Schweizerische Eidgenossenschaft
Confédération suisse
Confederazione Svizzera
Confederaziun svizra

Swiss Agency for Development and Cooperation SDC

Pillar 2: Supporting Strategic Interventions Against Corruption

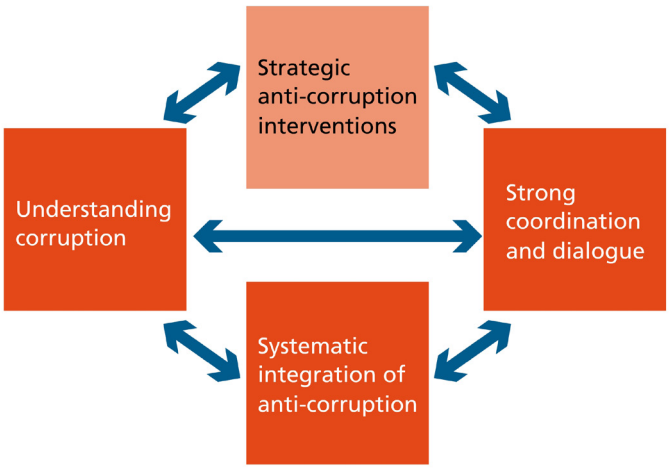
A key component of SDC's Four Pillar approach is to support strategic interventions to prevent, contain and reduce corruption.

A strategic intervention is considered to be one which has combating corruption as the primary objective and is targeted to address real problems (**relevant**); incorporates thinking and working politically (**feasible**); mitigates risk and is mindful of unintended consequences (**does no harm**); and is adaptive and open to innovation (**promotes sustainability**).

Relevance: Narrowing down on key corruption problems and goals

The goal is to narrow down where investing efforts to fight corruption can be most beneficial. This might involve identifying the forms or patterns of corruption that are inflicting greatest damage in economic and social terms and posing the biggest obstacles to achieving concrete development goals. It can also mean identifying needs, gaps and bottlenecks that have a significant negative effect on the ability of the domestic

Figure 1. The Four Pillar approach: Pillar 2



Source: Author's own.

One of a series of eight, this Issue Paper is a companion document to The SDC's Anti-Corruption Guidance. The series provides recommendations on how to apply the Four Pillar approach described in the Guidance for the purpose of anti-corruption programming with a thematic focus or as a transversal theme. The Issue Papers follow the structure of the Guidance and they clarify the concepts, topics and approaches it presents, and also provide links to resources that go deeper into selected topics.

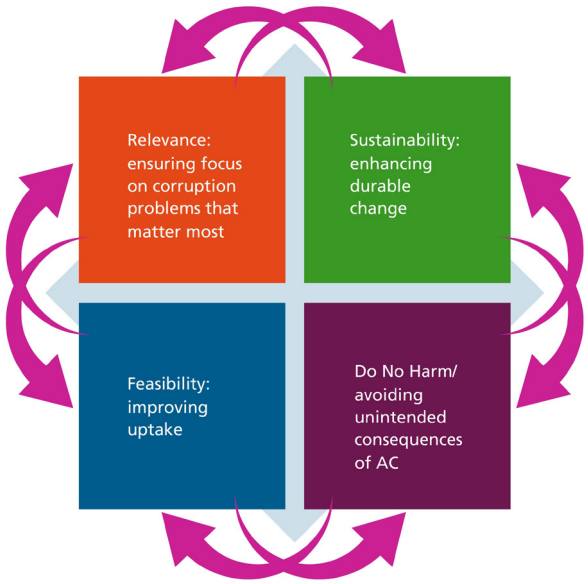
anti-corruption system to prevent, detect, investigate and prosecute cases of corruption and to manage the return of stolen assets.

International standards such as those set by the United Nations Convention against Corruption (UNCAC) and high-level goals such as the SDGs can provide direction to the analysis, as well as the concrete strategic goals set by the Swiss Cooperation Programme adopted for each country or region. Table 1 suggests some useful questions to help identify key corruption problems relative to their impact on achieving desired goals.

Having a problem-driven and goal-oriented approach is useful to identify key issues according to relevance.

