

**UNDERSTANDING ANTI-CORRUPTION NETWORKS:  
STRUCTURE AND FUNCTIONS**

**Sonja LEVSTIK<sup>1</sup>**

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<sup>1</sup> PhD Candidate in Law and Institution, University of Turin.

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### **1. INTRODUCTION**

Anti-corruption networks, i.e. networks composed of the Anti-Corruption Authorities (ACAs) or by them and the Law Enforcement Authorities (LEAs) of different countries, are no longer an institutional novelty, but a constantly growing phenomenon that characterises international cooperation in preventing and combating corruption.

The first study on anti-corruption networks, published in 2020, looked at twelve networks to assess their activities and effectiveness in achieving their goals<sup>2</sup>.

The main objective of this article is to provide a summary of the literature on networks in the public sector, with a view to identifying possible ways of reconstructing anti-corruption networks, given that networks have been studied from different perspectives that have led to the identification of different concepts and definitions - including those of *policy network*, *network management* and *network governance* - that are particularly relevant for the analysis of their structure, content, actors, relationships and functions<sup>3</sup>.

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<sup>2</sup> S. SCHÜTTE, *Networks of anti-corruption authorities*, in *Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Brief 2020:2)*, 2020, <https://www.u4.no/publications/networks-of-anti-corruption-authorities>.

<sup>3</sup> M. DAL MOLIN, C. MASELLA, *Networks in policy, management, and governance: a comparative literature review to stimulate future research avenues*, in *Journal of Management & Governance*, 2016, 823-849.

## **2. THE CONCEPTS OF POLICY NETWORK, NETWORK MANAGEMENT, AND NETWORK GOVERNANCE**

Networks, such as those for the delivery of services to citizens, are no longer new from an institutional perspective.

The tendency for the public and private sectors to work together stems from common goals and challenges, and the need to meet growing user demands and expectations with limited resources. Indeed, the joint provision of certain services, the integration of methods and procedures, the exchange of information and the sharing of working tools can ensure greater effectiveness and efficiency in the delivery of services and information.

The network logic requires, on the one hand, maintaining a citizen-centred perspective and, on the other hand, overcoming the single-competence perspective.

From an academic perspective, the network concept has attracted the attention of several public sector researchers who have analysed policy networks, management and governance of networks.

The definition of public policy as ‘a series of intentionally coherent decisions or activities taken or carried out by various public - and sometimes – private actors, whose resources, institutional links and interests vary, with a view to resolving in a targeted manner a problem that is politically defined as collective in nature’<sup>4</sup>, is now widely accepted<sup>5</sup>, and

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<sup>4</sup> P. KNOEPFEL, C. LARRUE, F. VARONE, M. HILL, *Public Policy Analysis*, in *Bristol University Press, Policy Press*, 2007.

<sup>5</sup> F. VARONE, K. INGOLD, M. FISCHER, *Policy Networks and the Roles of Public Administrations*, in A. LADNER, N. SOGUEL, Y. EMERY, S. WEERTS, S. NAHRATH (eds.), *Swiss Public Administration. Governance and Public Management*, Palgrave Macmillan, Cham, 2019: [https://doi.org/10.1007/978-3-319-92381-9\\_20](https://doi.org/10.1007/978-3-319-92381-9_20).

in policy science there is detected a growing interest in the idea of *policy network* as a concept for describing and analysing the context in which policy is developed and implemented<sup>6</sup>.

Networks are described in several ways<sup>7</sup>. A key common element of these descriptions is that they concern more or less long-term patterns of relationships and interactions between dependent actors, both public and private, who exchange information and other action-relevant resources in order to increase their influence on the final outcome of the decision-making process<sup>8</sup>.

This exchange is organized within *policy networks* and is often presented as a non-hierarchical approach to public sector decision-making<sup>9</sup>. It emphasises the horizontal relationships between different actors, where there is no clear hierarchy between them, and focuses on the influence of administrative units in the formulation of public policy.

A network is characterised not only by its actors and their relationships, but also by the rules to be observed. Rules are procedures that the actors create together in the course of their interaction in order to regulate their behaviour. They specify issues such as what is

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<sup>6</sup> E.H. KLIJN, J. KOPPENJAN, *Managing Networks in the Public Sector: A Theoretical Study of Management Strategies in Policy Networks*, in *Public Administration* 73(3), 2007, 439-440 [https://www.researchgate.net/publication/229927151\\_Managing\\_Networks\\_in\\_the\\_Public\\_Sector\\_A\\_Theoretical\\_Study\\_of\\_Management\\_Strategies\\_in\\_Policy\\_Networks](https://www.researchgate.net/publication/229927151_Managing_Networks_in_the_Public_Sector_A_Theoretical_Study_of_Management_Strategies_in_Policy_Networks).

<sup>7</sup> E. PERKIN, J. COURT, *Networks and Policy Processes in International Development: a literature review*, Working Paper 252, Overseas Development Institute, London, 2005. <https://www.files.ethz.ch/isn/22716/wp252.pdf>. According to Perkin and Court, networks are broadly defined as ‘formal or informal structures that link actors (individuals or organizations) who share a common interest on a specific issue or who share a general set of values’.

<sup>8</sup> P. LEIFELD, V. SCHNEIDER, *Information Exchange in Policy Networks*, in *American Journal of Political Science*, John Wiley & Sons, vol. 56(3), 2012, 731-744.

<sup>9</sup> P. KENIS, V. SCHNEIDER, *Policy Networks and Policy Analysis: Scrutinizing a New Analytical Toolbox*, in B. MARIN, R. MAYNTZ (eds.), *Policy Networks: Empirical Evidence and Theoretical Considerations*, Campus Verlag, Frankfurt am Main, Westview Press, 1991, 25-59.

allowed and what is not, what positions actors can take, what action is associated with which position, how decisions or policy products are to be realised, and what costs and benefits are associated with a particular behaviour<sup>10</sup>.

The concept of *network management* refers to the strategies, activities and leadership skills used by network managers to guide the interactions of actors, solve problems, build consensus among participants, and coordinate activities to achieve network objectives<sup>11</sup>.

In network management, leadership values are crucial because public managers have to manage different organisations with conflicting objectives. The ability of network managers to develop collaborative working practices and to define a credible compromise between different organisations is crucial to the efficient delivery of public services.

In principle, network management does not have a central purpose, but has a more facilitating role. Managers can be government actors, but also actors from outside the government. Although managers are interested in how the policy process unfolds within the network, it would be a mistake to think that they do not have their own interests at stake<sup>12</sup>.

Finally, *network governance* refers to the process, often in the hands of public authorities, of directing and governing networks according to specific rules and procedures, with the ultimate goal of producing and delivering public services<sup>13</sup>. In other words, network

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<sup>10</sup> See, for example, E. OSTROM, *An Agenda for the Study of Institutions*, in *Public Choice*, vol. 48, no. 1, 1986, 3-25.

<sup>11</sup> M. MCGUIRE, R. AGRANOFF, *The Limitations of public management networks*, in *Public Administration* 89(2), 2011, 265 - 284.

<sup>12</sup> See, again, E.H. KLIJN, J. KOPPENJAN, *Managing Networks in the Public Sector: A Theoretical Study of Management Strategies in Policy Networks*, cit., 441-442.

<sup>13</sup> E. SØRENSEN, J. TORFING, *Making Governance Networks Effective and Democratic Through Metagovernance*. in *Public Administration*, 87(2), 2009, 234 - 258.

governance thus refers to the setting of network objectives as well as the allocation of resources and funds managed by network managers at the network level.

In network governance, the relevant value is the allocation of power among governing actors, enabling them to act as legitimate controllers over others. Power refers not only to traditional authoritative power (e.g., allocation of resources, law making), but also includes the skills and capabilities that can confer authority on specific actors<sup>14</sup>.

### **3. ANTI-CORRUPTION NETWORKS AS POLICY NETWORKS**

Based on the analysis of the different concepts that have developed around networks, it seems appropriate to examine their applicability to anti-corruption networks.

Anti-corruption networks composed of ACAs from different countries are *policy networks* that contribute to the global public policy-making process of preventing and combating corruption.

The willingness to cooperate and exchange among the network's ACAs stems from common goals and challenges: working together on specific issues, exchanging information, and sharing working tools can ensure greater effectiveness in identifying innovative policy proposals.

