating procedure and equilibrium) (Della Porta & Vannucci, 1999; Johnston, 2005; Mungiu-Pippidi, 2015; Persson et al., 2013; Robbins, 2000; Rothstein, 2011a; Teorell, 2007), rather than the occasional or accidental deviant behavior of individuals, afforded a new theoretical lens to the problem of corruption.

A key theoretical insight comes from the scholarship on the problem of collective action (CAP) (Jagers et al., 2019; Olson, 1965; Ostrom, 1998). This body of work suggests that even when it is in the best interest of all individuals within a group or groups to achieve a common goal, individuals often fail to exert sufficient effort toward that shared objective. The collective benefit thus remains unrealized. This is especially the case with so-called public goods, which are goods whose consumption cannot be restricted (nonexcludable). Because individuals who do not contribute to the production of public goods (referred to as "free-riders") cannot be excluded from benefiting from them, people are less motivated to contribute to the common good as they anticipate that others will free-ride. Essentially, if non-contribution is the expected behavior of others, the rational strategy for individuals is not to contribute, thus impeding the realization of the collective benefit.[4]

Based on a number of studies that laid the groundwork for conceptualizing corruption as a collective action problem (Bardhan, 1997; Della Porta & Vannucci, 1999; Rothstein, 2011a; Teorell, 2007), Persson et al. (2013) systematically applied CAP insights to the phenomenon of corruption. They argue that given the

[4] Within the CAP theoretical framework rationality is understood as context-bound. This means that individual decisions, such as whether to engage in corrupt behavior, are heavily influenced by shared expectations regarding the likely actions of others. This interdependence and societal contingency shape a risk-return calculus.

harmful effect of corruption on the human condition, everyone stands to benefit from a corruption-free society. Achieving this collective benefit necessitates all individuals to refrain from engaging in corruption. However, because the expectation that "others" will engage in corruption is widespread, particularly in societies where the distribution of public goods follows a particularistic pattern (Mungiu-Pippidi, 2006), individuals have no incentives to abstain.

Moreover, when corruption becomes pervasive, abstaining from it exacts a high cost (Della Porta & Vannucci, 1999). Even if everyone prefers honest conduct, being the sole "complier" represents the worst possible outcome for any individual. For instance, if person X chooses not to pay a bribe to bypass a long queue for a publicly funded medical service while others engage in bribery, X receives neither the service nor the benefit of a corruption-free society. Consequently, in the face of widespread expectations that "others" will engage in corruption, individuals find themselves trapped in a self-reinforcing equilibrium where corruption is both materially and socially rewarded (Persson et al., 2013, 450, 457). Such expectations are widespread even in societies with relatively low corruption levels. For instance, according to a 2019 survey conducted by the Social Science Research Institute at the University of Iceland, 76% of respondents believed that others had used personal or political connections to improve their chances of receiving social housing (Mitchell, 2020: 38). Similarly, a 2022 Eurobarometer survey found that 68% of EU citizens perceive corruption to be rampant in their country (European Parliamentary Research Service, 2022: i).

The CAP-based understanding of the nature of corruption has had significant implications for how anti-corruption change is conceived. First, it suggests that there is no "natural" anti-corruption stakeholder (such as the principal in PAT), who would become the focal point of concerted anti-corruption reform (Persson et al., 2013). Second, the CAP-based conceptualization of corruption also points to the immense challenge of changing expectations about the behavior of "others", that is social norms or "standard operating procedures"

(Rothstein, 2011a). Third, corruption constitutes a large-scale CAP, which means that effective anti-corruption solutions are particularly constrained by a large number of actors, the large spatial and temporal distances between them, and complexity (Jagers et al., 2019).

The literature on collective action underscores that solving large-scale collective action problems requires two conditions to be met: the agreement of all parties to solve the CAP and a set of measures to sustain this agreement (Jagers et al., 2019). In the case of corruption, the first condition would mean a widespread commitment at both societal and leadership levels to ending corruption. Regarding the second condition, the literature identifies at least eleven such facilitators, including measures that monitor individual behavior and punish non-cooperators – credible enforcement of collective agreements (D'Arcy & Nistotskaya, 2017; Jagers et al., 2019). This means that tackling corruption through the monitoring and sanctioning of corrupt behavior is as important in the CAP theory as in PAT. However, PAT and CAP ground these measures in vastly different assumptions, apply them to diverse sets of actors, and thus offer distinct causal narratives regarding why monitoring and sanctioning would lead to anti-corruption change. In essence, if in PAT, monitoring and sanctioning is always about bringing a "rogue" agent in line with the "principled principal", in CAP, monitoring and sanctioning predominantly aim at addressing the behavior of conditional cooperators. Table A.1 of Appendix A summarizes the facilitators generating and sustaining successful collective action.

Understanding the nuances of these perspectives can be challenging, and corruption as a collective action problem is often misunderstood, especially by practitioners. Most often, it is conceived of as improved cooperation between stakeholders. For instance, the World Bank Institute defines collective action as:

> [A] collaborative and sustained process of cooperation between stakeholders. It increases the impact and credibility of individual action, brings vulnerable individual players into an alliance of like-minded organizations and levels the playing field between competitors. Collective action can complement or temporarily substitute for and strengthen weak local laws and anti-corruption practices. (United Nations Global Compact, 2021a: 4)

This definition is the basis for the anti-corruption work of many high-profile international organizations. For example, the UN Office on Drugs and Crime holds that to combat corruption as a collective action problem, "there is a need for collective and coordinated approaches, such as reform coalitions or proactive alliances of like-minded organizations" (United Nations Office on Drugs and Crime, nd: 14). Similarly, the guide to anti-corruption by UN Global Compact, a voluntary initiative by CEOs of businesses to support UN goals, is tellingly called "Uniting Against Corruption" (United Nations Global Compact, 2021b). And a task force on integrity and compliance of The Group of Twenty (the premier forum for international economic cooperation between the 19 biggest economies in the world and the European Union) views collective action as a partnership "between states and companies in order to deal with the supply and the demand side of bribery" (Alderman, 2014: 77). In other words, the understanding of corruption as CAP and the approaches to tackling it that currently exist, even among premier anti-corruption stakeholders, is somewhat reductionist in its focus on cooperation.

Box 2: Social norms

Social norms are referred to as standards of appropriate behavior for actors within a given group of individuals, driven by a logic of conforming to social expectations or perceived practices, rather than by a logic of maximizing one's perceived self-interest ("logic of appropriateness" vs "logic of consequences") (March and Olsen, 1989; Raymond et al., 2014). In other words, social norms are informal rules of behavior that individuals follow because they think that important others (a reference group) also follow them, think of them as acceptable, and are ready to sanction those who do not follow such norms (Bicchieri, 2016). Insofar as an individual's behavior depends on what the individual expects others to do (descriptive norms) or thinks should be done (injunctive norms), social norms are conditional preferences (this attribute sets social norms apart from values, an individual's view about what is right, independent from the attitudes or actions of others). A change in social norms requires that individuals update their perceptions of the views of others in their reference group. In real life, such updates can be brought about by changes in the formal rules (institutional signals) (Rothstein, 2011a; Tankard & Paluck, 2017), information shocks, such as elections (Bursztyn et al., 2020), or elite rhetoric (Clayton et al., 2021).

The importance of changes in social norms features prominently in CAP accounts of corruption, and consequent anti-corruption measures (Persson et al., 2013; Rothstein, 2011a; Teorell, 2007). As an illustration, Rothstein's "big bang" approach is motivated by the need to change "agents' beliefs about what 'all' the other agents are likely to do when it comes to corrupt practices" (2011a: 249). It is only recently that this line of theoretical reasoning has been subjected to systematic empirical testing (for an overview see Köbis et al. (2020)). In line with the theoretical expectations, it was found that information that highlights widespread corruption among citizens (negative descriptive norms) encourages pro-corruption attitudes and behavioral intentions in citizens

(Corbacho et al., 2016; Peiffer & Alvarez, 2016) or politicians (Boas et al., 2019; Chong et al., 2015; Peiffer, 2020), while positive descriptive norms (describing corruption as rare or declining in society) decreases respondents' intentions to engage in corrupt behavior (Köbis et al., 2022, 2015). Furthermore, Agerberg (2021) demonstrated the power of injunctive norms to affect people's willingness to engage in corruption. This literature, however, remains small and lacks field evidence (but see Köbis et al. (2022) on the power of social nudging to transform people's expectations and behavior in their normal environments). And although the international anti-corruption agenda, formalized in Article 13 of the 2004 UN Convention Against Corruption, instructs governments to "raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption", the evidence base speaking to the effectiveness of this agenda remains scant.

Due to the systemic nature of corruption, the CAP literature argues that the response should also be at the system-level, and puts forward two primary strategies to alter the corrupt societal equilibrium: either to jolt it through a coordinated "big push" (Collier, 2000) or "big bang" (Rothstein, 2011a) or undermine it through indirect interventions within selected areas of state-citizen interactions that would change the informal rules of the game (Rothstein, 2018, 2021; Rothstein & Tannenberg, 2015).

2.2.1 The big bang strategy of anti-corruption change

The big bang anti-corruption strategy logically stems from the CAP conceptualization of corruption, suggesting that corruption can be eradicated through large-scale reform that affects the "full set" of major formal institutions in the country (Rothstein, 2011a, 245), which in turn will change prevailing expectations of the behavior of others (Collier, 2000; Rothstein, 2011a). In support of this argument, Rothstein (2011a) argues that between 1855 and 1875, Sweden

implemented more than twenty reforms of major political, social and economic formal institutions that moved the country away from a corrupt setting. In two companion articles, Rothstein and Teorell explore several causes of this major and lasting transformation: the threat to the very existence of Sweden as a sovereign nation (exogenous cause), previous changes in the legal system, recognition of the problem of corruption by the main political actors, and the rise of a new liberal ideology (endogenous causes) (Rothstein & Tannenberg, 2015; Teorell & Rothstein, 2015). Recently, big bangs have seen some success in countries such as Romania, Rwanda and, most notably, Georgia after the Rose revolution of 2003 (Berglund & Engvall, 2015; O'Shea, 2022; Schueth, 2012), but critics point to "a historically specific constellation of factors" that led to success, making this approach ill-suited as a policy recommendation (Erlingsson & Kristinsson, 2020; Gans-Morse et al., 2018; Prasad et al., 2019). Indeed, as exogenous shocks proved to be the most convincing cause of successful big bangs, waiting for a large exogenous crisis is hardly a workable policy prescription. Indeed, some authors have contended that the impracticality of this strategy has led to over-reliance on PAT reforms as the default anti-corruption strategy (Prasad et al., 2019).[5]

The big bang approach has also been criticized for neglecting cases in which a low corruption equilibrium was achieved through incremental changes, such as in the USA (Skowronek, 1982) or Great Britain (Crook & Cawood, 2022). Furthermore, the sustainability of the new societal equilibria achieved in recent big bangs has been questioned (Mungiu-Pippidi, 2015; Rotberg, 2018). In point of fact, after the considerable progress achieved in Georgia in the early 2000s, efforts to reduce low-level corruption have slowed

[5] Having said this, the current war between Ukraine and Russia, has added new credence to this approach. Echoing Teorell & Rothstein's 2015 argument, a recent New York Times article describes corruption as an existential threat to Ukraine, and the fight against corruption as "a second front", urging donors to use the window of opportunity to engage with corruption in a meaningful way (Stockman, 2023).

since 2012, grand corruption has increased, as have attacks by the Georgian government on anti-corruption watchdogs (Boffey, 2023; Transparency International, 2023; TIG, 2023a). Finally, the limits of broad reform of for- mal institutions has also been exposed by research on the quality of government in European regions (Charron et al., 2014), which showed considerable subnational variation in corruption across EU regions. Despite being governed by the same set of formal institutions, regions in the north of Italy are almost as clean as Denmark, while the southern regions are among the most corrupt in the EU.

2.2.2 The quality of government strategy of anti-corruption change

Another CAP-based anti-corruption strategy concerns a set of interventions aimed at establishing new informal rules of the game, thereby changing expectations regarding the likelihood of corrupt behavior by others (Johnston, 2020; Mungiu-Pippidi & Dada Mungiu-Pippidi & Dadašov, 2017; Prasad et al., 2019; Rothstein, 2018; Rothstein & Tannenberg, 2015). Instead of relying on strategic messaging about the prevailing descriptive and injunctive norms or pursuing a big bang, entailing the complete overhaul of major formal institutions in a country (Rothstein, 2011a, 245), a more productive pathway for altering expectations about the behavior of others and instituting corruption-free standard operating procedures (informal rules) in society involves strategically reforming selected formal rules governing exchanges between the state and its citizens (Rothstein, 2021; Rothstein & Tannenberg, 2015).

The selection of which formal institutions to target is context-specific, but existing research highlights several distinct areas where altering formal rules is likely to shift prevailing social norms and, consequently, reduce corruption. These include gender equality, broad-based taxation, human resource management in public bureaucracies, and education (Rothstein, 2021; Rothstein & Tannenberg, 2015).

The argument, consolidated by Rothstein (2021), posits that modifying the formal rules within these domains will influence the dynamics of interaction between the state and its citizens. Specifically, this is anticipated to result in fairer treatment of citizens by the state, which in turn can foster increased trust in the government (signaling changed expectations about politicians and bureaucrats) and greater interpersonal trust (signaling altered expectations about other members of a society). Ultimately, this sequence is believed to contribute reduced corruption.

To illustrate the logic of this argument, consider the reform of human resource management in public bureaucracies. A change in the formal rules governing hiring practices within the public bureaucracy – typically transitioning from patronage-based systems to merit-based recruitment – is expected to enhance the impartiality of public bureaucrats and improve the delivery of public goods and services. Consequently, this improvement can foster greater trust among citizens in the government, boost interpersonal trust, and ultimately contribute to a decrease in corruption (Dahlström et al., 2012; Evans & Rauch, 1999; Nistotskaya & Cingolani, 2016; Oliveros & Schuster, 2018).

This argument heavily focuses on altering the formal rules governing interactions between citizens and the state, hence it is termed a "quality of government approach" (Rothstein & Tannenberg, 2015). There is, however, another side of the argument, which is anchored in social contract theory. Targeted reforms of formal institutions are likely to persuade citizens that the social contract is shifting from an approach based on selective access to public goods and services (particularism) to one based on ethical universalism, impartiality, and efficient provision of truly public goods and services. This gives citizens a stake in the existence of a well-functioning public sector that can deliver public goods and services for the benefit of most citizens, rather than a privileged few (Johnston, 2020; Rothstein, 2021). In essence, when public goods and services are delivered universally and impartially, institutional as well as interpersonal trust rises. This

occurs as citizens adjust their expectations regarding the government and fellow society members. Ultimately, this dynamic helps alleviate the social dilemma inherent in corruption: when individuals are assured that their neighbors will not receive preferential treatment through bribery or connections, a critical prerequisite for a successful anti-corruption effort is fulfilled.

CAP-based quality of government anti-corruption theory entails a long causal chain: reform in formal institutions leads to shifts in trust levels toward the government and interpersonal trust, ultimately resulting in reduced corruption. Empirically testing this chain is challenging. For instance, numerous studies have linked meritocratic recruitment in public bureaucracies to impartiality (Meyer-Sahling & Mikkelsen, 2016; Oliveros & Schuster, 2018), increased trust and satisfaction with government (Boräng et al., 2017; Dahlberg & Holmberg, 2014), improved provision of public goods and services (Nistotskaya & Cingolani, 2016; Oliveira et al., 2023; Rauch & Evans, 2000), and reduced corruption (Dahlström et al., 2012; Evans & Rauch, 1999; Meyer-Sahling et al., 2018). However, the complete causal argument has yet to be empirically tested in its entirety.

Similarly, while the correlation between increased representation of women in politics and reduced corruption is well-documented (Dollar et al., 2001; Esarey & Schwindt-Bayer, 2018; Goetz, 2007; Swamy et al., 2001), research on the specific mechanisms through which this occurs, i.e. how women's presence in politics mitigates corruption, remains understudied. Despite the growing availability of granular corruption data alongside increased female political representation, the debate on the underlying causal mechanisms remains unresolved (Alexander & Bågenholm, 2018; Bauhr et al., 2019). Moreover, existing evidence suggests that in weak democracies like Rwanda and in autocracies like Russia, a higher proportion of women in legislatures does not necessarily correlate with decreased corruption or increased trust in government (Dauti, 2023; Nistotskaya & Stensöta, 2018). Additionally, research indicates that greater representation of women in public

administration may not necessarily lead to lower corruption (Stensöta et al., 2015).

The quality of government strategy for anti-corruption change has several limitations. First, there is a notable absence of empirical evidence supporting the entire causal chain proposed. Second, its focus on altering social norms through changes in formal rules within the state-citizen exchange overlooks whether similar changes in other spheres of public life, such as business-to-business (B2B), business-to-customers (B2C), and citizens-to-citizens (C2C) interactions, could also yield consequential changes in social norms. For instance, Rothstein (2011a) argued that Sweden's introduction of equal inheritance rights between men and women in 1845 had a profound impact on reducing corruption in the country. Thus, targeted reforms of the formal rules governing B2B/B2C/C2C interactions, which signal equal opportunities for and treatment of all members of society, may help to dispel the expectation of advantage held by some members, potentially leading to reduced corruption. However, this line of reasoning remains largely underdeveloped in the literature, both theoretically and empirically.

Third, the quality of government strategy for anti-corruption change relies on the presence of a political actor who stands to gain from reduced corruption (Gans-Morse et al., 2018) and possesses the capacity to initiate and drive targeted reforms (Brinkerhoff, 2010). The issue of transformational leadership or political will has been highlighted by numerous anti-corruption scholars (Mungiu-Pippidi, 2015; Rotberg, 2018, 2021) and international organizations (World Bank, 2012) as a critical determinant of successful anti-corruption efforts. It is largely uncontested that political will plays a significant role in the effectiveness of anti-corruption efforts (Brinkerhoff, 2000), with some scholars even suggesting it as the sole (Rotberg, 2018) or primary factor for such initiatives to succeed (Brinkerhoff, 2000, 2010). However, others argue that the quest for political will oversimplifies the intricate nature of transformative reforms (Johnston, 2018; Persson & Sjöstedt, 2012).

Box 3: Political Will

Political will is "the commitment of actors to undertake actions to achieve a set of objectives... and to sustain the costs of those actions over time" (Brinkerhoff, 2000, 242). The notion of political will involves intent and motivation, which are inherently intangible phenomena that can exist at both the individual and collective levels and that can only be manifested through action (Brinkerhoff, 2010). As with many factors that can only be measured through outcomes, the explanatory factor (political will) is indistinguishable from the outcome it seeks to explain – a reduced level of corruption. For instance, it is often implied from the success of Georgia's anti-corruption reforms in the 2000s that President Mikheil Saakashvili possessed the political will for anti-corruption reform. This renders the concept of political will less useful for practitioners as they can have no influence over the political will of politicians. On the other hand, when the notion of political will is expanded to "the extent to which country actors... develop sound technical programs to implement reforms, take actions that demonstrate resource commitments and the enforcement of meaningful sanctions, and pursue implementation consistently over time while assuring monitoring and adaptation to emerging circumstances" (Brinkerhoff, 2010), then this makes the notion conceptually close to the concept of capacity, making the notion of political will redundant.

In summary:

- The collective action perspective on corruption has revolutionized academic scholarship and anti-corruption practice.
- Collective action theory emphasizes the systemic nature of corruption, pointing to a change in shared expectations about the behavior of others as the key to success of anti-corruption efforts.
- The dominant CAP-based strategy of anti-corruption change focuses on the change of formal rules, which in turn is expected to affect the nature of interaction between the state and society. This results in greater fairness in the state's treatment of its citizens, spilling over to greater trust in government (signaling changed expectations about politicians and bureaucrats) and greater interpersonal trust (signaling changed expectations regarding other members of a society), and eventually lower corruption.
- The quality of government strategy of anti-corruption change underscores the need for reform of the formal rules in state-citizen interactions.
- Taxation, human resource management in public bureaucracies, gender equality, and education are highlighted as the most promising areas for reform.
- While existing empirical evidence supports certain elements of the complex causal chain in the quality of government approach, there remains a dearth of empirical evidence regarding the entire causal chain argument.
- Development cooperation professionals frequently misinterpret the CAP's characterization of corruption and the necessary measures to initiate and sustain successful collective action.

2.3 Emerging literature

In response to both the PAT and CAP approaches to anti-corruption, a new literature has emerged during the last decade (Heywood, 2017; Heywood & Pyman, 2020; Hutchinson et al., 2020; Khan & Pallavi, 2022; Marquette & Peiffer, 2018). This literature's foundational claim is that both PAT and CAP approaches are based on overly generic definitions of corruption. It argues that systemic corruption varies within countries (Charron et al., 2014; Drapalova & Di Mascio, 2020; Meza & Pérez-Chiqués, 2021; Pérez-Chiqués & Meza, 2021), across levels of government, sectors, professional domains, and organizations (Drapalova & Di Mascio, 2020; Heywood, 2017; McDonnell, 2017; Pyman, 2020). Furthermore, both PAT and CAP present the motivation of individuals behind corruption as "fixed, clear, and non-problematic…instead of exploring how people arrive at the decision to engage in corruption" (Zaloznaya, 2014: 188).

The new literature contends that a broad conceptualization of corruption, coupled with a fixed explanation for individual engagement in corrupt practices, overlooks the diverse structures of economic and social incentives, functional complexities, and even the "epistemology and mental models" of different settings (Pyman, 2020, 5). This ultimately hampers the practical design of anti-corruption reform. Instead, robust anti-corruption interventions must begin with a differentiation between different types of corruption and focus on specific sectors (Khan et al., 2019, 2020; Khan & Pallavi, 2022) or organizations (Pyman, 2020).

2.3.1 Developmental governance

One theory emerging in the new anti-corruption scholarship is "developmental governance" (Hutchinson et al., 2020; Khan et al., 2019, 2020; Khan & Pallavi, 2022). This literature asserts that in "adverse contexts", efforts to enhance the enforcement of broad rule

of law measures, such as transparency and accountability, are ineffective. This is because in such contexts powerful individuals and organizations frequently flout formal rules without facing consequences. Thus, incentives for a precise application of legal norms are lacking. In such contexts, anti-corruption reforms targeting specific areas of rule enforcement hold more promise for effecting real change than attempting to bolster rule enforcement uniformly.

The "adverse contexts" described are polities that operate by law, meaning that law enforcement is "...explicitly linked to the relative power of the parties affected" (Khan & Pallavi, 2022, 15). This stands in contrast to the concept of rule of law, where rules are enforced regardless of the relative power of the individuals or entities involved. Nonetheless, even within such adverse contexts, there exist influential or productive organizations – both economically and politically – whose "complex businesses and transactions" would benefit from the enforcement of formal rules (Khan et al., 2019: 6). Initially, these organizations may prioritize compliance with a narrow subset of rules relevant to their own activities. However, as their transactions grow in complexity, they may advocate for a broader rules-based system, recognizing its benefits for overall stability and predictability (Khan & Pallavi, 2022: 16).

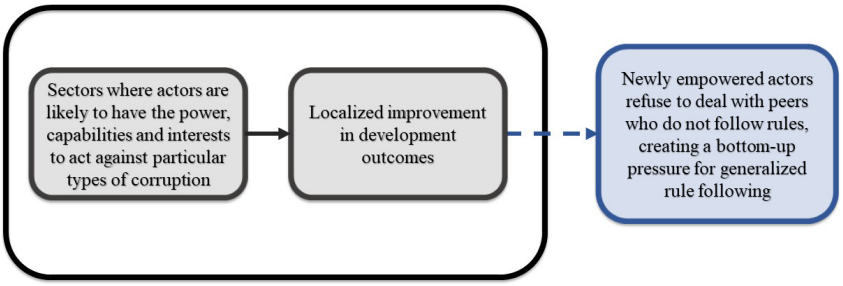
Based on these assumptions and insights, Khan and colleagues advocate for a targeted approach to anti-corruption efforts. Their strategy focuses on identifying opportunities where actors possess the power, capabilities, and interests to combat specific types of corruption – namely, by enforcing formal rules relevant to their own activities (Khan & Pallavi, 2022, 3). These opportunities, they argue, are typically found at the sectoral level. In this approach, powerful organizations within sectors take a proactive stance by refusing to engage with peers who flout the rules. By doing so, they assist enforcement agencies in identifying and penalizing violators (Khan & Pallavi, 2022, 18). If successful in compelling peer organizations to adhere to formal rules, these influential entities

benefit from the resulting new status quo. This bolsters their power and resources, creating fresh incentives for rule enforcement in additional sectors and, ultimately, promoting a broader culture of adherence to the rule of law.

From this perspective, anti-corruption efforts begin by conducting a thorough analysis of different types of corruption through a "rents analysis" and "political settlement" assessments to uncover a coalition of stakeholders committed to anti-corruption, their motivations, and capabilities. These analyses should identify sectors in which powerful organizations are prepared to engage in the selective enforcement of rules (feasibility criterion), as well as sectors in which improvements in law enforcement will bring substantive developmental outcomes (high impact criterion). The underlying idea is that development not only amplifies the influence of existing powerful actors but also cultivates new influential entities with a vested interest in localized (sector-level) rule of law. As more organizations within sectors gain influence and power becomes more evenly distributed, a critical mass of influential actors emerges, collectively incentivized to uphold rule-following at the societal level. Figure 1 illustrates the theory of anti-corruption change within the framework of developmental governance.

Thus, the developmental governance literature could be viewed as a synthesis of CAP, PAT, and modernization theory. Like CAP, it conceptualizes corruption as a social phenomenon rooted in the unequal distribution of power. Akin to PAT, developmental governance concerns itself with the monitoring/enforcement of those who may have the incentives and opportunities not to follow the rules by those who have self-serving incentives to curb partiality in the implementation of the law. However, in contrast to PAT, developmental governance acknowledges that efforts to combat corruption can originate from diverse actors, not solely political principals, driven by their self-interests.

Figure 1: Developmental governance: theory of change



The requirement for anti-corruption initiatives to have a high developmental impact links the developmental governance literature with modernization theory, which underscores the pivotal role of economic development in driving societal transformation from traditional to modern (Rostow, 1960). This affiliation with modernization theory distinguishes developmental governance from alternative approaches to anti-corruption change. However, this aspect of the theory remains relatively underdeveloped, leaving uncertainties regarding the threshold of developmental impact necessary for donor endorsement. Should analyses of rents and political settlements determine an anti-corruption intervention's feasibility, yet its developmental impact proves less substantial, should donors refrain from supporting it?

Furthermore, while this theory of change holds potential for generalizability across contexts, its implementation is intricately tied to the specificities of each setting. This contextual dependence leaves development cooperation practitioners grappling with significant uncertainty regarding the most appropriate course of action. Despite this challenge, the theory has recently received a surge of positive feedback from practitioners, particularly within the realm of public health (Angell et al., 2021; Binyaruka et al., 2023; Hutchinson et al., 2023, 2020; Naher et al., 2022; Odii et al., 2022; Ogbozor et al., 2022; Onwujekwe et al., 2023). Similarly encouraging responses have emerged from other sectors, such as energy (Roy et al., 2023), procurement (Khan et al., 2022b), and various others (Khan et al.,

2022a). While the ongoing accumulation of positive empirical evidence will improve the practical viability of this approach, the lack of robust empirical evidence remains a notable impediment (Johnson et al., 2012), hindering its broader application within the realm of development cooperation.

In summary:

- Developmental governance has emerged as a synthesis of PAT and modernization theory.
- It is predicated on assumptions about context-specific types of corruption and the omnipresence of powerful organizations with self-interest in the improvement of the enforcement of formal rules within their areas of activity (sectors).
- Such powerful organizations are interested in and capable of compelling peer organizations in their sectors to be rule-following, which improves localized development outcomes, which in turn aligns the interests of a sufficiently large number of powerful actors to demand a system/society-wide enforcement of the rules.
- Developmental governance comes across as a mid-range theory of change, combining generalizability with context-specificity.
- Interventions are expected to take place in sectors, and meet the criteria of feasibility and high developmental impact, making many projects *a priori* not suitable for funding given their projected low to medium developmental impact.
- Several theoretical blind spots and the lack of a large empirical evidence base raise questions about the broad adoption of the developmental governance approach to anti-corruption change (in its current state).

2.3.2 The organizational approach

Another strand within the emerging anti-corruption literature features what is called here the organizational literature. Similar to the developmental governance approach, the foundational assumption of this literature envisages varieties of corruption (Drapalova & Di Mascio, 2020; Heywood, 2018; Marquette & Peiffer, 2018),[6] which necessitates "tactical reforms" (Heywood & Pyman, 2020: 34). Various authors argue that every "named" corruption situation has anti-corruption stakeholders "committed to working for reform and to improve outcomes" (Heywood & Pyman, 2020:34).

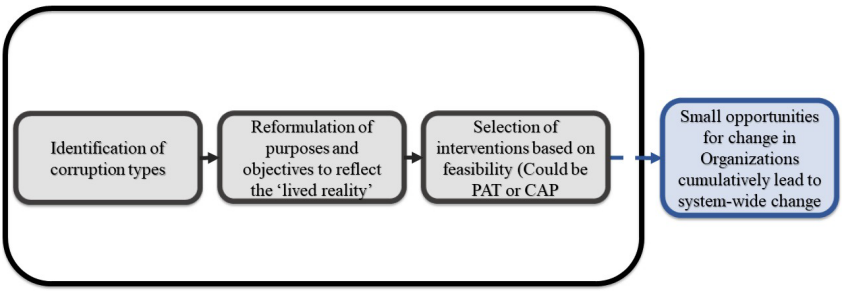
Within this literature, the so-called Sector Focus & Reformulation Approach (SFRA) (Heywood & Pyman, 2020) offers the most exhaustive explanation of anti-corruption change.[7] The SFRA's approach is built on the assumption that each "professional domain" has its own epistemology, mental models, economic incentives, functional complexities, and political specificities that have to be

[6] The organizational literature does not engage in the development of corruption typologies. Instead, its focus lies in comprehending the roles that various forms of corruption play in social interactions. Marquette & Peiffer (2018) were the first to note that to understand who has a stake in changing the corruption equilibrium, it is necessary to first understand how corruption affects different individuals. The authors emphasize the role of corruption in establishing a stable, albeit unequal, distribution of public goods, and that individuals may prioritize such outcomes over a more advantageous distributive outcome in the future. Marquette & Peiffer's (2018) argument that the lack of recognition that corruption may provide stability undermines our understanding of how to support anti-corruption reforms. Similarly, Pérez-Chiqués & Meza (2021) show how different types of corruption networks (driven by different needs, supported by different informal systems, and motivated by different incentives) required markedly different reform prescriptions.