The choice to tackle particular problems of corruption will involve making decisions about risk appetite and ambition. Some problems of corruption might be relatively more straightforward to address, representing low-hanging fruit of sorts. Tackling such problems has the advantage of lower risk and a higher degree of certainty that an intervention (a programme or project) will achieve its intended goals. However, low-hanging fruit-type corruption problems might not be those that deliver the greatest overall impact in terms of promoting high-level development priorities and goals. The corruption challenges that generate greatest losses and systemic costs tend to be highly political and complex, requiring a decidedly riskier, long-term approach. There is therefore the need to recognise that there are trade-offs to be grappled with.

Figure 2. The elements of an anti-corruption strategic intervention



Source: Author's own.

Table 1. Identifying where anti-corruption can have the most impact

What is the overarching goal that is being pursued?	Useful questions
Swiss Cooperation Programme goals for the country or region	What are the **consequences of not addressing** the corruption problem(s) identified in terms of making progress toward the goal(s)?
SDGs	How **important** are these problems of corruption with regard to making progress toward the goal(s)? Do they make progress impossible/ difficult/still possible? Which among the different corruption problems have the **greatest impact** on achieving concrete, desired policy outputs and outcomes?

Source: Author's own.

Feasibility: Assessing what can be realistically changed

The analysis conducted under Pillar 1 will yield a reasonably good understanding of the nature of the problems that are generating the observed corruption outcomes (see 'Pillar 1: Understanding Corruption'. This understanding, while essential, is still not enough to be able to discern the concrete anti-corruption strategies that best fit the context. Therefore, a feasibility component is necessary.

There will be problems of corruption that might be plausible to tackle through a variety of means. For example, grand corruption in the procurement of high-value projects can be fuelled by perceptions on the part of contractors that it is impossible to win a tender without bribing. This problem might be addressed by strengthening the legal framework governing the procurement process, adding new controls and transparency mechanisms, and/or building trust and bringing together private actors around an Integrity Pact to pledge to refrain from bribing, and/or introducing open contracting measures to enhance transparency and empower civil society to monitor procurement processes.

In the abstract, or from a purely technical perspective, several approaches might be suitable. However, an understanding of which approach(es) can actually work in the local context is still missing. This is where Thinking and Working Politically comes into play. In order to

Table 2. Anti-corruption programme risks	
Negative unintended consequences and backlashes	**Examples**
1 Corruption re-emerges in the same space but in a new form or finds a way of playing with the new rules of the game.	In order to remain anonymous under new requirements, beneficial owners in the extractive industries sector put in place nominee shareholders to represent them, whilst others reduce their ownership level to below disclosure thresholds (Lemaitre 2019a; Lemaitre 2019b).
2 The form of corruption being targeted by the intervention not only remains intact but increases.	Raising civil servant salaries results in an increase in petty corruption (Foltz and Opoku-Agyemang 2015).
3 The corrupt practice of actors shifts to a different sector, country, city, institution or arm of the institution.	A clampdown on corruption in one municipality leads to an increase in public sector transfer requests to other municipalities.
4 The anti-corruption tool is misused or co-opted.	A new anti-corruption law or agency is used to prosecute and punish political rivals and critics (Johnston and Johnsøn 2014).
5 The anti-corruption tools and/or their proponents are directly undermined or stopped.	A successful anti-corruption project is stopped in the run-up to an election allegedly due to pressure from those harmed by the intervention (Barnwal 2017; Fisman and Golden 2017).
6 The broader social, political or economic landscape is undermined.	Removing the opportunity to receive informal payments when salaries are below livable wages leads to an increase in healthcare personnel taking side jobs (Mæstad 2007)
7 The enabling environment for future anti-corruption reform is undermined.	Anti-corruption projects and pledges with no or limited results leave citizens disillusioned (Johnston and Johnsøn 2014).
Source: Wathne (2021).	

properly assess the feasibility of localising different possible interventions, it is important to conduct a Political Economy Analysis (PEA) and to undertake a stakeholder mapping and assessment exercise (see Issue Paper 'Stakeholder Mapping and Assessment').

'Do no harm' and avoiding unintended consequences of anti-corruption efforts

While originating in the discussion around humanitarian action in conflict settings, 'do no harm' has become a cross-cutting principle and lens in a variety of development cooperation areas. It acknowledges that aid and development cooperation can have negative consequences – this includes anti-corruption programming. Incorporating the 'do no harm' principle into your thinking means proactively considering the potentially negative consequences the anti-corruption interventions (including where anti-corruption is being mainstreamed into a wider sectoral programme) might have for stakeholders.

