



URUGUAY REPORT

Follow-up on the Lima Agreement

Citizen Corruption Observatory.

Photograph: Department of Photography of
the Uruguayan Parliament



Country: Uruguay



Local

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Document Acronyms

ANCAP= Administración Nacional de Combustibles Alcohol y Portland [National Administration of Alcohol and Portland, NAAP]

ARCE= Agencia de Compras del Estado [State Purchase Agency, SPA]

FCA = Foro Ciudadano de las Américas [Citizen Forum of the Americas, CFA]

JUTEP= Junta de Transparencia y Ética Pública [Public Ethics and Transparency Board, PETB]

LUC = Ley de Urgente Consideración [Urgent Consideration Law, UCL]

OCC = Observatorio Ciudadano de Corrupción [Citizen Corruption Observatory, CCO]

OAS = Organization of American States

NGO = Non-Governmental Organization

CSO = Civil Society Organizations

PASCA = Participación de la Sociedad Civil en la Cumbre de las Américas [Civil Society Participation in the Summit of the Americas, CSPSA]

Redlad: Red Latinoamericana y del Caribe para la Democracia [Latin American and Caribbean Network for Democracy, LACND]

SCJ = Suprema Corte de Justicia [Supreme Court, SC]

SENACLAFT= Secretaría Nacional para la Lucha contra el Lavado de Activos y Financiamiento del Terrorismo [National Secretariat for Fighting against Asset Laundering and Terrorism Financing, NSFALTF]

UAIP= Unidad de Acceso a la Información Pública [Access to Public Information Unit, APIU]

UIAF= Unidad de Información y Análisis Financiero del Banco Central del Uruguay [Financial Analysis and Information Unit of the Central Bank of Uruguay, FAIUCBU]



Introduction

The main purpose of the project titled “Citizen Corruption Observatory (CCO) - Follow-up on the Lima Agreement” is to strengthen the Citizen Forum of the Americas (CFA) by co-creating, together with the Latin American and Caribbean Network for Democracy (REDLAD, by its Spanish initials) and the Citizen Forum of the Americas (CFA), an observatory that provides technical support to the implementation of the Project titled: “Civil Society Participation in the Summit of the Americas (PASCA, by its Spanish initials). Within the framework of the activities developed by the CCO, the progress of the Lima Agreement was monitored using a methodology that took into account both normative and practical developments, which was based on the participatory discussion of different civil society organizations in each of the 19 countries participating in this process. Thus, the CCO is made up of a coalition of civil society organizations and social actors of the continent, created to follow up on compliance with the agreements adopted by the governments of the hemisphere at the VIII Summit of the Americas held in 2018 in Lima, Peru. The Lima Agreement, “Governance Against Corruption”, a document resulting from the Summit, provided an opportunity to endorse and ratify previous international commitments on anti-corruption issues.

In that sense, the national report has the main purpose of providing a summary of the results and conclusions of the follow-up to the progress and/or compliance of the 2018 Summit commitments in Uruguay, prepared from the document of the follow-up to the Lima Agreement¹ methodology and the information review done by 5 organizations of the Uruguayan civil society. The entire information gathered in the framework of the follow-up can be seen at the CCO website².

The follow-up methodology to the Lima Agreement allows civil society to assess the progress and/or compliance with 19 commitments prioritized³ by the CCO for monitoring in each of the countries participating in this observatory. The follow-up is based on the review of developments at both the normative⁴ and practical levels made by national governments over the last two years in respect to commitments made in the fight against corruption.

At the normative level, current regulations were reviewed, based on 75 guiding questions regarding constitutional, legislative and jurisprudential developments. The analysis of practice consists of the review of concrete measures taken by the government in response to the commitments made. For this purpose, 64 questions were constructed, which were answered through requests for information, interviews, reference to media reports, reports and research

¹ The methodology can be seen at: <https://occ-america.com/metodologia>

² Available at: <https://occ-america.com/>

³ The 19 commitments were prioritized taking into account the possibility of making a comparative analysis in all of the CCO participating countries.

⁴ The CCO made a first balance on the policy indicators at a regional level, the document is available at: <https://occ-america.com/2021/07/29/primer-informe-del-observatorio-ciudadano-de-corrupcion-revela-avances-y-retos-normativos-para-la-lucha-anticorruptcion-en-la-region/>

on the subject, among others. This information is the basis for evaluating each commitment in terms of effectiveness, efficiency and sustainability⁵.

Participating Organizations

In Uruguay, the CCO involved a diversity of institutions that contributed, on the one hand, their expertise in the research and monitoring on transparency, access to information, e-government, political parties monitoring, among other subjects. And, on the other hand, organizations whose working expertise includes the gender perspective, the youth, racial and ethnic discrimination, human rights and economic, social and cultural rights, who contributed an intersectional analysis in the compliance and/or progress evaluation of the Lima Commitments in the country.

In addition to the committed work of Civil Society organizations, there was the expert contribution of Dr. Cecilia Rossel and Dr. Rafael Piñeiro from the Department of Social Sciences of the Catholic University on the issues of access to public information and parties funding.

This process of formation and work in the CCO contributed to the creation of a new articulation of civil society organizations and to the strengthening of our capacities to monitor compliance with the commitments assumed by the Uruguayan State during the 2018 Summit. The information gathered was analyzed and validated by the participating organizations, which closed this stage of work with the preparation of this report and the recommendations that arose from this process.



1. Communication and Development Institute (CDI). The CDI was in charge of the National Coordination of the CCO, the CDI being a civil society organization based in Montevideo, Uruguay. The CDI has more than 30 years of experience in the design and execution of projects destined to contribute to the strengthening of civil society and citizen participation in the processes of democracy and development.