[7] Despite declaring the sectoral focus of such reforms, effectively, SFRA responds to corruption situations in organizations, as evidenced by the following quote: "I am responsible for delivering policies/services/products. My team and I know the issues, the politics and the context, but we know little about reducing the damaging impact of corruption on our operations" (Heywood & Pyman, 2020:4).

understood and acted upon, above all by the endogenous anti-corruption stakeholders themselves (Heywood, 2020). This implies that unlike PAT, CAP and developmental governance, which derive their reform strategies from certain macro theories, the organizational approach calls for the incorporation of all known anti-corruption measures (when suitable to the "lived reality"/context), including monitoring and transparency (the hallmarks of PAT), but also measures aimed at altering social norms (CAP), among others (Heywood, 2020; Marquette & Peiffer, 2018). Figure 2 visualizes the SFRA approach to anti-corruption change.

Figure 2: The SFRA approach to anti-corruption change



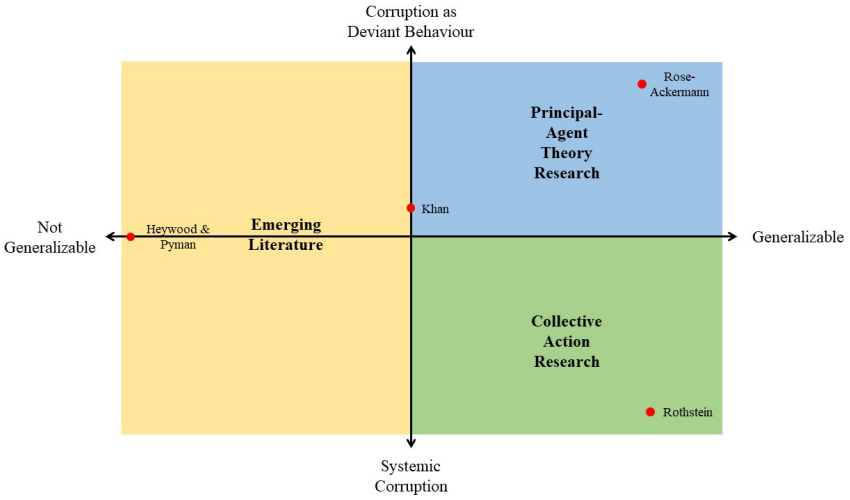
In other words, the organizational literature does not have its own theory of change but is open to all those currently in existence. Its contribution lies in developing a "methodology for formulating an appropriate reform strategy", comprised of three major actions – "focus, reformulate, then lay out and review the options" – from which the most appropriate set of actions can be derived (Heywood, 2020: 7). The need to constantly review and reframe anti-corruption objectives (in order to accommodate, for example, recent international anti-corruption experiences or reactions to the already accomplished actions) is particularly highlighted.

An important implication of the operational nature of this anti-corruption approach is that of significant expected variations in the scale, speed, sequencing, and timing of anti-corruption measures, indicating the low generalizability of this approach. Furthermore,

this approach implies a rather slow pace of knowledge accumulation. Indeed, as far back as 2009, Disch et al. (2009) found that there were very few careful reviews and evaluations of specific anti-corruption activities, calling, therefore, for a systematic documentation and analysis of interventions. As recently as 2022, Ceschel et al. (2022) argued that more exploratory analyses are required to understand the causal relationship of anti-corruption interventions in organizational contexts. Thus, there is a pressing demand for more empirical studies aimed at comprehending the rationale behind anti-corruption change in organizations. This means that, presently, the adoption of the organizational approach as a paradigmatic framework for anti-corruption effort by donors constitutes a "leap of faith", which stands in contrast to the prevailing focus on evidence-based policymaking and interventions in development cooperation.

There is an apparent trade-off between prioritizing the universality of the corruption phenomenon and striving for a widely applicable theory of anti-corruption change on the one hand, and the actionability but limited generalizability of the "varieties of corruption" literature on the other, which is visualized in Figure 3.

Figure 3: Theories of anti-corruption change



Note: The X axis denotes the extent of generalizability of the approach. The Y axis denotes characterization of corruption on the "individual-level deviant behaviour" to "a systemic phenomenon" continuum. Red dots denote the most cited authors of each literature on the X and Y axes.

This trade-off has sparked recent debate (Marquette & Peiffer, 2019; Persson et al., 2019). Critics of the "varieties of corruption" literature point out that reducing anti-corruption measures down to each individual instance of corruption runs the risk of needing to formulate a unique theory of change for every "village", which undermines the applicability of this approach (Persson et al., 2019).

It appears that the implementation of the organizational approach requires significant resources to support the effort of learning the circumstances of "lived experiences", identifying individuals within networks nested in organizations who could be the agents of change, devising a set of interventions and actively monitoring their adaptability to evolving circumstances. This also implies, albeit implicitly, the involvement of a dedicated "agent" (external to the parties involved) tasked with ensuring coordination and sustaining an ongoing dialogue among anti-corruption stakeholders, particularly in the face of setbacks. Apart from its mediating role, the external agent would also serve as a source of knowledge regarding available

courses of action. Given that "lived experience" is subject to constant change, the body of knowledge concerning suitable responses is ever-evolving. These roles, which could be taken on by a donor, are resource-consuming. This could pose a challenge to the widespread application of this approach in development cooperation.

The organizational approach presupposes that anti-corruption stakeholders and practitioners in development cooperation possess sufficient knowledge of existing theories of anti-corruption change to be able to choose an appropriate course of action. This may be an overly optimistic assumption. Imbuing personnel with such relevant knowledge is far from a simple task, requiring a long time horizon characterized by strategic hiring, and strategies of personnel retention and training, to witness a tangible effect.

Finally, a line of critique that the organizational literature shares with the developmental governance and quality of government literatures relates to the question "What is the threshold at which changes in individual sectors/organizations lead to the eradication of corruption in society at large?" Thus far, existing research has posited that incremental changes at a lower level can cumulatively lead to broader societal changes (Di Mascio & Piattoni, 2020; Pyman & Heywood, 2020), but this element of the theory remains underdeveloped. A recent review of the literature on the matter suggests that changes at the organizational level do not so readily spillover into the broader socio-political transformations (McDonnel & Vilaca, 2021).

In summary:

- The "varieties of corruption" premise is the point of departure for the organizational literature.
- It highlights the role of corruption in maintaining distributive outcomes in specific networks, nested in particular organizations.
- Anti-corruption interventions are expected to take place in the organizational/professional domain.

- The paths to no corruption are extremely idiosyncratic, and the only regularity in anti-corruption work is the methodology for formulating an appropriate reform strategy.
- The organizational approach is highly actionable but not generalizable and thus far features a very limited empirical evidence base.

2.4 Conclusion

Over the past decades, corruption research has progressed significantly towards a better understanding of the drivers of corruption and the factors that foster anti-corruption change. Initially, corruption was perceived as individually deviant behavior, believed to be rectifiable through incentivization (Klitgaard, 1988; Rose-Ackerman, 1978). This perspective has since evolved into viewing corruption as a collective action problem, amenable to resolution through changes in shared social norms (Persson et al., 2013). More recently, the notion of "varieties of corruption" has emerged, suggesting that anti-corruption efforts must embark on unique, context-specific journeys, tailored to each circumstance (Heywood & Pyman, 2020; Marquette & Peiffer, 2018).

Principal-agent theory is the most established of the approaches and is accompanied by a very large base of empirical research. The application of generalized PAT to corruption generated a solid narrative, constitutive of three elements – the nature of corruption, the main anti-corruption agent, and a theory of change – which has helped PAT to sustain interests from scholars and practitioners for more than 50 years. However, the existing empirical evidence base is neither unequivocally supportive of PAT's theory of change nor complete. PAT-based anti-corruption strategies constitute a big part of the standard "toolkit" of anti-corruption work in development cooperation (Gans-Morse et al., 2018; Johnson et al., 2012; Prasad et al., 2019). Arguably, the most glaring shortcoming of the PAT approach is that despite its logical elegance, a vast empirical

literature, and predominance in development cooperation, in most (if not all) polities, corruption has remained a serious problem. Moreover, observed changes in corruption levels cannot be solely attributed to PAT-based reforms.

Corruption as a collective action problem has revolutionized corruption research by shifting the focus to its systemic nature (Persson et al., 2019; Rothstein & Tannenberg, 2015; Rothstein & Varraich, 2017). It has brought attention to the importance of changing shared expectations about the behavior of others in producing sustainable anti-corruption outcomes. The focus on changes to shared expectations affords high generalizability – but a low degree of context-specificity – to the CAP theory of change. Regarding anti-corruption strategies, CAP suggests that change can come from either a system-wide "jolt" that produces new rules of the game and alters shared expectations, or from targeted reform of the formal rules of state-citizen interaction that may indirectly effect change of informal institutions. The first approach has been criticized for its lack of usefulness as a tool for practitioners due to the impossibility of inducing or even waiting for moments of extreme crisis (Prasad et al., 2019). The second – the quality of government approach – implies a long causal chain between intervention and outcome. While existing empirical evidence supports many of the intermediate links in the chain (Boräng et al., 2017; Dahlberg & Holmberg, 2014; Dahlström et al., 2012; Evans & Rauch, 1999; Meyer-Sahling & Mikkelsen, 2016; Meyer-Sahling et al., 2018; Nistotskaya & Cingolani, 2016; Oliveira et al., 2023; Oliveros & Schuster, 2018; Rauch & Evans, 2000), empirical evidence with regard to the entire causal chain is lacking.

Although CAP is convincing in describing what needs to be changed to affect the systemic nature of corruption, it does not explain how this should be done (Lee et al., 2022; Marquette & Peiffer, 2018). To argue that educational reform will induce citizens to update their expectations about others, which may then eventually lead to reduced corruption, is one thing. However, specifying when and

exactly how to effect the desired change is another. In other words, the actionability of CAP-based interventions has been increasingly questioned (Heywood, 2017; Heywood & Pyman, 2020; Marquette & Peiffer, 2018). There is also a question mark over the "identity" of the anti-corruption stakeholder(s) who may initiate the targeted reforms of formal rules, which brings the "ghost" of the principled principal – heavily critiqued by CAP scholars (Persson et al., 2013) – back into the picture. Furthermore, as our evaluation has revealed, the collective action theory of corruption is often misunderstood, even by high-profile development cooperation organizations, which further complicates the suitable actionability of CAP-based interventions.

The limited actionability of the CAP framework has generated a critical response in the form of the developmental governance and organizational literatures (Heywood, 2017; Heywood & Pyman, 2020; Khan & Pallavi, 2022). They emphasize the how-to elements of anti-corruption thinking rather than focusing on what corruption is. The cornerstone of these approaches is a differentiation between types and forms of corruption and the tailoring of a set of anti-corruption measures to contextual circumstances or the lived reality of corruption. In this way, these approaches give much needed attention to the ever-changing nature of corruption – but at the cost of generalizability. As highlighted by Rothstein & Varraich (2017: 45), finding a balance between universalism and the acknowledgement of the varied lived experiences of individuals poses a significant challenge for theories of anti-corruption change. Developmental governance seems to strike this balance best, whereas the organizational approach seems to lean towards the extreme of lived reality.

Khan & Pallavi's (2022) developmental governance focus on effecting change through the manipulation of incentives has a clear link to PAT, which makes this theory of change generalizable across varying contexts. At the same time, it highlights that context-related characteristics are the key to a successful application of incentives.

Despite striking a sweet spot between generalizability and actionability, the practical application of the approach raises some concerns for development cooperation. Specifically, the framework's concept of developmental impact could lead to the interpretation of developmental outcomes as a hierarchy. As discussed, this potentially encourages certain developmental aims to be discarded, despite being feasible, due to their unclear or low impact on developmental outcomes.

The organizational approach takes the importance of context one step further, effectively claiming that every journey to anti-corruption is unique (Heywood, 2017; Heywood & Pyman, 2020; Marquette & Peiffer, 2018; Pyman & Heywood, 2020), which comes at the cost of generalizability. The organizational literature embraces PAT and CAP equally and offers practitioners a methodology to devise suitable reform strategies. The logic of anti-corruption reform is that actors in professional domains/organizations already know how corruption undermine their operations. However, they often require guidance on how to effectively address these challenges (Pyman & Heywood, 2020). Therefore, the role of development cooperation actors is to help build a shared understanding of the hierarchy of corruption issues and corruption functions among key actors and to facilitate a solid review/feedback mechanism that provides the necessary levels of knowledge, derived from a large and constantly updated body of empirical evidence. While this pays due respect to the ever-changing and adaptive nature of corruption, the clearly idiosyncratic nature of anti-corruption efforts implies a significant burden on development cooperation professionals. Furthermore, the organizational framework remains primarily reliant on a small number of case studies to substantiate its applicability. The absence of a sufficiently large evidence base speaks against the en-masse practical adoption of this approach.

In summary:

- PAT persists as a way of thinking about corruption, anti-corruption change, and practice. It also features the largest empirical evidence base, but continued high levels of corruption, despite its prescriptions, raise considerable doubts about its effectiveness.
- CAP is theoretically coherent but features a long causal chain of anti-corruption transformation with little guidance as to how to initiate and follow-up the anti-corruption reform. While there is a solid evidence base supporting links between certain elements of the causal chain, nothing of this sort exists with regard to the causal chain in its entirety.
- Developmental governance is a middle-range theory that strikes a balance between generalizability and context-specificity. It features a small, but quickly expanding body of empirical research. These studies offer valuable insights into the design of anti-corruption strategies, delineating what proves effective, what does not, and the underlying reasons behind these outcomes.
- The organizational approach privileges context to the maximum extent; it provides a sound methodology for formulating an appropriate reform strategy but renders each anti-corruption journey highly idiosyncratic.

Each of the reviewed theories of anti-corruption change possesses its own strengths and weaknesses. This makes it challenging to identify a clear frontrunner that could offer development cooperation professionals a definitive framework for cohesive anti-corruption efforts. Three out of the four theories examined characterize corruption as a social practice and a systemic phenomenon. Yet, they differ significantly in their approaches to anti-corruption change. Conversely, organizational theory, while not disregarding the concept of corruption as a social practice, adopts a bottom-up perspective in defining corruption and in devising anti-corruption measures.

3 Sida's anti-corruption approach

This chapter thoroughly maps Sida's anti-corruption approach and examines whether this is relevant to the accumulated knowledge (reviewed in Chapter 2) and to what extent anti-corruption goals and targets are integrated into Swedish international development cooperation strategies.

The section's goals are:

1. To systematically map Sida's approach to corruption as a development obstacle, focusing on its conceptual and theoretical underpinnings.
2. To assess the extent to which Sida's approach to anti-corruption work is relevant to the current knowledge base.
3. To assess the extent to which anti-corruption goals and targets are incorporated in Swedish international development cooperation.

3.1 Data and analytical approach

To accomplish these goals, we relied on two primary types of data sources:

- Sida's steering documents relating to anti-corruption efforts and Swedish government strategies for international development cooperation.
- Key informant interviews (KIIs) with personnel at Sida's headquarters, including continuous dialogue with key anti-corruption personnel, staff at the U4 Anti-Corruption Resource Centre,[8] and representatives of other donor organizations.

[8] The U4 Anti-Corruption Resource Centre is a permanent centre at the Chr. Michelsen Institute (CMI) in Bergen, Norway, that conducts independent research on corruption and provides donors with support in how to combat it. See https://www.u4.no/

The steering documents furnished us with essential data regarding the conceptual and theoretical underpinnings of the anti-corruption policy. Additionally, they afforded insights into the implementation of the anti-corruption approach.

To gauge the degree of inclusion of anti-corruption concerns within Swedish international development cooperation at the policy level, we examined the government strategies that delineate the objectives and budget allocations for this cooperation. Sida provides the government with input on the content of strategies, based on government instructions, insights from past strategy cycles and dialogues with stakeholders. The Ministry for Foreign Affairs (MFA) oversees the finalization of the strategies, which are then approved by the government. Strategies typically apply for a period of five years. Throughout the study period, Sida's work was guided by 45 strategies, comprising 26 bilateral (country) strategies, 7 regional strategies, and 12 thematic strategies. Please refer to Appendix B.2 for a complete list of strategies.

Given the evaluation's focus on Sida's current efforts against corruption, the following steering documents[9] were considered:

- Sida's Anti-corruption Regulation (Sida, 2001) and Manual (Sida, 2004)
- Sida's Anti-Corruption Rule (Sida, 2016)
- Guidance for Sida's Work with Corruption as a Development Obstacle (Sida, 2021)
- Sida's Action Plan for Preventing and Mitigating Corruption, 2020–2023 (Sida, 2020).

[9] Appendix B.1 discusses these documents in greater detail.

Our analysis also relied on key informant interviews (KIIs). KIIs are a stalwart of policy-focused research, as they have demonstrated their utility for gathering factual information on the subject of study and insights from individuals who act as "owners" of important contextual knowledge (Bogner et al., 2009). We conducted KIIs with 17 employees at Sida's headquarters who work with corruption as a development obstacle, including three policy specialists of the Anti-Corruption Cluster at the Unit for Thematic Support of the Department for International Organizations and Policy Support (INTEM), representatives of Sida's Evaluation unit (UTV), the statistics department, the Department for Management Support (LED), as well as representatives from three thematic areas (human rights, democracy, and freedom of expression; gender equality, and health). Some of these individuals are those who drove the expansion of Sida's approach towards corruption beyond the risk perspective. We held multiple meetings with the three policy specialists at the Anti-Corruption Cluster and maintained continuous professional communication regarding the evaluation throughout the project.

While we did engage in discussions with individuals well-versed in Sida's conceptual approach to and practical work in anti-corruption, the selection of interviewees was guided by Sida's Anti-corruption Cluster, primarily due to the complexity of navigating Sida's internal structures as external actors. This presents a potential risk to the validity of the data gathered. To mitigate this risk, we conducted additional interviews with key informants identified by ourselves at Sida's headquarters. We also conducted follow-up interviews with several initial interviewees at Sida's headquarters, some of which were conducted on the basis of anonymity. Furthermore, we interviewed staff at the U4 Anti-Corruption Resource Centre in Bergen, Norway, which serves as an anti-corruption helpdesk to partner organizations and Sida's development cooperation sections at embassies. It is important to acknowledge that while U4 operates separately from Sida, its perspective cannot be regarded as entirely independent.

All interviews were conducted in a semi-structured fashion to allow for different, including controversial, perspectives and insights to be effectively communicated. The topics and themes touched upon in the initial interviews were frequently followed-up in further interviews and by email. Appendix B.3 provides a complete list of interviews.

To fulfill objective one, we utilized qualitative text analysis guided by the "What's the Problem Represented to be" (WPR) methodological approach (Bacchi, 2009). WPR involves critically examining how a particular issue or problem is represented in policy documents, political discourse, media coverage, or other forms of communication. This approach enabled us to unveil Sida's predominant lines of thought about corruption as a development obstacle. More specifically, the following questions guided the inquiry:

- How is the problem represented?
- What is the character of the problem and to whom is it a problem?
- Who or what are presented as the cause of the problem?
- How is the solution(s) to the problem represented?
- What potential problems, causes, and solutions are not represented?

Through a systematic examination of how documents and interviewees address these inquiries, we reconstructed and interpreted the conceptual and theoretical underpinnings of Sida's overarching anti-corruption approach. We then evaluated the extent to which Sida's conceptualization of corruption and theories of anti-corruption change are relevant to the current knowledge base (objective two). In the context of the relationship between the anti-corruption policy and accumulated knowledge, relevance refers to the alignment between the policy and existing knowledge, research findings, best practices, and lessons learned from past experiences. A policy is considered relevant to accumulated knowledge when it

incorporates these elements, thereby ensuring that it is evidence-based and more likely to be effective in achieving its intended goals. Conversely, a policy that is not relevant to accumulated knowledge may overlook important insights or fail to address underlying issues, reducing its effectiveness. Greater coherence of Sida's anti-corruption policy with the current knowledge base indicates relevance and a higher potential to contribute to reducing corruption in partner countries, all else being equal.

To achieve objective three, we analyzed whether key steering documents of Swedish international development cooperation include reduced corruption as a goal and/or an activity, and whether these are explicitly linked with the sector codes associated with Sustainable Development Goal (SDG) 16.5 – "substantially reduce corruption and bribery in all their forms". We assessed the extent of inclusion of anti-corruption on a three-point scale: high, medium, and low. If reduced corruption appears as both a goal and an activity in most strategies, it suggests a high level of integration. When it is present in roughly half of the strategies, it indicates moderate integration, whereas its occurrence in fewer than half of the strategies signifies low integration.

In addition to this, we gathered opinions from various key actors in international development cooperation, including the European Union and OECD's Anti-Corruption Task Team (ACTT), regarding the relevance of Sida's anti-corruption efforts (see Appendix B.4). While these perspectives may not constitute definitive evidence of external relevance, they provide a valuable approximation of how Sida's anti-corruption work is perceived by influential stakeholders.

3.2 Conceptual and theoretical underpinnings

This section delineates the conceptual and theoretical underpinnings of Sida's anti-corruption approach. Specifically, it focuses on the policy's characterization of the nature of corruption and its theories of change regarding how anti-corruption transformation occurs. Subsequently, these conceptual and theoretical underpinnings are assessed in relation to the policy's alignment with the current knowledge base.

3.2.1 Corruption: definitions and characterization of the nature of the problem

To comprehend Sida's overall anti-corruption approach, it is important to first examine what Sida means by corruption. What exactly is it that should be combated? The definition of corruption provided by Sida in core documents is "the abuse of trust, power or position for improper gain" (Sida, 2016, 2021). This implies that corruption can occur in both public and private spheres, aligning Sida with anti-corruption actors such as the United Nations (United Nations, 2004) and Transparency International (TI) (Transparency International, 2024). This is in contrast to other anti-corruption actors who characterize corruption as happening only in the public sphere, specifically as the abuse of public office (The World Bank, 2020). Furthermore, Sida's definition does not necessitate the abuser to privately gain from the act for it to be deemed corrupt. Instead, for Sida, the key factor defining corruption is improper gain, which can take various forms beyond financial gain. These improper gains need not be accrued directly by the abuser but can also extend to individuals closely associated with the corrupt actor, such as relatives, co-workers, co-partisans, co-ethnics, etc. (Sida, 2004).

Sida's definition also implies that corruption can be an individual act (or failure to act) (Sida, 2004: 7) or a widespread societal phenomenon. Sida states that "[Corruption] constitutes the norm and represents institutionalized practice. To participate in corruption then becomes the expected behavior, for decisionmakers as well as for ordinary citizens..." (2021: 10–11). In other words, Sida characterizes corrupt behavior not so much as a result of an atomistic cost-benefit calculus; instead, the root cause of corruption is a deeply ingrained expectation that "others" commit corrupt acts regularly.

Furthermore, Sida views systemic corruption as rooted in uneven power relations, where some benefit from it and aim to maintain the corrupt status quo, while others have few possibilities for "opting out" (Sida, 2021: 11). "The biggest problem is…those people who benefit from corruption use it as a means to remain powerful" (Interviews 1, 4, Sida). The implication is that anti-corruption measures need to address these underlying power relations. Sida's core documents make it clear that the underlying power disparities are context-specific, where context is understood as the national-level political community. This interpretation is supported by the fact that corruption assessments are most often conducted at the country level, such as Kenya's political-economy analysis.

Both the core documents and KIIs emphatically asserted that in locations where Swedish development cooperation is deployed, corruption is typically systemic, posing a significant obstacle to development (Sida, 2021, 3, 9). This characterization sets Sida apart from other major anti-corruption stakeholders, such as the UN, EU, and TI (but USAID (2022) conceptualizes corruption in terms similar to Sida).

Sida's characterization of corruption accommodates various empirical forms of corruption. The analysis of documents and KII statements revealed a spectrum of corrupt practices prevalent in partner countries, including bribery (involving money, services, or exertion of undue influence), embezzlement, kickbacks, fraud, extortion, nepotism, conflict of interest, breach of trust, and sextortion. The

recognition of a variety of practical forms of corruption by Sida underscores the importance of tailored interventions that consider the specific contexts and dynamics of corruption in different settings. This brings Sida's approach close to the emerging literature on anti-corruption change.

Lastly, Sida's definition of corruption does not encompass the international and cross-border dimensions of the phenomenon, despite a growing emphasis on these aspects by other donor organizations (European Commission, 2023d; The White House, 2021). Anti-corruption strategies that are based on a definition that excludes some important dimensions of corruption inevitably limit the potential of such strategies to contribute to reducing corruption.

In summary, Sida's anti-corruption approach is based on a characterization of corruption as:

- The abuse of trust, power, or position for improper gain.
- Predominantly a shared expectation, but the role of individual calculus is also acknowledged.
- A systemic phenomenon, wherein the system pertains to the national political community, but excludes the international and cross border domains.

In the contexts where Sida operates, Sida characterizes corruption as a systemic phenomenon and a social practice, driven by the expected behavior of "others" in society, which is rooted in the uneven distribution of power. Sida treats corruption as a matter of context, most often defined at the level of a country's political community, but also within sectors and other contexts.

3.2.2 Theories of change

In the realm of development cooperation, the concept of theory of change refers to "a pathway for how reforms will induce changes in complex internal dynamics, leading to larger endogenous change"

(Jackson, 2020, 1). Put simply, it provides a logical narrative detailing how a specific intervention leads to a desired outcome. While U4 Anti-Corruption Resource Centre contends that "a true theory of change…has been largely lacking from anti-corruption policy design" (Jackson, 2020: 1), our analysis suggests that Sida's anti-corruption approach encompasses several narratives of anti-corruption change. These revolve around three major types of anti-corruption activities advocated by the approach: strategic direct interventions, strategic indirect interventions, and systematic integration of anti-corruption (Sida, 2021).

Within Sida's anti-corruption approach, **strategic direct interventions** pertain to supported projects – also known as contributions – whose primary objectives are to reduce corruption (Interviews 1–3, Sida HQ). The majority of activities within these contributions are explicitly designed to contribute to reducing corruption. Strategic direct interventions address corruption as a "rule and enforcement problem" (Sida, 2021: 11). They aim to improve the overarching legislative framework, introduce specialized anti-corruption laws, and bolster control and law enforcement capacities (Sida, 2021, 9). The latter may involve such measures as enhancing the organizational capacities of law enforcement agencies or establishing dedicated anti-corruption bodies.

The theoretical underpinnings of strategic direct interventions are closely aligned with the tenets of principal-agent theory (PAT), which advocates tackling corruption by establishing clear formal rules for (un)acceptable behavior and ensuring their enforcement. According to PAT, these measures bring about anti-corruption change by influencing individuals' cost-benefit analyses regarding potential engagement in rule-breaking (Klitgaard, 1988; Rose-Ackerman, 1978). In other words, when it comes to strategic direct interventions, the characterization of the problem and theory of anti-corruption change draw from one of the most prominent bodies of the anti-corruption literature – the PAT literature. However, both Sida's Guidance (Sida, 2021) and the feedback from all interviewed

staff at Sida's headquarters are explicitly critical towards relying solely on direct strategic interventions. They critique such interventions for their "one-size-fits-all" approach, reactive nature ("catch and punish, not prevent" (Interview 21, Sida), and their lack of effectiveness, pointing to the "meager results" achieved by the first generation of anti-corruption efforts, which were primarily based on PAT (Sida, 2021: 11).

While not advocating for the complete decommissioning of direct strategic interventions, Sida's approach strongly advocates prioritizing different types of measures. First, there are strategic indirect interventions, which are contributions that have reducing corruption as one of but not the main goals. Second, there is systematic integration of anti-corruption, which entails incorporating anti-corruption measures within projects or programs, even if corruption is not their primary focus.

Strategic indirect interventions encompass various activities, such as supporting independent media, instituting merit-based recruitment in the public sector, improving public finance management, promoting e-government and e-citizenship, promoting universal education, gender equality, and tax reform measures, or encouraging the private sector's efforts to integrate into international trade relations (Sida, 2021: 10, 12, 15–16; Interviews 1–3, 7, 17, 19, 21–22, Sida HQ). While the Guidance does not provide an exhaustive explanation of how each of these activities induces anti-corruption change, it suggests that, ultimately, these measures will supplant "the current (corrupt) system of incentives" (Sida, 2001: 16).

Interviews with KIIs at Sida's HQ revealed that the envisioned anti-corruption mechanism centers on a) influencing incentives across multiple facets of a social system simultaneously, and b) not targeting corruption directly (Interviews 1, 4, 17 Sida HQ). For example, one interview (Interview 17, Sida HQ) remarked, "... gender equality, education, and taxes... we took it directly from the work of the Quality of Government Institute and DFID [the UK Department for International Development]." The QoG approach fundamentally

embodies a CAP-based theory of anti-corruption change, emphasizing the pivotal role of reshaping shared expectations about the behavior of others as a pathway to eradicating corruption.

While the Guidance explicitly mentions measures to facilitate collective action, both the Guidance and KIIs often construe such facilitation merely as a coordinated effort by individuals or organizations to address a shared issue. For instance, within the section entitled "Anti-corruption Coordination and Dialogue," the Guidance underscores the importance of endorsing business leadership committed to ethical business conduct as a form of collective action (Sida, 2021, 20). Similarly, as a KII explained,

> [Corruption as a] collective action problem is built into our approach. To support the actors prepared to fight corruption. This is the essence of collective action. […] A key part is building coalitions of the willing. It is very important to support these coalitions. […] They do not need to be many, but they need to be of high quality. (Interview 1, Sida HQ)

These reflect a somewhat reductionist perspective on facilitating collective action as the focus is on coordination, overlooking a multitude of facilitators for generating and sustaining successful collective action (Jagers et al., 2019). While the overarching causal narrative behind strategic indirect interventions is consistent with CAP, some examples of such measures are anchored in PAT's logic. For instance, the Guidance contends that an independent media enhances the observability of government behavior and reduces information asymmetry between the public and the government, resulting in increased scrutiny and accountability for the government (Sida, 2021: 16). While observability, monitoring, and sanctioning are also part of the repertoire of measures to sustain successful collective action (D'Arcy & Nistotskaya, 2017; Jagers et al., 2019), in this particular case their use is rationalized by addressing the behavior of a "rogue" agent (a fundamental PAT assumption) through improved

monitoring and reduced information asymmetry (core PAT mechanisms in combating corruption) (Rose-Ackerman, 1978). This example highlights the significance of a comprehensive theory of change in anti-corruption work. As PAT and CAP may endorse the same set of measures, it becomes crucial to specify the assumptions in which these measures are grounded, the actors to which they are applied, and, most importantly, articulate a coherent narrative of how measure X fosters anti-corruption change.

If those responsible for implementation of the anti-corruption policy lack clarity on these issues, several challenges may arise. They may struggle to design impactful anti-corruption measures. This could also lead to a lack of coherence between different contributions managed by different individuals. Additionally, the lack of clarity regarding the theory of change makes it difficult to evaluate the impact of anti-corruption interventions, making it challenging to assess progress and make informed decisions for future interventions. In the worst-case scenario, the lack of understanding of how (at least some) strategic indirect interventions differ from the previously advocated rule and enforcement approach may result in confusion and even skepticism about the credibility of anti-corruption interventions.