Anti-corruption networks also follow a multi-subjective organisational model, characterised by horizontal interdependence between network participants, to which vertical-hierarchical logics are consequently extraneous. What is missing is the element of possible conflict of interest between the actors, in relation to which the joint action of the network would play the fundamental role of finding a compromise on the best solution for each

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<sup>14</sup> J. TORFING, *Governance Network Theory: Towards a Second Generation*, in *European Political Science* 4(3), 2005, 305-315.

actor<sup>15</sup>. Indeed, the ACAs themselves, as actors in the networks, represent their own national anti-corruption policies, in relation to which there can clearly be no conflicting interests among the members of the networks themselves.

The reasons for ACAs to establish or join anti-corruption networks are mainly collaborative, aimed at finding innovative ways to overcome the difficulties of implementing anti-corruption policies.

In anti-corruption networks, the modalities of interaction and the rules guiding the actors' behaviour are laid down in the respective charters.

### ***3.1 Management and Governance of Anti-Corruption Networks***

Only anti-corruption networks that receive funding can make use of the network manager, who must ensure that the activities are adequately funded and that the funding is obtained in a way that guarantees the credibility and sustainability of the network<sup>16</sup>.

In terms of governance, anti-corruption networks can be divided into two main organisational models: one in which the chair is taken on a rotating basis by one of the members of the network, who also provides secretariat activities and services; or one in which the secretariat is established as an autonomous and permanent component of the network, linked to a larger ACA or regional organisation or donor.

In general, networks with sufficient resources to afford a permanent secretariat and dedicated staff are more likely to build and maintain effective collaborations within networks.

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<sup>15</sup> See, again, M. DAL MOLIN, C. MASELLA, *Networks in policy, management and governance: a comparative literature review to stimulate future research avenues*, cit.

<sup>16</sup> Some networks are funded by a larger regional or international organization, such as the United Nations, or by donors.

However, it has been observed that while this organisational model provides a more stable normative-political framework, it can also lead to a kind of inertia on the part of members, leaving little room for peer-to-peer discussion<sup>17</sup>.

Conversely, the model in which each member of the network takes over the chair on a rotating basis and ensures the fulfilment of the secretariat's own tasks would guarantee the networks their '*structured informality*'<sup>18</sup>, and avoid the creation of new bureaucracies.

#### **4. THE FUNCTIONS OF ANTI-CORRUPTION NETWORKS**

The institutional model of anti-corruption networks is very well established at international and European level, but the networks do not constitute a homogeneous category and differ in the type of functions they perform (prevention, repression, awareness-raising campaigns, training, etc.) and in the areas of intervention (conflicts of interest, lobbying, declaration of assets, whistleblowing, public procurement, etc.), which makes it difficult to define or typify them. In fact, they were created at different times and are regulated according to criteria that are not always homogeneous; moreover, they have developed largely independently of each other<sup>19</sup>.

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<sup>17</sup> See, on this point, S. SCHÜTTE, *Networks of anti-corruption authorities*, cit., 9.

<sup>18</sup> See, to this effect, W.H. REINICKE, F.M. DENG, *CRITICAL CHOICES - The United Nations, networks, and the future of global governance*, 2000, 64. [https://www.gppi.net/media/Reinicke\\_Deng-2000-Critical\\_Choices.pdf](https://www.gppi.net/media/Reinicke_Deng-2000-Critical_Choices.pdf).

<sup>19</sup> Interesting in this respect is the approach proposed by E. MENDIZABAL, *Understanding Networks: The Functions of Research Policy networks*, Working paper 271, Overseas Development Institute, 2006, London; <https://www.files.ethz.ch/isn/22841/wp271.pdf>, according to which, in order to avoid the difficulties posed by traditional network definitions - which are not always applicable to the variety of existing networks - reconstructive efforts should be directed towards enucleating the functions exercised by networks.



However, their common denominator is that they bring together people and institutions from different countries and continents who are involved in promoting and implementing anti-corruption policies and who perform a variety of functions.

The mapping of the networks (*see below*) and the direct observation of three networks dealing exclusively with corruption prevention<sup>20</sup> made it possible to identify four main functions, although no single typology does justice to the full range of activities carried out by the networks. Most networks perform several of these functions, but not every network necessarily performs all of them.

First, the networks are committed to *putting new issues on the global anti-corruption agenda* or highlighting issues that have been neglected.

The most common means of communicating new issues is to participate in major international events dealing with the phenomenon of corruption, for example by presenting research findings<sup>21</sup>, or by advocating to international organisations to adopt certain measures.

The networks also aim to *develop and promote an international culture of integrity, transparency and ethics in public life*, thereby contributing to the fight against corruption and strengthening public confidence in institutions and public officials, particularly in their dealings with the private sector.

This type of activity is often carried out in cooperation with anti-corruption stakeholders (media, leading NGOs, universities and other organisations). Such cooperation

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<sup>20</sup> Network for Integrity - Réseau pour l'Intégrité (NFI), Network of Corruption Prevention Authorities (NCPA), European Network for Public Ethics - Réseau européen d'éthique publique (ENPE).

<sup>21</sup> See, for example, the participation of an anti-corruption network in a side event organized under the Conference of the States Parties to the United Nations Convention against Corruption (COSP). The Conference is the principal decision-making body of the United Nations Convention against Corruption (UNCAC). It supports States Parties and signatories in their implementation of the Convention and provides policy guidance to UNODC to develop and implement anti-corruption activities.

is useful for gathering information, developing knowledge, obtaining technical and political support and creating synergies for specific initiatives.

Another important function of anti-corruption networks is to *contribute to the establishment of common standards*, which are essential for the practical application of the main conventions and other international instruments.

The role played by networks in identifying common standards reflects the weakness of the international treaty system, which struggles to adapt quickly to new scenarios, creating a regulatory gap. Indeed, any change requires the consensual action of governments and must contend with its rigid bureaucratic structure: two features that undermine the treaty system's ability to produce common policies and respond effectively to global challenges<sup>22</sup>.

Similarly, the United Nations Convention Against Corruption (UNCAC), the only legally binding international multilateral anti-corruption treaty, is struggling to deal with new forms of corruption. Indeed, the manifestations of corruption are constantly evolving, and new vulnerabilities - such as those created by the pandemic crisis or ongoing conflicts - increase the opportunities and incentives for corruption.

Finally, networks build bridges that allow different participants to exploit the synergies of these different resources, *pooling knowledge and exchanging experiences between members* belonging to different national legal traditions, and also creating new ones as consensus emerges even on issues that are still controversial.

Moreover, working together in networks brings regularity and predictability to the relationships between participants, creating an institutional framework that is conducive to new forms and modalities of cooperation and assistance.

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<sup>22</sup> O. PEREZ, *Transnational networked authority*, in *Leiden Journal of International Law*, 35, 2022, 266. Published online by Cambridge University Press. <https://www.cambridge.org/core/services/aop-cambridge-core/content/view/30BA2BEFDFBE84C9AC01390B92E1B534/S0922156521000728a.pdf/transnational-networked-authority.pdf>.

## 5. THE MAPPING OF ANTI-CORRUPTION NETWORKS

As previously pointed out, the phenomenon of anti-corruption networks has become very widespread in the last twenty years. Indeed, the various networks are present in the public sector, as well as in the private sector<sup>23</sup> and there is no shortage of networks composed exclusively of civil society organizations<sup>24</sup>.

In order to make the mapping of anti-corruption networks as close as possible to the basic approach of this study, which focuses on the preventive aspects of public anti-corruption policies, only networks composed of - predominantly - public institutions were analysed and mapped. These are therefore formal networks<sup>25</sup>.

Furthermore, the analysis was limited to networks dealing with preventive policies and multipurpose networks, which bring together institutions with preventive (Anti-Corruption Authorities - ACAs) and repressive (Law Enforcement Authorities - LEAs) functions.

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<sup>23</sup> The following are mentioned as examples only: Africa Business Integrity Network <https://www.cipe.org/projects/africa-regional/>; MENA-OECD Business Integrity Network (MOBIN) <https://www.oecd.org/mena/competitiveness/business-integrity/>.

<sup>24</sup> See, for example, the UNCAC Coalition which is a global network of more than 350 civil society organizations (CSOs) in over 100 countries committed to promoting the ratification, implementation and monitoring of the United Nations Convention Against Corruption (UNCAC) <https://uncaccoalition.org/about-us/about-the-coalition/>.

<sup>25</sup> For an interesting distinction between *formal* and *informal networks* in the public sector, see the following article: D. LAZER, I. MERGEL, *Searching for Answers: Networks of Practice Among Public Administrators*, in *The American Review of Public Administration*, 2012, 3.

As a result, neither networks composed exclusively of members of the judiciary or law enforcement agencies with repressive functions<sup>26</sup>, nor networks dealing exclusively with specific anti-corruption measures, such as asset recovery<sup>27</sup>, were the subject of further study.