It is not possible to list all potential unintended consequences of anti-corruption programmes in this section. However, we suggest two broad categories: (a) where these negative consequences include risks to the physical safety and health of stakeholders, and (b) where anti-corruption programmes inadvertently have unintended effects that undermine the positive results they might achieve in the short term.

Risks to the physical safety and health of stakeholders

Anti-corruption interventions are political, and they threaten the positions of those who benefit most from corruption. Against the background of increasing democratic backsliding and a rise in authoritarianism across the globe, it is likely that resistance, but also intimidation and retaliation (including through human rights abuses), will come from these actors. In other words, anti-corruption interventions can be dangerous for those who facilitate (such as SCO programme staff at country level) or implement (such as civil society organisations) them. There have been numerous examples of this coming from the 2019/2020 Capitalisation Exercise on SDC's work on anti-corruption. These include threats to SCO staff; threats to implementing NGOs in the form of harassment of NGO activists by law enforcement authorities; and there was also a case where an SCO had to find physical shelter for activists whose lives where endangered.

The preceding sections in this paper seek to help unpack corruption in specific contexts and to find ways

to address them. Your analysis should include a 'do no harm' perspective. Also, take a hard look at who loses most should an anti-corruption intervention succeed, and what pushback and potentially life-threatening action against project stakeholders this might entail. You might then want to readjust the programme to eliminate the potential for physical threat to SCO staff or implementers and their families. You may also want to think through and/or find out about mechanisms to protect stakeholders in the event of these risks materialising.

How anti-corruption programmes may inadvertently have unintended effects that undermine positive short-term results

As highlighted above, the whole area of corruption and anti-corruption is inherently political. Therefore, **resistance to anti-corruption reforms by those individuals or structures that the interventions target is a genuine prospect.** Or, as Fisman and Golden (2017) state: '[E]very anticorruption or antifraud programme elicits a strategic response by those who orchestrated and benefited from wrongdoing in the first place.'

Table 2 presents some potential negative unintended consequences and backlashes.

Conducting a PEA will help identify and mitigate potential unintended consequences of corruption in the programme, by analysing which stakeholders are for and against corruption.

Programmes into which anti-corruption concerns are mainstreamed can also have unintended effects. These might not be consequences that negatively impact on corruption. However, they can relate to areas that concern SDC's cross-cutting principles, such as to 'leave no one behind'. Consider, for example, programmes that focus on digitisation to decrease administrative/petty corruption by eliminating the need for service users to interact with potentially corrupt officials. While e-services eliminate the interface between citizen and civil servants, such services might leave out those who have no access to digital tools or where internet connectivity is either absent or prohibitively expensive.

Promoting sustainability

A first consideration that is essential to the sustainability debate is to conceive interventions or approaches that 'work with the grain' to the greatest extent possible. This will, of course, mean different things in different contexts, but some guidelines include:

- **Work with local, trusted structures, organisations and stakeholders to the greatest degree possible. This might include:**
  - Indigenous structures such as community assemblies or neighbourhood organisations
  - Informal actors who are viewed as legitimate, credible opinion leaders and trendsetters.
- **Undertake stakeholder mapping and coordination with other development partners to:**
  - Harness synergies with other ongoing or planned projects
  - Identify skills, expertise and other forms of human capital that may be readily available as a means to strengthen or complement approaches or interventions.
- **Prioritise locally brewed solutions.**

A second consideration is that programme design and programme management are key to promoting sustainability.

Anti-corruption practice, as with development cooperation in general, is far from being an exact science. Even the best efforts to inform decision-making are often not enough to reveal without a doubt what strategy or approach will be successful in effecting the desired changes. For this reason, developing and testing new approaches with adequate M&E processes and indicators and an adaptive programming approach can help to increase effectiveness and to position SDC as a thought leader and innovator.

Further reading:

- Johnston, M. (2010) First Do No Harm – Then, Build Trust: Anti-Corruption Strategies in Fragile Situations, Working Paper 62006, Washington DC: World Bank