In summary, Sida's anti-corruption approach advocates for greater emphasis on strategic indirect interventions. The crux of the theory of change guiding these interventions centers on addressing corruption indirectly by altering the current incentive structures (e.g. of taxpayers, public service customers, presently marginalized groups), which draws heavily on the CAP literature and the Quality of Government literature in particular. However, within the policy's interpretation of CAP, there is a notable emphasis on coordination as the primary facilitator for generating and sustaining successful collective action. At the same time, a set of crucial facilitators, such as increasing concern for other actors' needs and preferences, improving procedural and distributional fairness, increasing interpersonal trust, improving communication, and others are not

sufficiently developed (Jagers et al., 2019, 1290). Furthermore, there remains a degree of ambiguity regarding the precise pathways through which strategic indirect interventions engender anti-corruption transformation.

In addressing the **systematic integration** of anti-corruption efforts, the Guidance envisions this effort at both the strategy level (discussed in 3.3) and within contributions (Sida, 2021: 17). Regarding its application in contributions, the Guidance explicitly references the developmental governance and organizational literatures (Sida, 2021: 19, 23), which view corruption as a fundamentally contextual phenomenon. The anchoring of systematic integration to these theoretical perspectives is evident in the fact that the Guidance provides over thirty examples of systematic integration in the context of the education sector. Moreover, it signposts to U4's and TI's publications on the integration of the anti-corruption perspective in development contributions in other sectors, such as natural resource management, public health, water systems, migration, the private sector, public finance management, justice, and education (Sida, 2021: 19).

The Guidance maintains that each contribution, even those that do not have corruption as their primary objective, has "areas" that are logically linked to anti-corruption (Sida, 2021: 17). These areas are accountability, transparency, integrity, participation, efficiency and impartiality in administrative and management processes (Sida, 2021: 12, 17–18, 23–24). It is within these areas that Sida's policy advocates specific anti-corruption activities to be initiated and implemented. Furthermore, as one KII emphasized "the anti-corruption potential of systematic integration is at the highest when all 'areas' are activated within a contribution" (Interview 23, Sida HQ).

This approach is, however, not without problems. As noted by Michael Johnston, a distinguished scholar of anti-corruption change, anti-corruption discourse and the anti-corruption industry has developed a lingo, including terms such as accountability and transparency, which "appears to answer questions that we haven't

taken time to frame with precision" (Johnston, 2023). Even though the Guidance underscores that the concrete forms of transparency, accountability and others – which we refer to as "first order" measures – should be context-adjusted (Sida, 2021: 19), the policy's focus on these first-order measures carries the risk of promoting a one-size-fits-all approach that precedes a nuanced understanding of corruption in different contexts. As Johnston cautions, the persistent use of this "tired language" is a major reason why anti-corruption reforms have often fallen short: it diminishes our ability to understand "a tremendous range of problems and variations" inherent in corruption, thereby impeding the development of impactful measures (Johnston, 2023).

Moreover, the application of some of these first-order measures is problematic from the collective action point of view. As Bauhr & Grimes (2014) have pointed out, the logic of collective action suggests that exposing widespread and severe corruption may actually discourage citizens from demanding accountability, rather than igniting them to demand it. Simply put, given Sida's operations in environments marked by systemic corruption, increased transparency might actually hinder anti-corruption change. Furthermore, the policy's focus on these first order anti-corruption measures poses a risk that partner organizations, and Sida's personnel on the ground, may converge on the incorporation of these jargon words into contribution documentation and dialogue without meaningfully adapting them to the context. This risk is understood by some of the KIIs, describing such uncritical adoption of first-order measures as "mainstreaming" (Interview 7, Sida HQ).

Sida's approach mandates that every contribution, irrespective of its objectives, intersects with anti-corruption through accountability, transparency, integrity, participation and efficiency, and impartiality in administrative processes. It underscores the importance of customizing these measures to sectoral contexts, which seems to align well with the developmental governance and organizational literatures. However, the reliance on these rather generic measures

appears contradictory to these literatures, which emphasize the importance of a deep understanding of corruption in its context before devising any solutions. The unconditional use of measures such as transparency in contexts where corruption is widespread may also be problematic for generating a robust response to collective action. In other words, there is some inconsistency in how this approach relates to existing theories of anti-corruption change, which raises questions about its relevance to the current knowledge base.

In summary, while not fully disregarding measures aimed at improving formal rules of human interaction and their enforcement, Sida's current anti-corruption approach is centered on addressing corruption indirectly through context-specific preventive measures and systematically integrating anti-corruption into all facets of its operations. Table 1 outlines the major differences between Sida's old and current approaches. The current approach stems from Sida's characterization of corruption as a predominantly social practice permeating society at all levels. This enables Sida to draw upon various theoretical frameworks of anti-corruption change and to expand the range of anti-corruption measures.

Table 1: Sida's anti-corruption approach: old and current

Old approach	Current approach
Focus on individual corrupt acts	Focus on corruption as a social practice and a systemic phenomenon
Reactive: detection and prosecution of corrupt acts	Proactive: prevention of corruption
One-size-fits-all	Context-specific
Direct approach: rule and enforcement	Measures that do not target corruption directly and systematic integration of anti-corruption

While the idea of addressing corruption indirectly draws heavily on the CAP literature, and the Quality of Government approach in particular, several facilitators necessary for generating and sustaining successful collective action are not adequately incorporated. Additionally, there is considerable ambiguity regarding the underlying causal mechanisms of certain suggested operational solutions, such as monitoring and sanctioning. This may hinder effective implementation of the policy by personnel on the ground. Moreover, the less established theoretical foundation of the systematic integration approach compromises the policy's potential to effectively reduce corruption in partner countries.

3.3 Anti-corruption in Swedish international development cooperation strategies

This section addresses the question of the extent to which anti-corruption concerns are included in Swedish development cooperation at the policy level. Swedish international development cooperation with and humanitarian assistance to other countries and regions, in thematic areas and with multilateral organizations, is governed by government strategies. As strategies constitute the central guiding documents for all government personnel involved in international development cooperation, the inclusion or exclusion of anti-corruption in strategies influences the potential of Sida's anti-corruption efforts: "Program officers take anti-corruption much more seriously when reduced corruption is a goal of the strategy under which they operate" (Interview 21, Sida HQ). The designation of reduced corruption as a goal holds particular significance as it directly impacts the allocation of financial resources to the pursuit of anti-corruption change (Interviews 1, 3, 18, Sida HQ).

Currently, Sida is guided by 45 strategies, which include 26 bilateral, seven regional, and 12 thematic strategies. Government development cooperation strategies are typically concise documents, spanning five to six pages. Each strategy is structured into three parts: one delineating objectives, another addressing specific contextual considerations, and a third outlining suggested activities.

In our analysis, we first examined whether each strategy explicitly referenced reducing corruption as either a goal or an activity. A greater frequency of the term reduced corruption across strategies, whether denoting a goal or an activity, indicated a more thorough consideration of the anti-corruption perspective. In the next step, we attempted to analyze the semantic context surrounding the term "corruption" to discern whether the core facets of Sida's anti-corruption approach – viewing corruption as a systemic phenomenon, considering context-specific factors, prioritizing prevention, and employing indirect measures and systematic integration of anti-corruption – have been incorporated into the strategies. However, due to its small size (225 pages) (with the exception of systematic integration, which is discussed below), the corpus of the strategy documents did not allow for meaningful quantitative analysis of all aspects of the approach. Instead, insights into the portrayal of the nature of corruption and the anti-corruption measures contained in the strategies build on a qualitative analysis of the strategies relevant to the case studies.

3.3.1 Reduced corruption as goal and activity

The goal of reduced corruption is explicitly stated in 15 out of 26 bilateral development cooperation strategies. A parallel commitment to combating corruption is evident in three regional strategies and three thematic strategies (see Tables B1, B2, B3 of Appendix B.2). In other words, reduced corruption is explicitly designated as a goal in about half of the government strategies (47%), indicating that an anti-corruption perspective is not fully considered

in Swedish international development cooperation at the policy level. This is, however, a considerable increase compared to 2011, when only 10% of the strategies included corruption as an objective (Interview 18, Sida HQ) and to 2014 when 23% of strategies had this objective. This indicates a positive trend when it comes to the integration of an anti-corruption perspective over time.

Regarding the incorporation of reduced corruption as an activity, 21 out of the 26 bilateral strategies, five out of the seven regional strategies and four out of the 12 thematic strategies explicitly include it as a pursued activity. This means that two-thirds (67%) of the strategies designated anti-corruption as an activity. At the same time, in four bilateral strategies, one regional and six thematic strategies (see Appendix B.2), the term reduced corruption is neither mentioned as an explicit goal nor as an activity.

Moreover, while each bilateral and regional strategy emphasizes the relevance of its activities to SDG 16, the absence of reduced corruption as an activity in some of these strategies suggests a potential discrepancy in the interpretation of SDG 16 within the bilateral and regional strategies. In other words, in reference to SDG 16, some strategies incorporate SDG 16.5 – substantially reduce corruption and bribery in all its forms – while others do not. This discrepancy raises questions about the overall consistency in the integration of an anti-corruption perspective across strategies.

3.3.2 Systematic integration into strategies

Sida's anti-corruption approach emphasizes the importance of integrating anti-corruption into every contribution by incorporating measures related to accountability, transparency, participation, integrity, and efficiency. Notably, each of these broad measures holds equal weight within the approach. Therefore, a balanced representation of these measures would signify a robust integration of an anti-corruption perspective. Conversely, significant variance in the frequency of any measure could imply a less comprehensive integration.

Among the 45 strategy documents, these terms collectively appear a total of 95 times. However, there is notable variability in their frequency. The most frequently mentioned term is "accountability" (48 times), followed by "transparency" (24) and "participation" (18). "Efficiency" appears only five times, and "integrity" does not feature at all. Furthermore, only one out of five 'first order' systemic integration measures (accountability) appear in all of the strategies. Three other measures feature in at least 40% of the strategies and one measure did not make it into a single strategy. This brief analysis suggests that the strategies may fall short in incorporating the systematic integration of anti-corruption and also in maintaining Sida's intended focus on the equal importance of all measures. In other words, the degree of integration of this aspect of anti-corruption policy within the strategies appears to be low.

In summary, presently half of the government strategies have reduced corruption as a goal, pointing to something less than the full incorporation of an anti-corruption perspective into Swedish international development cooperation strategies. This is, however, a substantial increase compared to the 2010s, when only 10% of the strategies included such a goal. Furthermore, two-thirds of the strategies contain reduced corruption as a designated activity, suggesting that anti-corruption at the time of this analysis had become an integral part of Swedish international development cooperation. However, including reduced corruption into strategies as a goal is, arguably, more consequential for the success of Sida's anti-corruption efforts as it impacts the allocation of aid funds for anti-corruption initiatives. As one of our key interviewees explains, "a key indicator of meaningful integration of anti-corruption is how many strategies have reduced corruption as their goal" (Interview 18, Sida HQ). When it comes to what Sida's anti-corruption approach refers to as the systematic integration of anti-corruption, we do not find evidence of a balanced representation of the focal measures – accountability, transparency, participation, efficiency, and integrity – throughout the strategies, as required by the policy.

3.4 Conclusion

This chapter has presented a comprehensive analysis of Sida's anti-corruption approach (policy), including a mapping of its conceptual and theoretical underpinnings, an evaluation of its relevance to the existing knowledge base, and an examination of the inclusion of anti-corruption in Swedish international development cooperation strategies.

Sida's anti-corruption approach can be summarized as (1) viewing corruption as a social practice that permeates all spheres of society and as a development obstacle, (2) which is best addressed through indirect, (3) context-specific, and (4) preventative measures, and by (5) systematically integrating anti-corruption into all of Sida's development efforts.

This approach is relevant from the point of view of both the current knowledge base and the prevailing standard in the development cooperation industry (see Appendix B.4 for a sample of opinions about Sida's anti-corruption approach by other donors and stakeholders), pointing to its high potential to contribute to reduced corruption in partner countries.

Although Sida's anti-corruption approach is largely aligned with the accumulated knowledge, a degree of misalignment is detected in relation to the application of collective action theory and the insights from sectoral and organizational literatures. Additionally, there remains a degree of ambiguity regarding the precise pathways through which the advocated measures, particularly measures of systematic integration, engender anti-corruption transformation. This misalignment and ambiguity pose a risk to the policy's potential to contribute to the reduction of corruption in partner countries.

Having examined the 45 current government strategies, we found that half of them included the goal of reduced corruption, which according to the evaluative criteria set in the analytical framework signifies a moderate level of inclusion of anti-corruption at the policy

level. There is, however, a substantial increase in the share of strategies that have reduced corruption as a goal compared to 2011, which points to a positive trajectory of integration.

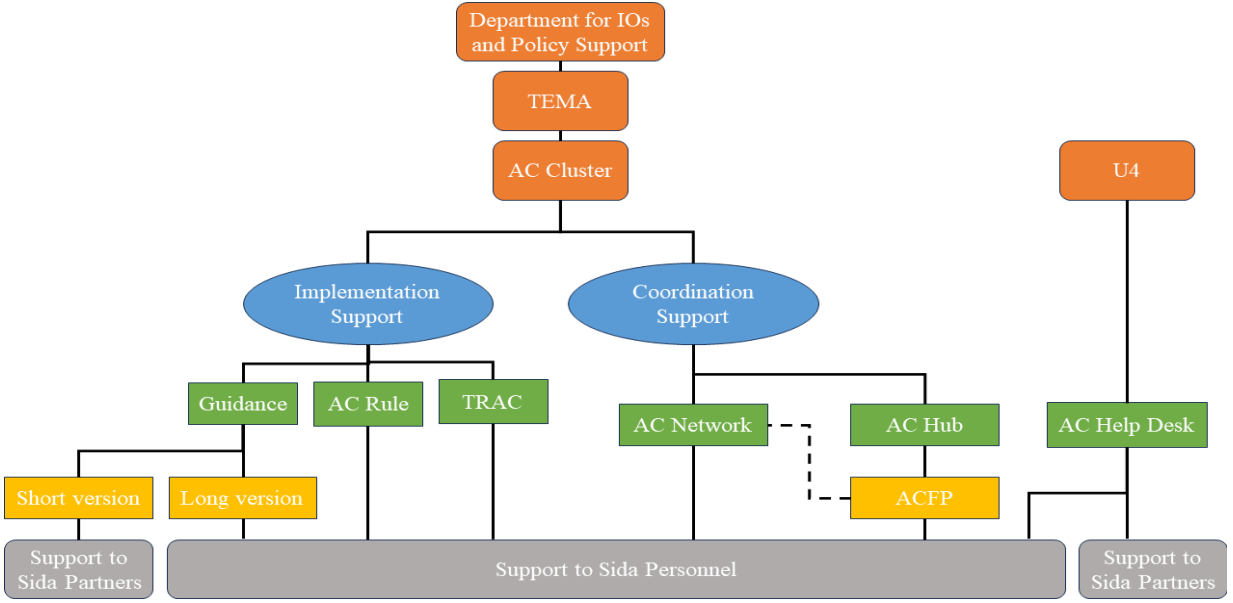
Finally, we find that despite the policy's emphasis on the equal significance of the five areas of anti-corruption efforts underpinning systematic integration, the concepts reflecting these five areas do not appear consistently across all the strategies. Therefore, we evaluate the integration of this facet of the policy as low.

4 The structure and organization of Sida's anti-corruption work

4.1 The anti-corruption cluster

Sida's work with corruption as a development obstacle falls under the purview of The Unit for Thematic Support (TEMA) of the Department for International Organizations and Policy Support (INTEM). The planning, implementation, and coordination of anti-corruption activities are carried out within the framework of INTEM/TEMA's regular operational processes. The Anti-Corruption Cluster, until recently featuring three senior policy specialists is hosted by TEMA. The Cluster supports the implementation and coordination of Sida's anti-corruption approach. TEMA's work involves developing tools to support policy implementation, gathering evidence, conducting contextualized corruption analyses, developing methods and knowledge about thematic and cross-sector connections, and integrating the various approaches and methods utilized by Sida. The work of the Cluster entails coordinating Sida's thematic networks for knowledge exchange and providing expert support to government offices. Figure 4 visualizes the organization of Sida's anti-corruption work.

Figure 4: Organization of Sida's anti-corruption work



Note: Orange denotes specified units of Sida's organizational structure. Blue denotes the core functions of the connected unit. Green denotes tools to support personnel in the implementation of the anti-corruption perspective. Yellow denotes sub-components of the connected tools. Most of the units, functions, and tools of Sida's anti-corruption structure are used internally within Sida's overall organizational structure. U4 and a short version of the Guidance are also used externally by Sida's partner organizations.

4.2 Tools to support implementation

Anti-corruption policy is operationalized through a range of documents and specialized tools, such as the contributions management software TRAC. Central to Sida's operational framework is the "Guidance for Sida's Work on Corruption as a Development Obstacle", developed in 2019 and updated in 2021 (Sida, 2021). This is available in long-format for POs at embassies and short-format for Sida's partner organizations. This document provides guidance on anti-corruption action and is structured around the four key building blocks, detailed in Table 2.

Among the operational documents are the so-called anti-corruption action plans, which detail a spectrum of activities that development cooperation personnel at Sida's HQ, regional offices, and embassies should undertake to achieve the goal of reducing corruption in partner countries. Since the adoption of the 2016 Anti-corruption Rule, two action plans have been adopted: one for 2017–2019 and another for 2020–2023. No new action plan has been adopted since the latter one expired, but anti-corruption has instead been incorporated into Sida's Operational Plan for 2024–2026. Both action plans were drafted by a working group within Sida's Anti-Corruption Network, with support from embassies and other departments, including the Department for International Organizations and Policy Support (INTEM), which represents a key node in Sida's anti-corruption "infrastructure".

The Action Plan for Preventing and Mitigating Corruption for 2020–2023 (Sida, 2020) positions anti-corruption work as directly contributing to Sida's overarching goal of poverty reduction and sustainable development (p. 2) and is expected to be conducted along both the development and risk perspectives. The former perspective encompasses seven specific areas of action, while the latter includes only two areas (pp. 4–7), suggesting that the latest operational framework presents the policy's emphasis on corruption

as a development obstacle. This represented a change from the previous Action Plan for 2017–2019, which designated five specific areas under the development perspective and six under the risk perspective.

Table 2: Guidance for Sida's anti-corruption work

Building bloc	Description
1. Understanding corruption	This entails a deep understanding of the actual state of corruption in Sida's partner countries as the first step of the anti-corruption effort. The understanding of corruption may be built on several types of study, including a political economy analysis (see Appendix C.4), focusing on the dynamics of corruption, TI's National Integrity System Assessments, UNCAC's country analyses, Public Expenditure Tracing Surveys (PRTS), and Quantitative Service Delivery Surveys (QSDS). This knowledge is expected to inform all forms of Sida's anti-corruption work and at all levels.
2. Strategic interventions against corruption	This includes interventions where the elimination of corruption is a stated objective. Strategic interventions can contribute to the eradication of corruption as a development obstacle directly and indirectly, and there is a clear emphasis on indirect strategic intervention.
3. Systematic integration of anti-corruption in interventions	Integration of the anti-corruption perspective into strategies and anti-corruption measures into projects and programs, even when corruption eradication is not among the stated goals. These measures typically focus on enhancing transparency, accountability, participation, integrity, efficiency, and impartiality.
4. Coordination and dialogue	Collaboration and coordination with other donors and key national and international actors in order to contribute to genuine change. This is achieved through formal and informal networks for sharing experiences of supporting anti-corruption efforts, advocacy, and coordinating with prioritized national actors in anti-corruption initiatives.

Within the development perspective, the 2020–2023 Action Plan further distinguishes between operations aimed at supporting partner countries' own efforts to combat corruption and coordination with other donors and strategic partners. Table C.1 of Appendix C lists examples of anti-corruption measures aimed at supporting partner countries' own anti-corruption efforts, which the Action Plan's authors "assessed to have the greatest impact and contribution to goal achievement" (p. 9).

Furthermore, various documents serve as practical tools for translating the anti-corruption policy into actionable measures. These include:

- The Checklist for the integration of the anti-corruption perspective into new strategies.
- The Checklist for the integration of the anti-corruption perspective into the operationalization of new strategy or annual strategy plans.
- Guidelines for organizations seeking financial support from Sida.
- A dialogue support paper to facilitate discussions with partner organizations.
- A special version of Sida's Guidance for partner organizations.
- The Guidance tool for addressing corruption in education (systematic integration).
- Training materials based on Sida's Guidance for departments, units, embassies, and partner organizations.

A vital element of the operational framework is Sida's contributions management software, TRAC. It features a dedicated assessment section, mandating consideration of anti-corruption from both risk and development perspectives during contribution evaluations and assessments. This anti-corruption assessment within TRAC is supported with explanatory texts and prompts to address a

comprehensive set of questions related to anti-corruption measures (Sida, ndb), rendering TRAC an indispensable component of the operational framework.

A critical operational aspect of Sida's anti-corruption policy is the absence of anti-corruption as one of the integration perspectives in Sweden's development cooperation (for a detailed presentation of each of the perspectives, see Table C.3 in Appendix C). Five perspectives – poverty, human rights, conflict, gender equality, and environment and climate – "form a point of departure for all that Sida does – analysis, interventions, and dialogue" (Sida, 2020: 1). The fact that anti-corruption is not classified as a perspective has several important implications. First, operationalization of the anti-corruption approach has lagged behind that of the five perspectives, each of which is supported by a broad range of tools for translating policy frameworks into actionable measures. For instance, Sida's Poverty Toolbox alone comprises nearly thirty distinct documents, offering guiding questions, a menu of indicators, numerous examples of multidimensional poverty analysis, and other supportive materials (Sida, nda).

Second, and more importantly, the fact that anti-corruption is not designated as an official perspective may have a negative impact on the incentives of implementing staff. A substantial body of literature on public sector performance suggests that goal-setting plays a crucial role in shaping employees' affective responses, such as motivation and commitment, as well as their overall performance (Latham et al., 2008; Perry et al., 2010; Rainey, 2009). Specifically, when a hierarchy of goals is established, employees are likely to prioritize goals that are perceived as more important, diverting attention and effort away from those deemed less significant, thereby potentially reducing overall performance (for a review of the literature, see Nistotskaya (2023)). For example, as argued by Towns et al. (2023: 26), when the Swedish Feminist Foreign Policy was adopted by the Swedish government in October 2014, it was a

clear signal that all the MFA-related actors "should prioritize work with gender equality". This emerged as a recurring theme in KIIs, with one interviewee stating,

> Anti-corruption is competing with five other perspectives. Because they are 'official' [perspectives] and anti-corruption is not, the incentives are clear – the 'must' ones go first... relegating anti-corruption to an afterthought. (Interview 21, Sida HQ).

4.3 Tools for coordination

The Guidance recommends establishing "robust routines for sharing and learning from our own experience" (Sida, 2021: 12). These routines are intended to be carried out internally, encompassing discussions both within the embassies and with colleagues at Sida at large, with fellow donors engaged in anti-corruption efforts, and with partner organizations. Several such routines have been instituted and integrated into what this report refers to as the anti-corruption infrastructure.

Key components of the infrastructure include the Anti-Corruption Hub and Anti-Corruption Network. The Hub functions as coordination mechanisms between the anti-corruption focal points (ACFPs) – designated personnel in various departments at Sida's headquarters and embassies. It is a primary communication platform for the Anti-Corruption Cluster to disseminate anti-corruption-related matters organization-wide. Departmental focal points also serve as the primary contacts for embassy staff on anti-corruption issues. By way of contrast, the Network targets a broader audience of international development cooperation professionals beyond the ACFPs, with the aim of increasing the efficiency and quality of Sida's and Sweden's anti-corruption work through knowledge transfer and coordination. The Network convenes four to five meetings annually, in which ACFPs, other personnel at embassies, invited scholars, and

representatives of donor and partner organizations exchange experiences, share updates, and participate in topical seminars organized by the thematic departments. Information sharing primarily occurs through an internal web page, regularly updated to provide members with the latest information. Additionally, major updates are communicated via newsletters to prompt members to check the web page for updates.

The anti-corruption infrastructure features two helpdesks to support anti-corruption work undertaken by development cooperation professionals and partner organizations in partner countries: the U4 Anti-Corruption Helpdesk (run in collaboration with TI) and the Finnish Consulting Group (FCG) Democracy and Human Rights Helpdesk. The helpdesks reply to corruption-related queries in concise and quality-checked briefings of 5–10 pages. The responses are based on desk research and knowledge drawn from a network of several hundred experienced practitioners. The topics encompass a broad spectrum of issues, ranging from the efficacy of anti-corruption agencies and recent developments in anti-corruption legislation at the global and EU levels to anti-corruption interventions in post-conflict settings (Heilbrunn, 2007). The most recent queries answered by the U4 Helpdesk range from updates on major contemporary concepts in corruption research, public service delivery in sectors, and illicit financial flows across borders to corruption analyses at the country-level in Kazakhstan, Uzbekistan and Syria, and at the sector-level in the education sector in Ukraine and natural resources in Madagascar.

4.4 Partner organizations and program officers

Sida's operational framework places organizations operating in partner countries at the forefront of its anti-corruption efforts. These partner organizations encompass a diverse array of actors, ranging from international organizations and Swedish state agencies to the

governments or state agencies of the country in question, as well as civil society organizations (CSOs). Unlike some other organizations administering Swedish development cooperation funds, Sida does not issue open calls to which organizations can apply under conditions of competition. Instead, potential partners apply for Sida funding, with embassy program officers assisting in shaping project parameters in such a way that, apart from responding to partner needs and the partner country's government policies and priorities, they reflect the strategic priorities of the relevant Swedish development cooperation strategy. Sida's five development perspectives (the two overarching perspectives: the poor people's perspective on development and the rights perspective; and three thematic perspectives: conflict, gender equality, and environment and climate) and the anti-corruption perspective, both as a risk and as development, must also be taken into consideration. As a recent study on the organization of Swedish development cooperation has shown, employees of the entities administering Swedish aid funds, including Sida, have an important say in "constructing" the applications (David, 2021). The formal funding decisions are made by the heads of development cooperation.

This approach is grounded in Sida's broader commitment to the Paris Declaration on Aid Effectiveness (2005) and the Accra Agenda for Action (2008), which established ownership as a fundamental principle of international development cooperation. The ownership principle underscores the leadership and responsibility of the political community – the recipient of funding – in shaping their development priorities, policies, and strategies.

Requiring partner organizations to initiate the funding application process, with Sida, as the first mover serves several crucial functions in facilitating effective anti-corruption efforts, as explained in KIIs. First, it acts as a potent cooperative input into the effort to uproot the corrupt equilibrium, thereby encouraging others to cooperate, and eventually leading to a strong "coalition of the willing" (Interview 1, Sida HQ). From a CAP perspective, this encourages

conditional cooperation, a vital facilitator of large-scale collective actions (Jagers et al., 2019). Second, local partner organizations possess a deep understanding of the context, enabling them to identify "the right areas and the right methods" as well as "windows of opportunity" for successful anti-corruption work (Interviews 1, 4, Sida HQ). This is where local partner organizations hold a comparative knowledge advantage. Furthermore, this aspect of Sida's organization of anti-corruption work in partner countries makes Sida's anti-corruption efforts relevant, as per OECD DAC's definition of relevance, because it puts the needs and priorities of partner organizations at the center (OECD, 2021).

Consequent to partner organizations taking a large role in Sida's operational framework, Sida's program officers are the primary Sida personnel responsible for overseeing projects and programs aimed at development and humanitarian assistance. Program officers typically work within a thematic area, such as gender equality, the environment, civil society, or state institutions. They play a central role in appraising proposed interventions, monitoring and evaluating interventions, liaising, and coordinating with partner organizations and other donors, and supporting partner organizations' efforts to ensure their objectives and activities are aligned with those of Sida. As elucidated in the case studies, program officers form a personal working relationship with their counterparts in partner organizations and often take personal ownership of the contribution, signaling that although the partners are responsible for designing and "owning" the intervention, Sida is equally committed to the efforts made.

As of summer 2023, approximately 220 program officers were employed in the development cooperation sections of Swedish embassies in countries where Sweden is engaged in development cooperation. This figure was determined through communication with the heads of the development cooperation sections during the administration of a questionnaire, which is detailed in the subsequent section. At the request of EBA, the heads of the development cooperation sections furnished the research team with the contact

information of all currently employed program officers at the section. It is noteworthy that neither Sida nor the MFA were able to provide a comprehensive list of all currently employed personnel at the sections, and during the compilation of the list, some personnel were either in the process of exiting from or onboarding into the section, rendering this number somewhat provisional.

Program officers can be engaged in either bilateral or regional development cooperation, and they may be employed directly by the embassy or seconded from Sida's HQ. Seconded personnel are typically posted at the embassy for two years, with an option for extension. Frequent rotation of Sida personnel was commonly cited in KIIs as an organizational feature that could potentially undermine not only anti-corruption work but also broader development cooperation efforts (Interviews 1–3, 21, 22 Sida HQ). Furthermore, a recently adopted new human resource policy acknowledged that national program officers were not on "an equal footing with posted staff" (Sida, 2023, 3) which has negative implications for the quality of development cooperation efforts and outcomes. Adopted in October 2023, the new human relations policy aims to increase the fieldwork duration for Sida staff while also expanding the role and presence of national program officers.

4.5 Conclusion

Sida supports the implementation of anti-corruption policy through a robust anti-corruption infrastructure and a range of operational documents and tools that provide guidance for anti-corruption action. The policy's operationalization, however, trails behind other areas of Swedish international development cooperation that have been prioritized by the government as "perspectives". In addition to being tied to a less developed toolkit for supporting implementation, the fact that anti-corruption is not an official perspective creates a hierarchical arrangement of objectives, potentially prompting employees to prioritize goals situated at the apex of this hierarchy.

The on-the-ground work is structured in such a manner that it enables partner organizations to take the lead in generating intervention ideas. This ensures that initiatives are firmly embedded in the local context and effectively address specific needs. Program officers also play a crucial role in shaping contributions, ensuring alignment with the objectives of the relevant strategies set by the Swedish government and the governments of partner countries, and with the initiatives of other donors. However, these sets of objectives may not always perfectly align, underscoring the necessity for meaningful dialogue between POs and local stakeholders to ensure that interventions are responsive to local needs and priorities.

5 Sida's anti-corruption efforts in partner countries: survey data evidence

This chapter provides a comprehensive overview of the implementation of the anti-corruption policy by development cooperation personnel across the countries where Sida conducts development cooperation. It examines how program officers (POs) comprehend the four building blocks of the anti-corruption approach and translate them into action. Based on this data, an assessment is conducted to gauge the extent to which POs adhere to these four building blocks. Furthermore, this chapter seeks to outline the challenges faced by POs in embracing the development perspective and the systematic integration of anti-corruption efforts into policy areas.