The ICD has developed action-oriented policy research in areas related to governance, transparency and accountability of public and private actors, and has developed research projects on the impact, effects and measurement of corruption and the institutional fight against corruption.



2. Record and Access to Public Information Center (RAPIC). participated in the process of information gathering and preparation of the project report. RAPIC is a non-profit civil

⁵ The methodological aspects of this assessment will be presented in more detail further on in the report.

association that develops actions in Uruguay for the right to public information, freedom of expression and social participation.

RAPIC carries out its work through the dissemination and advice to individuals and civil society organizations on the right to information, records and freedom of expression. Their specialty is training and carrying out advocacy and litigation actions on the issues of her expertise, at the national level, the Universal System and the Regional Human Rights System.



3. Colectiva Mujeres [Women Ensemble], a participant in the process of gathering information and preparing the project report, is a feminist organization that works for gender, ethnic and racial equality, developing its activities through training, research and advocacy actions, preparing follow-up reports on international and regional instruments for the protection of women's human rights

and against racism.

At the national level, it coordinates with grassroots organizations, State agencies and Multilateral agencies. At the regional level, they are part of Red de Mujeres Afrolatinoamericanas, Afrocaribeñas y de la Diáspora (REMAAD) [Network of Afro-Latin American, Afro-Caribbean and Diaspora Women], Red de Educación Popular entre Mujeres (REPEM) [Popular Education Network among Women] and the Comité de América Latina y el Caribe para la Defensa de los Derechos de las Mujeres (CLADEM) [Latin American and Caribbean Committee for the Defense of the Rights of Women].



4. Colectivo Trans del Uruguay, CTU [Trans Ensemble of Uruguay, TEU] participated in the process of gathering information and preparing the project report. TEU is a trans organization with national representation created in 2017 with the objective of decentralizing its work by the trans community and expanding the territorial scope of its actions. Its mission is to

achieve the full enjoyment of the human rights of trans people. It is made up of various subject areas on family, trans femininities, trans masculinities, advice legal education, humanitarian assistance, trans people deprived of liberty, migrants, sex work and health, each with their respective coordinators.

The TEU belongs to CORPORA IN FREEDOM (network of work with LGTBQI + people deprived of liberty) OBSERVATORY LAC (Registry of hate murders of trans people in LAC) RIE (Red Iberoamericana de Educación LGTBQI + [Ibero-American Network of Education in LGTBQI+]) REDCATH (Red Americana de Colectivo de Hombres Trans [American Network of Trans Men Ensemble]) at the national level, we are part of the TRANS AND DISIDENT BLOCK (Block of LGTBQI + Organizations of the country)..



5. The Uruguayan Commission for the Fight Against Corruption - Transparent Uruguay (TU) participated in the process of gathering information and preparing the project report. TU is a non-profit civil association that

proposes measures in order to combat the causes that make corruption possible, identifying the problem, analyzing its causes, proposing actions to improve legislation in the fight against corruption at the level of government, society civil and private sector.

Transparent Uruguay provides citizens with the instruments so that they can report those acts or events that may be considered corruption, without this constituting a risk for the whistleblower. It works in alliance and coalitions with other organizations at the local and international level.

Uruguayan Context

Uruguay has developed a strong democratic institutionality, in which the high levels of judicial, legislative and government independence stand out; the strength of its organized civil society and the high level of citizen participation. The general quality of the country's democracy is widely valued internationally. In addition, Uruguay is recognized as an active member of the international community by being part of multiple international and regional agreements and commitments to protect rights or to fight against corruption, among many others.

In April 2018, during the VIII Summit of the Americas held in the city of Lima, Tabaré Vázquez, the Uruguayan President at that time, signed the Lima Agreement, "Governance Against Corruption", thus expanding the commitments that Uruguay had already assumed on issues of fight against corruption at the international level. This action occurs within the framework of his second term⁶ and, at the time when his government was facing a deep crisis⁷ due to allegations of corruption⁸ on Vice president of that period, Raúl Sendic.

In 2016, Sendic was reported in court by representatives of the opposition parties for crimes of corruption⁹. In September 2017, Sendic resigned and was succeeded by the until then senator, Lucía Topolansky (Deutsche Welle, 09/12/2017). Finally, in April 2018, the former

⁶ Tabaré Vázquez was the head of the first government of the political party Frente Amplio from 2005 to 2010. He was succeeded by José Mujica in the 2010-2015 period and again returns to the presidency in the 2015-2020 period.

⁷ The crisis not only impacted on the government but also on the inside of the Broad Front itself, see in the references: Garcé, 2017; Radiomundo 1170 am - En perspectiva, 2017.

⁸ The allegations to Raúl Sendic management at the head of the Administración Nacional de Combustibles Alcohol y Portland, ANCAP [National Administration of Alcohol and Portland Fuels] began in 2015 due to the capitalization done to this company by the State for losses related to its management. In 2016, a new controversy was opened when he admitted that he was awarded a university degree that he did not have (see in references: El Observador 02/24/2016; Portal 180, 02/24/2016) and later complaints about his travel expenses and the use of corporate cards.

⁹ See in references the accusation record of the Office of the Attorney General of the Nation.

Vice president was convicted without prison for the crimes of abusing functions and embezzlement that occurred during the period he was in charge of the state-owned company¹⁰. And in the period after the signing of the Lima Agreement, Uruguay did not escape the investigations of the two most notorious international corruption cases in recent times in the region, the “Lava Jato” (Sudestada, 05/05/2018) and Odebrecht (El País 2/02/2020).

In September 2019, the country once again expanded its regional commitments by ratifying the Regional Agreement on Access to Information, Public Participation and Access to Justice in Environmental Matters in Latin America and the Caribbean, the “Escazú Agreement” (Law No. 19,773).