Therefore, the mapping of the networks, which is based on an in-depth analysis of the information reported on their respective websites, is by no means exhaustive, but it is a valuable guide to reconstructing and understanding the role of anti-corruption networks.

In particular, the year of establishment, composition, objectives and organisational structure of the 20 networks analysed are reported in order to outline their prevailing characteristics.

ANALYSIS	
<b>Name</b>	Name and acronym
<b>Year of establishment</b>	1998 - 2023
<b>Composition</b>	Presence within them of anti-corruption authorities (ACAs), states (ministries, departments, commissions), law enforcement agencies (LEAs).
<b>Objectives</b>	Prevention and/or repression, information exchange, capacity-building, identification of common standards, etc.
<b>Governance</b>	Permanent secretariat, rotating presidency, other.

<sup>26</sup> See, for example, the Global Operational Network of Anti-Corruption Law Enforcement Authorities (Globe Network) <https://globenetwork.unodc.org/>.

<sup>27</sup> See, for example, Camden Asset Recovery Inter-agency Network (CARIN) <https://www.carin.network/>; Asset Recovery Inter-Agency Network of Southern Africa (ARINSA) <https://new.arinsa.org/>.

**Table showing the mapping of 20 anti-corruption networks**

Name	Year	Composition	Objectives	Governance
OECD Anti-Corruption Network for Eastern Europe and Central Asia (OECD/ACN)	1998	The OECD/ACN is open to the countries of Eastern Europe and Central Asia. The main counterparts are the national governments and anti-corruption authorities (ACAs and LEAs) of the participating countries <sup>28</sup> .	Provides a regional forum for the promotion of anti-corruption activities (prevention and repression), information exchange, development of best practices, and donor coordination. The OECD/ACN works through general meetings and conferences, sub-regional initiatives and thematic projects.	The Secretariat is based in the Anti-Corruption Division of the OECD Directorate of Financial and Corporate Affairs. It is responsible for the development and implementation of the work program.
Southern African Forum against Corruption (SAFAC)	2001	The SAFAC is composed of 14 member states <sup>29</sup> and anti-corruption authorities, where they exist.	The network promotes cooperation, the adoption of anti-corruption strategies and the exchange of information; makes recommendations to the governments of the region (SADC) <sup>30</sup> and its members on anti-	The network has adopted an organisational model in which the presidency is held in turn by one of the members who organises the

<sup>28</sup> OECD/ACN Participating countries: Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Georgia, Kazakhstan, Kosovo, Kyrgyzstan, Latvia, Lithuania, FYR of Macedonia, Moldova, Mongolia, Montenegro, Romania, Serbia, Slovenia, Tajikistan, Turkmenistan, Ukraine and Uzbekistan.

<sup>29</sup> SAFAC Member countries: The Republic of Angola, Botswana, The Democratic Republic of Congo, The Kingdom of Lesotho, The Republic of Malawi, Mauritius, Mozambique, Namibia, Seychelles, South Africa, The Kingdom of Swaziland, The Republic of Zambia and The United Republic of Tanzania.

<sup>30</sup> Southern African Development Community (SADC).

			corruption policies (preventive and repressive); and organises training courses.	annual conference.
South East Asia Parties Against Corruption (ASEAN-PAC) <sup>31</sup>	2002 <sup>32</sup>	The network consists of anti-corruption authorities and police forces from 10 countries <sup>33</sup> .	The network provides a platform to promote and strengthen cooperation among its members to improve their capacity to prevent and combat corruption.	The network has adopted an organisational model in which the presidency is held in turn by one of the members who organises the annual conference.
European Partners against Corruption (EPAC)	2004	The EPAC is composed of anti-corruption authorities and police control bodies of Council of Europe member states.	The network establishes, maintains, and develops contacts between specialised anti-corruption agencies and law enforcement agencies; supports the development and promotion of common working standards and best practices for its members, etc.	The General Assembly is the highest decision-making body of EPAC/EACN and brings together all members. It consists of the President, two Vice-Presidents and two Assistant Vice-Presidents. The activities of the Secretariat

<sup>31</sup> (formerly SEA- PAC).

<sup>32</sup> <https://www.sprm.gov.my/admin/files/sprm/assets/pdf/korporat/INFO/ASEANPAC.pdf>.

<sup>33</sup> Brunei Darussalam, Cambodia, Indonesia, the Philippines, Laos, Malaysia, Myanmar, Singapore, Thailand, and Vietnam.

				are carried out in turn by the members.
European Contact Point Network against Corruption (EACN) <sup>34</sup>	2008	The EACN, on the other hand, is a more formal network, established by a decision of the Council of the European Union and comprising nearly 50 anti-corruption authorities and police forces from EU Member States.	The objectives of the EACN include improving co-operation between authorities and agencies in preventing and combating corruption in Europe; providing a forum for the exchange of information on effective measures and experiences; and facilitating the establishment and active maintenance of contacts between its members.	The General Assembly is the highest decision-making body of EPAC/EACN and brings together all members. It consists of the President, two Vice-Presidents and two Assistant Vice-Presidents. The activities of the Secretariat are carried out in turn by the members.
International Association of Anti-Corruption Authorities (IAACA)	2006	A total of 166 members (43 African states, 44 Asia-Pacific states, 37 Eastern European states, 19 Latin American and Caribbean states, 23 Western European states and others) representing anti-corruption agencies, prosecutors' offices, police forces, departments of justice and interior ministries, etc. are part of the network.	The IAACA promotes the effective implementation of the UNCAC and assists international anti-corruption authorities in preventing and combating corruption, promotes the exchange of experience and best practices among anti-corruption authorities and practitioners around the world; organises tailor-made conferences, symposia, workshops and training programmes in	The IAACA is an independent and non-political anti-corruption network. Its governing body is the Executive Committee (ExCo). It consists of a Chair, four Vice-Chairs, thirteen members, two advisors and one observer. The activities of the Secretariat

<sup>34</sup> The two EPAC/EACN organizations mostly work together stating the identity of mission and goals. Most anti-corruption authorities are actually members of both.

			cooperation with member authorities and relevant international and regional organisations.	are carried out in turn by the institution holding the Presidency.
East African Association of Anti-Corruption Authorities (EAAACA)	2007	The EAAACA comprises the anti-corruption agencies of eight countries in the region. Membership is open to all anti-corruption agencies of the East African Community Partner States.	The overall objective of the EAAACA is to promote and facilitate regional cooperation, mutual legal and technical assistance to prevent and combat corruption in the region, exchange information, organise training and conduct joint research.	The network has three main bodies: the General Assembly, the Executive Committee - which is the governing body - and the Permanent Secretariat. The President is the chief executive of the Association and serves for a two-year term. The presidency rotates.
Arab Anti-Corruption and Integrity Network (ACINET)	2008	ACINET currently includes 49 ministries and government agencies from 18 Arab countries <sup>35</sup> , two observer members and the Non-Governmental Group, which consists of 28 independent organisations from civil society, the	Its objectives include capacity building through joint training courses, legislative harmonisation among member states, promotion and implementation of international and regional anti-corruption conventions, and the organisation of seminars, courses, conferences, and other events.	The network has a permanent secretariat; the presidency rotates among the members and lasts for 2 years. Funding comes from the organisations with which they are affiliated, although members may

<sup>35</sup> Algeria, Bahrain, Comoros, Egypt, Djibouti, Iraq, Jordan, Kuwait, Lebanon, Libya, Palestine, Qatar, Saudi Arabia, Sudan, Tunisia, United Arab Emirates, Yemen.



		private sector and academia.		contribute additional funds.
Network of National Anti-Corruption Institutions in West Africa (NACIWA)	2010	NACIWA brings together national anti-corruption institutions from 14 ECOWAS member states in West Africa <sup>36</sup> . Members are concerned with the prevention and repression of corruption.	The network promotes cooperation among anti-corruption agencies; encourages the strengthening of systems and procedures for the prevention of economic and financial crime; strengthens the independence of existing national institutions and encourages West African states that do not have such institutions to establish them; supports the harmonisation of legislative, regulatory, and administrative provisions among national anti-corruption authorities, etc.	NACIWA's organisational structure includes three bodies: 1. The General Assembly; 2. The Executive Committee; 3. The Permanent Secretariat. The President, Vice-President, Secretary General and Treasurer are also appointed.
Association of Anti-Corruption Agencies in Commonwealth Africa (AAACA)	2011	Brings together the anti-corruption prevention and law enforcement agencies of Commonwealth African countries.	The network promotes engagement and cooperation among African Commonwealth countries in the fight against corruption through peer review, exchange of information and best practices on anti-corruption strategies, and other initiatives.	The network's organisational model includes a permanent secretariat and an executive committee. Funding comes from the organisations with which they are affiliated, although members may