We designed and executed an original online survey of POs within Swedish development cooperation sections at embassies in 32 embassies administering Swedish development cooperation funds (aid embassies) and Sida's four regional offices. The survey targeted both National Program Officers (NPOs) and those seconded from Sida's HQ.

The sampling frame, devised with the help of the Expert Group for Aid Studies and the Swedish MFA, was comprised of 220 POs. Out of the 220 POs invited to participate, 149 responded, yielding a response rate of 68%. Out of the 149 respondents, 116 (78%) were stationed at embassies, with each embassy housing a development cooperation section contributing at least one respondent to the survey. All regional portfolios were represented in the sample, with the exception of the West Balkans and Turkey. This offers a solid basis for generalizing the survey's findings to the entire population of development cooperation professionals operating in partner countries.

The survey comprised three sections, amounting to 44 questions in total. The questionnaire paid greater attention to the systematic integration of anti-corruption, as this represented the most novel element within Sida's anti-corruption approach (Interviews 1–3, 17, Sida HQ), distinguishing Sida's efforts from those of other donors (see Appendix B.4). Furthermore, as discussed, systematic integration appears to be founded on the least coherent theoretical basis among all the types of interventions. This warranted a closer examination of its implementation by the on-the-ground personnel.

Appendix D.3 presents all survey questions together with the answer options. The questionnaire featured a clickable glossary providing detailed explanations of the terms used throughout the survey. A General Data Protection Regulation (GDPR) compliant informed consent was obtained from all participants. Appendix D.1 provides detailed information about the implementation of the survey.

We assessed the extent of PO's adherence to the anti-corruption policy on a three-point scale: high, medium, and low. High adherence is inferred when the majority of POs are cognizant of the policy's principles, incorporate different forms of anti-corruption interventions, make use of the anti-corruption infrastructure, and actively participate in coordination and dialogue. Moderate adherence is indicated when approximately half of the POs meet these criteria. Conversely, low adherence is observed when the majority of POs lack awareness of the policy's principles, fail to integrate all types of anti-corruption interventions, neglect the anti-corruption infrastructure, and refrain from engaging in coordination and dialogue.

5.1 Program officer backgrounds

The average age of respondents was 48, ranging from 26 to 69 years old. A significant majority of the participants (64%) self-identified as female. While no POs identified as a gender other than male or female, 2 opted not to answer the question. Furthermore, an overwhelming majority of POs reported to hold a master's degree or higher (72%), with 16% possessing a PhD degree.

A typical PO had 6 years of working experience with Sida, with the range spanning from 1 to 24 years. The majority of respondents were stationed at embassies (81%), while the remainder worked in Sida's regional offices. In terms of employment contracts, a larger share of POs had a national contract (55%) compared to those being seconded (45%).

Most POs were not employed by Sida before assuming their current positions (58%). The most common previous employment was with international NGOs (34%), followed by international governmental organizations (28%), and the government of the partner country (12%). The least common prior employment included Swedish NGOs (1%), academia (1%) or being unemployed (1%).

Concerning previous anti-corruption experience, 26% of respondents worked with the risk perspective, 8% with the development perspective, and 45% with both perspectives. Put differently, about half of all respondents had prior experience with the development perspective. On the other hand, 21% had no anti-corruption experience, pointing to the need for Sida's commitment to equip staff with the necessary skills to address corruption effectively.

Regarding anti-corruption training, 16% of respondents had received training on the risk perspective, 10% on the development perspective, and 69% on both perspectives. Only 5% of respondents had received no anti-corruption training. This indicates that an overwhelming majority of POs had undergone training in the development perspective.

The survey data suggests that the personnel tasked with implementing the anti-corruption efforts in partner countries comprised a well-educated and diverse workforce. The fact that approximately half of the POs reported to have prior experience in anti-corruption, coupled with the majority having undergone anti-corruption training, establishes a robust foundation for impactful anti-corruption efforts.

5.2 Corruption analysis and understanding corruption in context

The Guidance for Sida's work with corruption as a development obstacle underscores the importance of conducting a thorough analysis of corruption within the specific contexts in which Sida operates as a first step in any attempt to effect change (Sida, 2021). According to the survey data (N=138), almost three-quarters (72%) of all POs had access to a written corruption analysis of the context in which they operate. Among POs stationed at embassies (N=116), 77% confirmed having access to a corruption analysis. Among POs with access to a corruption analysis (N=100), the substantial majority (83%) affirmed that it aided them in identifying and better supporting contributions with the potential to reduce corruption.

When respondents were asked to rank various obstacles to development, presented to them in a randomized order, corruption was consistently ranked as the top obstacle. Specifically, 72% of POs ranked corruption as the first or second biggest obstacle to development. Subsequent to corruption, respondents ranked income inequality, lack of human rights, absence of democracy, gender inequality, conflict, and environmental degradation and climate change in that order. This points to the alignment of POs' perceptions of corruption with that of the Swedish government and of Sida's anti-corruption approach (Sida, 2016, 2021).

The vast majority of Sida personnel working in partner countries perceived their understanding of corruption in the contexts in which they operate as either very good or good, accounting for 27% and 59% of all respondents, respectively. In multivariate regressions, we observed that respondents on national contracts, those who have undergone anti-corruption training with a focus on the development perspective, and those with access to a corruption analysis had a significantly higher estimate of their own understanding of corruption (see regression results in Figure A6 of Appendix D). This implies that comprehension of corruption is not only a function of

inherent local knowledge among national employees but can also be cultivated through training and dedicated corruption analysis – both integral components of the anti-corruption policy.

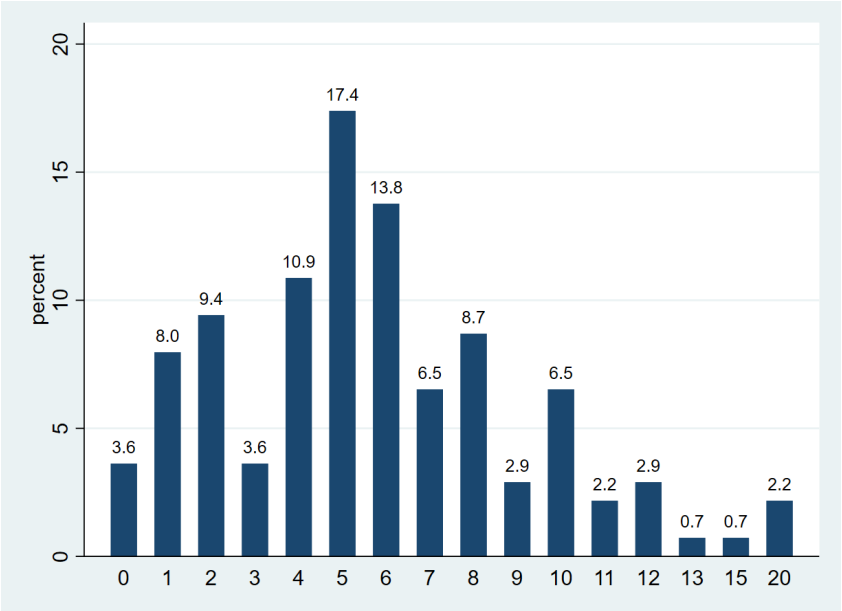
Furthermore, 72% of POs agreed with the statement that their understanding of corruption has improved in the last two years. The results of the multivariate regression analysis show that seconded employees, those with access to a corruption analysis and those who see corruption as a first-order obstacle to development were more likely to have seen an improvement in their knowledge of corruption (see regression results in Figure A6 of Appendix D).

Taken collectively, these findings suggest a strong adherence to this facet of the anti-corruption policy by personnel operating in partner countries.

5.3 Strategic anti-corruption interventions

Supporting contributions is the cornerstone of a PO's day-to-day work in partner countries. According to the survey data, on average, POs manage sex contributions, ranging from zero to a maximum of 20. 82% of POs oversee up to eight contributions. Figure 5 depicts the distribution of the total number of contributions handled by POs.

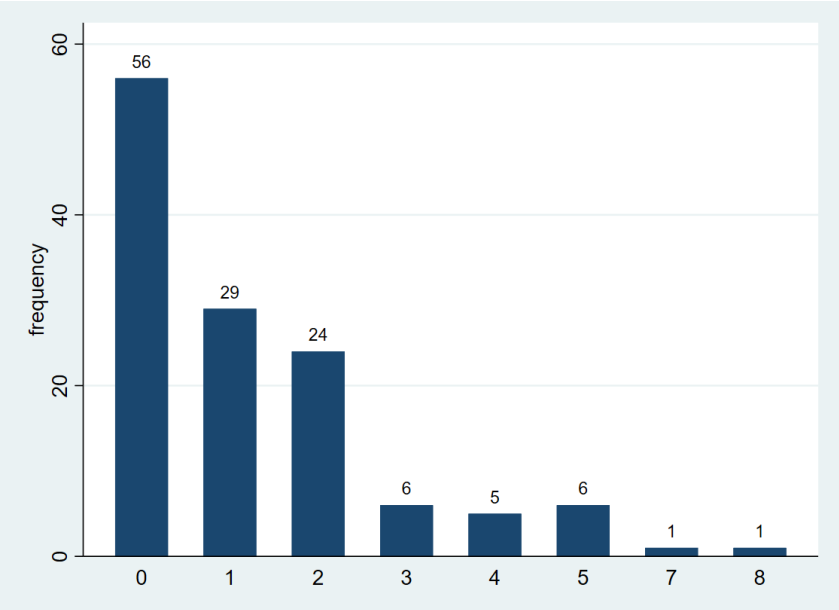
Figure 5: Total number of contributions in current portfolios



The number of strategic – both direct and indirect – anti-corruption contributions in POs' portfolios ranged from between zero to eight (Figure 6). 44% of the respondents (N=128) had no strategic anti-corruption contributions in their portfolio and half of the respondents reported managing one or two such contributions.

The reported figures of contributions containing strategic interventions (N=160) and also of the systematic integration of anti-corruption (N=432) align with the data compiled by Sida's Anti-Corruption Cluster (Figure C.2 in Appendix C). This suggests that the survey provides a reliable reflection of the actual scope of anti-corruption efforts on the ground, thereby providing more credence to our survey results.

Figure 6: Strategic anti-corruption interventions in current portfolios, number of contributions



5.4 Systematic integration of anti-corruption

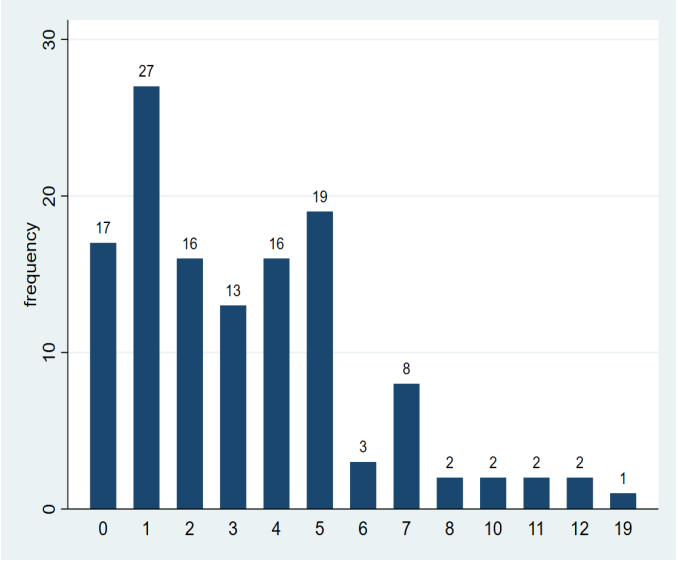
Regarding the systematic integration of anti-corruption, the number of such contributions ranged from zero to 19 (Figure 7). On average, POs managed three such contributions, but 16% of POs (N=128) stated that they managed no contributions with systematic integration. About 38% of POs reported an increase in the number of contributions with systematic integration measures in their portfolios compared to two years ago, indicating a more extensive adoption of the anti-corruption approach.

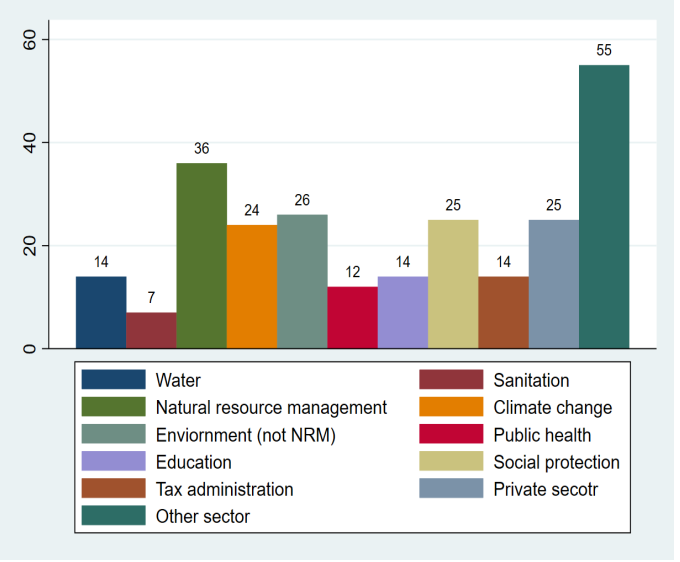
According to POs, contributions incorporating measures of systematic integration were most prevalent in the environmental sector (56%), including natural resource management. This was followed by the climate change, social protection, and private sector

(around 25 contributions in each sector). The right panel of Figure 7 depicts the distribution of contributions related to systemic integration across various sectors.

A notable finding is that a sizable majority of POs (62%) expressed a lack of clear understanding regarding the theory of change underlying the systematic integration of anti-corruption into their work. This aligns with our findings from the policy analysis, indicating a high degree of ambiguity regarding the precise pathways through which systematic integration fosters anti-corruption transformation. Essentially, this aspect of policy lacks clarity and/or is not well understood among POs, suggesting limited potential for such measures to contribute to reducing corruption. This underscores the need for increased attention and resources to clarify this aspect of anti-corruption policy and to provide adequate support for POs in effectively implementing it.

Figure 7: Systematic integration of anti-corruption in current portfolios





5.5 Anti-corruption infrastructure

At embassies, 81% of POs acknowledged the presence of a designated Anti-Corruption Focal Point (ACFP), with 15 respondents (10%) serving in this role themselves. Additionally, 12% of respondents expressed uncertainty regarding the existence of an ACFP, while an additional 8% confirmed its absence altogether. By comparison, in a survey on the implementation of Swedish Feminist Foreign Policy, 71% of employees at Swedish aid embassies reported that their embassy had a Gender Focal Point (GFP) (Towns et al., 2023: 68). These results suggest that ACFPs were either more consistently appointed by embassies or had a stronger mandate, resulting in higher awareness among colleagues compared to GFPs.

POs who served as the ACFP themselves dedicated an average of 19% of their working hours to tasks associated with this responsibility. This allocation of time ranged from 5% to 60%, underscoring a diverse range of engagement levels among individuals fulfilling this pivotal function.

Despite near universal awareness among POs (with the exception of four) of the Anti-corruption Network (ACN), a constituent part of Sida's anti-corruption infrastructure, only a quarter of all POs participated in its activities.

The question on the utilization of designated anti-corruption resources – the Anti-Corruption Help Desk (U4 ACHD) and the Democracy and Human Rights Help Desk – revealed that 55% and 52% of POs, respectively, never accessed these assistance platforms. By contrast, the overwhelming majority of POs (N=132)[10] agreed that TRAC – the contributions management software – was helpful in assessing the corruption risk in contributions (83%) and in developing and supporting contributions with measures aimed at reducing corruption (80%).

[10] Hereafter, the number in parentheses indicates the number of respondents who answered the question under consideration.

Thus, the survey data yielded mixed results regarding the utilization of the available anti-corruption infrastructure. While the presence of ACFPs and the perceived usefulness of TRAC showed positive utilization rates, the low engagement of POs in ACN activities, and the fact that half of the personnel on the ground had never utilized the anti-corruption helpdesk indicate room for improvement in leveraging available resources for enhancing anti-corruption efforts at embassies. Moving forward, there is a need for greater awareness and engagement by POs to fully harness the potential of the anti-corruption infrastructure to drive impactful anti-corruption efforts.

5.6 Coordination and dialogue

Building Block Four of the Guidance mandates POs to coordinate and collaborate with other donors and key national actors. This is rationalized primarily with the aim of leveraging economies of scale and enhancing efforts aimed at fostering genuine change (Interviews 1–3, Sida HQ). POs are further tasked with engaging in dialogue with partner organizations to ensure the alignment of projects and programs with Swedish development cooperation priorities. Dialogue also extends to establishing routines for sharing and learning about anti-corruption or mechanisms for collective action between development cooperation section colleagues (hereafter internal dialogue).

Coordination with other organizations occurs at a moderate frequency, with *sometimes* being the most frequently selected response. Among the three types of organizations, POs most often coordinate with partner organizations and least frequently with other anti-corruption stakeholders.

The overwhelming majority of POs (88%) conveyed that when working with contributions without explicit anti-corruption objectives, they engage in dialogue with the aim of incorporating anti-corruption measures into the contribution. According to POs, the type of partner organization that is most open to such dialogue

is foreign NGOs (85% strongly agree or agree, N = 102), followed by local NGOs (82% strongly agree or agree, N = 114) and multilaterals (79% strongly agree or agree, N = 114). At the same time, POs consider central and sub-national governments to be the least open to such dialogue (52% strongly agree or agree, N = 90).

When POs engage their partners in such dialogue, this usually occurs during the appraisal process (61%), but 36% of POs indicated that they broached such matters with partner organizations before the formal appraisal process commences (N=117).

Regarding internal dialogue, 91% of POs reported that a learning and sharing routine is institutionalized at the embassy. The form that these dialogues typically take is that of formal but irregular group meetings.

Discussions regarding the development perspective with colleagues at Sida HQ occur at a low frequency: with *rarely* being the most frequently selected response. Among the five types of communication between Pos and Sida HQ, interaction with "other colleagues at HQ" is the most frequent, while Sida's ACN meetings are the least frequent.

5.7 Anti-corruption potential of current contributions

In relation to their current portfolio of contributions, POs were asked to evaluate the potential of the three main types of anti-corruption interventions: strategic direct, strategic indirect, and systematic integration. The potential of strategic direct interventions was deemed as high by 45% of POs (N=112). Approximately half of the POs (N=119) concurred on the high potential of strategic indirect interventions. Conversely, a mere 36% of POs regarded systematic integration as having a high anti-corruption potential (N=124).

In multivariate regressions, we observed that no single individual-level characteristic consistently influenced a higher estimate of anti-corruption potential for the different types of intervention (see regression results in Figure A7 of Appendix D).

5.8 Challenges in integrating anti-corruption

About a quarter of POs indicated that it was either very difficult or difficult to integrate the development perspective into their work with contributions, and about 54% stated it was neither easy nor difficult.

Regarding the support that the POs received from Sida HQ on integrating the development perspective into their work, about 44% evaluated this as sufficient, while one-fifth of POs perceived the support as insufficient.

When asked about the ways in which Sida HQ could provide support to on-the-ground personnel, on-demand support on emerging issues from the Anti-Corruption Cluster was the most widely endorsed option. This was followed by helping partners to bring out the anti-corruption potential of their projects, appraising proposals from the standpoint of the development perspective, anti-corruption training, and guidance on corruption analysis. The POs indicated that the least demanded forms of support include updates on corruption research, clarification on policy documents, and advice on effective communication with other anti-corruption actors about the development perspective.

When respondents were asked to assess how well they were equipped to work with systematic integration of corruption, about half of them responded positively, including 45% who considered themselves rather well equipped and 6% who felt very well equipped.

5.9 Survey data evidence: conclusions

Table 3 provides an overview of our assessment regarding the degree of adherence to the four building blocks of Sida's anti-corruption policy. Among the 15 facets of the anti-corruption approach, eight were evaluated as exhibiting high adherence, while five received a rating of low adherence, with the remaining two falling in the middle.

Within Building Block One – awareness and knowledge – all facets except one were rated as exhibiting high adherence. However, the remaining facet, which concerns theories of change, was assessed as having low adherence, despite its critical importance. By contrast, utilization of different elements of the Anti-corruption Infrastructure was found at the lower end of the rating scale, ranging between moderate (Helpdesks) and low (member of ACN and ACFP). Finally, incorporation of anti-corruption interventions into contributions (blocks two and three) and coordination and dialogue (block four) received mixed ratings.

Based on these individual assessments, we conclude that the overall adherence to the development perspective in the work of on-the-ground personnel is moderate.

Table 3: Adherence to the anti-corruption approach

Finding	Degree of adherence
Awareness and knowledge	
Majority rank corruption as the top obstacle to development	High
Majority has good/very good understanding of corruption in the context	High
Majority improved their understanding of corruption over last two years	High
Majority has access to a corruption analysis	High
Majority agrees that corruption analysis aids them in identifying and better supporting anti-corruption contributions	High
Majority does not have a clear picture of theories of change underlying systematic integration	Low
Utilization of anti-corruption infrastructure	
Quarter are members of the ACN	Low
Quarter do not have an ACFP or are uncertain who the ACFP is	Low
Half never used anti-corruption help desks in the last two years	Moderate
Anti-corruption interventions in contributions	
Half has at least one contribution with strategic anti-corruption measures (direct or indirect)	Moderate
Majority has at least one contribution with systematic integration interventions	High
A third has more contributions with systematic integration measures than two years ago	Low
Dialogue	
Majority engages in internal dialogue	High
Dialogue with colleagues at Sida HQ on the development perspective is rare	Low
Majority engages partner organizations whose projects do not have apparent anti-corruption objectives in dialogue on integration of anti-corruption measures	High

Furthermore, Table 4 presents several additional findings from the descriptive statistics of relevance for the assessment of adherence to the development perspective. A positive sign indicates an expected positive influence on implementation, while a negative sign suggests a negative influence.

Out of five findings, two are expected to have a negative impact on adherence to, or implementation of, the policy: a quarter of POs consider support from HQ to be insufficient, and a quarter feel that systematic integration is very difficult or difficult. These findings point to areas where additional measures may be appropriate to boost implementation of anti-corruption policy.

Table 4: Factors with potential to influence the implementation of the anti-corruption approach and policy

Finding	Direction of influence
Half believes itself to be sufficiently equipped to systematically integrate anti-corruption	+
Quarter feels that systematic integration is very difficult/difficult	–
Quarter considers support from HQ insufficient	–
Majority finds TRAC useful	+
Over time trend in the adoption of the policy's facets	+

Conversely, the remaining three findings are expected to have a positive impact on adherence: half of POs believe that they are sufficiently equipped to systematically integrate anti-corruption into their individual portfolios; the majority of POs find TRAC to be useful, and the trend over time in the adoption of the policy's facets indicates improved adherence to the policy.

Finally, while POs, on average, assessed the anti-corruption potential of the measures in their current portfolio of contributions as not very high, there is considerable variation in the responses. This variation will be further examined to offer additional insights into the on-the-ground implementation of the anti-corruption policy.

6 Evaluation of Sida's anti-corruption effort on the ground: evidence from three case studies

This section examines Sida's anti-corruption efforts in three country settings (Kenya, Serbia, and Georgia), reflective of the varied contexts in which Sida operates. The aim is to understand 1) the extent to which the anti-corruption efforts of Sida's personnel on the ground is consistent with Sida's anti-corruption approach, and 2) the relevance of anti-corruption efforts to the contextual circumstances of partner countries.

The chapter's goals are as follows:

- To gauge the extent to which POs' implementation efforts are in line with the main tenets of Sida's anti-corruption approach, including the understanding of corruption, the ambition to support strategic direct and indirect interventions as well as systematic integration, utilization of the anti-corruption infrastructure, and engagement in coordination and dialogue.
- To assess the extent to which anti-corruption efforts by embassy personnel is coherent with the objective of the relevant Swedish government strategy and the developmental priorities of the partner countries.
- To assess the extent to which anti-corruption efforts are sensitive to the socio-economic and political conditions in which they take place.

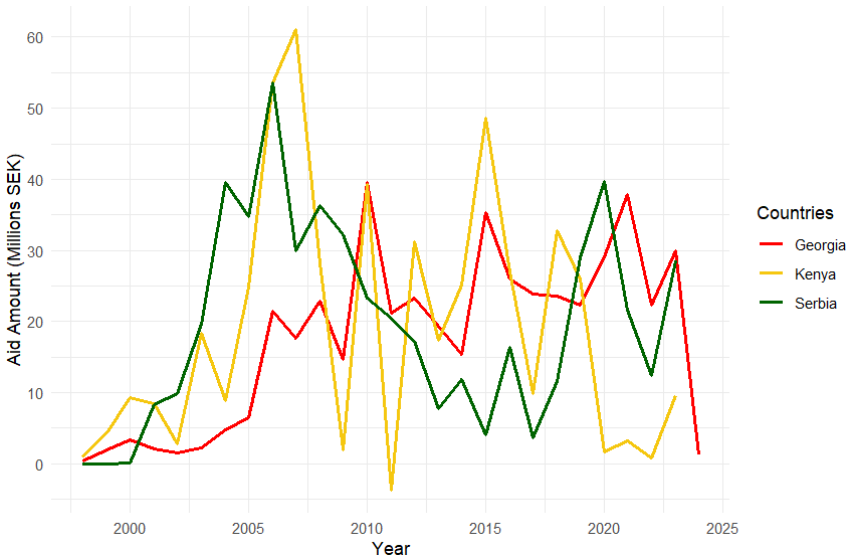
6.1 Selection of cases

Assessing Sida's anti-corruption efforts in three divergent contexts allows us to speak to the overall breadth of Sida's anti-corruption efforts as well as to their relevance to the contexts. The cases were

deliberately chosen to encompass a range of societal conditions relevant to both corruption and to the activities of development cooperation actors.

To begin with, each of the three countries included – Kenya, Serbia, and Georgia – has been a recipient of substantial Swedish development cooperation funds. Serbia has received the highest amount, averaging 512 MSEK annually between 1998 and 2023, followed closely by Kenya with an average annual funding of 492 MSEK, and Georgia with an average of 486 MSEK per year during the time period. Figure 8 shows disbursements over time across the five sectors with relevance for anti-corruption. Despite some fluctuations over the years, Sida's sustained commitment to anti-corruption is apparent.

Figure 8: Sida's aid disbursements to Kenya, Serbia, and Georgia across five sectors, 1998–2023



Note: The aid funding includes the following sectors: public sector policy and administrative management; legal and judicial development; public finance management (PFM); anti-corruption organizations and institutions; domestic revenue mobilization.
Source: OpenAid.se

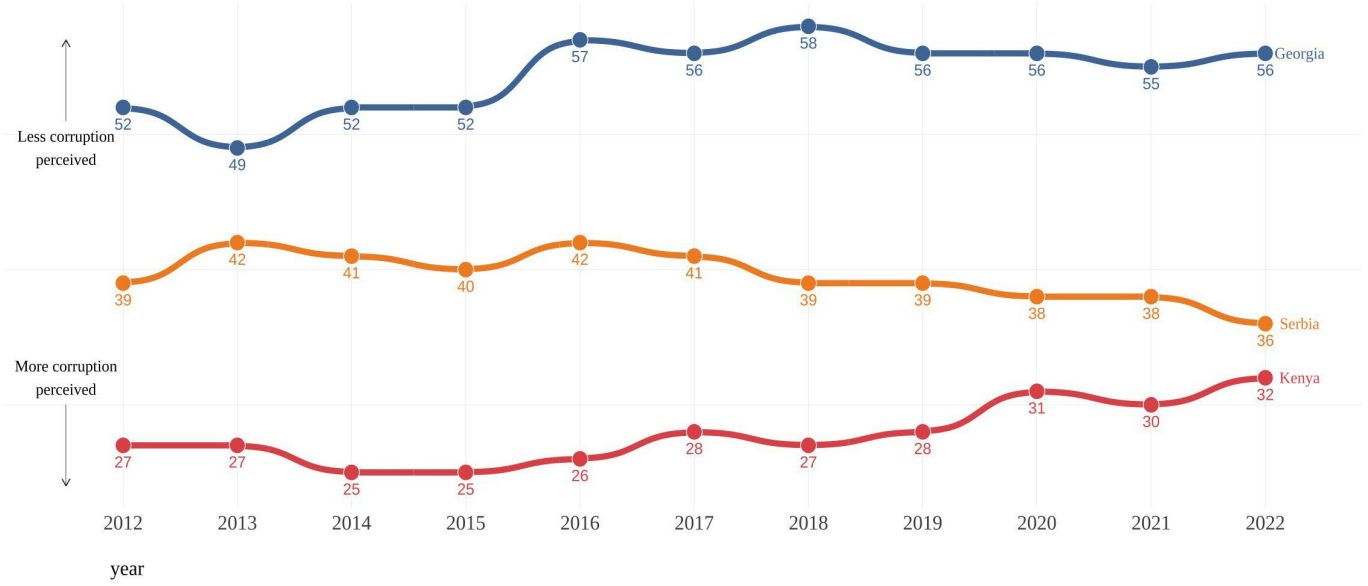
While corruption is entrenched at a systemic level in Kenya and Serbia, there is a weak, but discernible upward trajectory in Kenya's case, whereas Serbia appears to be on a downward trend, as depicted in Figure 9. By contrast, corruption in Georgia is not systemic; the reforms implemented in the early 2000s led to a rare instance of significant reductions in corruption, particularly in terms of eliminating petty corruption. However, progress has stagnated since 2012.

In the year 2000, all three countries were categorized as low-income countries. However, Serbia's gross domestic product per capita (GDPpc) was twice as large as Kenya's (915 and 412 USD, respectively), while Georgia's GDPpc stood at 740 USD. By 2022, all three countries had been re-classified as upper-middle-income countries, with a GDPpc of 2,100 USD in Kenya, 6,700 USD in Georgia, and 9,500 USD in Serbia (The World Bank, nda). The disparity in the magnitude of economic challenges among the three countries is evident in the percentage of the population living in poverty, i.e. on less than 2.15 USD per day: 36% in Kenya, 5.5% in Georgia, and 1.2% in Serbia (The World Bank, ndb). While addressing economic challenges requires also addressing corruption, the scale of such challenges may also detract from the anti-corruption agenda.

Democracy is a relevant factor for corruption. On the one hand, competitive elections can serve as a mechanism for reducing corruption since corrupt incumbents risk losing office due to voter backlash. On the other hand, the imperative to finance political campaigns can create incentives for politicians to engage in corrupt practices, trading political favors for funding (D'Arcy & Cornell, 2016; Jetter et al., 2015; Kolstad & Wiig, 2016). All three countries are presently designated as electoral democracies, falling short of the highest ranking of liberal democracy (Papada et al., 2023). Recent regime dynamics vary across the three countries: Georgia has consistently maintained its status as an electoral democracy over the past decade, while Kenya predominantly has been categorized as an electoral autocracy, except during the periods 2014–2017 and 2022

to the present, when it transitioned to electoral democracy. By contrast, Serbia has shifted from a liberal democracy in the early 2010s to its current status as an electoral autocracy.