On June 30, 2019, the internal elections of the political parties were held and thus a new electoral process began (Penco, 2019), which would be resolved in two rounds in the months of October and November of the same year. On March 1, 2020, Luis Lacalle Pou assumed as President of the Republic. The triumph of the candidate of the National Party occurred in the second electoral round, for which the “multicolored” coalition was formed (La República, 03/01/2020), with the until then opposition parties (Partido Nacional [National Party], Partido Colorado [Colorado Party], Partido Independiente [Independent Party]), the People's Party and the newly created Partido Cabildo Abierto [Open City Hall Party] (La Diaria 4/04/2020). In this way, after 15 consecutive years in government, the party Frente Amplio became an opposition party (Nocetto, Piñeiro, Roseblatt, 2020).

In 2020, the departmental and municipal elections were held (2nd and 3rd level of government), culminating an electoral cycle of almost two years, since these elections, which should have been held in May, due to the pandemic and with the agreement of all political parties, the electoral court and the legislative branch, were held in September.

The most ambitious legislative project of the new government was embodied in Law No.19.889: Urgent Consideration Law¹¹, approved by the Parliament in July, 2020. The process of discussing the new norm was completely interrupted by the pandemic and, both from the opposition and from civil society, attention was drawn to the difficulties that this context presented to facilitate a public debate on a project of this magnitude, in which a diversity of issues and changes to current regulations were raised that, as argued, needed to be discussed separately (Amnesty International Uruguay, 2021; SERPAJ, 2020), but the limited

¹⁰ See in references the sentence of the Legal Judge in Criminal Matters Specialized in Organized Crime, Dr. Beatriz Larriau. Also: Voz de America, 05/30/2018; La diaria, 05/20/2021; Seminario Búsqueda 20 at 05/26/2021.

¹¹ For the consolidation of the “Multicolor Coalition” the five parties signed the document “Commitment for the Country”, which is the fusion of the respective party programs into a common government program. The Urgent Consideration Law was the instrument used to install the new government's program. This type of law is known as “omnibus law” because it brings together in a single block a significant number of laws aimed at modifying another equally significant number of public policies. The use of this instrument can make it easier for the executive branch to establish its priorities. However, it has a negative impact on the process of parliamentary discussion and public debate both because it limits the discussion times (this type of law requires a maximum treatment of 80 days), as well as because of the volume, variety and complexity of topics to be discussed. The Urgent Consideration Law was presented in April 2020, with 502 articles, it was debated between the months of May and June. It was finally approved in July with 476 articles divided into 11 sections subdivided into chapters.

period for its approval made it impossible to carry out a broad, plural and informed public debate.

In December 2020, the pro-referendum commission was created made up of social, union and political organizations that promote the repeal of 135 articles of the Urgent Consideration Law, considered regressive in terms of rights such as: security, education, health, housing, political participation, among others¹². On July 8, 2021, the signature collection campaign came to an end, having fulfilled its mission, since it reached - and exceeded - the number of signatures necessary to promote the referendum. Once the Electoral Court validates the signatures, a process of public debate on these articles would begin (El País, 07/08/2021).

Within the framework of the current government's efforts to attract foreign investment, the Urgent Consideration Law incorporates changes that simplify some tax procedures, and restrictions on cash transactions were lowered (Transparent Uruguay, 06/12/2020), actions that may have negative impacts on the fight against money laundering (La Diario, 06/01/2020), a permanent challenge for Uruguay for which international organizations linked to the issue continue to demand improvements (Winter, Aalbers, 2021: 8).

In addition to the Urgent Consideration Law, the austerity policy of the Lacalle Pou management, approved in the budget law¹³ (Law No. 19,924) negatively affecting the Public Transparency and Ethics Board (JUTEP), the main anti-corruption body in Uruguay, which, due to budgetary restrictions, saw its resources and personnel reduced, which could hinder ongoing investigations and those carried out in the future¹⁴.

Since the beginning of the pandemic, the civil society has also been mobilized due to the lack of information on the measures taken by the government to face the pandemic and, more recently, due to possible setbacks in access to information. Since March 2020, numerous complaints have been raised from social organizations and journalists, on this point, and numerous rejections of requests for access to information on the purchase of vaccines were registered (Werner, Lema; 2021). This resulted in a public statement from various organizations demanding greater transparency about the management of the pandemic (RAPIC, 05/03/2021) and a judicial hearing due to the lack of response from the government to actions to access information related to purchases of vaccines (RAPIC, 05/23/2021).

The organizations in the Red de Gobierno Abierto [Open Government Network] (Open Government Network, 2021) drew attention to the modifications that Article 29 of the Accountability introduces¹⁵ to the Law No. 18.381 on Access to Public Information, without

¹² See the web page in the references.

¹³ Article 214 of the Constitution of the Republic establishes that the Executive Power is responsible for projecting, with the advice of the Planning and Budget Office (PPO), the National Budget that will govern for its period of government, the five-year National Budget project. The project must be sent to the Legislative Power within the first six months of taking office, for discussion and approval.

¹⁴ Transcript CCRR - Special Commission Money Laundering No. 318 of 2020.

¹⁵ In article 214, subsection D, of the Constitution of the Republic, it is established that the Executive Power will present to the Legislative Power, within six months after the expiration of the annual exercise, the Rendering of

having gone through a consultation process with civil society, or resorting to the participation spaces that exist, and work, where the right of access to information has been worked collaboratively, including proposals for improvement to the Law itself.

COVID – 19 in Uruguay

On March 13, the first cases of positive COVID-19 were registered in Uruguay, just a few days after the new government took office, which began to take measures to prevent the spread of the virus, avoid a possible collapse of the health system and mitigate its negative impact in the economy.