<sup>36</sup> Benin, Burkina Faso, Cape Verde, Côte d'Ivoire, Ghana, Guinea Conakry, Guinea Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, and Togo.

				contribute additional funds.
Asset Recovery Inter-Agency Network for Eastern Africa (ARIN-EA)	2013	ARIN-EA is an informal network established under the EAAACA <sup>37</sup> to share information on individuals, assets and businesses regionally and internationally to facilitate the tracing and recovery of illicit assets.	ARIN-EA promotes regional and international cooperation to effectively trace and recover assets of illicit origin within and beyond East Africa's territorial borders. It facilitates the exchange of information and best practices. It promotes training and research activities.	The Network has adopted the organisational model of a rotating presidency among its members. It has a permanent secretariat.
African Association of Anti-Corruption Authorities / Association des Autorités Anti-Corruption d'Afrique (AAACA)	2013	The network brings together anti-corruption authorities from several countries, divided as follows: East Africa (8), North Africa (4), Southern Africa (9), West Africa (13), and Central Africa (6). <sup>38</sup>	The Network promotes cooperation among its members on the preventive and repressive side of corruption, encourages the development of research and training centres in the field of prevention and investigation techniques, and promotes the adoption of measures aimed at increasing transparency and good governance.	The network has a permanent secretariat. Funding comes mainly from membership fees. The Executive Committee consists of the President and two Vice-Presidents.
Regional Anti-Corruption Initiative	2013	The RAI is a regional intergovernmental	The network provides a common regional platform for discussion	The Secretariat is the executive body, headed by

<sup>37</sup> EAAACA members: Burundi, Ethiopia, Djibouti, Kenya, Rwanda, South Sudan, Tanzania, Uganda.

<sup>38</sup> They hold Partner status: Banque Africaine de Développement (BAD), African Union Advisory Board On Corruption (AUABC), United Nations Office On Drugs and Crime (UNODC), United Nations Economic Commission for Africa (UNECA or ECA).

<b>(RAI)</b>		network that focuses exclusively on anti-corruption issues and brings together nine member states <sup>39</sup> .	between governments and civil society through the provision of tailored training, peer-to-peer learning, and the exchange of knowledge, communication tools, and sharing of best practices in a multidisciplinary context.	the Secretary General, while the Steering Group is the decision-making body of the Network. The Network also elects its own Chair.
Réseau des Institutions Nationales Anticorruption d'Afrique Centrale <b>(RINAC)</b>	2015	RINAC is a sub-regional platform that brings together different countries <sup>40</sup> .	The network is committed to promoting regional, continental and international cooperation in the implementation of policies to prevent and combat corruption, including through the sharing of knowledge, information and best practices.	The network has adopted the organisational model of a rotating presidency among its members.
<b>Network for Integrity (NFI)</b>	2016	The Network for Integrity is a cooperative space that brings together 20 institutions (+ 2 observers) that carry out tasks related to the promotion of integrity, transparency, and	The Network aims to develop and promote an international culture of integrity, transparency, and ethics in public life; to encourage the exchange of information and best practices among its members; and to provide advocacy to	The Presidency and Vice-Presidency are held alternately by the members and last for two years. The activities of the Secretariat are ensured by

<sup>39</sup> Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Moldova, Montenegro, North Macedonia, Romania and Serbia.

<sup>40</sup> Angola, Burundi, Cameroon, Chad, Gabon, Equatorial Guinea, Central African Rep., Rep. Congo, DR Congo, Rwanda, and São Tomé and Príncipe.

		ethics of public officials.	international organisations and civil society.	the institution holding the Presidency or Vice Presidency.
<b>Council of Europe's Network of Corruption Prevention Authorities (NCPA)</b>	2018	The Council of Europe's Network of Corruption Prevention Authorities brings together 32 member institutions, 2 observers and 5 partners.	The Network is committed to: (i) improving the systematic collection, management, and exchange of information among anti-corruption authorities, including their respective experiences and best practices; (ii) promoting the operational independence of its members; (iii) recognising and implementing international standards for the prevention of corruption; and (iv) cooperating with other international stakeholders.	The NCPA follows a rotating chair model, with a member institution chairing the meetings. In addition to the Chair, the Network elects up to 3 Vice-Chairs and the Steering Committee. The secretariat is provided by the chairing institution.
Network of European Integrity and Whistleblowing Authorities (NEIWA)	2019	The network consists of 29 authorities specialising in the protection of whistleblowers, representing 23 European countries <sup>41</sup> .	NEIWA provides a platform for the exchange of expertise and experience at the theoretical, practical, and strategic levels to ensure the protection and/or monitoring of whistleblowers, to develop tools and programmes and to promote cooperation	The network has adopted the organisational model of a rotating chairmanship among its members. It does not have a permanent secretariat.

<sup>41</sup> Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, the Netherlands, Romania, Slovenia, Slovakia, Spain, Sweden, Montenegro.

			with the institutions of the European Union.	
Global Operational Network of Anti-Corruption Law Enforcement Authorities ( <b>GlobE</b> ) <sup>42</sup>	2021	Specialised anti-corruption authorities, as defined in Article 36 of the UNCAC, operating in a UN Member State or a State Party to the UNCAC, may be members of the GlobE network. <sup>43</sup>	The GlobE Network provides a platform for peer-to-peer information sharing and informal cooperation to better identify, investigate and prosecute cross-border corruption crimes and recover illicit assets.	The organisational structure of the GlobE Network includes 3 bodies: (a) The Plenary Assembly; (b) The Steering Committee; (c) The Permanent Secretariat. The Chair and Vice-Chair of the Steering Committee are also the Chair and Vice-Chair of the Plenary Assembly.
<b>European Network for Public Ethics (ENPE)</b>	2022	The European Network for Public Ethics (ENPE) brings together 18 institutions from EU Member States that are active in the field of integrity and transparency in the public sector. Of these, 15 are members of the network and 3 have observer status.	In addition to promoting a culture of public integrity and pursuing the harmonisation of legislation in the EU Member States, the network aims to develop specific expertise in preventive policies, enabling it to act as a privileged interlocutor with the European authorities on	The ENPE charter stipulates that the network is chaired by a member elected to the presidency for a period of two years. The secretariat of the network is provided by a member institution for a

<sup>42</sup> "Anti-corruption Law Enforcement Authorities" shall mean specialized authorities as referred to in Article 36 of the Convention.

<sup>43</sup> It currently includes more than 170 corruption enforcement authorities (law enforcement authorities).

		Since 2023, the European Ombudsman has also joined the network as an observer.	issues of integrity, transparency, and public ethics.	period of three years.
African Anti-Corruption Research Network (AACRN)	2023	Membership of the network is open to African Union member states that have ratified the African Union Convention on Preventing and Combating Corruption (AUCPCC) <sup>44</sup> .	The network's objectives are to develop the clearest possible definition of corruption; to analyse the role of multilateral institutions in combating corruption; to assess the efficiency and effectiveness of national anti-corruption bodies; to apply a systematic approach to combating corruption, including the impact of social and cultural characteristics; to compare anti-corruption measures at the continental level; and to map existing anti-corruption research.	At its launch (May 9-11, 2023), an Interim Executive Committee was appointed consisting of: AUABC <sup>45</sup> , Stellenbosch University, Kenyatta University, Association of African Anti-Corruption Authorities, Cameron Anti-Corruption Commission, African Association for Public Administration and Management.

<sup>44</sup> African Union Convention on Preventing and Combating Corruption (AUCPCC) <https://au.int/en/treaties/african-union-convention-preventing-and-combating-corruption>.

<sup>45</sup> African Union Advisory Board Against Corruption (AUABC) <https://anticorruption.au.int/>.

### ***5.1 The Mapped Anti-Corruption Networks: Composition, Objectives, and Governance.***

In the light of the above mapping, initial considerations can be made, as well as insights for further future research on anti-corruption networks.

Scrolling down the first column of the table, three networks can be identified that can be traced back to three international organisations: the Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE) was established within the United Nations, specifically at the United Nations Office on Drugs and Crime (UNODC); the OECD Anti-Corruption Network for Eastern Europe and Central Asia (OECD/ACN) is an OECD network; and the Network of Corruption Prevention Authorities (NCPA) can be traced back to the Council of Europe.