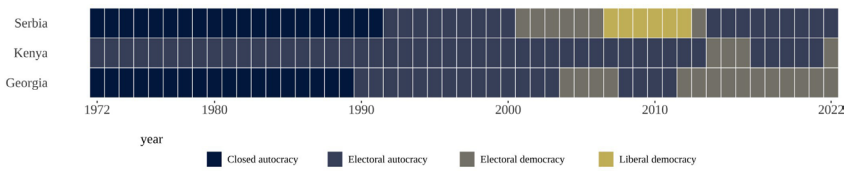
Figure 9: Corruption perceptions index: Kenya, Serbia, and Georgia, 2012–2022



Note: Corruption Perception Index, Transparency International.

Serbia's and Georgia's aspirations for EU membership are significant drivers for their respective political elites to stay on the reform trajectory. This pursuit also serves as a crucial leverage point for donors seeking to bolster democracy, human rights, and the rule of law. Both countries receive concrete recommendations and substantial support from the EU with regard to anti-corruption reforms (European Commission, 2023b; OECD, 2023). Kenya does not have this pull factor and, despite facing policy challenges in all areas of sustainable development, receives much less aid from the EU institutions than Serbia and Georgia (OECD, 2023).

Figure 10: Political regimes in Kenya, Serbia, and Georgia, 1972–2022



Note: Data is from Papada et al. (2023).

The cases also vary in terms of gender equality, ongoing conflict, and state fragility. As shown in Table 5, Georgia and Serbia are among the more gender equal countries as measured by UNDP's Gender Inequality Index (GII), while Kenya is among the more unequal. GII is composed of three dimensions: health (the maternal mortality and adolescent fertility rates), empowerment (the share of parliamentary seats held by each gender, and by secondary and higher education attainment levels), and women's participation in the labor market.

All three countries are characterized by weak state capacity, as measured by the Fragile State Index (FSI), which captures aspects such as the loss of physical control of territory and a monopoly on the legitimate use of force, inability to provide reasonable public services, and inability to interact with other states as a full member of the international community. Furthermore, both Kenya and Georgia are grappling with ongoing conflicts.

Table 5: Case selection criteria and characteristics of studied countries

	Kenya	Serbia	Georgia
Corruption	Systemic	Systemic	Non-systemic
CPI score	31	36	53
Regime type	Electoral democracy	Electoral autocracy	Electoral democracy
GII	0.533	0.119	0.283
FSI	89.2	67.4	72.6
Ongoing conflict	Yes	No	Yes
EU candidate	No	Yes	Yes

Note: Data is from the Quality of Government Institute's Dataset, 2021.

6.2 Data and analytical approach

The analysis of Sida's anti-corruption efforts in Kenya, Serbia, and Georgia is based on a diverse array of empirical sources, including collected documents and interviews. The documents encompass a wide range of materials, such as the Swedish government's strategies guiding Sida's work in these countries and their operationalization by the respective embassies. Additionally, documents related to the management of contributions, including applications, appraisals, and evaluations, were examined. Materials pertaining to the interaction between Sida's HQ and embassies regarding anti-corruption work, such as training materials and communications, were also included. Furthermore, various documents from partner organizations, such as meeting minutes and financial and organizational audits, were also included in the analysis.

In addition to these primary sources, a wide array of analytical materials pertaining to corruption and anti-corruption efforts in the selected countries were consulted. These materials were sourced from organizations such as the World Bank, the Council of Europe, different bodies of the European Union, and the Expert Group for Aid Studies. Finally, a broad range of academic publications addressing socio-economic and political developments in the countries under study complemented the analysis.

Interviews were conducted with the employees of the development cooperation sections of the embassies, representatives of partner organizations, other donor organizations, and anti-corruption stakeholders, such as journalists, scholars, politicians, and civil society representatives. In total, 83 interviews (with 105 individuals as some interviews were carried out with several organizational representatives) were conducted for the case studies. All interviewees were questioned about the causes and manifestations of corruption within their respective contexts. The interviews with program officers primarily focused on the implementation of the anti-

corruption policy, including their awareness of the policy's tenets, main operational documents, their explanation for the choice of anti-corruption contributions (where reducing corruption is the primary objective), and anti-corruption interventions within contributions where reducing corruption is not the primary objective. Their use of the anti-corruption infrastructure and ways of cooperation with partner organizations and other donors were also considered. POs were also asked about the constraints they encounter in fully integrating anti-corruption efforts into their work.

Meanwhile, discussions with partners delved into their comprehension of theories of anti-corruption change, aiming to discern their perceptions of the potential and constraints for integrating anti-corruption measures into their work. Interviews with non-partner stakeholders were utilized to gain deeper insights into the contextual dynamics surrounding corruption.

Interview data was triangulated across interviews, the documents described above, with academic research, and with other sources of information such as media reports, survey data and documents of the partner countries' governments. References to individual interviews have been anonymized where appropriate.

In Kenya, 26 interviews were conducted with embassy staff, partner organizations and non-partner NGOs, and country experts over a period of two weeks in June 2023. In Serbia, a total of 23 interviews were carried out with 43 individuals from 14 partner organizations and four organizations that currently do not receive funding from Sida, but are active anti-corruption stakeholders, and four program officers over a period of two weeks in July 2023. In Georgia, 36 interviews were conducted with the employees of the development cooperation section of the embassy, partner organizations, non-partner NGOs, and country experts over a three-week period in April 2023.

Each country study provides a contextual overview of the manifestations of corruption, their roots and the political developments that have a direct bearing on the state of corruption and anti-corruption work. This is followed by a brief overview of ongoing development cooperation contributions from the points of view of Sida's anti-corruption approach and contextual circumstances. The remainder of the case study discusses coherence and complementarity across initiatives, relevance to contextual circumstances, and prospects for meaningful impact of Sida's efforts to reduce corruption in the countries.

6.3 Kenya

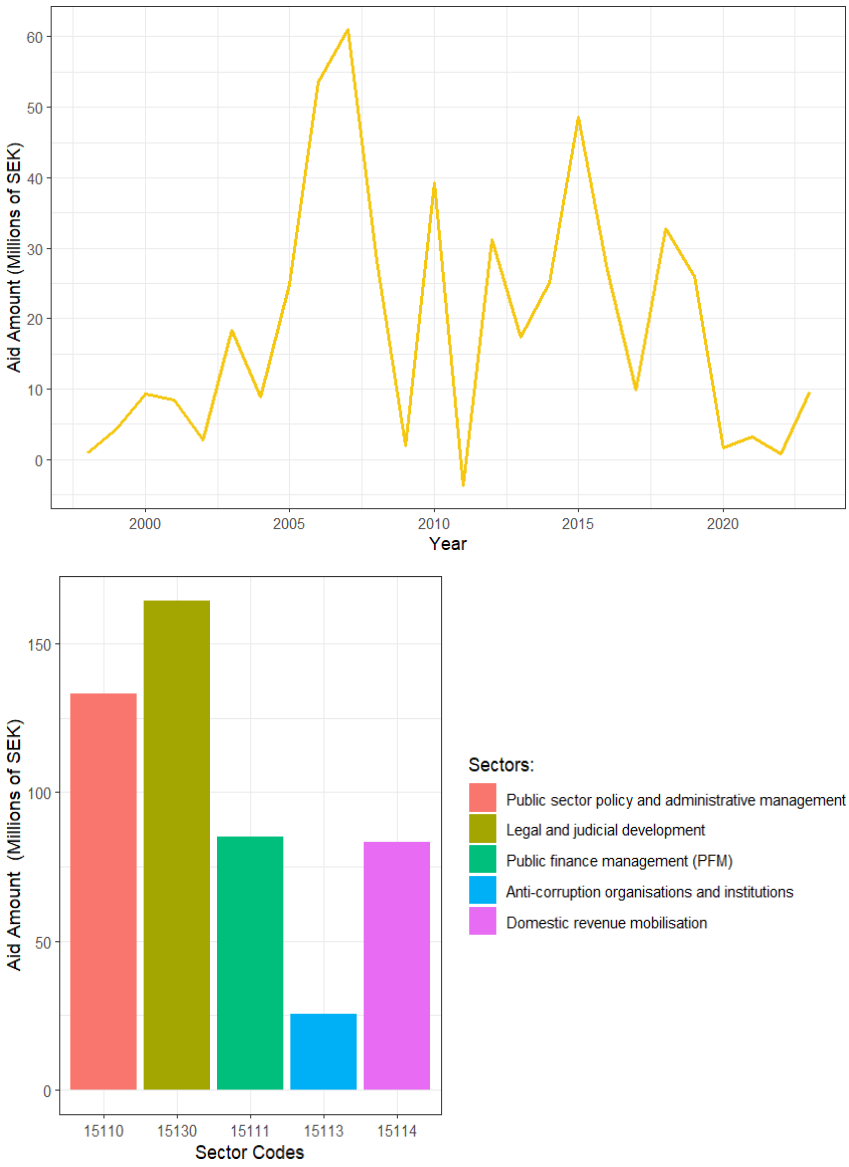
In 2021, total official development assistance to Kenya amounted to 3,142 MUSD, or about 3% of Kenya's gross national income. Sweden was the twelfth largest donor to Kenya, contributing about 55 MUSD (OECD, 2023).

Over the past decade (2014–2023), Sida's average annual contributions to work in Kenya amounted to 490 MSEK. As Figure 11 illustrates, between 1998 and 2023, contributions to five sectors with anti-corruption relevance totaled approximately 508 MSEK (top panel), of which support to anti-corruption organizations and institutions accounted for only 25 MSEK.

The Strategy for Sweden's Development Cooperation with Kenya (2021–2025), outlines three priority areas: 1) human rights, democracy, the rule of law, and gender equality; 2) environment, climate, and sustainable use of natural resources; and 3) inclusive economic development. The strategy includes "reduced corruption" as one of its objectives within a broader goal of the strengthened respect for human rights, democracy and the rule of law. Furthermore, the strategy outlines "the decentralization process and reduced concentration of power" as the main areas for anti-corruption work (Swedish Ministry for Foreign Affairs, 2020: 4), and a substantial number of contributions were focused on the sub-

national level. The portfolio of anti-corruption contributions is well aligned with these priorities.

Figure 11: Sida's aid disbursements to Kenya in five sectors with anti-corruption relevance, 1998–2023



Note: Open Government Data of Swedish Aid.

POs emphasized the negative impact on the anti-corruption efforts of the multiple and conflicting priorities characterizing Swedish development cooperation in Kenya (Interview 4, Kenya). Funding is allocated to contributions aligned with strategic objectives and sectoral priorities, which are established by the country, global and thematic strategies (e.g. education is no longer a priority), gaps (areas where other donors are not working), and sectoral shifts (e.g. the current emphasis on climate-related initiatives within the environment sector). This means that anti-corruption considerations are not factored in when selecting priorities and sectors, thereby restricting the opportunity to tailor anti-corruption interventions to sectors in which interventions could have a greater impact.

In Kenya, Sida collaborates with various partners, including multilaterals lite UNDP, United Nations Children's Fund (UNICEF), UN Women, and United Nations World Food Program (UNWFP), local chapters of international NGOs, such as Transparency International Kenya, local NGOs like Hand in Hand, Swedish NGOs such as ForumCiv and Diakonia, and Kenyan governmental bodies like the Kenyan Revenue Authority.

6.3.1 Roots and manifestations of corruption in Kenya

During the past decade, Kenya has consistently remained in the bottom 30% of Transparency International's Corruption Perception Index, which points to the endemic character of the problem.

Corruption's deep roots stem from the interaction between pre-colonial cultures and the policies, structures, and practices imposed first by the British East African Company and then by the British government between 1888 and 1963. The fusion of pre-colonial and colonial institutions created a legacy of concentrated and overlapping political and economic power, which incentivized capture, a weak social contract between citizens and the state, which was illegitimate and distrusted, and strong horizontal bonds rooted in ethnicity that

legitimized plundering public resources (Ekeh, 1975; Michela, 2009). The origins of endemic corruption and the ways in which it is rooted in society are a legacy of the country's history.

In the last two decades, Kenya has experienced significant political and institutional developments. In 2002, Mwai Kibaki was elected as president, ending the 24-year rule of Daniel arap Moi. The National Rainbow Coalition (NARC), led by president Kibaki promised a broad reform agenda, including anti-corruption measures and constitutional reforms. A constitutional review ended in the rejection of a proposed constitution in the 2005 referendum, revealing divisions within the government and society. In 2007, the disputed presidential election results sparked widespread violence across the country, which eventually ended in a coalition government in 2008. In 2010, Kenya enacted a new constitution, which reduced the power of the executive, devolved political power to sub-national authorities, and formally guaranteed a host of social and economic rights to women, minorities, and marginalized communities. This created improved conditions for prevention and control of corruption. Furthermore, the constitution provided for reforming and bolstering the independence of the judiciary and established critical infra-structure of horizontal accountability, including an independent ethics and anti-corruption commission, an independent auditor-general, and a controller of the budget. In the 2013 and 2017 general elections, Uhuru Kenyatta was elected as president and his Jubilee Coalition as the parliamentary majority. In its entire post-independence history, Kenya has been an electoral autocracy, with the exception of the periods 2014–2017 and the year 2022, when it was an electoral democracy (see Figure 10).

The two most pernicious forms of corruption in Kenya, from the point of view of a more equitable and inclusive society – private appropriation of public funds and ethnic clientelism – are sustained by contemporary political incentives. In a setting where most voters are poor and have low trust in government, vote buying and ethnic clientelism are essential strategies for winning elections

(Cheeseman, 2015; D'Arcy, 2019), making elections extremely expensive and a track record of delivering clientelist goods to co-ethnics important (Cornell & D'Arcy, 2014). This incentivizes politicians, in the absence of public campaign funding, to amass substantial financial reserves between election cycles and to use public office to reward their political clients and ethnic voters, thereby distorting accountability. Thus, the two main drivers of political corruption in Kenya are the need to recoup and enrich in order to win elections, which drives some of the most common forms of corruption, such as irregularities in procurement and the use of public resources to sustain the political settlement between ethnic groups. In both cases, the pressure that sustains these incentives comes from below, from the electorates themselves, and thus are sustained by democratic institutions.

Box 4: Ethnic clientelism

Ethnic clientelism is the exchange of material resources for political support between members of the same ethnic group. While not always considered a form of corruption, ethnic clientelism diverts resources away from common good purposes. Although in the short term it contributes to the maintenance of peace between ethnic groups, in the long term it creates a negative peace by fueling grievance and sacrificing good governance for an uneasy truce between communities.

Although Kenya has undergone significant institutional changes in the last two decades, corrupt practices have adapted, penetrated more deeply into society, and in certain ways become more sophisticated. The introduction of devolution as per the 2010 constitution aimed to contain pressures for ethnic conflict and improve local service delivery. While devolution has delivered on both of these goals to an extent (Malik, 2020; Muwonge et al., 2022), it has also decentralized corruption and clientelism (D'Arcy & Cornell, 2016). Interviews underscored the prevalence of systemic corruption at both the national and county levels. Instances of

"budgeted corruption", where inflated budgets are approved with specific contractors or providers in mind, bribery at every stage of the procurement process, ghost workers in county governments, and the use of shell companies were cited as some of the ways in which corruption has become more sophisticated (Interviews 5, 6, 18, 20, Kenya).

While there have been examples of anti-corruption wins (discussed below), the extent to which corruption is socially entrenched, politically incentivized, and capable of adaptation has led to resignation among the population and in leadership attitudes. The general public's perception and experience of corruption point to its systemic character. According to the results of the 2021 corruption survey, conducted by the Ethics and Anti-Corruption Commission (EACC) of Kenya, 21% of the respondents who sought government services were asked to pay a bribe (The Ethics and Anti-Corruption Commission of Kenya, 2022). Two-thirds of Kenyans believe most police officers are corrupt (Paul et al., 2022). The epitomizing example of resignation among the elites was President Uhuru Kenyatta's public statement questioning what he could do about corruption (Interview 5, Kenya). This makes change extremely difficult to effect.

6.3.2 Implementation of Sida's anti-corruption policy in Kenya

Awareness of Sida's anti-corruption policy by POs: Most of the POs interviewed exhibited a low awareness regarding the new anti-corruption approach, showing little indication that it has influenced their approach to anti-corruption work. Moreover, they demonstrated a limited understanding of the various types of anti-corruption interventions outlined in the policy, and of the idea that different types of interventions rest on varying theories of anti-corruption change.

While POs demonstrated a solid comprehension of corruption within the context (discussed below), indicating that the "right" problems were identified, there was limited evidence of intentional search and selection of solutions suitable for the problems identified. In other words, most, if not all, anti-corruption contributions lacked an explicit theory of anti-corruption change. The lack of purposeful consideration by POs regarding how a specific intervention brings about anti-corruption change has had implications for the evaluation of anti-corruption efforts in Kenya. The absence of a clearly defined theory of change supporting various anti-corruption interventions makes it impossible to attribute impact to the intervention.

The prevailing understanding of Sida's anti-corruption approach leaned towards the risk perspective (further discussed below). While there were past efforts to work more extensively with the development perspective in contributions, the turnover of personnel has posed challenges to continuity, and it remains unclear who locally takes ownership of anti-corruption. Some POs expressed the view that combating corruption was not currently among the foremost priorities of development cooperation in Kenya.

Corruption analysis: in 2020, the Swedish embassy in Nairobi commissioned a political economy analysis of corruption. The analysis, conducted by a private consultancy firm, FCG Sweden, under Sida's Democracy and Human Rights Helpdesk, is of high quality. It provides a detailed presentation of the particular ways in which corruption manifests in Kenya, highlighting broader political economy drivers of corruption and the underlying power relations, and also sector-specific influences. However, there appeared to be a lack of awareness among staff regarding the existence of the analysis, with no indication that it has been incorporated into anti-corruption efforts. For example, application appraisals normally discussed corruption in a generic manner, without addressing the specific manifestations of corruption outlined in the FCG report. Consequently, the anti-corruption policy's intent to leverage contextual knowledge for context-specific, politically informed, and,

consequently, more potent anti-corruption contributions has not been put into action.

All POs interviewed characterized corruption as endemic and pervasive, describing it as "daily business", "high and accepted", and a "mentality". This suggests that POs view corruption as a systemic phenomenon, warranting interventions with a focus on indirect measures and systematic integration. However, as discussed in detail below, the existence of a political settlement ready for a major anti-corruption drive highlights the value of strategic direct interventions as well.

Utilization of anti-corruption infrastructure: there has been a decrease in the utilization of the anti-corruption infrastructure, coinciding with personnel changes. Not too long ago, the ACFP frequently sought guidance from Sida's headquarters and the helpdesks. However, once the office holder departed from the role, the momentum towards mainstreaming anti-corruption diminished. Interviews with POs revealed that dialogue within the development cooperation section on anti-corruption matters was conducted in an ad hoc manner and infrequently.

Obstacles to implementation: during interviews with POs, it became evident that reconciling the anti-corruption policy's mandate to bolster anti-corruption efforts while minimizing the risk of aid misappropriation poses a significant challenge. The risk perspective, embedded in all contributions, involves capacity building of partner organizations and monitoring, which is time- and resource-consuming. At the same time, the policy's provision to put partner organizations in the driving seat of the design of contributions effectively entails engaging in extensive dialogue with numerous potential partner organizations during the pre-application stage, which is also time- and resource-consuming. The misalignment between the policy's focus on ownership by partner organizations and available resources has turned what is a positive concept – ownership – into a heavier workload for POs. According to POs, this unsustainable situation requires either increased resources or the consolidation of projects.

Some POs also noted that the development perspective is not a formal perspective from the point of view of the organization of Swedish international development cooperation. They pointed out that it was already nearly impossible to reconcile all the existing perspectives, including the risk perspective.

Strategic direct interventions: None of the contributions in the country's portfolio could be strictly classified as direct strategic interventions in the sense that they deal with corruption exclusively as a rule and enforcement problem. Instead, several supported projects integrated measures aimed at strengthening key control institutions, such as the establishment of an anonymous toll-free reporting line to the police's internal affairs department (Diakonia) or enacting secondary legislation to facilitate the enforcement of the Access to Information Act (Transparency International Kenya).

Transitioning away from strategic direct interventions may appear logical in Kenya, given that the anti-corruption institutional framework is weak and, in some ways, compromised. For example, while the Ethics and Anti-Corruption Commission (EACC) is designated as the formal body for anti-corruption oversight, it faces significant challenges. These include inadequate resources, a lack of autonomy (since its head is appointed by the president), and the necessity to operate within an environment where corruption is a highly politicized issue (Abuso, 2024).

Similarly, although the judiciary had achieved some victories in anti-corruption cases through public interest litigation brought by civil society,[11] there has been a glaring absence of convictions of high-level politicians on corruption charges (Interview 6, Kenya). Moreover, the executive has persistently attempted to erode judicial independence (Interview 15, Kenya).

[11] Examples include prohibiting impeached former Nairobi governor Mike Sonko from seeking re-election, nullifying the finance bill of Kiambu county, deeming Constituency Development Funds unconstitutional due to their misuse by MPs, and ruling against the reinstatement of chief administrative secretary positions, which were the breeding grounds for patronage.

That being said, there are contextual nuances concerning the anti-corruption potential of direct strategic interventions. First, unlike in other contexts, the 2010 constitution of Kenya – achieved through hard-won efforts during the political window of opportunity following the 2007 post-election violence, bolstered by strong international support and clear popular endorsement – provides a robust legal framework for addressing corruption (particularly in Chapter 6 of the constitution). Prominent CSOs such as Transparency International, the Katiba Institute, and the Institute for Social Accountability have, in many instances, effectively pressured the government to implement constitutional provisions. This is slow, painstaking work, undertaken primarily through public interest litigation pursued on a case-by-case basis. Ultimately, Kenyan CSOs are striving to carve out the rule of law from under the weight of vested interests. Any shift away from contributions directly supporting such efforts would imperil the long-term prospects of reducing corruption in Kenya.

Second, certain control institutions, such as the Office of the Auditor General and the Office of the Controller of Budget, have maintained their integrity and independence, despite attempts to undermine them, particularly through budgetary allocations (Interview 12, Kenya). Failing to identify and support institutional allies, along with the CSOs they rely on for information and capacity, represents another way in which moving away from direct approaches could jeopardize the potential for reducing corruption.

Strategic indirect interventions on the input side of politics: some of the supported contributions could be categorized as strategic indirect interventions targeting the input side of politics, defined here as the exercise of power in formulating policy and law by elected officials. One prominent form of such interventions was Public Finance Management (PFM), while another was centered on the inclusion of women in politics.

Public finance management: most of these interventions were understandably focused on county governments, which lacked strong management processes given their recent introduction, in 2013. Examples of PFM activities included facilitating citizen participation in budget development at both county and national levels, implementing social budgeting initiatives through which communities identify needs and monitor expenditure on the ground, revising national accounting standards to enhance transparency in tracking individual budget lines, facilitating Public Expenditure Tracking Surveys (PETS), and enabling social auditing. Additionally, initiatives like the Action for Transparency (A4T) app have facilitated citizen monitoring of public resource utilization in key sectors such as education and health.

The contributions embedding these interventions were often rationalized in terms of the rights-based perspective (see Appendix, C.3), which seeks to empower rights-holders to claim their rights and enhance the capacity of duty-bearers to protect and fulfill these rights. As such, it is implicitly linked with the PAT-based theory of anti-corruption change, which focuses on reducing information asymmetries and aligning the incentives of agents (politicians) with those of the principal (citizens). However, it is important to note that observability, monitoring, and sanctioning also play pivotal roles in the CAP theory of anti-corruption change. Therefore, various forms of public expenditure monitoring, identified in the supported contributions, should have been rationalized within the framework of CAP. Yet, the documentation accompanying the aforementioned contributions lacked such references.

While the rights-based rationalization of anti-corruption interventions has the potential to prevent budgeted and petty corruption, several challenges may hinder its effectiveness in the Kenyan context. First, the approach places the burden of ensuring accountability on ordinary people. Engaging in participatory and monitoring activities comes with an opportunity cost that many Kenyans may find prohibitive. For instance, a local NGO in Busia wrote over 200 memos

concerning a community health facility that had been budgeted for, but which remained unbuilt for three years (Interview 16, Kenya). Such intensive efforts in just one aspect of service delivery can lead to burnout and apathy among citizens. Slow implementation means that citizens are asking again and again for the same projects to be delivered (Interview 16, Kenya). The potential of participatory budgeting and expenditure monitoring is also compromised by the high turnover of duty-bearers – Members of the County Assembly and the county administration – requiring awareness raising and capacity building after each election (Interview 22, Kenya).

Second, the effectiveness of the rights-based approach ultimately hinges on the organizational capacity of local civil society, which varies considerably across Kenya. However, this capacity is often too weak and fragmented to sustain the coordinated effort necessary to ensure effective voice and accountability. While there are many strong NGOs at the national level, in the counties, NGO capacity has been developed from a very low base (Interview 19, Kenya). Capacity discrepancies are evident across the country, with stronger NGOs typically found in the western counties, where opposition influence and political mobilization are more pronounced. Conversely, in central areas, social capital tends to be organized around economic institutions, such as cooperatives, leading to weaker civil society structures (Interview 6, Kenya). Donor funding tends to be concentrated in specific counties, notably those in the north, due to prioritization of food security and climate. There is also a lack of coordination among NGOs, as they compete for limited donor resources. Funding models that prioritize programs over core funding exacerbate this issue by providing minimal incentives or resources for coordination. As a result, many NGOs lack a sustainable foundation, and when projects conclude, the organizations themselves often cease to exist (Interview 14, Kenya).

The fragmentation and inherent weakness within civil society make it considerably easier for county executives to manipulate participatory budgeting processes to their advantage. For instance, the County

Budget Economic Forum, which is typically formed by the Governor, can be influenced in its composition, potentially reducing it to a mere checkbox exercise and diminishing its anti-corruption measure potential (Interview 12, Kenya). Conversely, in cases in which there is a political will from the Governor and a well-coordinated civil society, devolution has yielded notable improvements in public service delivery, with the water services in Baringo and transparency in Tana River being cited as examples (Interview 1, Kenya).

Ultimately, the effectiveness of the rights-based approach depends on the quality of political institutions. Unfortunately, county assemblies are falling short in their oversight responsibilities. As noted by Deputy Speaker of the Senate, Kathuri Murungi, "the financial autonomy of county assemblies is lacking as they rely on the whims and caprices of their respective county executives and as such cannot be said to be independent." (Kathuri, 2023). Moreover, while the Senate is tasked with overseeing county governments, it has, in reality, been co-opted by former governors (Interviews 5, 10, Kenya). Similarly, although the Auditor General issues recommendations to parliament, these often fail to translate into substantive action (Interview 16, Kenya). The weaknesses in formal democratic institutions further undermine the effectiveness of the rights-based approach.

To conclude, while empowering rights-holders to claim their rights is, in and of itself, an important developmental goal, harnessing it to anti-corruption tasks in Kenya involves asking the least resourced members of society to take responsibility for policing politicians' behavior. While it may at present be the only viable approach, it is unlikely to lead to a change in the standard operating procedures, particularly given the fact that the incentives for corruption are also themselves a function of a form of accountability to electorates.

Inclusion of women in politics: a number of the contributions concerned the inclusion of women in politics, an intervention associated with the Quality of Government approach to anti-

corruption change. These efforts included attempts to increase the representation of women within parties, as candidates, and to mainstream a gender perspective in budgeting processes. The former included providing support for women and youth leagues within parties with a clear constitutional mandate and role, as well as supporting parties in developing anti-harassment policies (Interview 9, Kenya). The latter involved gender responsive budgeting and using gender-disaggregated data to inform policy (Interview 9, Kenya). In both cases, the primary rationale for these efforts rested on the idea of women as political outsiders, making them more likely to support rules-based approaches and less susceptible to capture. The second theory of change underpinning these interventions rested on the idea that women are among those most affected by corruption, potentially forming a sizable constituency for change.

Some interviewees among partner organizations expressed skepticism concerning the effectiveness of these approaches. While efforts to give women a formal footing within parties were seen as successful, this did not translate into support for nomination. Moreover, in cases where women were elected, they were seen to be too few in number to have a meaningful impact and as behaving similarly as their male counterparts (Interview 10, Kenya). Lacking a critical mass, female politicians have conformed to the mannerisms and modes of behavior of male politicians and are not perceived as less corrupt (Interview 5, Kenya). Quotas, and even the implementation of the two-thirds rule (the constitutional requirement that no gender should occupy more than two-thirds of seats in elective and public bodies), were not seen by some interviewees working on the issue to be a solution to the problem of gender inequality. The reasons for this, according to interviewees, is that they would increase the overall size of parliament, diluting and undermining the potential influence of a larger number of women MPs (Interview 9, Kenya). In a context where political participation is gendered and men own and control the major share of economic resources, structural change ultimately requires leadership and therefore buy-in from men.

Strategic indirect interventions on the output side of politics: many of the supported contributions could be categorized as strategic indirect interventions targeting the output side of politics. This is defined here as the implementation and exercise of power by the permanent institutions of the state. In all polities, politicians need certain areas of the state to function free from corruption in order to sustain political order. This means that there are corruption-constraining incentives embedded in the output side of politics, which could be harnessed in contributions.

Perhaps the prime example of an output-side institution that all governments need in order to function is the tax authority. This is particularly the case at present in Kenya, as the country is facing significant fiscal issues due to escalating debt repayments (Anders, 2023). The Kenyan Revenue Authority (KRA) project, supported by Sida, provided strong evidence of high potential of anti-corruption effects. It relies on technology, cultural change supported by the leadership, and credible enforcement to both reduce the opportunities for corruption within the KRA and by citizens in their interactions with the KRA. For example, KRA used technology to build a better tax compliance certification system, which matters for procurement – a major area of corruption – as those tendering for public projects need a tax compliance certificate. The technology provided a way to assess compliance more effectively and impartially by, for example, eliminating the discretion of individual bureaucrats who could potentially be susceptible to bribery. Similarly, KRA has devised new data-driven indicators for detecting one of the most prevalent forms of value-added tax thefts from governments, known as "missing trader fraud," thereby eliminating fictitious claims more effectively. All of these initiatives employ technology to enhance the visibility of the actions of both economic agents and officials, while simultaneously reducing the discretion of the latter. This enables more efficient monitoring and sanctioning of corrupt behavior. While the long-term outcomes of these measures are still unfolding, the significant backing from the highest levels of the political hierarchy (Interview 18, Kenya),

coupled with the fact that the KRA, unlike the EACC, has prosecutorial powers, points to the high potential of this intervention to contribute to reducing corruption.