Among the measures adopted are the dissemination campaigns of personal hygiene measures and social distancing to prevent the spread. Based on the “stay at home” campaign and the so-called “responsible freedom” (Presidency, 2020), the population was urged to reduce mobility, face-to-face classes were suspended at all educational levels as well as massive public activities and crowds were banned, along with the closing of borders. From the beginning the new government ruled out the possibility of confinement and promoted teleworking among state agencies and private companies. According to Lanzilotta, Merlo and Mordecki (2020), the economic measures that were taken had different scopes,, were implemented with different levels of haste and they focused on financing emerging health expenditures, mitigating the negative impacts of the pandemic on commercial and productive activity, and softening the effects on household income.

According to the epidemiological report of the Ministry of Public Health (12/31/2020) in the year 2020, 19,119 positive COVID cases were registered throughout the country and 181 associated deaths. By the time this report was done, (7/7/22021) 9,632 active cases are counted and since the health emergency was declared on March 13, 2020, 5,758 persons have passed away. As of April, a vaccination plan was implemented that at the closing date of the report accounted for 65.80% of the population with the first dose and 53.09% had already received the second dose.

The main results of this exercise are presented below. This analysis is complemented with the information collected in Appendix 1 “Assessment of the Lima Agreement in Uruguay” and in Appendix 2 “Actions and Recommendations for Compliance with the Lima Agreement in Uruguay”.

Accounts and the Budget Execution Balance corresponding to said exercise. In the bill on Accountability, drafted with the advice of the Planning and Budget Office (PPO), the Ministry of Economy and Finance (MEF) and the National Civil Service Office (NCSO), the Executive Power may propose the modifications that it deems essential to the global amount of expenses, investments and salaries or resources and to carry out creations, deletions and modifications of programs for duly justified reasons.

Country Results

As a result of the VIII Summit of the Americas, a process in which the Citizen Forum of the Americas had an active participation, the countries of the region signed the Lima Agreement, entitled "Democratic Governance against Corruption", in which 57 commitments were made, in order for member states to implement concrete actions to build citizen's trust in institutions and reduce the negative impact of corruption on the effective enjoyment of human rights and sustainable development of the peoples of the hemisphere.

For the follow-up, four criteria were taken into account to select the commitments: they should be representative, to analyze the anti-corruption actions in the region countries; they should be sustainable actions with the possibility of institutionalize them; they should include new approaches in the anti-corruption actions; and they should include the perspective of people in vulnerable situation. As a result, 19 commitments were selected, classified in 5 specific topics:

- A. Reinforcement of Democratic Governance.
- B. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression
- C. Financing of political organizations and election campaigns
- D. Prevention of corruption in public works and public procurement and contracting.
- E. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery.

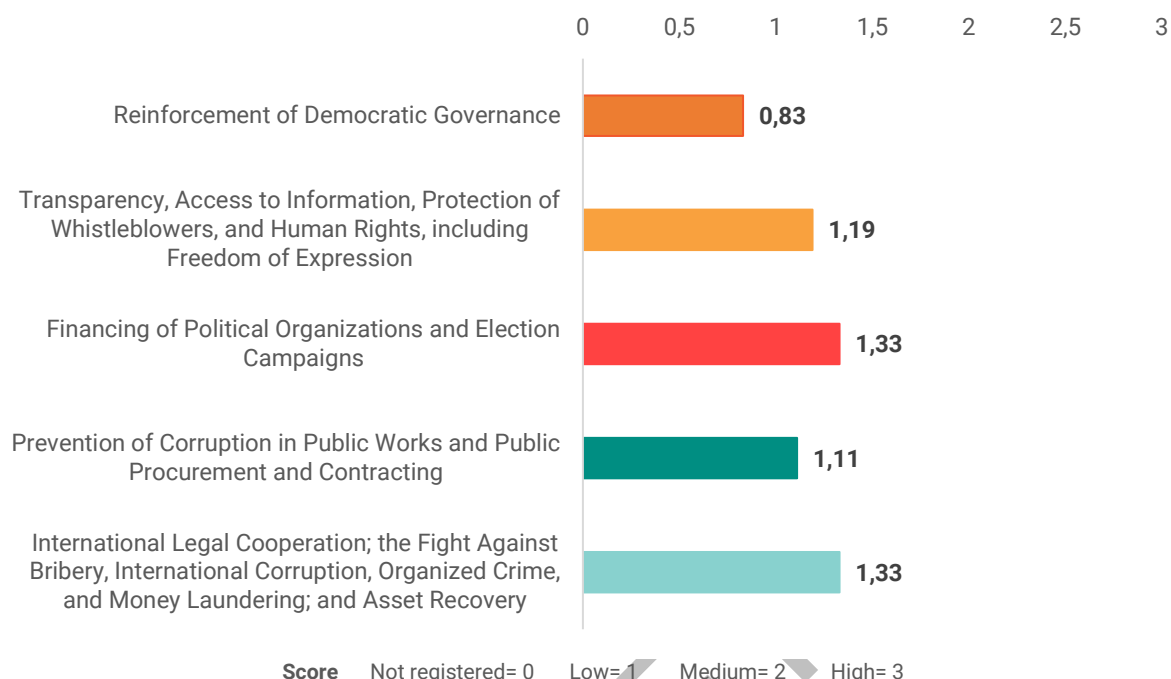
These commitments were analyzed by identifying regulatory and practical developments which were rated on a scale¹⁶ of 0 to 3, taking into account the following follow-up criteria:

- **Effectiveness:** Establishes to what extent the actions developed by the government as a result of the Lima Agreement contribute to the fight against corruption in the country.
- **Relevance:** Establishes to what extent the actions developed by the government are timely, convenient and adequate according to the economic, institutional and/or social context of the country.
- **Sustainability:** Determines to what extent the actions carried out to fulfill the commitment will have continuity over time.