In this context, the question has been raised whether the role of international organisations is comparable to that of the state in some public networks.

The literature on networks, which has developed primarily around service delivery networks, has also examined the role of the state within them, highlighting that in policy networks and network governance, the state often retains a central role in guiding decision-making processes, targeting activities and network operating mechanisms.<sup>46</sup>

Well, analysis of the respective sites and direct observation lead us to conclude that only UNODC and OECD maintain a central role in the two reference networks. Although the NCPA is the network of the Council of Europe, the support offered by the organisation is in fact only logistical and does not influence the content choices of the network in any way.

Geographically, only 4 networks (IAACA, NFI, NCPA, GlobE) can be defined as global, as they bring together institutions from different continents. The remaining 16 are

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<sup>46</sup> See, again, M. DAL MOLIN, C. MASELLA, *Networks in policy, management and governance: a comparative literature review to stimulate future research avenues*, cit., 3.4.2 Actors.

regional networks, with Africa having the highest density of regional anti-corruption networks (8).

The vast majority of the anti-corruption networks analysed are composed of ACAs and LEAs. Only 4 networks (NFI, NCPA, NEIWA, ENPE) include only ACAs and 1 (GlobE) only LEAs.

15 networks can be identified for the promotion of preventive and repressive anti-corruption policies; 1 (GlobE) focuses on strengthening cross-border cooperation and implementing repressive measures; 4 networks (NFI, NCPA, NEIWA, ENPE) deal exclusively with and promote corruption prevention policies.

In general, however, the objectives of most networks are similar.

Promoting cooperation among members, developing anti-corruption strategies, capacity building, harmonising legislation among members, providing technical assistance and training, and promoting and implementing international and regional conventions are at the top of the list.

As far as the organisational structure is concerned, 9 of the networks analysed have adopted the model where the chair is taken in turn by one of the members who also provides the secretariat; 11 networks, on the other hand, can rely on a secretariat which is set up as an autonomous and permanent part of the network, usually linked to an international or regional organisation or to a larger ACA.

In the light of the concepts outlined above, we now proceed to an in-depth examination of three mapped networks that deal exclusively with the prevention of corruption: the Network for Integrity - Réseau pour l'Intégrité (NFI), the Network of Corruption Prevention Authorities (NCPA), and the European Network for Public Ethics - Réseau européen d'éthique publique (ENPE).



## **6. IN-DEPTH STUDY: THE NETWORK FOR INTEGRITY - RÉSEAU POUR L'INTÉGRITÉ (NFI)**

Launched in Paris on 9 December 2016 on the occasion of the International Day against Corruption, the Network for Integrity is a cooperation space that brings together 22 institutions<sup>47</sup> with missions related to the promotion of integrity<sup>48</sup>, transparency and ethics of public officials<sup>49</sup>.

The institutional structure of the network is characterised by a horizontal organisational model, with the participation of several members operating on an equal footing<sup>50</sup>.

Any public institution, other than a judicial body, that is committed to the prevention of corruption and to transparency and is independent of government interference can become a member of the network<sup>51</sup>. Institutions that do not meet these criteria may have 'observer' status, while the role of 'partner' is given to organisations that support the operation and activities of the network<sup>52</sup>.

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<sup>47</sup> 20 members and 2 observers.

<sup>48</sup> See the 2023 Plenary Meeting Declaration.

<sup>49</sup> Article 2(1) of the Network's Charter which states, *"The Network pursues the objective of developing and promoting an international culture of integrity, transparency and ethics in public life, in order to contribute to the fight against corruption and the strengthening of citizens' confidence towards public office holders, notably in their relations with the private sector."*

<sup>50</sup> According to Article 4 of the Charter, *"All votes cast by members are equal"*.

<sup>51</sup> Article 4 of the NFI Charter.

<sup>52</sup> Article 6 of the Charter.

The NFI does not receive any external funding and membership of the network is free of charge.

The management and governance of the Network for Integrity follows a network governance model in which the chairmanship is taken in turn by an institution that is a member of the Network, represented by its President or his/her delegate for a period of two years<sup>53</sup>. In addition to the president, a Vice-president is elected who becomes president at the end of the term<sup>54</sup>.

Although the Network Charter defines its secretariat as permanent, it is in fact provided by the institution holding the rotating presidency or vice-presidency<sup>55</sup>.

The NFI contributes to the global anti-corruption agenda by fostering partnerships with international organisations such as the United Nations, the World Bank, the OECD, and non-governmental organisations, while promoting the Network's participation in international forums and conferences on integrity<sup>56</sup>, as reflected in the Charter, website and strategic plan proposed by the current Presidency.

The Network also fosters relations with other international networks that promote the prevention of corruption<sup>57</sup> and offers its members the opportunity to count on greater and better visibility through the Network's awareness-raising and advocacy work with civil

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<sup>53</sup> Article 9 of the Charter.

<sup>54</sup> At the Fourth Plenary Meeting of the Network, held in Bucharest on 5 May 2023, the National Institute for Transparency, Access to Information and Protection of Personal Data - INAI (Mexico) was elected Chair for the period 2023-2025, while the National Anti-Corruption Authority - ANAC (Italy) was elected Vice-Chair for the same period.

<sup>55</sup> Article 11 of the Charter.

<sup>56</sup> See Network for Integrity Action Plan 2023-2025, p.9.

<sup>57</sup> Article 3(6) of the Charter.

society and international organisations<sup>58</sup>. For example, members may decide to adopt common positions in response to specific events<sup>59</sup> or on the network's participation in the work of other organisations promoting particular policies.

The NFI also encourages innovation and creativity in the development of new strategies and tools to strengthen transparency and integrity measures, as shown in an interesting Network publication on digital tools and open data<sup>60</sup>, which is also a compelling testimony to what international cooperation can offer: by collecting best practices and identifying common challenges, this document shows how Network members have been able to harness the ever-growing power of technology to promote a culture of integrity in their countries.

While recalling the different national legal traditions in which its member institutions are embedded, the Network reiterates the importance of establishing international cooperation mechanisms that allow the identification of common standards and best practices<sup>61</sup>.

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<sup>58</sup> Article 2 of NFI Charter.

<sup>59</sup> Article 16 of the Charter. On the occasion of the 4th plenary meeting, held in Bucharest on 5 May, the authorities that make up the network expressed their support and solidarity with the National Institute for Transparency, Access to Information and Protection of Personal Data (INAI), the current president of the network, in the face of the accumulated delays by the competent institutions in completing the process of appointing the vacant commissioners, which is preventing the INAI board from reaching the legal quorum required to fully carry out its mission.

<sup>60</sup> Developing digital tools to promote transparency in public life, December 2020, [https://networkforintegrity.org/wp-content/uploads/2020/12/Networkforintegrity\\_Developing-Digital-Tools-and-Open-Data-dec-20.pdf](https://networkforintegrity.org/wp-content/uploads/2020/12/Networkforintegrity_Developing-Digital-Tools-and-Open-Data-dec-20.pdf).

<sup>61</sup> In this sense, reference is made to the general guidelines drawn up and published by the Network, which develop common minimum standards relating to the principles of integrity, impartiality and objectivity, honesty and discretion. The rules and guidelines contained in this document apply to all officials, whether or not they belong to a specific institution. The guidelines also include an interesting self-assessment manual which can help officials to assess their institution's level of commitment to ethical values, as well as their own. See Ethics and integrity in the

One of the other key functions of the NFI is to identify relevant issues and commonalities between Network members and to facilitate information sharing and mutual learning.<sup>62</sup>

To this end, the Network organises working meetings on specific topics, facilitates the development and delivery of training among members, provides a platform for members to exchange information with other institutions, and offers specific support to members wishing to develop new activities or countries wishing to establish institutions to promote integrity, transparency and ethics in public life<sup>63</sup>. These activities include the organisation of seminars on topics of common interest and training courses, the production of publications, articles or press releases<sup>64</sup>.

## **7. IN-DEPTH STUDY: THE NETWORK OF CORRUPTION PREVENTION AUTHORITIES - NCPA**

The Network of Corruption Prevention Authorities is the network of national anti-corruption authorities that was established - on the initiative of Italy, France, and Croatia -

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public sector - Guidelines, September 2019, [https://networkforintegrity.org/wp-content/uploads/2019/09/Guidelines\\_sept2019.pdf](https://networkforintegrity.org/wp-content/uploads/2019/09/Guidelines_sept2019.pdf).

<sup>62</sup> *Network for Integrity Action Plan 2023-2025*, 13.

<sup>63</sup> Article 3 of the Charter.