The contribution involving Statistics Sweden and the Kenyan National Bureau of Statistics (KNBS) further illustrates the challenges of trying to change standard operating procedures. Despite being an independent public institution on paper, KNBS in practice lacks full independence. The National Treasury of Kenya holds the authority to approve the release of the national accounts. Historically, these releases have been delayed when the accounts depicted an unfavorable picture. The hierarchical structure means that decisions need to go all the way to the top (Interview 11, Kenya). With these organizational characteristics fostering entrenched interests among civil servants, resistance to change becomes formidable. Politicians may need to be standing on a "burning platform" – in line with the "Big Bang" approach, they may need to face an existential threat, such as fiscal crisis.

Given these difficulties, some of the interventions on the output side focused on more readily achievable objectives. To illustrate, the Oslo Centre worked with the Office of the Register of Parties, which has responsibility for keeping registers of party membership. These registers matter for parties as they need offices in a majority of counties to meet constitutional requirements. Previously, the lack of transparency in the registration system allowed for manipulation through bribery, resulting in inflated party memberships. To address this issue, an online system was implemented to enhance transparency and minimize discretionary practices (Interview 9, Kenya). While such interventions may not fundamentally alter the incentive structure, they introduce a degree of resistance and inconvenience for those inclined to exploit the system.

Strategic indirect interventions in the business sector: a blind spot in Sida's current anti-corruption portfolio in the Kenyan context stems from the fact that contributions largely focus on accountability in the formal political sphere. This implies less

emphasis on accountability in economic relations. As suggested by the developmental governance literature (Khan et al., 2019, 2020), engaging private-sector actors interested in the anti-corruption agenda for reasons of economic efficiency can bring broader anti-corruption gains. This theoretical approach holds particular relevance in the Kenyan context, where the structural origins of corruption are intricately linked to the entrenched intersection of political and economic power inherited from the colonial era. Therefore, economic relationships must be scrutinized through an anti-corruption lens. Interventions in the economic livelihoods space, such as the one discussed below, could do more to make us of the insights of this perspective to identify and harness the potential anti-corruption aspects and design more potent interventions.

Partner organizations highlighted instances of corruption within economic relations, such as the exploitation of producers by intermediaries who capitalize on their inability to access markets directly, as well as misconduct by cooperative leaders (Interview 21, Kenya). They specifically emphasized power imbalances within well-established export-driven industries and burgeoning carbon credit markets. The absence of stringent regulations governing carbon markets compromises accountability to communities leasing their customary land to carbon credit companies. This opacity renders the sector exceedingly susceptible to corruption.

More broadly, the lack of accountability in economic relations undermines political accountability, with the corollary that improving accountability in economic relations may have an important knock-on effect in improving political accountability. Building organizational capacity among economic actors – even where the goal is a different development outcome, such as food security – could have knock-on effects on political accountability. For example, in one contribution undertaken by *Hand in Hand*, work was done to build organizational capacity among farmers (horizontally) in the form of Community-Based Organizations (CBOs) and co-operatives

for the purposes of enabling extension projects – either government- or NGO-run – to more effectively reach producers and link them to markets. In other words, the project goals are more related to economic development and livelihoods than to anti-corruption, but building this capacity is a governance task. The goals help to establish a governance framework involving an executive and production and marketing committees, which are accountable to one another, creating separation of power, and then linking government (and donors) to farmers through these organizations to facilitate extension work, and skills and technology transfer.

Where organizational capacity grows as a result of capacity building, it can give farmers strength to amplify their voices and demands in both the economic and the political sphere. Increased bargaining power can improve economic positioning and enable farmers to demand political accountability, and apply for further projects. Strong economic organizations can model accountability, show that it can lead to concrete results, and demonstrate the power of collective action. As farmers are affected by particularly acute forms of corruption – such as in road construction – they are a potential constituency pressuring for reform, where they have the organizational capacity to mobilize. Crucially, economic organizations have the potential to be self-sustaining because they are membership-based and directly aligned with members' economic interests. However, this also means that they are at risk of capture.

While the difficulty of building organizational capacity should not be underestimated, and the potential for capture should not be overlooked, it is important that economic actors and economic relations are not absent from discussions of anti-corruption, especially where projects with other goals are also potentially contributing to anti-corruption.

6.3.3 Sida's anti-corruption policy and efforts on the ground in Kenya

Domination of the risk perspective: anti-corruption efforts in Kenya are dominated by the risk perspective, which is not adherent with the policy. This has a number of implications for the implementation of the policy, and more broadly for Sida's development efforts.

A positive consequence is that the risk perspective contributes to building anti-corruption capacity within partner organizations and the broader local civil society. For instance, one partner recounted how Sida assisted their organization in strengthening anti-corruption policies and practices. This support included initiatives such as ensuring that procurement processes were conducted by a committee rather than an individual and modifying human resource practices, such as inductions and contracts, to explicitly express the principle of zero tolerance for the misuse of funds. These efforts have played a role in ingraining integrity at institutional, operational, and cultural levels (Interview 7, Kenya).

The high standards expected by Sida of partner organizations Sida, backed by appropriate capacity building, might have a cascade effect, as partners exert downward pressure for integrity, transparency, and accountability on various local civil society actors. Furthermore, partner organizations engage in capacity building with their local counterparts in the same manner that they experienced with Sida. Sida's partner organizations also model zero tolerance for the abuse of trust, power, or position for improper gain to local NGOs and communities, demonstrating how this can lead to tangible positive results. The logic behind these anti-corruption measures is reminiscent of that found in the development governance literature. Put differently, the application of the risk perspective, as described above, has the potential to yield a positive (perhaps unintended) consequence of contributing to reducing corruption beyond the immediate goal of safeguarding the funds of Swedish taxpayers.

Box 5: Implementation of the risk perspective

The risk perspective is applied through collaboration with partners who have established the relevant policies and have the capacity to enforce anti-corruption measures, along with continuous monitoring and assessment during implementation within the project. During the assessment phase, program officers scrutinize partner organizations' policies and procedures, checking for elements such as the presence of a procurement policy, a feedback and complaint mechanism, and a process for anonymous whistleblowing. They also evaluate the existence of appropriate checks and balances, including public participation. The assessment extends to appraising the capacity to implement these policies, drawing on the partner's reputation and past experiences. This information contributes to the risk assessment, which focuses on identifying risks to achieving the intervention's objectives and devising strategies for mitigation.

In instances where partner capacity is deficient, program officers collaborate with partner organizations to develop the necessary guidelines and protocols. Once projects are selected, monitoring and evaluation are deemed critical in preventing corruption, encompassing baseline, mid-term, and end-of-the-project reports, spot checks conducted by consultants, and field visits undertaken by embassy staff. In cases where corruption is detected, thorough investigation follows, and if substantiated, the partner is obligated to return funds, placing the burden of risk on them.

Nevertheless, there are several potential drawbacks associated with this approach. Managing contributions in this manner demands significant resources from both embassy staff and partners, creating incentives to collaborate predominantly with trusted partners. This could, arguably, result in a more conservative choice of contributions and a certain degree of path dependence.

In an environment where a limited number of credible partners exists, this approach may result in the concentration of contributions within a small group of partner organizations and overlapping of projects among donors. Additionally, it may restrict engagement with new and grassroots NGOs as it necessitates resource-intensive capacity building and involves lower initial trust due to the lack of prior experience. If the ability to effectively address corruption in terms of safeguarding Swedish funds is a major factor in the choice of partner organizations, the actual content of projects (once aligned with strategic objectives) may become a secondary consideration.

Furthermore, POs were of the opinion that the need to prevent corruption within contributions can at times hinder the implementation of the developmental perspective. Sida's continued emphasis on zero tolerance for the misuse of development cooperation funds may constrain programming choices by ruling out adventurous or bold initiatives. Indirect and systemic integration measures require greater innovation and, consequently, greater tolerance for risk. This can be achieved through, for example, a scaled approach to the principle of zero tolerance that can bolster anti-corruption efforts (Arne, 2020).

The emphasis on safeguarding against the misuse of Swedish funds also has implications from the partners' perspectives. The high standards and rigorous oversight that partners are required to maintain are resource-intensive and challenging to uphold in a systemically corrupt environment as they involve going against established social norms. For instance, partners may face constraints in recruiting the most qualified individuals for positions as they must prioritize personal and professional ethics. Furthermore, partners may need to forego certain opportunities and find alternative ways of operating that do not align with informal social practices and norms. Consequently, this may confine partners to areas where they can implement better monitoring and engage in activities with limited potential for diversion of funds, avoiding more complex sectors.

By way of example, health is a more complex sector than water, with greater potential for corruption and more challenging monitoring. The risk of corruption is higher because there are higher levels of more lucrative procurement of machinery, supplies and medicines. Transparency is more challenging as different tasks are the responsibility of different levels of government and outcomes are individualized. The sector is also particularly prone to ghost workers (Interview 6, Kenya). The imperative to meet the zero-tolerance requirement in contributions not only shapes what partners can do but also influences how they go about their activities.

Domination of the rights perspective: when discussing anti-corruption-related interventions, relevant embassy staff repeatedly stressed that they are grounded in Sida's rights-based perspective, which identifies citizens as rights-holders and politicians and other public officials as duty-bearers (see Appendix C.3). The rights perspective aims to empower rights-holders to claim their rights and enhance the capacity of duty-bearers to protect and fulfill these rights. This is broadly coherent with Sida's anti-corruption approach. Indeed, when interventions aim to address information asymmetries and improve monitoring, capacity (such as for instance FOJO – Anticorruption Program, Diakonia – HR and Governance Program Phase II), they appear to align with the anti-corruption approach's focus on direct measures and PAT-associated theories of change. Where interventions aim for "access to high-quality services", such as for instance the Consolidate Gains and Deepen Devolution or Kenya Social Protection Support project, they seems to adhere to the policy's emphasis on indirect measures and, specifically in this instance, with the Quality of Government (QoG) theory of change.

While this adherence is evident to the evaluators, the on-the-ground personnel did not perceive it as such. Interviews with contribution managers revealed that many of them did not recognize the anti-corruption potential of interventions aimed at improving access to high-quality services. This lack of recognition is unsurprising given the overall unawareness of the anti-corruption policy among the on-

the-ground personnel and the difficulties they experience in making deliberate choices regarding interventions for specific corruption problems (discussed above). However, it is concerning because when program officers fail to recognize a contribution's anti-corruption potential, they are unable to maximize its impact, such as by refining the intervention's design in collaboration with partner organizations.

Furthermore, the rights approach operates under the assumption that citizens are "principled principals", which is a challenging notion in a context where approximately 80% of the population is "living below or just above the multidimensional poverty line" (Swedish Ministry for Foreign Affairs, 2020: 2). Consequently, the potential impact of anti-corruption measures aimed at empowering the broader citizenry to claim their rights through the monitoring of public officials is questionable.

6.3.4 Conclusions from the Kenya case study

When assessing the potential of Sida's current efforts to contribute to the reduction of corruption in Kenya, it is crucial to maintain a realistic and humble perspective. The pervasive nature of corruption within Kenya's political, economic, and social fabric, its deep historical roots, the relatively young age of democratic institutions (only 20 years old), and the modest scale of Sida's operations in Kenya all require careful consideration. Transitioning away from a status quo in which corruption is deeply entrenched in society is an immensely challenging and intricate process. Importantly, successful change is most likely to occur through endogenous and organic shifts. The role of external actors in these processes is minimal.

In terms of policy adherence – and potential for implementation – an awareness of the four building blocks of the anti-corruption policy among POs is low, and there is little indication that the change in Sida's anti-corruption approach has influenced how POs work on-the-ground. There is also a paucity of explicit theories of change

underpinning contributions. Internal dialogue among POs is not an institutionalized routine and neither is the use of Sida's anti-corruption infrastructure. These issues, jointly, point to a rather low adherence to the anti-corruption policy.

The contributions considered in this evaluation collectively grappled with the pervasive issue of corruption in Kenya, primarily through strategic indirect interventions. In this sense, the actions taken in contributions are compliant with the anti-corruption approach. However, Sida's anti-corruption efforts in Kenya are dominated by the risk perspective.

The focus of anti-corruption interventions in Kenya's portfolio appears to be shifting from strategic direct to strategic indirect approaches. While this shift may appear to be a step in the right direction, as bolstering politically dependent enforcement institutions has not resulted in a reduction in corruption (Persson et al., 2013), several contextual factors indicate that such a dramatic shift may not be necessary. First, there exists a robust anti-corruption legal framework embodied in the 2010 constitution, which constitutes a bedrock on which a less corrupt Kenya can emerge. This constitution, heavily influenced by civil society and representing a political settlement among elites, forged in response to internal crises, enjoys strong support for its rigorous implementation. Arguably, Sida's most significant contribution towards creating conditions conducive to controlling corruption lies in supporting Kenyan CSOs through core, rather than project-based, assistance. Second, there are "islands of integrity" within the government, which play a pivotal role as allies in combating corruption. Recognizing and supporting these entities is essential for effective anti-corruption efforts.

Strategic indirect contributions underpinned a number of interventions, such as public financial management, transparency in public budgets, greater gender equality in the public sector among others, as recommended by the anti-corruption policy. However, there is a notable lack of understanding among POs regarding

underlying theories of change. Consequently, if anti-corruption change does occur, it is unclear whether it resulted from these indirect measures. The paucity of theories of change underpinning anti-corruption interventions renders the potential impact of these contributions unknowable.

In light of this, the potential impact of Sida's anti-corruption effort in Kenya is at best remedial in the short-term, but external funding to civil society and support to institutional allies keeps the window for change open.

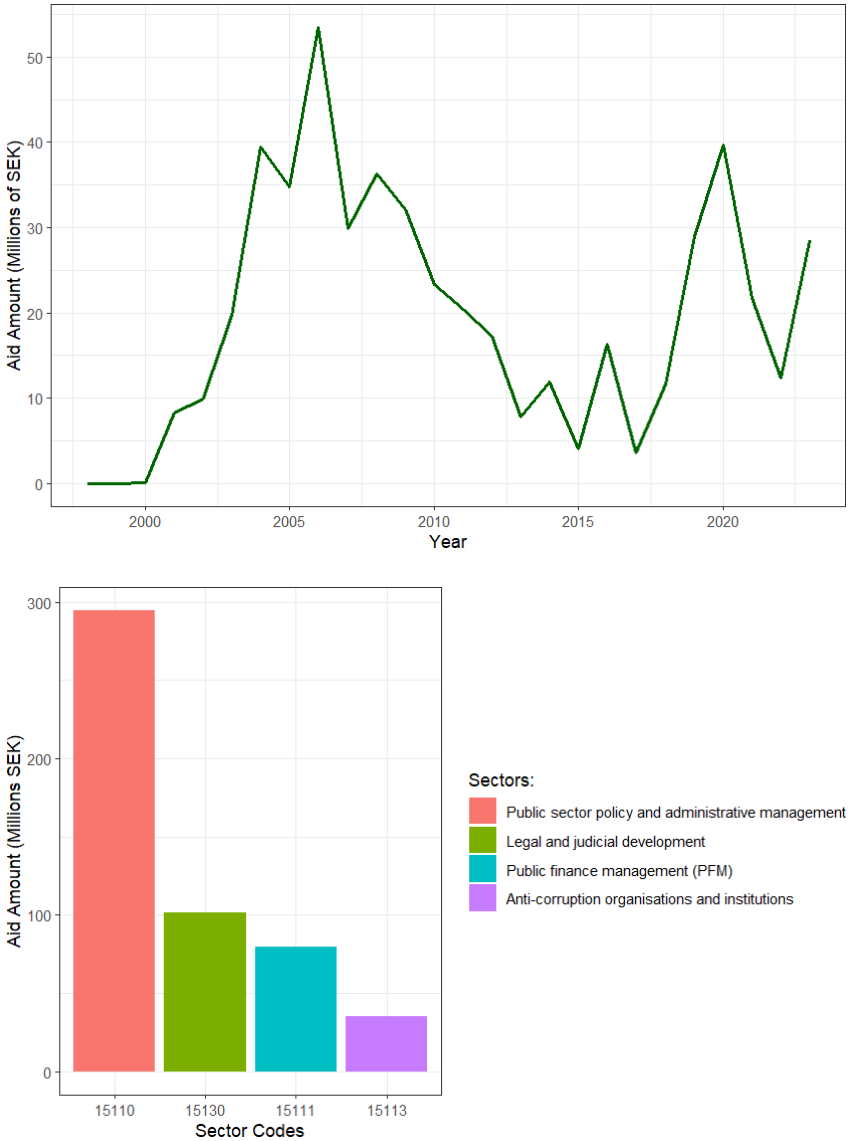
6.4 Serbia

In 2021, total official development assistance to Serbia amounted to 533 MUSD, or about 1% of Serbia's gross national income. Sweden was the tenth largest donor to Serbia, contributing about 16 MUSD (OECD, 2023).

Sida's average annual contributions to development work in Serbia in the past decade (2014–2023) was 125 MSEK. As Figure 12 illustrates, between 1998 and 2023, contributions to four sectors with anti-corruption relevance totaled approximately 512 MSEK (top panel), of which support to anti-corruption organizations and institutions accounted for only 32 MSEK.

Development cooperation between Sweden and Serbia is governed by Sweden's Strategy for Reform Cooperation with the Western Balkans and Turkey (2021–2027). This strategy delineates four priority areas: 1) human rights, democracy, the rule of law, and gender equality; 2) peaceful and inclusive societies; 3) environmentally and climate-resilient sustainable development and sustainable use of natural resources; and 4) inclusive economic development. Under the first priority area, the strategy lists "strengthened conditions for accountability, increased transparency, and reduced corruption" as one of its key objectives.

Figure 12: Sida's aid disbursements to Serbia in four sectors with anti-corruption relevance, 1998–2023



Note: Open Government Data of Swedish Aid 2024.

In Serbia, Sida collaborates with various international organizations, including multilaterals such as OSCE, World Bank, Council of Europe, USAID, and the UN, as well as government agencies. Additionally, Sida partners with domestic NGOs, many of which offer capacity-building services and financial support to local CSOs, operating at the grassroots level.

In 2023, Sida supported 45 contributions in Serbia. The analyses below covered 21 ongoing or recently completed contributions chosen for their direct or indirect relevance to anti-corruption work. Table E.2.2 of Appendix E provides the names of the contributions, the name of the implementing partners, project budgets, and agreement periods.

The portfolio of anti-corruption contributions is well aligned with both the Swedish strategy and with the Serbian government's formal reform priorities, which are aimed at achieving EU membership. By way of example, the digitalization of information and transactions reduce room for corruption, but also expands access to this information to a broader set of bidders, local activists, and citizens in general. Projects that strengthen the accountability ecosystem by supporting media and CSOs also expand the range of actors who can potentially engage in political debates and deliberations. Both approaches thus seek to expand the possibilities for oversight but also to mitigate the concentration of power in the hands of the incumbent party, or at least support the pre-conditions for expanding access to power when conditions become more favorable.

The degree of complementarity and coordination across projects is high. In several instances, projects address many of the elements needed to effect change. The development of systems, such as the digitalization of procurement processes and cadasters, is complemented by efforts to train the government officials tasked with implementing those systems, the training of market actor expected to use those systems, as well as the capacity building of civil society to equip them to monitor the operation of for example procurement processes. In addition, many of the partner

organizations collaborate on multiple projects. By means of illustration, the OSCE and UNDP both developed training courses for civil servants in collaboration with the National Academy for Public Administration. Such collaborative efforts keep lines of communication active and may enhance coherence across projects and over time. In addition, all partners reported having frequent and regular contact with program officers at the embassy, also a favorable condition for coordination and for avoiding conflicting purposes of projects.

Two instances of conflicting project aims were highlighted during the interviews. First, the two approaches used to support organizations in the media sector employ different logics – one a market logic and the other a non-profit logic. Some partner organizations are supported directly through donor funding without any expectation of surviving on income from the production of content or services in the longer term. The organizations seeking to develop a business model to secure their own longer-term sustainability (the market logic) thus compete with organizations whose model is instead to secure donor funding, which could have a market distorting effect. This effect is, however, minor in comparison to the market distortions resulting from the advantages enjoyed by regime-friendly outlets.

Second, conflicts in project aims may stem from European candidacy requirements, which stipulate that government outsourcing and contracting must serve the secondary objectives of environmental and social justice. However, the obligation to include "green" and "social" dimensions may constrain the bidder pool, potentially favoring dominant market actors who can afford to incorporate such elements. Despite these requirements, there is no guarantee that firms with insider status will actively pursue social and environmental development goals, as they may not be rigorously monitored and held accountable for contractual conditions aimed at advancing these objectives.

6.4.1 Context: the roots and manifestation of corruption

Since the dissolution of Yugoslavia in 1992, Serbia has undergone significant political and institutional developments: from state-planned to market economy, from one-party state to democracy, and from a federal state to a unitary state. Between 1992 and 2000, Serbia was an electoral autocracy (see Figure 6.5.1). Under the dominant rule of Slobodan Milošević and his Socialist Party of Serbia, this period was marked by the military conflicts of Serbia with Croatia, Bosnia and Herzegovina, and Kosovo, economic hardships, and international isolation.

Mass protests against electoral manipulation led to the resignation of Slobodan Milošević in 2000, which was followed by a period of political turmoil but continued democratic and institutional progress from 2000 to 2012. Some observers argue that insufficient development of institutional safeguards during this period granted subsequent executives the discretion to reverse numerous advancements (Pavlović, 2021).

Since 2012, the political landscape in Serbia has been influenced by the Serbian Progressive Party (SNS) and Aleksandar Vučić, who has been in leading government positions since 2012, including serving as president since 2017. By strategically placing SNS party members in public firms and institutions, the SNS maintains support for the regime by controlling state-owned enterprises, the broader market, the judiciary, law enforcement organizations, and media (Andrej, 2022; Cvejić et al., 2016).

The authority of parliament has been curtailed by the executive, lacking an annual workplan and frequently being called for plenary sessions with only 24 hours' notice (European Commission, 2023a, 5). Multiple observers of the parliamentary election of 17 December 2023 agreed that "Serbia did not fulfil its commitments to free and fair elections" (European Parliament, 2024). By 2013, Serbia had lost its liberal democracy status and has been rated as an electoral autocracy

since 2014 (see Figure 10). These circumstances are coupled with a waning public interest in politics writ large (Lavrič & Bieber, 2021).

Such developments had profound implications for fostering opportunities for corruption and for impunity for corrupt acts. Instances of utilization of public resources for the benefit of the ruling party or individual government officials are not uncommon. Public funds extracted in this manner often find their way back to the incumbent party, creating new avenues to restrict political competition, civil liberties, and media freedom (Cvejić et al., 2016; Keil, 2018; Pavlović, 2021, 2023).

Corruption in Serbia is considered to be "pervasive" by both external observers, such as the Group of States against Corruption (Group of states against Corruption, 2022: 6), and its citizens. According to surveys of citizens' perceptions of corruption and anti-corruption efforts in Serbia, conducted by USAID in 2018–2020, corruption was perceived as among the top three problems for Serbian citizens. More than half of the respondents (53%) recognize its negative impact on Serbian society, politics (50%), and the business environment (34%) (USAID, 2020).

Anti-corruption legislation and initiatives addressing corruption control have either stalled or faced reversals. The most recent strategic document, the National Anti-corruption Strategy 2013–2018, was followed by a significant gap in strategic planning. Despite discussions about a new strategy for the period 2023–2018, Serbia has lacked an overarching anti-corruption plan. This absence is particularly noteworthy considering that anti-corruption is an integral component of the EU accession requirements.

The document that was most often referred to as containing the key anti-corruption legislation was the Revised Action Plan for Chapter 23 on EU integration and its sub-chapter entitled "Fight against Corruption". However, progress in this area was considered as "limited" (European Commission, 2023a; Group of states against Corruption, 2022). Reforms to counter various forms of undue influence are yet to be undertaken (The World Bank, 2019).

Among the conditions impeding efforts to combat corruption, activists highlighted a perceived decline in the level of public concern among citizens (Lavrič & Bieber, 2021). Based on a poll conducted in February 2022 by the Center for Research, Transparency and Accountability (CRTA), the "...majority of Serbian citizens believe that the state of democracy in the country improved in the last five years" (CRTA, 2022, 4). The same survey found that a majority of respondents agreed that Serbia should maintain good relations with Russia, even at the price of EU membership. The prospect of EU membership has been a driving force for reform efforts, and as public attitudes have changed, public pressure for reform has waned as well.

In addition, both civil society and the media sector were heavily constrained in terms of reporting government-backed campaigns intended to intimidate or discredit them, as well as efforts to drain them of resources through frequent audits and lawsuits. Independent evaluators deem that 70–80% of government co-financing for media companies goes to outlets sympathetic to the incumbent party (Interview 5, Serbia).

In conclusion, Serbia presents a context in which corruption is a systemic issue. The democratic landscape has experienced a decline marked by a weakened institutional framework for checks and balances. This decline encompassed the re-politicization of the judiciary and the undermining of both the third sector and market forces. EU membership serves as a pivotal lever in advancing anti-corruption efforts and progress in implementing Chapter 23 of the Action Plan on EU integration, particularly in combating corruption, stands as a cornerstone for Serbia's path to EU accession. Without tangible advancements in this area, there can be no substantial progress in the EU accession process.

6.4.2 Implementation of Sida's anti-corruption policy in Serbia

The influence of the anti-corruption policy is clearly evident in Sida-funded contributions in Serbia. In most contributions, corruption was addressed both as a development obstacle and as a risk to development funding. The risk perspective is evident both in the appraisals of all projects, and in interviews with partner organizations. All interviewees reported that Sida expected them to have policies for and employ the correct procedures for procurement, for internal assessments of potential conflicts of interest, and for the tracking and monitoring of financial flows. Partners who in turn provide funding to organizations through sub-granting also reported engaging in extensive training efforts to ensure that local partners also complied with Sida's requirements (Interviews 4, 5, 19, 21, Serbia). The development perspective was evident in numerous contributions supported by Sida, predominantly in the form of strategic indirect interventions (discussed below).

Awareness of Sida's anti-corruption policy by POs, corruption analysis, utilization of anti-corruption infrastructure: the POs interviewed exhibited a high level of awareness regarding the new anti-corruption approach. Furthermore, there is a Swedish embassy strategy not specific to Sida, called Anti-Corruption Strategy Serbia, which incorporates all four building blocks of Sida's Guidance for addressing corruption as a development obstacle. Annex 1 of the anti-corruption strategy outlines the anti-corruption action plan, stipulating that anti-corruption work entails: 1) an analysis of the main forms of corruption; 2) support for both direct and indirect interventions; 3) integration of an anti-corruption perspective across the portfolio of projects; 4) systematic follow-up with all partners; and 5) periodic stock-taking of lessons learned and possible areas of development. Several POs have worked at the embassy for 20 years or more and described the evolution in Sida's work in Serbia from direct approaches with an emphasis on strengthening detection and

prosecution to mostly indirect approaches. They made reference both to Sida's shift in strategic approach and to their own learning from past projects (Interviews 1, 2, 3, Serbia).

The POs' descriptions and analyses of the drivers and dynamics of corruption and the socio-economic and political situation in Serbia were consistent with academic research and policy reports by both domestic and international actors. They were also knowledgeable and well-informed on prevalent forms of corruption at the national level. They construed corruption in Serbia as systemic, thus necessitating indirect approaches to combat it. For instance, the digitalization of information and services related to the management of public property and of public procurement were named as viable avenues for anti-corruption work since politicians did not always fully understand that such reforms make illicit dealings easier to detect (Interview 3, Serbia).

The embassy had an Anti-Corruption Focal Point (ACFP), known to all personnel. Evidence suggests a robust utilization of the anti-corruption infrastructure, with frequent mentions of events within the Anti-Corruption Network and communication with Sida's Anti-Corruption Cluster and the Helpdesks. Additionally, in March 2022, personnel engaged in anti-corruption training in Belgrade. Within the development cooperation sections, there is an established internal dialogue on anti-corruption matters.

The large and diverse set of anti-corruption interventions embedded in supported contributions builds on an equally rich range of theories of change. Furthermore, many projects incorporate multiple anti-corruption initiatives, grounded in more than one theory of change. This is not necessarily a weakness of implementation, as the complexity of corruption as a policy challenge may necessitate a plurality of approaches and interventions. The PAT-informed theory of change was evident to the evaluators, POs, and partner organizations in many contributions. However, POs exhibited varying levels of awareness of the potential collective action dynamics at play.

The following section discusses the theories of change in contributions as identified by the evaluators. Project documents for strategic direct interventions offer some insight into the underlying theory of change connecting the project to anti-corruption, albeit in somewhat cursory terms. On the other hand, project documents for strategic indirect interventions discuss the links between the budget, activity plan, and the expected results concerning the project's primary objectives without discussing how the project may contribute to reducing corruption. For a more comprehensive understanding, please refer to the Appendix on Serbia.

Strategic direct interventions: several supported contributions expressly aimed at strengthen the capacity of institutions with investigative and prosecutorial powers. This was done through cooperation with multilaterals such as the Council of Europe and the World Bank, rather than through local partner organizations. A project spearheaded by the Council of Europe has, for example, coordinated with several national authorities to strengthen both the legal frameworks and systems for the detection and prosecution of money laundering and financing of terrorist activity. Together with the World Bank, a complementary initiative organized training for law enforcement and prosecutors with the aim of strengthening follow-through. It was evident, albeit not explicitly, from contribution documentation and interviews with POs that those projects built on the assumption that stronger enforcement institutions would bolster the detection and punishment of corruption. This not only aids in holding present officials accountable for past transgressions but also serves as a deterrent against future rent-seeking behavior, thus exemplifying the principal-agent approach.

Strategic indirect interventions: many of the supported contributions could be categorized as strategic indirect interventions. They involved contributions concerning digitalization and open data, capacity building for civil servants and clients, human resource management in public administration, capacity building of accountability forums, monitoring and analysis in the electoral arena,

public consultation in policymaking, implementation of national by-laws in local government, and judicial function review. See a more detailed discussion of these contribution in the appendix for Serbia.

A set of contributions concerned **observability for improved monitoring and impartiality**. For instance, contributions to increase observability in municipal budgeting, case processing in the judicial system, management and contracting in public procurement processes and the ownership structures of companies vying for government contracts were often rationalized in project documentation and PO interviews by the aim of making the detection of abuses (and sanctioning) easier, which is aligned with PAT.

At the same time, the digitalization and publication of various forms of information were justified not solely by their utility for detecting and sanctioning abuses, but also by reducing the opportunities for abuses by politicians and civil servants. To illustrate, cadasters – public records containing detailed information about the ownership, leasing activity, and infrastructure accessibility of property – may help to prevent undervalued sales or leases of public property in exchange for kickbacks or favors to politically connected private firms. Similarly, the shift of government services to online platforms reduces opportunities for bribery or preferential treatment, promoting impartiality, and bolstering citizens' trust in government institutions and their fellow citizens (a theory of change implied by the quality of government approach (Rothstein & Tannenberg, 2015)). It was argued (Interviews 11, 14, Serbia) that e-government portals may also contribute to a longer-term process of anti-corruption change by increasing access to government services to a broader segment of the population, which is also consistent with the quality of government approach.