Chart 1 presents the general results for Uruguay in the five topics the commitments are classified into:

¹⁶ Rated on a scale of 0 to 3: 0= no records, 1=low, 2=medium and 3=high

Chart 1¹⁷. Results by topic of the Lima Agreement



Prepared by the authors based on information provided by the CSO who participated in the CCO.

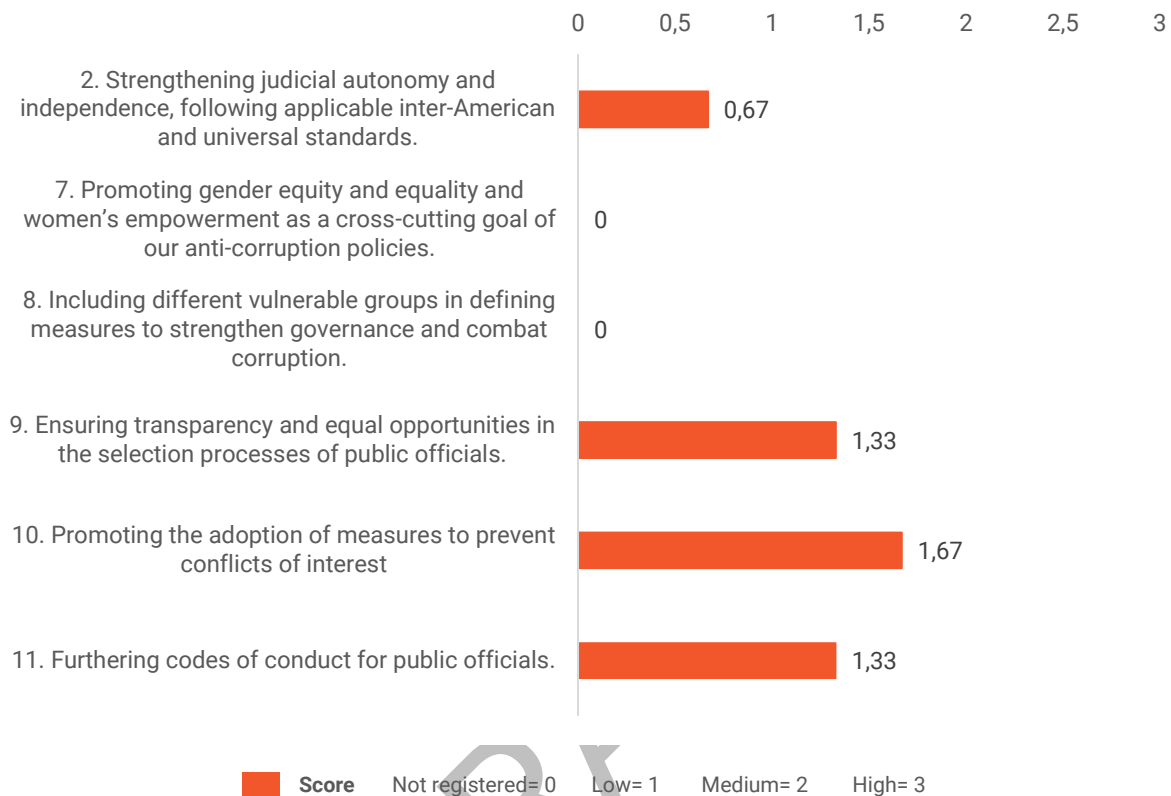
As a result from this study, it may be concluded that, in recent years, Uruguay has seen an important development in their regulations and public policies, which has favored the strengthening of the democratic governance, has promoted and ensured the access to information, seeking transparency in the operation of the political parties and the State, also. And, within the framework of the compliance of international commitments, Uruguay has tried to implement the best practices to contribute to the fight against corruption at an international level.

From the compliance evaluation of the different groups of commitments, efforts to make progress in the subject have been seen. However, important lags have been registered in the compliance of some of the analyzed commitments; there is some stagnation in the development and implementation of regulations that elaborated on the fight against corruption, transparency, accountability from the State and the private sector and, also, uneven growth levels between the policies, that limit the effectiveness of the implemented actions. We acknowledge the serious inconsistencies between the policy development and the funding of the public policies fighting corruption, which compromise their effectiveness and sustainability.

¹⁷ The colors of the charts herein account for the color designation given to each of the topics for the CCO and do not have a correspondence to a numeric scale.

1. Reinforcement of Democratic Governance

Chart 2. Results of the Commitments Regarding the Reinforcement of Democratic Governance



Prepared by the authors based on information provided by the CSO who participated in the CCO.

- This topic has an uneven progress. We found that in some cases, the development corresponds to the country's context and needs, however the measures taken are not sustainable, and in general and due to the lack of control, their effectiveness is limited. On the other hand, beyond some efforts of the Open Government Network, from Transparent Uruguay it is understood that the country lacks from an integrative vision from the gender and vulnerable population perspective in general. Such approach should be cross-sectional to the entire State policy and not be limited to specific proposals.
- The commitments 9, 10 and 11 are the ones with the best progress, although important inconsistencies are found in reality. Regarding open and equal calls, in reality, the criteria and selection are judged by the body that requested the position, which are not published. As far as commitment 10, the one with the highest score (1.67/3.0), some progress is still left to make regarding transparency and accountability over measures that prevent conflict of interests, patrimonial statements

submission and financial information of public servants. Also, the creation of an information systems on the identified cases, their approach and resolution. Transparent Uruguay has pointed out, more than once, that the biggest downside in this subject is the poor policy implementation. The bodies in charge of its control lack of the necessary resources, therefore, their compliance is unreal and strictly regulatory. Regarding commitment 11 (1,33/3.0), a big progress was seen with the Ethics Code in the Public Service (Law No. 19.823), although its weakness is their management of the report made and the lack of guarantees for the whistle-blower. Transparent Uruguay considers that the whistle-blower protection in the public sector does not provide the guarantees enforced at a criminal level, even when numerous corruption offenses are discovered due to complaints in the heart of the Administration. For the three commitments, a great distance is seen between the policy development and the reality, due to lack of resources.