<sup>64</sup> Article 16 of NFI Charter.

on 18 October 2018 in Šibenik<sup>65</sup>, during a plenary session of GRECO<sup>66</sup>. Initially signed by 16 authorities (15 from Council of Europe member states and one from an African country), the declaration now has a rich and articulated membership of 32 national authorities, including 2 members with observer status and 5 partners.

The NCPA is a policy network that contributes to the development of anti-corruption policies through the exchange of technical information, the sharing of best practices and the identification of concrete solutions to common challenges, which are many and varied in the field of anti-corruption.

Although conceived within the framework of the Council of Europe<sup>67</sup>, the Network is based on horizontal relations between the various ACAs that make it up, to which hierarchical logic is alien. Indeed, all members operate independently and autonomously, without undue influence or interference<sup>68</sup>, on a completely equal footing<sup>69</sup>.

Unlike the Charter of the Network for Integrity, the Charter of the NCPA does not list the requirements that institutions must fulfil in order to become members. In the absence of their identification, we must therefore assume that it is necessary and sufficient to include what is encapsulated in the Network's name, i.e. to be an authority/agency/department/commission dealing with the prevention of corruption at the national level.

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<sup>65</sup> Declaration for a Network of Corruption Prevention Authorities, 15-16 October 2018, <https://rm.coe.int/declaration-for-a-ncpa/168098e817>.

<sup>66</sup> <https://www.coe.int/en/web/greco>.

<sup>67</sup> See the section of the Council of Europe website dedicated to the network of anti-corruption authorities: <https://www.coe.int/en/web/corruption/ncpa-network>.

<sup>68</sup> Article 8(5) of the Charter.

<sup>69</sup> Article 10 of the NCPA Charter.

This circumstance, i.e. that only national authorities can be members of the NCPA, is confirmed by the case of Spain, where, in the absence of a national anti-corruption authority, the autonomous bodies responsible for preventing and combating corruption at regional level can only join the network as observers<sup>70</sup>, a role currently played by the Agency for the Prevention and Combating of Fraud and Corruption of the Valencian Community<sup>71</sup> and the Office for the Prevention and Combating of Corruption of the Balearic Islands<sup>72</sup>.

On the contrary, there is nothing to prevent more than one authority from joining, provided that they are equally responsible for preventing and combating corruption at national level<sup>73</sup>. However, this should not undermine the principle of "one country, one vote"<sup>74</sup>.

Similarly, the Charter does not specify the requirements for the status of observer or partner in the Network, but only allows their presence<sup>75</sup>. This issue was raised at one of the first meetings of the Network, where it was clarified that "observer" status coincides with the initial/exploratory phase of an institution's participation in the Network's activities, with a view to later full membership; that of "partner", on the other hand, is the status that can be

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<sup>70</sup> See NCPA plenary meeting, 6 September 2022, minutes, <https://rm.coe.int/minutes-ncpa-pl-6-9-2022/1680a85ba5>.

<sup>71</sup> Agència de Prevenció i Lluita contra el Fraus i la Corrupció de la Comunitat Valenciana (AVAF) <https://www.antifraucv.es/en/inicio-en/>.

<sup>72</sup> Oficina de Prevención y Lucha contra la Corrupción en las Illes Balears (OAIB) <https://www.oaib.es/>.

<sup>73</sup> This is the case of Ukraine, which has two full members: the National Anti-Corruption Bureau of Ukraine (NABU) <https://nabu.gov.ua/en/> and the National Agency on Corruption Prevention (NACP) <https://nazk.gov.ua/en/>.

<sup>74</sup> See Article 10, which states that decisions of the Network shall be taken by a majority of the votes cast and that each country shall have one vote.

<sup>75</sup> See Article 1(4) of the Charter, which states that the Network also accepts observers and partners.

held by other organisational entities, such as international and regional organisations, think-tanks, universities, NGOs and other civil society organisations (CSOs), which, while supporting and working to strengthen the prevention of corruption, are not equivalent to public institutions, the only ones that can become full members of the Network<sup>76</sup>.

The NCPA receives no external funding. Technical and logistical support is provided by the Council of Europe Secretariat. Members are committed to ensuring the cost-effectiveness of the network by actively using all available resources and existing communication channels<sup>77</sup>.

The organisational structure of the Network follows the model that the chairmanship of the network is taken on a rotating basis by a member institution, which chairs the meetings and helps to ensure the continuity of the network's work<sup>78</sup>.

The NCPA elects its Chairperson and up to three Vice-Chairpersons in plenary session by secret ballot<sup>79</sup> and simple majority, for a period of one year<sup>80</sup>. The Steering Committee is composed of the Chairperson, the Vice-Chairpersons and a minimum of 4 to a

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<sup>76</sup> See, Summary of the second meeting of the Network of Anti-Corruption Authorities (held in Strasbourg in June 2019). <https://rm.coe.int/minutes-prevention-network-meeting-public/168098f193>.

<sup>77</sup> See, Article 8 (6), of the Charter.

<sup>78</sup> The current Chairmanship (since 2024) is represented by France - Agence Française Anticorruption (AFA). Previous Chairs: 2023: Croatia - Conflict of Interest Commission (Sukobi Interesa); 2022: Greece - National Transparency Authority (NTA); 2021: Serbia - Agency for the Prevention of Corruption (APC); 2020: France - Agence Française Anticorruption (AFA); 2019: Italy - National Anticorruption Authority (ANAC).

<sup>79</sup> During the COVID-19 pandemic, plenary sessions were held remotely, and the President was elected by consensus without a vote. See Virtual Plenary 16 December 2020: The Serbian Anti-Corruption Agency (ACAS) was elected by consensus as Chair of the NCPA. <https://rm.coe.int/minutes-ncpa-plenary-meeting-december2020-public/1680a16ab7>.

<sup>80</sup> See Article 3 (1), of the Charter.

maximum of 12 members, each representing a member of the Network, considering gender and geographical balance as well as multidisciplinary expertise<sup>81</sup>.

The member chairing the Network also ensures during his or her term of office the activities of the Secretariat<sup>82</sup>, which is responsible for providing strategic, administrative, and other support to the structure and general activities of the Network<sup>83</sup>.

The global nature of the NCPA has been clear from the outset, as the signatory authorities and those who have subsequently joined the Network include national institutions from countries that are neither members nor observers of the Council of Europe<sup>84</sup>.

Moreover, one of the Network's first major publications is the result of fruitful cooperation between a Network member, the OECD and GRECO<sup>85</sup>.

The NCPA also participated in the Eighth Session of the UNCAC Conference of States Parties (COSP), which was held in Abu Dhabi in 2019, taking part in two side events

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<sup>81</sup> See Article 5 of the Charter.

<sup>82</sup> See, Article 7 of the Charter.

<sup>83</sup> At a plenary meeting, one member raised the idea of creating a permanent secretariat to manage the activities currently carried out by the rotating NCPA chair. However, concerns were expressed about the lack of specific resources for the network and the feasibility of the project in the near future. See Virtual Plenary 29 September 2020 <https://rm.coe.int/minutes-ncpa-plenary-meeting-september2020-public/1680a022ac>.

<sup>84</sup> Benin, Brazil, Chile, Ecuador, Egypt, Jordan, Kazakhstan, Morocco, Palestinian Authority, Moldova, Tunisia.

<sup>85</sup> Agence Française Anticorruption (AFA); OECD; GRECO. (2020) Global Mapping of Anti-Corruption Authorities. Analysis Report. <https://rm.coe.int/ncpa-analysis-report-global-mapping-acas/1680a16ab9>.



focusing on the role of ACAs<sup>86</sup> and international initiatives to prevent corruption<sup>87</sup>. Likewise, at the Ninth Session of the COSP held in Sharm El-Sheikh in 2021, the Network presented the results of a research on the importance of information and communication technologies in preventing and combating corruption<sup>88</sup>.

In the course of 2022, the rotating presidency organised several webinars involving not only representatives of NCPA member institutions, but also representatives of international organisations, the public sector, business associations and academia<sup>89</sup>. In particular, the webinar on a truly global issue such as whistleblower protection attracted over 100 participants from Europe, Asia, Africa, and Latin America<sup>90</sup>.

Spreading and reinforcing a culture of integrity is a core function of the NCPA, as evidenced by the three-pronged approach the Network takes to promoting it.

Indeed, the beneficiaries of the activities and efforts aimed at achieving this fundamental mission are not limited to the ACAs that are members of the Network. In this sense, the Network has indeed implemented a real strategy of involving key stakeholders in the promotion of integrity in the public sector, the private sector and society at large, initiating

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<sup>86</sup> From theory to practice: What do anti-corruption authorities really look like? <https://www.unodc.org/unodc/en/corruption/COSP/session8-specialevents.html>.