Moreover, if calls for tender, final contracts and other procurement documents are made public, belief in widespread rigging may decrease and confidence among potential bidders increase. According to one interviewee (Interview 14, Serbia), potential bidders abstain from

submitting bids as they do not feel that they will be given equal, or for that matter any, consideration. Potential bidders are potential stakeholders in fair procurement processes; if they are convinced of rigging, they have no reason to submit bids and thus no reason to raise concerns regarding suspected manipulation. In theory then, digitalization allows a broader set of shareholders to submit bids for contracts or for buying or leasing public property, which may incentivize market actors to observe and object to suspicious, market-manipulating dealings. In line with the developmental approach to anti-corruption, transparency, and competitiveness, and thus also the legitimacy of market processes, digitalization could transform potential bidders into stakeholders who are incentivized to engage both with other firms and with government to try to expose and minimize market manipulating schemes. As competitiveness increases, so do the quality and value of services and infrastructure, which may foster trust in government.

Another set of contributions could be categorized as **strengthening the knowledge base for evidence-based reforms, accountability actions, and advocacy**. Many projects supported collection and analysis of data relevant to corruption prevention. Examples include analyses of compliance of local governments with national bylaws, media content to quantify space granted to opposition parties compared to the ruling party, and analyses of the time it takes to complete administrative transactions. Output from such analytical efforts can affect the prevalence of corruption through a fairly long causal chain, but may nonetheless be an important component in change efforts. As noted above, outputs are often reported in assessments by international organizations such as the Council of Europe or the World Bank. Such analyses help to identify areas in which existing laws and bylaws are not fully implemented and enforced, which is consistent with both PAT and the organizational approach, which emphasizes that anti-corruption measures must be tailored to the specific conditions at hand.

In addition, concrete evidence of inefficiency, noncompliance, and abuse can equip both domestic and international actors to exert pressure on decisionmakers to take action. This may in the best case contribute to building the political will needed to address corruption. Political will is often presupposed in any theory of change. When lacking, even the best intervention will fail to initiate change.

Projects that aim at strengthening the capacity of civil society and the media sector are also premised on several complementary theories of change. One such theory sees the media and civil society as members of an accountability forum (Bovens, 2007). Here, they are not formally granted the role and power of a principal but can nonetheless engage in monitoring and sound alarms at suspected malfeasance. Developing the organizational and civic skills of CSOs is thought to make them better equipped to detect a range of irregularities and noncompliance in government, which can serve as the basis for more effective advocacy work. Projects that seek to stimulate a demand for better access to the judicial system, or for more inclusive policymaking, also rest on a similar, if partial, theory of change: that stimulating a will to promote reform among incumbents is a necessary first step for any subsequent change. By working on multiple fronts with different sets of actors, these initiatives may contribute to citizens or firms recognizing their shared interest in bringing about change, which may in turn lead to collaborative efforts to pressure for change, i.e. the collective action approach.

Revelations of government wrongdoing by civil society or the media may also, in the shorter term, trigger the police, prosecutors and courts to take action or, alternatively, create a public outcry that can force officials to resign. This type of pressure, referred to as societal accountability, has been documented to aid in redressing corruption in a range of political settings. Actors who lack formal powers to exercise accountability can put pressure on formal principals to act.

Another aim of these projects builds, instead, on the developmental approach. By providing seed money and business training to media related companies, projects hope to identify and foster stakeholders

that, moving forward, might hold one another to standards of integrity, while still in a market environment (Interviews 5 and 20, Serbia). These projects do not expressly require or even expect media outlets to focus on scrutinizing the government. Pluralism is an end in itself, with an eye to nurturing organizations that have the business and journalistic skills and editorial independence needed to sustain a viable and resilient media landscape. Such actors may then engage in democratic policy dialogue and accountability efforts when the political climate becomes more permitting.

Projects, such as those supporting the digitalization of cadasters, also seek to support more long-term and indirect processes of change by increasing access to and inclusiveness of the public space. To illustrate, making information about publicly owned property publicly available is a necessary precondition for reducing favoritism in urban planning. The project's appraisal document states that:

> People who are disadvantaged and have limited access to public information will now have a greater opportunity to a more easy, equal (regardless of age, sex/gender, economic or any other status) and informed way of participating in spatial and urban planning. This will able them to influence public debate and decisions related to the local areas where they live and work. Activities are planned to address root causes that result in lack of citizens' participation in the public decision-making process, namely, lack of access to information of public importance. (Embassy of Sweden Serbia 2022c: 5)

Similarly, a stronger civil society and media are thought, in the longer term, to strengthen citizen engagement in policymaking, filing access to information requests, seeking to influence government budgets, and participation in urban planning. Some projects actively encourage local organizations to engage in these ways. By lowering information barriers to participation and expanding the set of actors participating

in broader policy deliberations, these projects hope to reduce favoritism in policies and planning itself, which in the longer term will constrain the partial and extractive systems now in place.

One area for enhancing the potential impact of certain contributions involves integrating insights from the collective action approach. In organizational settings, behavioral change presents a collective action dilemma. Behavioral change requires effort, and observing new or amended rules may require more effort than past behaviors. Some partner projects may have greater impact if these dynamics are fully considered.

For instance, programs that entail training civil servants to comply with open data requirements or prosecutors to investigate and prosecute newly criminalized activity mean that the actors in question may incur costs ranging from the effort to learn new operating procedures to risking resistance or retaliation from peers or superiors for making that effort. A determined prosecutor can experience retaliation if acting unilaterally and without the backing of superiors. Training for prosecutors or civil servants was conducted primarily on an individual basis rather than targeting entire units or organizations as a whole. Improving the effectiveness of prosecutors does, admittedly, face complex challenges given that their investigations may target those with power. However, creating structures that allow prosecutors to interact with one another on a regular basis, to discuss obstacles and possible solutions, and to receive assurances that other prosecutors will take the steps needed to investigate and prosecute suspicions of malfeasance may help cultivate beliefs about new standard operating procedures, thereby increasing individual willingness to prosecute. Similarly, civil servants may be more willing to make the effort to implement new systems and comply with rules if they become convinced that others will do the same. Intensive training directed at agencies, units, or departments as a whole may increase the impact, especially if supported by regular follow-ups that encourage interaction among relevant sets of civil servants. Such an approach goes beyond

disseminating knowledge and seeks to bring about normative change and trust among relevant sets of actors. One tactic already employed that may help sustain a process of behavioral change is when international development actors have longer-term stays in government agencies. UNDP staff in some projects had offices at state institutions (e.g. the Audit Office and Ministry of Finance), which provides for a more continuous presence of a reform agent.

However, if bureaucrats choose not to comply with change because it serves their interests or those of their political patrons, the effectiveness of such training is likely to be restricted, regardless of the organization of such activities. Tax officials might opt to selectively enforce tax obligations and civil servants could engage in similar behavior to favor certain citizens and firms. When such favoritism is deliberate, the impact of trainings is expected to be minimal.

Projects that seek to bring about change via the quality of government approach also face significant challenges. If, as a result of intervention, some services become more impartially administered, then this is a gain in itself. However, such advances are unlikely to have a more transformative impact on institutional and social trust if favoritism and side-payments continue to be elicited, expected, and offered in other services. Many respondents reported that access to health care was rife with gift-giving, with the legal limit of a gift set at 460 euros. Even if not illegal, the prevalence of such practices likely nurtures a continuous sense of partiality and the use of public employment for self-serving, which then undermines trust and willingness to obey laws. The quality of government approach is thus only likely to bring about broader change if incorporated into government programs alongside a concerted effort to reduce such practices across all public services, a task beyond the purview of donors.

A few projects seem to entail rather light touch interventions, and the prospects for effecting change is likely to be low. Examples of such projects include brochures informing citizens about their rights to turn to the courts for help with adjudication, which would seem

unlikely to counteract the real and perceived exclusionary dynamics faced by citizens. Public awareness campaigns that seek to increase the status, and thus retention, of civil servants, and to increase voluntary tax compliance also seem unlikely to have an impact given the legitimacy deficit of state institutions. Such initiatives seek to effect change in citizens' knowledge of their rights or beliefs about legitimacy, neither of which are likely to result in behavioral change on a notable scale.

6.4.3 Conclusions from the Serbia case study

Personnel on the ground at the embassy in Serbia demonstrated a commendable familiarity with Sida's anti-corruption approach. They moreover actively engage in internal dialogue, communication with Sida's Anti-Corruption Cluster, and in the organization-wide anti-corruption infrastructure. They also demonstrated an in-depth understanding of corruption that extended beyond the national context in general to specific sectors and organizations. POs were often engaged in deliberate efforts to select interventions suitable for the corruption problems identified, and they had ongoing dialogue with partners as well as other development cooperation actors. While project documentation may not consistently include well-defined theories of change, interviews with POs indicated that theories of change are an integral part of their work with contributions. These considerations collectively point to a high adherence to the anti-corruption policy.

The conditions for change and reform in Serbia are currently unfavorable. Endemic corruption is an intractable problem, particularly in regimes that curtail contestation, freedoms of association and expression, the separation of powers and, indeed, the separation of the spheres of politics, the state, market, and civil society. Designing and deploying impactful anti-corruption interventions under such conditions presents a challenge. Arguably, the most rational strategy is to employ a very indirect approach by

seeking to sustain or, if possible, strengthen the conditions that promote change when political openings arise and perhaps contribute, where possible, to changing the current political conditions. In this regard, Sida's anti-corruption strategy is sensitive to the socio-economic and political conditions of Serbia.

In past decades, Sida and the larger donor community employed a more direct approach through projects specifically setting up anti-corruption agencies, developing anti-corruption policies and legal frameworks, and utilizing the capacities for monitoring and sanctioning corruption in government operations. This approach yielded little result as knowledge transfer and capacity building related directly to anti-corruption could not change the fact that principals were either prevented from performing accountability work or incentivized to turn a blind eye. Members of Sida's staff feel that this approach corresponds to Sida's policies on corruption as a development obstacle, but that they instinctively began approaching anti-corruption in a more indirect way in the early 2000s, since the direct approach was not working.

POs as well as many partner organizations now seek avenues of advancement wherever they may appear. These include stimulating demand for good government, including access to the judiciary, various open data projects (for which there is a pocket of political commitment), and strengthening the capacity of civil servants and forums for accountability.

Given the political climate, the prospects for significantly reducing corruption are, in the near to medium term, low. While the portfolio of projects approaches the issue from various perspectives and promotes conditions that may, in the longer term, help to bring about change, change in the short term requires political will. The will for reform has not been sustained even with the incentive of EU membership, which highlights the difficulty of the task at hand. That said, in closed political periods, maintaining the status quo may itself be a means to maintain the societal structures and conditions that can help promote positive change when the political climate shifts.

Even if somewhat restricted given the rather limited access to mainstream media, the existence of organizations that seek to document misdeeds and support whistleblowers can act as a reservoir of policy expertise on anti-corruption. Furthermore, advocacy for much-needed institutional reform provides a forum to allow possible coalitions to form and to generate change when a window of opportunity presents itself.

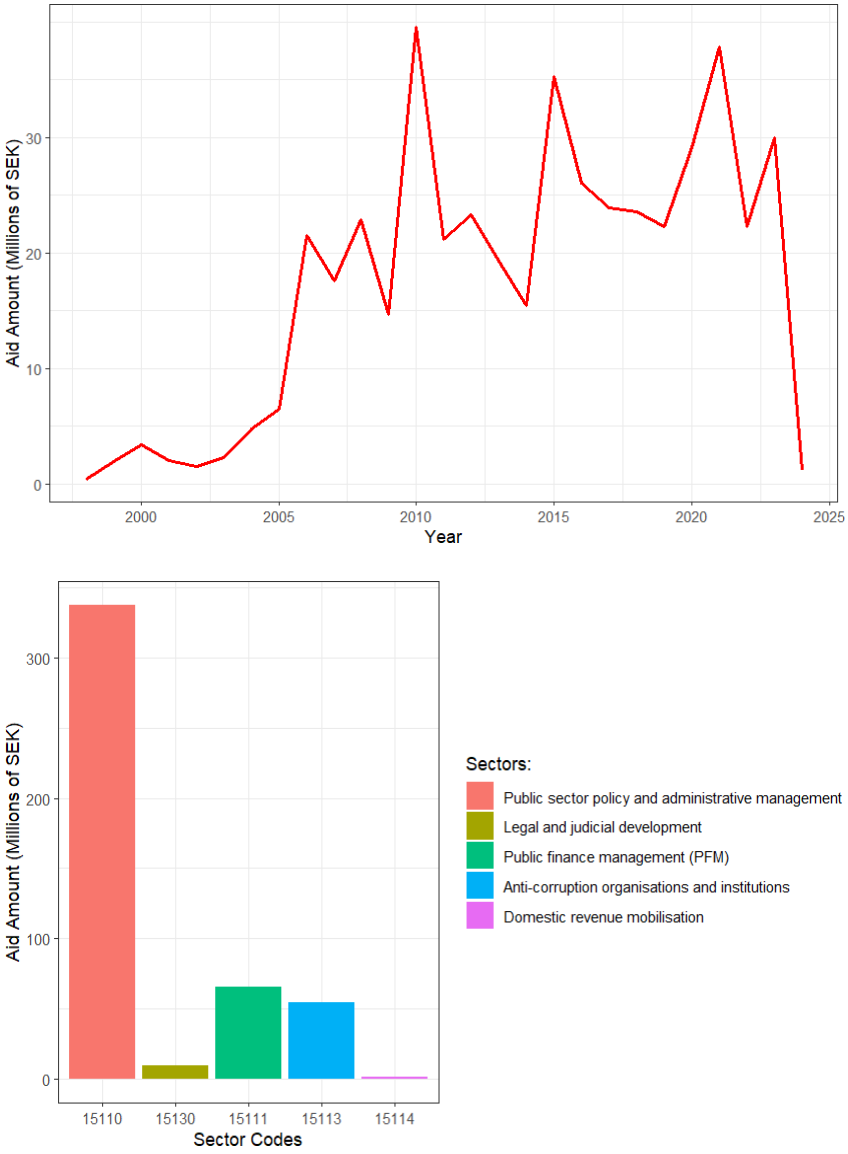
6.5 Georgia

In 2021, total official development assistance to Georgia amounted to 768 MUSD, or just over 4% of Georgia's gross national income. Sweden was the fifth largest donor to Georgia, contributing about 18 MUSD (OECD, 2023).

Sida's average annual contributions to development cooperation in Georgia in the past decade (2014–2023) amounted to 145 MSEK, with a considerable annual increase observed in the last decade: 88 MSEK in 2016 compared to 214 MSEK in 2023 (OpenAid). As Figure 13 illustrates, between 1998 and 2023, contributions to five sectors with anti-corruption relevance totaled approximately 486 MSEK (top panel), of which support to anti-corruption organizations and institutions accounted for only 55 MSEK.

Development cooperation between Sweden and Georgia is governed by Sweden's Strategy for Reform Cooperation with Eastern Europe (2021–2027). This strategy delineates four priority areas: 1) human rights, democracy, the rule of law, and gender equality; 2) peaceful and inclusive societies; 3) environment and climate sustainability, including sustainable use of natural resources; and 4) inclusive economic development. Under the first priority area, the strategy lists "Strengthened conditions for accountability, increased transparency, and reduced corruption" as one of its key objectives.

Figure 13: Sida's aid disbursements to Georgia in four sectors with anti-corruption relevance, 1998–2023



Note: Open Government Data of Swedish Aid 2024.

In Georgia, Sida collaborates with various partners, including multilaterals, such as the World Bank, UNDP, UN Women, United Nations Population Fund, UNICEF; international NGOs; local chapters of international NGOs, such as Transparency International Georgia (TIG); national and local NGOs, such as the Institute for Development of Freedom of Information (IDFI); private sector entities; and Swedish government bodies like the Swedish National Financial Management Authority (ESV). Several ministries and agencies of the government of Georgia were partners within larger projects, such as Strengthening Financial Management and Control in Georgia or the Governance Reform Fund. Table B10 of Appendix E provides a full list of contributions, including their names, implementing partners, budgets, and agreement periods.

Contributions with strategic direct and indirect anti-corruption interventions fit well with the Georgian national reform program. To give an example, TIG's efforts to shape solid anti-corruption regulations and reform of the judiciary aligned with a long-standing formal reform agenda of the Georgian government. Moreover, the EU accession process, which necessitated anti-corruption-related legal and institutional reforms, benefited from the expertise of organizations like TIG or IDFI. These organizations were able to swiftly adjust their annual plans, which was facilitated by core support from Sida rather than project-specific funding. Similarly, the Strengthening the Financial Management and Control in Georgia project was clearly aligned with the Georgian government's aim to introduce a modern public internal financial control systems, which was spelled out in both the Public Finance Management Reform Strategy and the Public Administration Reform Strategy.

6.5.1 The roots and manifestation of corruption in Georgia

Georgia emerged as an independent state from the collapsing Soviet Union in 1991. The early 1990s were characterized by significant challenges, including a severe economic crisis, separatist military conflicts in South Ossetia and Abkhazia, and a coup d'état against the first democratically elected President of Georgia, Zviad Gamsakhurdia, followed by an uprising in his attempt to regain power.

During the presidency of Eduard Shevardnadze between 1995 and 2003, the government achieved some progress in basic market reforms. The country then experienced a period of political stability, although it remained an electoral autocracy. However, Shevardnadze's presidency was overshadowed by issues of steep economic decline, rampant corruption, and allegations of nepotism (The Telegraph, 2014). At the time, Transparency International placed Georgia among the world's most corrupt nations, ranking it 124th out of 133 countries assessed.

The 2003 parliamentary elections faced widespread condemnation for electoral fraud, sparking public outrage and leading to the "Rose Revolution", which ousted Shevardnadze from power and brought Mikheil Saakashvili and his United National Movement (UNM) to office. During Saakashvili's tenure, Georgia implemented significant economic and political reforms and achieved notable progress in reducing corruption. Anti-corruption reforms have yielded notable successes in various sectors, including the patrol police, tax collection, customs, energy supply, business regulation, public and civil registries, admission to institutions of higher education, and in municipal government (Bank, 2012). In 2011, Transparency International ranked Georgia 64th out of 183 countries assessed. These achievements have propelled Georgia to prominence as a historic exemplar of effective anti-corruption progress.

While corruption in everyday administrative processes was either eradicated or significantly reduced, the UNM and Saakashvili came under criticism for failing to address grand corruption. Moreover, they were accused of utilizing the courts and pro-government media to suppress opposition (Rukhadze, 2013), employing excessive force against protesters, and violating human rights (Harding, 2009; Human Rights Watch, 2007). Subsequent elections in 2012 and 2013 saw the UNM lose its parliamentary majority and Saakashvili lose the presidency. The Georgian Dream (GD) party – bankrolled by businessman Bidzina Ivanishvili, whose assets equaled 35% of Georgia's GDP (Radio Free Europe, 2015) – emerged victorious in 2012, and then again in the 2016 and 2020 parliamentary elections. Since 2012, nearly all municipal administrations have been run by GD member mayors and all municipal councils have had a GD majority.

During its first two terms in power, GD implemented important anti-corruption reforms and continued to keep public service provision free from corruption, as evidenced, for example, by Transparency International's Corruption Perception Index ranking (see Table 9). Among the important anti-corruption measures implemented were the broad reform of the judiciary and public prosecution system, the set-up of the State's Inspector Service, with a mandate to investigate and prosecute violations committed by law enforcement officials, and the establishment of the assets and interest disclosure system (OECD, 2020, 8).

However, critics contend that the GD party's commitment to anti-corruption and democracy has diminished over time. By 2018, the European Parliament had already noted that "high-level elite corruption remains a serious issue" (European Parliament, 2018: 9). In 2019, Transparency International named Georgia a "country to watch" due to growing concerns about high-level corruption as well as broader worries about the health of democratic governance" (Transparency International, 2019). Transparency International particularly noted corruption in the judicial system, manifested in

informal arrangements between members of GD and select senior judges. They also pointed to the impact of Bidzina Ivanishvili, who exerted significant influence on both the party and the government while operating outside the realm of formal office, thereby evading any public accountability.

Following the parliamentary elections of the 2020s, anti-corruption efforts decreased further: advancement of reforms aimed at safe-guarding judicial independence stagnated (European Parliament, 2021; Venice Comission, 2021), and the recently established State Inspector's Service, recognized as one of Georgia's most credible institutions (United Nations Country Team in Georgia, 2022), was swiftly abolished without inclusive and transparent deliberations. Additionally, there was a notable surge in violations of media freedom (European Parliament, 2022b). In December 2022, Georgia was characterized by both internal and external anti-corruption stakeholders as a "captured state" (European Parliament, 2022a; TIG, 2022).

In 2022, following Georgia's application for EU membership, the European Commission recommended, and the European Council endorsed, twelve key priorities that Georgia needed to address before advancing to EU candidate status. In its November 2023 report assessing Georgia's progress towards these twelve priorities, the Commission acknowledged some progress in the fight against corruption, specifically the establishment of the Anti-Corruption Bureau, the adoption of an action plan on de-oligarchization, and an increase in prosecutions and convictions in corruption cases (European Commission, 2023c). In December 2023, Georgia was granted candidate status by the European Council on the understanding that progress concerning the twelve priorities would continue to advance. This included anti-corruption measures such as a transparent and effective judicial reform, strengthening of the independence of the Anti-Corruption Bureau and the new Special Investigative Service, appointment of a New Public Defender in a transparent manner and to ensure the Office's effective institutional

independence, and following through with fighting high-level corruption and eliminating vested interests, including that of oligarchs (European Commission, 2023b).

While EU accession constitutes a powerful pull factor in advancing anti-corruption efforts, the Georgian authorities' commitment to such efforts remains questionable. To illustrate, in summer 2023, the Georgian government withdrew from the 5th Monitoring Round of the OECD Anti-corruption Network for Eastern Europe and Central Asia (OECD/ACN). This monitoring aimed to assess anti-corruption areas such as the National Anti-Corruption Policy, the functioning of the judiciary and prosecution, and the effectiveness of investigation of high-level corruption cases, which are considered important in the context of European integration. Furthermore, the GD government ignored the EU's recommendation to equip the Anti-Corruption Bureau with investigative functions. Additionally, in February 2023, GD put forward a proposal for a law "On Transparency of Foreign Influence" that would designate all civil society and media organizations as foreign agents if funding from abroad constituted more than 20% of its total revenue. This proposal was widely perceived by many, including by 400 Georgian NGOs and media outlets, as GD's response to "the substantial incidents of violence, corruption, lawbreaking, and arbitrary application of laws that civil society and critical media are investigating and disclosing" (TIG, 2023b). In May 2024, the Georgian parliament voted to adopt the law.

In conclusion, the current situation in Georgia is characterized by impressively low levels of petty corruption combined with widespread high-level corruption. In other words, unlike Kenya or Serbia, corruption in Georgia is not systemic. However, the political landscape is characterized by oligarchic domination of the executive with weak parliamentary and judicial oversight. EU integration is an important lever for anti-corruption efforts, but the excessive influence of oligarchic interests in economic, political, and public life is a serious structural impediment to speedy reforms and EU

accession. Nonetheless, the overwhelming majority of Georgian citizens support EU accession, and there is also a vibrant civil society, with numerous organizations incorporating anti-corruption efforts into their agenda.

6.5.2 Implementation of Sida's anti-corruption policy in Georgia

The development cooperation section at the Swedish embassy in Tbilisi comprises four POs, the section head, and one supporting administrative staff member. Three of the four POs were recruited locally, while one was seconded from Sida's HQ. Although the number of POs has remained unchanged over the past decade, a significant increase in delegated funds during the same period has resulted in a considerable rise in the workload of contribution managers (Interview 4, Georgia). Notably, two of the NPOs have accumulated over a decade of experience working at the embassy, suggesting a continuity of expertise within the team.

In Georgia, corruption is approached from a risk perspective across all supported contributions, whereas the developmental perspective is integrated into only a subset of these. Partner organizations interviewed underscored that the existence of robust internal anti-corruption guidelines and protocols, including written procurement policies, conflict of interest regulations, whistle-blowing procedures, established financial management practices, IT controls for accessing computer systems, among others, constituted preconditions for Sida funding (Interviews 10, 17, 24, 34 Georgia). For some local partner organizations, this was "uncharted territory" and they expressed appreciation for Sida's assistance in conducting organizational and financial audits and in laying the foundations of an anti-corruption culture within their organizations (Interviews 8, 10, 20, 34, Georgia). Many partner organizations, especially those engaged in sub-granting, also reported that they required at least some basic anti-corruption safeguards from organizations they worked with

(Interviews 10, 20, 34, Georgia). Echoing the sentiments observed in Kenya, POs and partner organizations alike conveyed the belief that bolstering anti-corruption capabilities within partner organizations and the wider local civil society may have positive externalities for reducing corruption in society as a whole (Interviews 5–6, 10, 34 Georgia).

Awareness of Sida's anti-corruption policy by POs, corruption analysis, utilization of anti-corruption infrastructure: The majority of POs interviewed demonstrated a limited awareness of the new anti-corruption approach. For instance, during interviews, some POs sought clarification from the interviewer on key policy terms, such as the development perspective, strategic indirect interventions, and systematic integration (Interviews 3, 5, Georgia). That being said, POs emphasized that anti-corruption has been on the agenda of the Swedish embassy in Georgia for a long time, representing an organic area of interest (Interviews 2–4, 6, Georgia).

Therefore, it was unsurprising to observe that POs possessed a profound understanding of corruption within the existing context, which was substantiated by numerous examples, including those drawn from their respective portfolios (Interviews 2–6, Georgia). POs construed corruption as non-systemic and occurring predominantly within the highest echelons of power. They unanimously noted that younger citizens of Georgia have a mindset in which bribery in exchange for access to public services is not a norm (Interview 2–6, Georgia). The two most frequently exemplified forms of corruption in Georgia were concentration of power and the lack of independence of the judiciary (Interviews 2, 4, 6, Georgia).

POs were keenly aware that this was an atypical situation compared to neighboring countries and many countries where Sida works. However, they found themselves unable to articulate whether this impacted the nature of their anti-corruption efforts compared to those of colleagues in other partner countries (Interviews 2–3, 5 Sida HQ). This can be attributed, at least partially, to the limited involvement of POs in Georgia in the established routines for sharing and

learning within Sida as a whole. To illustrate, several POs could not recall the last time they participated in an event within the Anti-Corruption Network (ACN) (Interviews 2, 5, Georgia). Anti-corruption matters are frequently discussed within the weekly meeting of the development cooperation section, but this is driven by the head of the section rather than by the local ACFP.

A common thread running through the interviews was the perception among POs that one of the portfolios carried a clear "anti-corruption mandate", with several ongoing contributions specifically targeting corruption. POs expressed a positive outlook regarding the potential of these initiatives to contribute to reducing corruption (Interviews 2–3, 5, Georgia).

In relation to formal corruption analysis, the embassy engages in the EU's collaborative corruption analysis as part of the EU-wide cooperation framework (Interview 4, Georgia). However, the evaluators were not granted access to the document. Furthermore, the Strategy for Reform Cooperation with Eastern Europe (2021–2027) implementation plan by the embassy in relation to Georgia included elements of corruption analysis (Sida, 2022, 2023), which at least partially informed the selection of contributions (Interviews 4, 6, Georgia). For example, the decision to extend core funding to organizations like TIG and IDFI was driven by their demonstrated effectiveness in combating context-specific forms of elite-level corruption (Interviews 2, 4, Georgia).

Both plans also included a dedicated section titled "Sida's plan on anti-corruption," and while the 2023 plan lacked any reference to the development perspective, the 2024 document highlighted the planned support to CSOs and media "to make corruption visible as an obstacle to development" (Sida, 2023).

The objective to reduce corruption is part of the strategy goal "strengthened conditions for accountability, increased transparency, and reduced corruption". In both the 2023 and 2024 strategy plans, this goal was intended to be achieved through the following activities:

- To strengthen the capacity of law enforcement institutions at central, regional, and local levels.
- To work towards more efficient and transparent management in government at all levels.
- To strengthen protection of human rights defenders, change actors, journalists, and other voice carriers.
- To strengthen the conditions for freedom of expression and the development of free, professional, and independent media.
- To strengthen individual's and civil society's ability to demand accountability (Sida, 2022).

The selection of anti-corruption activities presented appears limited. In reality, though, the supported anti-corruption interventions were far-reaching. They encompassed a set of activities, spanning from the enactment of anti-corruption legislation (TIG, IDFI, and Georgian Foundation for Strategic and International Studies) and investigative work by non-state actors to uncover high-level corruption (TIG), to tackling structural inequalities that foster corruption through, for example, improving individual opportunities to become viable economic actors (TBA Bank) and gender equality means (e.g., United Nations Joint Program Gender Equality in Georgia III).

Strategic Direct Interventions: Sida's anti-corruption efforts in Georgia are largely shaped by two contributions, consisting of core support to two CSOs focused on anti-corruption initiatives: TIG and IDFI. These organizations undertake anti-corruption activities linked not only to the strategy goal of increased transparency and reduced corruption, but also to several other sub-goal areas including democratic governance, human rights, the rule of law, and strengthen conditions for accountability and an equal society. This makes these contributions cross-cutting and significant.

The bulk of TIG's work can be characterized as strategic direct interventions, as the organization puts considerable effort into shaping the legislative framework that "condenses spaces for corruption and allows for effective oversight of institutions of government" (Interview 25, Georgia). In the year 2023 alone, TIG submitted three legislative proposals to Parliament and assessed several important draft laws. To illustrate, it took an active part in shaping and assessing anti-corruption regulations and the establishment of the Anti-Corruption Bureau, mandated by the EU accession recommendations. For a long time, TIG advocated for a single independent agency with relevant anti-corruption functions, departing from the system whereby these responsibilities were dispersed among various law enforcement entities (Interviews 11, 14, Georgia). TIG successfully bolstered an initially weak draft by advocating for the incorporation of monitoring mechanisms for asset declarations and political party funding. However, its propositions for granting investigative authority to the Bureau and ensuring the appointment of a genuinely independent head were not backed by the Georgia Dream parliamentary majority.[12]

In addition to this, TIG was involved in investigative, analytical, and advocatory anti-corruption work. For example, the organization maintained a list of cases of alleged high-level corruption, which by the end of 2023 included 151 cases involving 163 officials. Their oversight work is exemplified by three investigative, user-friendly, and regularly updated websites: one focused on political donations, another on procurement monitoring, and a third on company ownership and business interests.