- The commitments 7 and 8 have the lowest score (0,0/3,0), because no action towards women empowerment has been taken, as a transversal objective on the anti-corruption policies. In regulations or in reality, it is also not seen (or mentioned), the existence of vulnerable groups¹⁸ within the framework of the fight against corruption. The actions towards gender mainstreaming are brought by civil society, for example, within the process of creating an Action Plan of an Open Government, as done by Transparent Uruguay. However, these efforts are not enough since the State does not create a general policy that coordinates all the actions with a intersectional perspective.

Colectiva Mujeres, throughout its history, has expressed great concern about the lack of statistically relevant information on the situation of people of African descent in different public policies¹⁹ y, in the case of policies and regulations related to corruption, this situation is no different. In no area of decision or action on corruption are experts on gender or racism and discrimination incorporated. The exclusion of their voice and knowledge as subjects capable of contributing to the fight against corruption also contributes to the invisibility of different groups as real or potential victims of corruption crimes. For the Colectivo Trans del Uruguay, groups in situations

¹⁸ Speaking of corruption regarding drug dealing -at a small or large scale- or human trafficking for sexual exploitation purposes, women and/or children and teenagers are mentioned. Meanwhile, in other regulatory developments related to other corruption-related crimes, no other specific group is identified as vulnerable or emerging as a consequence of corruption.

¹⁹ In the continuous survey of Households (CSH) 2019-2020 of the National Institute of Statistics (NIE) the question on ethnic-racial descent was not included. In this period, the ECH began to be applied by telephone and that is why it was shortened. In this process, this question was removed and the survey on the employment situation was outlined. However, the INE has stated that, although this question is not included, information is obtained on the ethnic-racial variable. Colectiva Mujeres maintains that this ECH 2019-2020 does not generate statistically relevant information that makes it possible to see the situation of the different ethnic-racial groups in the country or their living conditions that allows the elaboration and implementation of public policies that contemplate the different groups in the post-pandemic context.

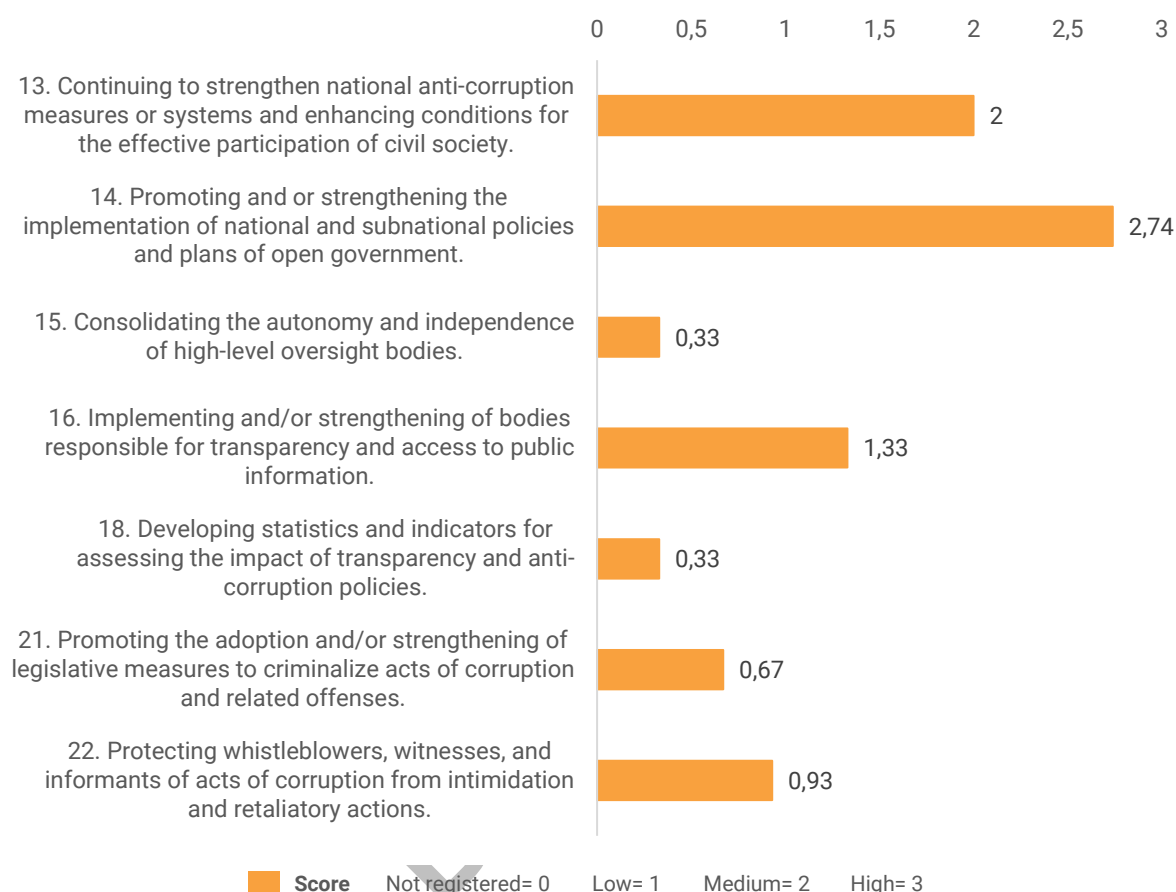
of vulnerability experience a total invisibility and exclusion from the spheres of participation in the generation of public policies that impact the population as a whole and not only as part of their specific demands for protection and guarantee of your rights. We can conclude that the exclusion of trans or African-descendant people, among others, from the debate spaces and policy-making against corruption does not escape this logic.