<sup>87</sup> International initiatives for the prevention of corruption: short to long-term perspectives <https://www.unodc.org/unodc/en/corruption/COSP/session8-specialevents.html>.

<sup>88</sup> Challenges and opportunities of ICT to prevent and detect corruption and to foster integrity and transparency <https://www.unodc.org/unodc/en/corruption/COSP/session9--special-events/14-Dec-2021.html>.

<sup>89</sup> The four webinars on strengthening public integrity organised by the 2022 Presidency covered the following topics: i) Trends and challenges in lobbying regulation; ii) Designing and implementing effective whistleblower protection systems; iii) Fighting corruption in sport in the 21st century; iv) Fighting corruption in public procurement; see NCPA Annual Report 2022, pp. 8-9. <https://rm.coe.int/ncpa-annual-report-2/1680a9db18>.

<sup>90</sup> NCPA Newsletter 2022, p. 3. <https://rm.coe.int/ncpa-newsletter/1680a9db16>.

important collaborations with a wide range of stakeholders, such as international and regional organisations, think tanks, universities, and civil society organisations, as well as business associations<sup>91</sup>.

Since its creation, the Network's efforts have focused on defining minimum standards common to the various instruments of a preventive nature and on identifying best practices in this field<sup>92</sup>.

The exchange of information between anti-corruption authorities has become an increasingly important and valuable tool in the prevention of corruption. With this in mind, as stated in the Network's Charter, its member ACAs are joining efforts to further improve the collection, management and exchange of information among themselves.

The NCPA has made a significant contribution to raising awareness of ACAs through two major projects. The results of the first show that the size, powers, activities, and visibility of anti-corruption agencies vary widely around the world. In some cases, they play an important role in developing anti-corruption strategies and policies for their countries, translating international standards into national action. In others, they do not yet exist<sup>93</sup>. Instead, the second project focuses on analysing 11 ACAs that are members of the NCPA, looking at their institutional arrangements, mandates, activities, cooperation and limitations. This initiative was conceived as a continuation of the global mapping of anti-corruption

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<sup>91</sup> The Network has also addressed the challenges of corporate integrity by adopting guidelines on "facilitation payments" with the aim of offering concrete solutions, without being too detailed, so that they can be applied in the different contexts in which companies operate.

<sup>92</sup> This intense activity has resulted in the publication of several guidelines, including the Guide to the Design, Implementation and Monitoring of National Anti-Corruption Plans and Strategies, the Guide on Cooling Periods and the Prevention of Conflicts of Interest, and the Guide on the Gender Dimension of Corruption.

<sup>93</sup> Global Mapping of Anti-Corruption Authorities. <https://rm.coe.int/ncpa-analysis-report-global-mapping-acas/1680a16ab9>.

authorities, in that it sought to increase knowledge of the functions of anti-corruption authorities and, consequently, to identify opportunities for cooperation within the NCPA<sup>94</sup>.

## **8. IN-DEPTH STUDY: EUROPEAN NETWORK FOR PUBLIC ETHICS - RÉSEAU EUROPÉEN D'ÉTHIQUE PUBLIQUE (ENPE)**

The European Network for Public Ethics (ENPE), launched in June 2022 on the initiative of the French High Authority for Transparency in Public Life<sup>95</sup>, brings together 18 institutions from EU Member States active in the field of integrity and transparency in the public sector. Of these, 15 are members of the network and 3 have observer status. Since 2023, the European Ombudsman has also joined the Network as an observer<sup>96</sup>.

The ENPE is certainly a policy network, as its actions contribute to the policy-making process of corruption prevention. In addition to promoting a culture of public integrity and pursuing the harmonisation of legislation in the EU Member States, the network aims to develop specific expertise in preventive policies that will enable it to act as a privileged interlocutor with the European authorities on issues of integrity, transparency, and public ethics<sup>97</sup>.

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<sup>94</sup> Report on the similarities and differences in the mandates of the members of the Network of Anti-Corruption Authorities (NCPA) <https://rm.coe.int/75-1-17-10-2022-correo-anexo-informe-mandatos-ncpa-eng/1680a90ce1>.

<sup>95</sup> Haute Autorité pour la transparence de la vie publique (HATVP) <https://www.hatvp.fr/>.

<sup>96</sup> European Ombudsman <https://www.ombudsman.europa.eu/it/home>.

<sup>97</sup> Article 2 of the ENPE Charter.

ENPE is also characterised by its networked organisational structure, which is embodied in horizontal workflows and processes that facilitate cooperation and ensure a good level of information symmetry between members.

Any authority may become a member of the Network upon request, provided that it is a national authority or a ministerial department of an EU Member State or an EU institution, body or agency, that it performs functions and tasks related to transparency, ethics or public integrity, and that it has functional guarantees of independence to ensure the impartial exercise of its powers, in particular in the conduct of investigations and the execution of any decisions taken<sup>98</sup>.

The Network is a non-profit organisation. Members are financially responsible for their participation in Network activities. However, they may individually seek external contributions to fund such participation<sup>99</sup>.

ENPE has also adopted the model whereby one institution, a member of the network, chairs the work for a predetermined period. At the end of this period, there is a rotation with another institution of the network, which is elected as chair for the same period. The effect of this system is not only to ensure the permanence and continuity of the Network's work, but also to ensure formal equality between its members. Specifically, the ENPE Charter states that the Network is chaired by a member elected to the Presidency, for a two-year term<sup>100</sup>.

The Network Secretariat is provided by a member institution, for a period of three years<sup>101</sup>. Although, according to the wording of the Charter, the activities of the Secretariat

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<sup>98</sup> Article 4 of the Charter.

<sup>99</sup> Article 12 of the Charter.

<sup>100</sup> [https://www.hatvp.fr/english\\_news/the-high-authority-elected-as-president-of-the-european-network-for-public-ethics/](https://www.hatvp.fr/english_news/the-high-authority-elected-as-president-of-the-european-network-for-public-ethics/).

<sup>101</sup> Article 9 of the Charter.

may be carried out by a different member from the one who holds the Chair, in practice the two functions may be carried out by the same member. The originality of the statutory provision lies in the fact that the duration of the two mandates has been differentiated: two years for the Chair and three years for the Secretariat, with the clear aim of ensuring the continuity of the Network's work.

Although the Network has been active for just over a year<sup>102</sup>, it has already shown great internal dynamism and a strong inclination to be a major player in the international context. An analysis of the Charter, the documents published on the website<sup>103</sup> and the minutes of meetings allows us to identify the various functions carried out by the Network and to see if they can be traced back to the four main functions outlined above.

While the ENPE was established with the primary objective of promoting public ethics and harmonising legislation on the prevention of corruption among EU Member States, it recognises the importance of involving international organisations active in the fight against corruption in its work in order to stimulate discussion, strengthen cooperation and support multilateralism<sup>104</sup>.

In this context, the international conferences organised by the ENPE should certainly be mentioned, which dealt with highly topical issues and were attended by important representatives of the EU institutions, the OECD, GRECO and Transparency International<sup>105</sup>.

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<sup>102</sup> The Network was launched in Paris on June 9, 2022, by the High Authority for Transparency in Public Life as part of the French Presidency of the Council of the European Union.

<sup>103</sup> ENPE does not, at present, have its own site, but relies on that of the Haute Autorité pour la transparence de la vie publique (HATVP), which holds the current presidency. <https://www.hatvp.fr/en>.

<sup>104</sup> Article 3(1) of the Charter.

<sup>105</sup> The first, held in Paris on 9 June 2022, entitled "Ethics and transparency: which tools to ensure citizens' trust?" addressed the issues of transparency, conflicts of interest and the regulation of lobbying. [https://www.hatvp.fr/english\\_news/a-european-conference-on-ethics-and-transparency/](https://www.hatvp.fr/english_news/a-european-conference-on-ethics-and-transparency/). The second, the "Conference on revolving doors and the cooling-off period", held in Zagreb on 9 November 2022, addressed the

The ENPE is also proving to be a very capable interlocutor with the European authorities on issues related to the prevention of corruption and is in constant dialogue with the EU Commission to represent the interests of its members.

In addition, the Network aims to promote a culture of public integrity<sup>106</sup>, including through meetings and seminars organised with its members on a specific topic related to ethics, transparency, or the enablers of corruption.