[12] In addition to TIG and IDFI, the Georgian Foundation for Strategic and International Studies (GFSIS) also contributed to the "rule" aspect of the "rule and enforcement" interventions through tailored educational courses in policy analysis designed for government officials. One of the modules within these courses specifically hones in on the analysis of corruption risks (Interview 28, Georgia).

True to its name, the work of IDFI is centered on the role of information in both anti-corruption efforts and broader democratic governance. As one of the organization's representatives noted, "our work is based on the assumption that information is the best disinfectant" (Interview 26, Georgia). The work of IDFI revolves around: monitoring the online information resources of public authorities in Georgia, conducting comparative analyses to understand the drivers of the proactive disclosure of such information, requesting and analyzing expenditures of municipalities, evaluating authorities' compliance with freedom of information acts, advocating for enhanced transparency standards to ensure government accountability, building capacity within the watchdog community regarding freedom of information and speech, facilitating increased accessibility to legal judgments, and strategically litigating on cases related to information disclosure, among other activities.

Box 6: Access to public information in Georgia

In 2022, IDFI published its 13th report on access to public information in Georgia. This comprehensive report was compiled from an analysis of 7,582 freedom of information requests dispatched to 374 public institutions. Notably, the response rate from public institutions in 2022 stood at a concerning 58%, marking the lowest figure recorded since 2010. Moreover, an established critical threshold of 80%, consistently upheld from 2013 until 2022, was unmet. Alarmingly, 69 institutions, including 49 agencies subordinate to ministries, failed to respond to any of the inquiries from IDFI (IDFI, 2022).

These descriptions paint TIG and IDFI as "rule and enforcement" anti-corruption actors. When queried about the appropriateness of this form of anti-corruption work in the context of Georgia, the POs interviewed unanimously agreed that it was well-suited to the local environment (Interviews 2–4, 6, Georgia). Specifically, given that corruption is concentrated at the top, the main aim of anti-

corruption actors is to "...not allow the elite to create one set of rules for themselves and another [set of rules] for the rest" (Interview 2, Georgia). When discussing the theory of change behind these interventions, the PO underscored the role of robust watchdogs as a deterrent against future rent-seeking behavior, thus alluding to principal-agent logic.

The partner organizations in question saw themselves as watchdogs that "should ensure that powerholders don't cross the established lines" (Interview 11, Georgia). While this portrayal, which strongly aligns with the PAT theory of anti-corruption change, may indeed be fitting, both organizations operate within a broader framework of anti-corruption change beyond just PAT (discussed below).

Strategic Indirect Interventions: strategic indirect interventions were found in contributions concerning public finance management (Strengthening the Financial Management and Control in Georgia and Governance Reform Fund IV), civil service reform (Governance Reform Fund IV, core support to TIG), gender equality (UNJP Gender Equality in Georgia and Core Support to Kakheti Regional Development Fund) and those supporting the business sector (e.g., Portfolio Guarantee to TBC Bank), among others.

While TIG's anti-corruption strategy primarily follows a traditional "rule and enforcement" approach, the organization also engages in strategic indirect interventions. A notable instance is its facilitation of local collective actions in various regions. TIG supports local groups of citizens, Committees of Concerned Citizens (CCCs), in articulating their needs, prioritizing demands related to public service provision, and presenting them to relevant authorities. In 2023, the organization assisted these CCCs in raising 150 issues, leading to the successful resolution of 60 of them, with fundraising initiated for another 30. This example underscores another facet of TIG's anti-corruption efforts, highlighting its role in fostering and sustaining collective action.

In discussions with evaluators, TIG representatives recognized that the impact of CCCs on corruption is not solely about apprehending wrongdoers. Rather, the collaborative efforts of these groups cultivate unity and trust among members, while "getting positive responses from authorities [usually municipal bodies - the authors], and getting things done... makes people trust municipal bodies" (Interviews 11, 12, Georgia). One TIG representative emphasized: "trust in each other and in authorities is fundamental to combating corruption", noting Sweden's example as a testament to this principle (Interview 12, Georgia). The organization's role in this process involves logistical support, such as scheduling meetings, keeping a register of attendance of both the citizens and officials, and even providing "coffee to keep people going..." (Interview 14, Georgia).

This example supports the notion that TIG pursues diverse avenues of anti-corruption efforts, transcending its conventional watchdog role. Furthermore, it suggests that organization's staff possess a clear understanding of the theory of anti-corruption change and of their role in sustaining, if not initiating, localized collective action.

Several contributions encompassed interventions consistent with the Guidance's concept of strategic indirect interventions. For instance, over the years, TIG has legally contested the practices relating to the hiring and firing of civil servants by local government authorities. It has succeeded in reinstating "hundreds" of politically dismissed civil servants to their positions (Interview 14, Georgia). Additionally, in numerous municipalities such as Imereti and Samegrelo, (TIG advocated for and succeeded in bringing about changes from arbitrary bonus distribution practices to performance-based criteria (Interview 12, Georgia).

The Governance Reform Fund (GRF) contribution has long been dedicated to civil service reform, with the institutionalization of the independent Civil Service Bureau standing out as a notable achievement, recognized not only by the partner organizations involved (Interviews 20, 33, Georgia), but also by observers (Interviews 8–9, 35, Georgia). One example of the Bureau's

independence is its work on the auditing of the recruitment commission protocols for the central and sub-national governments and the judiciary and also of the asset and conflict of interest declarations. Several observers, both internal and external to the interventions, assessed the anti-corruption potential of civil service reform as notably high, especially in the Georgian context where political corruption remains a prominent concern (Interviews 4, 9, 15, 27, 28, Georgia). This assessment was underpinned by the notion that civil servants recruited on merit and shielded from politically motivated dismissals and arbitrary salary adjustments, are inclined to exhibit greater resilience against informal and overtly illicit demands from their political superiors – a viewpoint substantiated by both academic research (Dahlström & Lapuente, 2017; Nistotskaya & Cingolani, 2016) and Sida's Guidance (Sida, 2021, 15).

Other examples of strategic indirect interventions are several contributions supporting different types of public finance management (PFM) reforms. First, there is GRF – a decade-old contribution aimed at supporting government-led demand for knowledge and skills in program budgeting, accounting, and reporting in public sector, tax, and customs issues and evaluating and addressing fiscal risks (Interview 20, Georgia). Second, during the period 2020–2022, Sida supported a project aimed at middle-level managers in six ministries of Georgia's central government, who attained knowledge and skills pertaining to internal control management, including managing risk (Strengthening the Financial Management and Control in Georgia). Furthermore, several partner organizations, such as TIG, IDFI, UN Women, KRDF, and the International School of Economics (ISET) took significant steps toward enhancing transparency in all facets concerning public budgets. Their efforts ranged from implementing participatory budgeting, which incorporates considerations for gender, disability, and youth inclusivity, to the development of a gender index for the state budget and a transparent public procurement rating. For instance, in 2022, IDFI analyzed the financial transparency and expenditures of sports federations, expenses for bureaucracy,

including salary increases, and the expenditures of the contingency fund of the Georgian government. To convey these intricate findings effectively, the organization prepared summaries of the findings along with visual aids such as infographics and videos.

The assessment of the anti-corruption potential of these interventions by POs, partner organizations, and anti-corruption stakeholders, suggests a low impact in the short term and a moderate one in the long term (Interviews 9, 13, 19, 20, 25, 27, 36, Georgia). Many interviewees cited the inherent limitations of any control system when explaining their assessment of the potential as moderate. When it comes to the short-term potential, as one of the interviewees put it, given the significant gaps and deficiencies in the country's PFM landscape, "a couple of initiatives 'to patch up the holes' doesn't make a big difference" (Interview 9, Georgia). With that said, some observers have suggested that concentrating resources on specific areas rather than dispersing them thinly across multiple domains could constitute a more impactful anti-corruption strategy in the field of PFM (Interviews 8, 24, Georgia). The transformation of the Georgian tax authority (Revenue Service) during the 2000s stands as a compelling example. Despite the passage of time, it has upheld a remarkable level of efficiency and integrity (Interview 24, Georgia).

Finally, many of the activities of TIG and IDFI, supported through core funding, fall under the "digitalization, e-government, and utilization of open data" category of strategic indirect interventions. Here, IDFI is a major player, since objective one of the organization is "the advancement of open government principles" (Interviews 25, 26, Georgia). In addition to monitoring, analysis, and strategic litigation concerning public access to various government data (discussed above), IDFI collects, updates, and publishes public data in open formats and develops tools (such as Global Data Barometer, a courts statistics module) to foster the use of open data, specifically in terms of coordinating campaigns and activities. It also trains public officials in, for example, how to prepare annual reports and

how to reply to citizens' inquiries, including those from people with disabilities. Moreover, IDFI worked with a selection of government bodies (such as the Parliaments of Georgia and Ajaria) to support the implementation of Open Government Partnership (OGP) principles.

Although transparency may sometimes elicit resignation rather than active opposition against corruption (Bauhr & Grimes, 2014), it was observed by POs, partner organizations, and anti-corruption stakeholders not involved in these specific contributions that two specific contextual factors mitigate this risk within the Georgian context (Interviews 2, 4, 6, 8, 9, 15, 25–27, Georgia). First, corruption is not pervasive, and second, Georgia has a robust civil society, comprising no fewer than 500 organizations, with a vested interest in good governance (Interview 4, Georgia). This network is adept at seeking accountability from the relevant authorities, as highlighted by one interviewee who noted that they know "who to ask for an account and how to ask" (Interview 26, Georgia). In such circumstances, increased transparency serves as a catalyst for fostering accountability.

Systematic integration of anti-corruption: a number of contributions within Georgia's country portfolio did not have reduced corruption as either a primary or secondary objective, implying that these contributions could benefit from systematic integration of anti-corruption. However, surprisingly, there was no evidence of such integration. Notably, not a single contribution met the requirement of simultaneously including all five systematic integration measures. Partially, this could be attributed to a lack of awareness among personnel regarding the policy (discussed above). Those who had knowledge of this facet of the policy were skeptical regarding its potential impact (Interviews 3, 5–6, Georgia). As one PO explicated: "not every environmental contribution will make the environment better, and if five anti-corruption measures are added on top of the main objective, then the environmental objective is further diluted" (Interview 5, Georgia).

Relatedly, all embassy personnel interviewed emphasized that the absence of anti-corruption, particularly the developmental perspective, as an official perspective of Swedish international development cooperation diminished the sense of urgency in incorporating systematic integration into contributions where anti-corruption is a tertiary goal.

> As you will see in our assessments, for every project we write how this will contribute to environment, to gender, to rights, to poor people... and then you have anti-corruption... I just think at some point it becomes a little bit artificial... (Interview 5, Georgia)

When it comes to theories of change, POs exhibited varying degrees of understanding regarding the importance of theories of anti-corruption change. Many believed that when the contribution's primary objective is the fight against corruption, then a theory of change needs to be included. However, if it is not the primary objective, then some POs expressed uncertainty about the necessity of including a theory of change (Interviews 2–3, 6, Georgia).

Principal-agent theory (PAT) emerged as the most frequently cited theory of change. All POs viewed TIG and IDFI contributions through this theoretical lens, despite many of their activities falling under the heading of strategic indirect interventions and, hence, possibly involving more than PAT-informed theories of change.

Some POs demonstrated an understanding that some of the interventions could be seen as addressing corruption as a collective action problem (Interviews 2–4, 6, Georgia). For instance, several POs viewed gender equality contributions as a meaningful anti-corruption endeavor because "it changes expectations how people think about each other" (Interviews 4–6, Georgia) and also because they disrupt established networks (Interview 6, Georgia). The role of gender equality interventions was seen as ensuring the continuous inflow of people from outside of corrupt networks, which would

disturb their smooth operation. "I don't think that women are less corrupt by nature. It is the very fact of their arrival [in formal politics] that creates a disruption... in the system of corrupt exchange" (Interview 6, Georgia).

However, the anti-corruption potential of gender equality interventions was not universally supported or recognized by POs and partner organizations. For instance, some partner organizations focusing on women's empowerment argued that "only women from already politically connected families" can be seen in national government or parliament, and therefore "it is naive to expect less corruption" from the inclusion of women in formal politics (Interviews 19, 23, Georgia). Conversely, a representative from a partner organization working on women's issues in one of Georgia's most deprived regions contended that they had never considered their efforts towards institutionalizing a women's council or changing customary family law as anti-corruption work (Interview 10, Georgia). "Now [after a conversation with the evaluator] I can see that what we do is [work] against corruption. They [men] in our community... make laws for their own gain and don't want to change that", the interviewee continued.

For several POs, there was a clear connection between producing high quality public services accessible to all citizens and shifting expectations about the acceptability of corruption (Interviews 4, 6, Georgia). Giving people a stake in a well-functioning government holds potential for anti-corruption efforts in Georgia (Interview 4, Georgia). The interviewee substantiated this assertion by noting that certain political forces in Georgia appeared to be deliberately keeping large segments of the population, especially in rural areas, dependent on ad hoc handouts from the government, thereby perpetuating more tolerance toward corruption.

> I'll tell you a real-life story. A politician gives a school bus to a community as 'a gift', although the moneys are of course from the state coffers. People are happy and say: 'This politician didn't take from us, but gave to us.' This is, of course, a false logic. Those kids [of the community] have the right for education, and if the school happens to be 10 kilometers [away], providing transportation is not a whim of a politicians but a duty.

However, many POs emphasized that while enhancing public services is crucial for all objectives of the strategy and for meeting the needs of the people more broadly, this task surpasses the resources available within Sida's aid program (Interviews 3–6, Georgia). Furthermore, some other POs argued that such interventions were better suited to reducing petty corruption, "a battle already won in Georgia during the 2000s" (Interview 3, Georgia). Consequently, they felt that these interventions were not very sensitive to the current socio-economic and political conditions.

6.5.3 Conclusions from the Georgia case study

In terms of policy adherence and implementation, most project officers demonstrated limited awareness of the new anti-corruption approach, especially when it comes to systematic integration. The use of Sida's anti-corruption infrastructure was also limited, and there was not an established routine for sharing and learning from the team's experiences. The understanding of the anti-corruption policy among staff in Georgia is dominated by the risk perspective. One noteworthy challenge in policy implementation is the reluctance among POs to fully embrace the importance of theories of anti-corruption change when designing and supporting contributions.

Having said this, corruption and anti-corruption have been on the agenda of the development cooperation section at the embassy in Georgia for nearly two decades. Staff continuity has ensured that that

there is a degree of institutional memory and accumulated knowledge. The section's understanding of corruption in the Georgian context is sound and its characterization of the current situation in the country aligns with that found in the academic literature and reputable media.

The contributions assessed in this report tackle corruption through a blend of strategic interventions. TIG and IDFI have carried the heaviest burden of anti-corruption efforts. The core support extended to these organizations enables them to implement strategic interventions of both a direct and indirect nature, adapting them as needed to the frequently shifting political terrain. Furthermore, in terms of efficiency, the core support provided to TIG and IDFI sustains a robust and wide-ranging anti-corruption portfolio of interventions to combat corruption, relative to the funds they receive.

In Georgia, "rule and enforcement" efforts are spearheaded by NGOs, which contrasts with the situation in Serbia, where such work has primarily been led by multilateral organizations. The prevalence of NGO-led strategic direct interventions is well-suited to the Georgian context, where corruption is primarily concentrated at the highest levels of authority and there is a strong civil society willing and capable of serving the watchdog role.

The repeated attempts by the ruling Georgian Dream party to hinder the willingness and capacity of civil society to hold power-holders accountable, evidenced by the attempts to introduce the so-called "Russian law", speaks volumes about the expertise of these organizations in combating corruption. This suggests a high potential for these organizations' interventions to address corruption.

Strategic indirect interventions are primarily concentrated on leveraging open data, enhancing public finance management, and implementing measures to address structural inequalities within society, particularly gender imbalances. During interviews, POs had an opportunity to reflect on the theories of change underpinning

such interventions, revealing a mixed understanding. While some POs had a clear understanding of the causal mechanisms behind the interventions they oversaw, others struggled to even approximate them. As in Kenya, the lack of clarity regarding the theories of change underpinning these anti-corruption interventions renders their potential impact rather uncertain.

Given these considerations, Sida's anti-corruption efforts can be assessed in two key dimensions. First, providing core support to highly capable and dedicated organizations with a strong commitment to the anti-corruption cause holds significant potential. However, this is conditioned on maintaining favorable political conditions, such as a liberal democratic environment and strong ties to the EU accession process. Second, given the lack of explicit understanding of theories of change regarding strategic indirect interventions and the paucity of systematic integration measures, the potential of these efforts is rather low.

6.6 Conclusions from three case studies

This section outlines several key findings regarding the implementation of anti-corruption efforts across the different countries. The first thing to note is a disparity in the level of policy awareness among personnel. POs in Serbia exhibit a better understanding compared to those in Kenya and Georgia.

Furthermore, while utilization of the anti-corruption infrastructure by POs in Kenya and Georgia was sub-optimal, POs in Serbia have been very active members of the Sida-wide network of anti-corruption sharing and learning. This finding aligns with survey evidence indicating that the anti-corruption infrastructure is underutilized.

There is also scant evidence that an internal anti-corruption dialogue is institutionalized within the development cooperation sections in Kenya and Georgia. In contrast, in Serbia, such dialogue is a standard operating procedure. This finding contrasts with the survey findings, which indicate that over 90% of POs engage in such dialogue.

The policy requirement of a political economy analysis of corruption was not fully met in all countries, and in all three cases, the implementation efforts are primarily concentrated to the risk perspective.

Another common feature among all three cases is the POs' sound understanding of the corruption within the country contexts. This finding is consistent with the evidence from the survey data. The comprehension of local drivers and dynamics of corruption has facilitated many judicious decisions regarding the selection and support of anti-corruption contributions. Moreover, the anti-corruption efforts reviewed largely align with the objectives of relevant Swedish government strategies and the developmental priorities of the partner countries' governments.

The country portfolios of contributions with anti-corruption relevance exhibit variation: in Kenya and Serbia, strategic indirect contributions predominate, whereas in Georgia there is a proportional mix of both. The emphasis on strategic indirect interventions, suitable for contexts in which corruption is a systemic issue, such as in Kenya and Serbia, aligns with the policy. Conversely, the large presence of direct strategic interventions in Georgia, where corruption is not systemic and where there is a strong pull factor in the form of the hard-gained EU candidacy, is also in line with the policy. However, because a broad political settlement that demonstrates readiness and anti-corruption drive already exists in Kenya, a greater emphasis on strategic direct interventions is merited.

In all cases, the supported contributions lacked systematic integration measures, and personnel struggle to see how integrating measures such as public participation or integrity into each contribution can drive anti-corruption change. This lack of clarity fosters a degree of resignation among personnel towards the idea of systematic integration. Such resignation is further intensified by the fact that corruption as a development obstacle is not an official perspective, making personnel less likely to prioritize it.

A noteworthy challenge in policy implementation is the hesitancy among POs to fully embrace the importance of theories of anti-corruption change. The theories of change underpinning anti-corruption interventions in Kenya and Georgia were unclear and unexplicit, both to POs and to the evaluators. The situation in Serbia is better, not least in terms of the POs' willingness to think about causal mechanisms in a systematic way. Moreover, a number of contributions are rationalized, albeit only orally and not in the project documentation, by multiple theories of change. In all cases, theories of anti-corruption change are not documented in the contribution materials.

While personnel on the ground seemed to understand that an intervention that is successful in one context may fail in another, there is a notable lack of appreciation among POs of the importance of having a clearly defined theory of change. Without it, attributing impact to a specific intervention becomes nearly impossible, thereby limiting opportunities for evidence-accumulation, systematic learning, innovation, and experimentation.

To summarize, our analysis revealed a moderate level of adherence to and implementation of Sida's anti-corruption approach among POs in the three countries. The most significant challenge lies in POs' reluctance to embrace theories of anti-corruption change, limiting the potential for evidence-accumulation and innovation, thus hindering the potential of efforts to reduce corruption. Furthermore, while such efforts largely align with the goals of the relevant Swedish government strategies and the developmental priorities of the three partner countries, and are responsive and sensitive to the contexts in which they take place, the potential of these efforts is constrained by the extremely challenging socio-economic and political conditions that exist.

7 Conclusions and recommendations

This report has addresses to the question "what is the potential of Sida's efforts to contribute to combating corruption as an obstacle to development in partner countries?" We have departed from the acknowledgement that complex social problems such as corruption defy simple policy solutions. However, a policy aligned with a current, evidence-based understanding of effective anti-corruption strategies – and of the reasons why they work – is more likely to succeed, all else being equal. Furthermore, the successful attainment of policy objectives heavily depends on the implementation efforts of government officials on the ground, who wield significant discretion in the interpretation and application of these policies (Lipsky, 1980). Thus, the potential of Sida's anti-corruption efforts to reduce corruption in partner countries is higher if the anti-corruption policy is relevant to the accumulated knowledge and is effectively implemented by the personnel on-the-ground.

Our second assumption, drawn from the modern standard of evaluation research in international development cooperation (OECD, 2021), posits that the sensitivity of anti-corruption efforts to the socio-economic and political conditions in which they are implemented will determine their relevance. Greater relevance, in turn, correlates with a higher potential for impact.

These starting points guided the overall design of this evaluation. First, we conducted a comprehensive review of existing knowledge concerning anti-corruption change. Next, we conducted a comprehensive review and evaluation of Sida's anti-corruption approach (policy) and examined the inclusion of anti-corruption goals and activities in Swedish government strategies for international development cooperation. Third, we assessed the implementation of the policy by conducting an online survey with development cooperation professionals employed by Sida in partner

countries. Finally, we conducted three case studies in contexts reasonably reflective of the range of environments in which Sida operates.

The following section presents the results of each of the pillars of the study, followed by policy implications and recommendations.

7.1 The accumulated knowledge of anti-corruption change

A critical review of the existing scholarship on the nature of corruption and theories of anti-corruption change revealed four dominant frameworks: principal-agent theory, collective action theory, the developmental governance approach and the organizational approach. Each of these is accompanied by varying levels of empirical evidence, and no single framework has established itself as paradigmatic. Additionally, there is a great deal of overlap in the measures endorsed by different theories. To give an example, both PAT and CAP draw attention to the importance of monitoring and enforcement, but the assumptions and, critically, theories of change – i.e. the pathways through which such measures foster anti-corruption transformation – differ markedly.

The literature offers no straightforward answer or clear guidance on how to address corruption operationally. It is therefore highly commendable that Sida's policy fully acknowledges the scale and complexity of the problem and reflects the latest advancements in anti-corruption literature. Given the range of competing frameworks on anti-corruption change, Sida's anti-corruption efforts would benefit from development cooperation and partner organization personnel recognizing the strengths and weaknesses of each approach, as well as their potential implications for programming. Achieving this requires dedicated training to ensure that the personnel is well-equipped to navigate and apply these theories effectively.

Table 6: Accumulated knowledge: findings and implications

Finding	Implications
Four frameworks dominate the anti-corruption scholarship, each supported by varying degrees of empirical evidence, with no single framework emerging as the definitive paradigm.	It is essential that development cooperation professionals recognize both the strengths and limitations of each framework. A relevant anti-corruption strategy has a motivated description of the nature of corruption and provides a logical and sufficiently nuanced narrative of how anti-corruption change may occur.

Table 7: Relevance of Sida's anti-corruption approach (policy) to accumulated knowledge: findings and implications

Finding	Implications
All four main frameworks are considered, but there remains an incomplete understanding of the facilitators of collective action, as well as of the insights from the sectoral and organizational literatures. Theories of change underlying advocated interventions are somewhat ambiguous, particularly in indirect interventions and measures of systematic integration.	This knowledge gap poses a risk to the successful implementation of the policy.

7.2 Overview and evaluation of Sida's anti-corruption approach

Sida's policy asserts that corruption is a systemic and endemic issue in most of the partner countries where Sida operates. Therefore, it must be addressed through indirect, context-specific, and preventative interventions, and through the systematic integration of anti-corruption into all of Sida's development efforts.

While this approach is indeed relevant to the accumulated knowledge, the main challenge remains bridging the gap between a sound conceptual understanding of the problem and the practical implementation of solutions in interventions.

Our analysis identified a need for clearer guidance on how scholarly insights into corruption, which are often highly abstract, can be translated into practical actions in the day-to-day development cooperation. At the conceptual level, Sida calls for the systematic integration of five principles or "spaces": accountability, transparency, participation, integrity, and efficiency. While these principles are sometimes cited straightforwardly in Sida's documents as the inverse of corruption, the processes through which accountability, transparency, and participation can lead to enhanced integrity and efficiency – and consequently reduce corruption – are multifaceted. Greater attention to unpacking the specific mechanisms and possible causal paths through which each of these "spaces" might contribute to reducing corruption, as well as possible pitfalls, would aid both Sida staff and its partners refine their anti-corruption efforts. We address these issues further in the recommendations section below.

Regarding the integration of the anti-corruption approach in Swedish international development cooperation at the level of government strategies, the evaluation reveals that the development perspective is not yet fully incorporated. However, there has been a significant increase in the share of strategies that explicitly aim to reduce corruption, through the articulation of goals or activities, compared to 2011. This indicates a positive trend toward greater integration.

7.3 Implementation of Sida's anti-corruption approach in partner countries

Based on the survey data of 149 program officers in partner countries, we assessed 15 individual facets of anti-corruption policy implementation. Based on this, we concluded that the overall adherence by embassy staff to Sida's policy on reducing corruption as an obstacle to development is moderate.

Our analysis of the implementation of the policy in three countries also revealed a moderate level of adherence to Sida's anti-corruption approach among POs. The most significant challenge identified is POs' reluctance to embrace the importance of having well-defined theories of change for each anti-corruption intervention, which hinders the effectiveness and potential impact of efforts to reduce corruption. Moreover, anti-corruption efforts face competition from Sida's five 'official' perspectives, often resulting in their deprioritization by personnel. Additionally, Sida's anti-corruption infrastructure has not been successful in consistently transmitting the necessary messages across to staff at Swedish embassies.

Based on these findings we suggest several recommendations.

7.4 Recommendations

Recommendation 1. Update the Guidance for Sida's Work with Corruption as a Development Obstacle with relevant knowledge in order to:

- Improve the design of anti-corruption interventions.
- Include all known facilitators of collective action, extending beyond the current emphasis on coordination.

- Clarify that although both PAT and CAP endorse interventions such as behavior observability and sanctioning of non-compliance, the underlying assumptions and causal mechanisms behind these interventions differ between the theories. Personnel should be equipped to distinguish between PAT- and CAP-based approaches to observability and sanctioning, select a suitable type, and clarify the theory of change and associated risks.
- Ensure that Sida keeps up to date with evolving research.

Recommendation 2. Deploy Sida's policy expertise into country programs to assist with the development of anti-corruption strategies and the design of anti-corruption interventions.

Recommendation 3. Reassess the systematic integration of anti-corruption in order to:

- Re-evaluate both the principles and methodological support for the systematic integration of anti-corruption.
- Engage representatives from academia, donors, partner organizations, and other stakeholder groups in developing the principles of systematic integration.

Recommendation 4. Introduce anti-corruption interventions based on randomized control trials (RCTs).

- Given that no single framework has emerged as the definitive paradigm, RCTs will offer Sida compelling empirical evidence on what works, in which settings, and why.

Recommendation 5. Designate anti-corruption as an official perspective in order to:

- Counteract the deprioritization of anti-corruption efforts by personnel.
- Mitigate the domination of the risk perspective.

- Prevent anti-corruption from becoming a mere checklist of due diligence.
- Attract additional funding to enhance the currently limited implementation support toolbox.

Recommendation 6. Include the characterization of corruption as a development obstacle and the goal of reducing corruption in every government strategy for development cooperation.

- Since strategy documents guides the work of each development cooperation section at embassies, this is likely to encourage POs to prioritize corruption as a significant development issue.
- Once designated as a goal, anti-corruption efforts are likely to attract additional funding to support and enhance anti-corruption efforts.

Recommendation 7. Ensure staff continuity to:

- Enable the accumulation of policy expertise and context-specific experience.
- Facilitate the establishment of networks with relevant domestic actors, allowing staff to act as facilitators. This is likely to help to connect potential collaborators, and overcome deficits in coordination and trust that may hinder the formation of effective anti-corruption coalitions.

As this report has shown, donor-supported anti-corruption work faces great challenges without domestic commitment. As interviews with numerous anti-corruption stakeholders in partner countries have highlighted, however, donors can play an important role in maintaining national and local efforts and pressure. Sida's partners help prevent backsliding, retain momentum in anti-corruption movements, and prepare for potential windows of opportunity for reform. The efforts of Sida and its partners can contribute to sustaining knowledge and activity, making corruption more difficult,

and holding the line against corrupt actors. Sida has developed an ambitious and evidence-based approach to combating corruption as an obstacle to development. This has, however, not been fully translated to action at the national level. Further efforts to implement this approach, as stipulated in the above recommendations, along with concerted efforts with other donors would help strengthen the potential for impact in partner countries.

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List of abbreviations

ACFP	Anti-Corruption Focal Point
BOS	Belgrade Open School
CRTA	Center for Research, Transparency and accountability
CSO	Civil Society Organization
DFID	UK Department for International Development
EBA	Expert Group for Aid Studies
EACC	The Ethics and Anti-Corruption Commission of Kenya
GDPR	General Data Protection Regulation
GII	Gender Inequality Index
GRECO	The Group of States against Corruption
INTEM	Sida's Department for International Organizations and Policy Support
LED	Sida's Department for Management Support
NALED	National Alliance for Local Economic Development
NAPA	National Academy for Public Administration
NARC	The National Rainbow Coalition
OECD	Organization for Economic Co-operation Development
OECD DAC	OECD Development Assistance Committee
SCTM	Standing Conference of Towns and Municipalities
SDG	Sustainable Development Goals
SFI	State Fragility Index, Peace Fund

Sida	The Swedish International Development Cooperation Agency
Sida's HQ	Sida's Head Quarters
SNS	Serbian Progressive Party
TEMA	Unit for Thematic Support of Department for International Organizations and Policy Support (INTEM)
UTV	Evaluation unit at Sida
QoG	The Quality of Government Institute
USAID	United States Agency for International Development

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Corruption constitutes a serious barrier to sustainable development. During the last few years, Sida has strengthened its efforts to tackle corruption in partner countries. This report presents a comprehensive evaluation of the potential of Sida's work to contribute to reduced corruption, based on a literature review, an analysis of Sida's anti-corruption approach and work and case studies of Sida's efforts in three partner countries.

Korruption utgör ett allvarligt hinder för hållbar utveckling. Sida har under de senaste åren stärkt sitt arbete för att motverka korruption i partnerländer. Denna rapport presenterar en omfattande utvärdering av Sidas förutsättningar att bidra till minskad korruption, baserat på en litteraturöversikt, en analys av Sidas angreppsätt för att minska korruption och fallstudier av Sidas insatser i tre partnerländer.

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