- Although commitment No. 2 did not receive the lowest score, all the participating organizations of the CCO emphasize that the low evaluation it received is due to the lack of economic independence of the Judiciary. To execute an insufficient budget for its function (Daily 09/02/2020), the SCJ has reduced its presence in the territory from successive agreements for the reorganization of jurisdictional territories²⁰. With the objective of "rationalization of spending", the Supreme Court seeks to optimize the distribution of human, material and budgetary resources, which it receives in the national budget and which are decided and approved by the Executive and Legislative Powers. As a consequence of this territorial reorganization, access to justice has been limited for people living in rural areas and for people in vulnerable situations in the interior of the country. In the same way that, due to its lack of presence, the capacity of the Judicial Power to deal quickly and independently with complaints about crimes associated with corruption is also limited.

²⁰ In Article 330 of Law No. 16,226, it is established that "Without prejudice to the provisions of Article 248 of the Constitution of the Republic, the Supreme Court may designate a single head of two or more neighboring Peace Courts, even if they belong to different departments and as long as they respond to a geographic, economic or social community." In 2003, the Supreme Court (SC), in order to enforce the provisions of the law, issued Resolution No. 7492 of September 22, 2003, which states that the Corporation decided to reorganize the jurisdictional territories under consideration. to "... That it is necessary to rationalize the cost of operating the judicial service" (Agreed 7492 in the Supreme Court of Justice, 2018). Since then, several agreements have been issued that, with the same argument, have progressively eliminate Courts of Peach in rural areas and the most isolated areas in urban centers and capital cities of different departments of the country.

2. Transparency, Access to Information, Protection of Whistle-blowers, and Human Rights, including Freedom of Expression

Chart 3. Results of the Commitments regarding the Transparency, Access to Information, Protection of Whistle-blowers, and Human Rights, including Freedom of Expression



Prepared by the authors based on information provided by the CSO who participated in the CCO.

- In this topic, the major developments are oriented towards participation and the strengthening of digital citizenship. While there is still no progress in introducing changes in the regulations that incorporate international recommendations regarding the classification of crimes. In all commitments, the sustainability criterion accounts for the distance between regulatory development and effective implementation. Legislation has been approved that represents an advance in the fulfillment of the different commitments, but the lack of resources destined for its implementation directly affects its effectiveness, for example, for the monitoring and evaluation of compliance with the norms.
- The best score was obtained by commitment 14 (2.74 / 3.00) and is due to the fact that current regulations and practice account for important advances for the

participation of different social actors through the open government strategy, which has worked for the adoption and strengthening of e-government, digital participation and has facilitated the relationship between the State and the citizenry based on digital tools that contribute to the fight against corruption based on transparency and accountability.

- The lowest score was obtained by commitments 15 (0.33 / 3.0) and 18 (0.33 / 3.0). This is because the existing regulations and policies are insufficient to achieve compliance with these commitments. No Actions aimed at consolidating the autonomy and independence of the higher control bodies were registered in accordance with commitment 15, in this way, they maintain their technical and administrative autonomy and in some cases with sanctioning capacity. But not all have budgetary autonomy and none have financial autonomy. RAPIC has insistently pointed out in recent years, the lack of autonomy of the body that enforces the Access to Public Information Law (the Public Information Access Unit -PIAC-), which continues to depend administratively and budgetarily on the Presidency of the Republic. This lack of independence has been noted in the discussion of important laws that have been approved between 2020 and 2021, and that seriously affect the right of access to public information (an example of this has been the LUC), without it having existed no pronouncement of said organism in defense of the right. Nor was progress made in the period analyzed in the production of statistics to evaluate the policies of transparency and the fight against corruption, and the delay in the publication of the mandatory reports on compliance with the Law on Access to Public Information (Law No. 18,381). This leads to a contradictory situation, in which the authorities highlight the existence of regulatory frameworks favorable to transparency and access to public information, but there is a lack of data to corroborate their compliance.
- Nor was information recovered that accounts for actions carried out by the government (including control entities) to develop indicators for the evaluation of anti-corruption and transparency policies, in accordance with commitment No. 18. In fact, Transparent Uruguay understands that the commitments promoted by Civil Society in the Open Government Plan, such as the Unified Complaint Platform (JUTEP), have not come to fruition due to lack of resources and coordination with the rest of the State bodies. While RAPIC, along with other social organizations, through public statements (RAPIC 2021b) has drawn attention to the difficulties in applying the law, pointing to the increase in denials of access in different areas of the State, including judicial sentences that embody the negative attitude of the forced subjects (case of Semanario Brecha vs. Presidency about information on vaccines)²¹. This situation, which has an impact on the climate of freedom of expression, which, although it continues to show better quality indicators than in most countries in the region, has

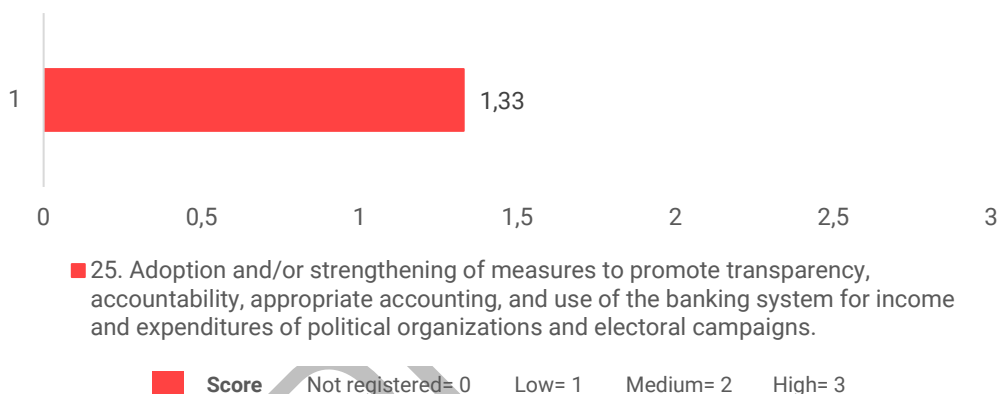
²¹ See in references RAPIC 2021a, Semanario Brecha 05/28/2021.

mobilized civil society to draw attention to the increase in cases that directly affect the possibility of access to public information by journalists.