In this context, it is important to mention the results of the technical meeting of ENPE members held on the occasion of the Zagreb Conference, where the Network Secretariat presented a reasoned document based on data provided by all members on the subject of revolving doors<sup>107</sup>.

On the other hand, at the Network's plenary meeting in Ljubljana on 5 October 2023<sup>108</sup>, the ENPE Secretariat presented a document summarising the Network member authorities' responses to the questionnaire on asset declarations<sup>109</sup>.

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phenomenon of revolving doors and the issues related to the length of the cooling-off period. On 4 October 2023, the "European Conference on Strengthening Public Integrity and Countering Undue Influence in Democracies" was held in Ljubljana, which, in addition to aspects related to the implementation difficulties of anti-corruption policies, also highlighted the importance of countering foreign interference in democratic processes.

<sup>106</sup> Article 2 of the Charter.

<sup>107</sup> The main findings of the study show that several member countries of the network have adopted specific measures to limit, for a certain period of time, the negotiating autonomy of a civil servant who, after leaving the administration, wishes to accept assignments offered by the beneficiaries of his or her decision-making power, as expressed in the functions he or she previously held. However, the national rules differ as regards to control/supervision and sanctioning powers. The length of the cooling-off period also varies from 1 to 3 years.

<sup>108</sup> [https://www.hatvp.fr/english\\_news/meeting-of-the-european-network-for-public-ethics-on-4-and-5-october-in-ljubljana/](https://www.hatvp.fr/english_news/meeting-of-the-european-network-for-public-ethics-on-4-and-5-october-in-ljubljana/).

<sup>109</sup> In terms of scope, most systems cover high-level elected and non-elected officials, such as ministers and members of parliament: in 3 countries (Lithuania, Portugal, and Romania) the President of the Republic is subject to the

However, the main function for which the ENPE was created is to identify common standards for the various legal instruments that have a preventive function with regard to the phenomenon of corruption, in order to contribute to the harmonisation of the respective practices and regulations adopted by the Member States<sup>110</sup>.

In this context, the ENPE has published a position paper<sup>111</sup> on the anti-corruption package<sup>112</sup>, calling on the European Commission to include in the European Anti-Corruption Directive common standards for legal instruments designed to prevent situations that facilitate corruption, arguing that only a legislative approach to preventive measures can guarantee full effectiveness<sup>113</sup>.

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reporting obligation. However, in some countries this obligation is extended to a wider range of officials, including local government representatives, members of regulatory bodies, members of state-owned enterprises and civil servants. In terms of frequency, however, it was found that civil servants tend to submit declarations at the beginning and end of their term of office. In most countries, they are also required to declare any changes in their circumstances during their term of office; these regular updates help to track changes in their financial situation and identify any sudden accumulation of assets. In some countries, the declaration of interests or assets must be updated annually during the term of office.

<sup>110</sup> See Article 2 and Article 3 (1) of the Charter.

<sup>111</sup> [https://www.hatvp.fr/wordpress/wp-content/uploads/2023/04/ENPE-position-anticorruption-EU\\_EN\\_final.pdf](https://www.hatvp.fr/wordpress/wp-content/uploads/2023/04/ENPE-position-anticorruption-EU_EN_final.pdf).

<sup>112</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_23\\_2516](https://ec.europa.eu/commission/presscorner/detail/en/ip_23_2516).

<sup>113</sup>The members of the network stress the importance of preserving the specificity of the models adopted by each Member State. However, they agree on the need to establish common minimum standards in order to place personal and public integrity at the heart of the principles of the European Union. Strengthening the independence, powers and resources of public integrity authorities is also important for the credibility of public action and public confidence in their institutions, both national and European. The Network suggests: harmonising the definition of conflict of interest in Member States; approximating Member States' legislation on declaration of assets; and improving the regulation of "revolving doors" between the public and private sectors.

The content of the ENPE position paper would have been included in the proposed anti-corruption directive, according to some<sup>114</sup>.

In addition, ENPE promotes and encourages stable collaborative relationships between its members, including the exchange of information and knowledge<sup>115</sup>. It also provides long-term support to members wishing to develop new missions or to countries planning to establish corruption prevention authorities.

Confirming the Network's strong European vision and vocation, the Charter provides, among other things, for the identification of experts among its members to be involved in twinning projects or partnerships with EU candidate countries.

## **9. CRITICAL ISSUES AND STRENGTHS OF ANTI-CORRUPTION NETWORKS**

The most critical issue identified in the work of these networks is probably related to the quality of their performance, which does not always appear to be linear and constant.

This phenomenon is mainly due to structural problems, as networks that cannot count on a stable and autonomous secretariat concentrate a large part of their activities on the chairing authority, which does not always have sufficient internal human resources to carry out the 'overtime' work required by the network in addition to its normal workload.

In part, however, the fluctuating trend in the networks' activities, which is particularly noticeable in outdated sites, is probably due to a largely physiological

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<sup>114</sup> In that sense, see *ENPE Position Paper and the Proposed European Directive on Anti-Corruption*, Compliance Observatory 231, May 8, 2023, <https://www.osservatorio-231.it/2023/05/08/il-position-paper-dellenpe-e-la-proposta-di-direttiva-europea-in-materia-di-anticorruzione/>.

<sup>115</sup> See Article 3 of the Charter.



phenomenon. Indeed, as is sometimes the case with national anti-corruption authorities or reforms of greater impact, an initial phase of conception and launch of a new anti-corruption network is followed by a phase of stabilisation, if not - sometimes - inertia.

Although there are no studies that can determine the ideal size of an anti-corruption network, it is believed that a very large number of participants can be an obstacle to the full involvement of all members. In fact, networks are natural 'focus groups', as meetings convened around a particular issue bring together a variety of opinions, perceptions and ideas on the subject.

On the contrary, the research activity carried out within the networks is favoured by a large number of participants, as it mostly takes the form of analysing the answers to questionnaires sent to their members or the results of international online surveys.

Since they - the anti-corruption networks - are not regulatory networks<sup>116</sup>, the documents they adopt have no regulatory effect, not even indirectly. However, they can contribute to the international and national debate and provide valuable insights for national ACAs when reporting to parliament and government on anti-corruption policy issues.

## 10. CONCLUSIONS

The study of anti-corruption networks first shows us that a legal reconstruction of these networks is not only possible, but technically plausible, in the light of the partitions drawn from the literature on public networks.

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<sup>116</sup> S. SALVADOR IBORRA, A. SAZ-CARRANZA, X. FERNANDEZ-I-MARIN, A. ALBAREDA, *The Governance of Goal-Directed Networks and Network Tasks: An Empirical Analysis of European Regulatory Networks*, in *Journal of Public Administration Research And Theory*, 2018, 270-292.

The concepts of policy network, network management and network governance have been analysed separately and recombined to make them easily applicable to anti-corruption networks.

In particular, with regard to the notion of network governance, it was found that networks that can rely on sufficient financial resources to maintain a permanent secretariat and dedicated staff are more likely to develop and maintain effective collaboration within the network than those that adopt the organisational model in which it is the chairmanship - rotated among the members - that ensures the activities and services proper to the secretariat.

Although the latter model has the advantage of not creating additional bureaucratic structures, thus ensuring that networks have the necessary 'structured informality', it suffers from the variable of an undynamic or insufficiently proactive chairmanship, which can lead to long periods of inertia.

Our findings also allow us to attribute a more effective overall action to anti-corruption networks composed only of ACAs than to multi-purpose networks (ACAs + LEAs), and a more incisive promotion of advocacy strategies towards international organisations.

Moreover, the mapping of 20 anti-corruption networks - over a long period of time - not only helps us to understand their structure and functions, but also allows us to define them as a constantly growing phenomenon.

This trend can be attributed to the need for network participants to acquire information, knowledge and tools that are essential to address the complex challenges of anti-corruption policy, with a focus on implementation aspects.

In addition, the networks address the need to fill a participatory gap, as not always and not all national ACAs are involved in decision-making processes at the international level.

In different ways, all the networks are trying to bring new anti-corruption issues onto the global agenda or to revisit those that have not received the attention they deserve.

The fact that these networks are forming around specific issues suggests that there is a general consensus among participants that these issues need more international attention.

Finally, these networks are designed to complement, not replace, the work of public institutions and policymakers.

***Abstract.** The phenomenon of anti-corruption networks is growing but remains an underdeveloped topic. There is a wide variety of network concepts and applications in the public sector literature, which offers us possible ways of legal reconstruction of these specific networks. This article attempts to provide a framework that helps to clarify what anti-corruption networks are and what they do and seeks to understand the role they play in the international arena.*