- For the Trans Group of Uruguay, although the assessment of commitment 22 (0.93/3.0) is not the lowest, due to its experience as a group, it draws attention to the lack of specific policies for the protection of whistle-blowers, witnesses and informants of acts of corruption with a gender perspective in a broad sense but that considers in particular the vulnerability of trans people, assuring them the guarantees so that this group can also report cases of corruption that affect their integrity, dignity and rights .

3. Financing of Political Organizations and Election Campaigns

Chart 4. Result of the Commitment Regarding the Financing of Political Organizations and Election Campaigns



Prepared by the authors based on information provided by the CSO who participated in the CCO.

- The Law No. 18.485 of 2009 regulates the operation of political parties. It establishes the mandatory accountability for political parties and the obligation of ensuring that the funds for their campaigns have a licit origin. However, although it establishes control mechanisms and obligations to be complied by the parties, the regulations are permissive and insufficient, and do not guarantee or effectively force the transparency and accountability of political parties. Transparent Uruguay considers that, even with the possibility of an information crossover within the Administration itself (Electoral court with a Unique State Providers Registry, Public Records, Tax Administration Department), this resources is not applied. Despite the fact that the Civil Society has questioned this in numerous occasions, since it is practical to know the true contributions to the political parties through the different competent bodies coordination, the idea has not thrived.
- The governing body in this subject is the Electoral Court. This organism does not have the effective control mechanisms to ensure the resources are licit, since the

declaration control is merely administrative. Some instructions and forms exist, although they are hard to access and have little control of potential conflicts of interest. In the current context, it is very easy for a private institution (or criminal organization) to avoid the established prohibitions in the parties law by means of numerous contributions with fixed limits and the Electoral Court would have no way to detect that (Piñeiro, Rossel, Acuña, 2016).

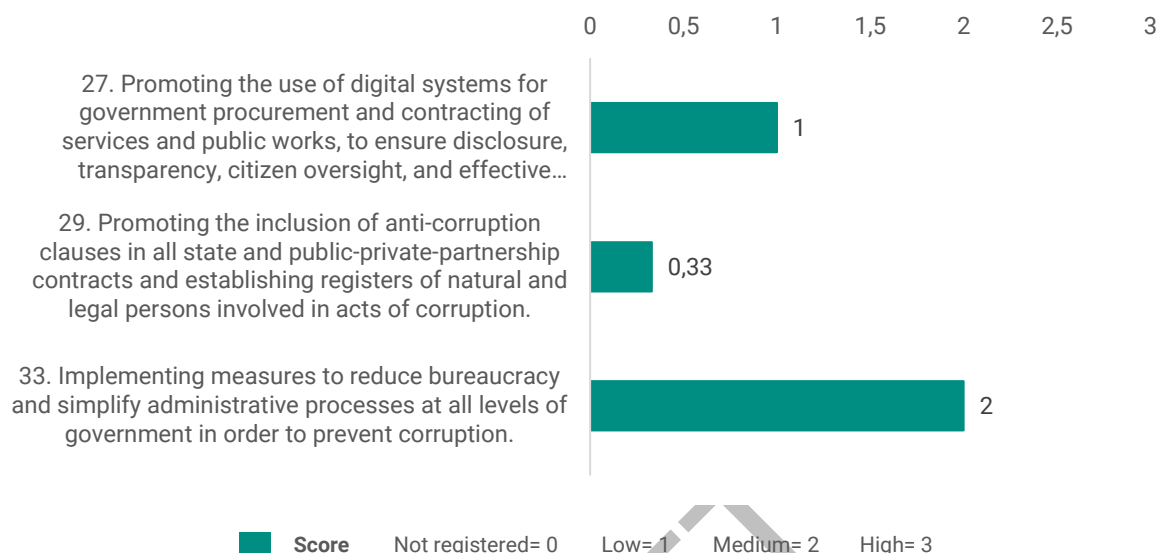
- Currently, the discussion was resumed due to a bill to modify Law No. 18.485. This bill has been submitted in the past legislative period, in 2017, but its discussion did not continue. Although it is highly valued that the subject is seen by the Parliament again, it does not imply a progress itself, since a plural and informed debate on the proposal is necessary to enhance it. From the civil society, it is expected that the project to be discussed in the Parliament be focused on improving the transparency and financing of the political parties²² and that it meets an institutional design that strengthens the superior control body, so they can effectively comply with their comptroller function.

RAPIC has requested the review and modification of the bill so that the proposed mechanism can ensure a proper transparency in the accountability, since the project under discussion does not include the political parties as mandatory subjects for an active transparency, nor clearly establishes the mechanisms the finances will be audited with to determine if there was any deviation to the regulations. Also, some measures opposed to the commitment 25 are kept, such as the possibility that the candidates can donate funds to their own campaigns without effective controls about the real origin of such funds. Also, the project does not establish any kind of prohibition for the donations of people who, through their companies or direct relatives, have contracts with the State, this situation being a risk for undue influence, which is not avoided with the current prohibitions established in the bill.

²² See transcription of CCRR – Special Commission with legislative purposes to study the funding for democracy. No. 439 of 2021.

4. Prevention of corruption in public works and public procurement and contracting.

Chart 5. Results of the commitments regarding the prevention of corruption in public works and public procurement and contracting



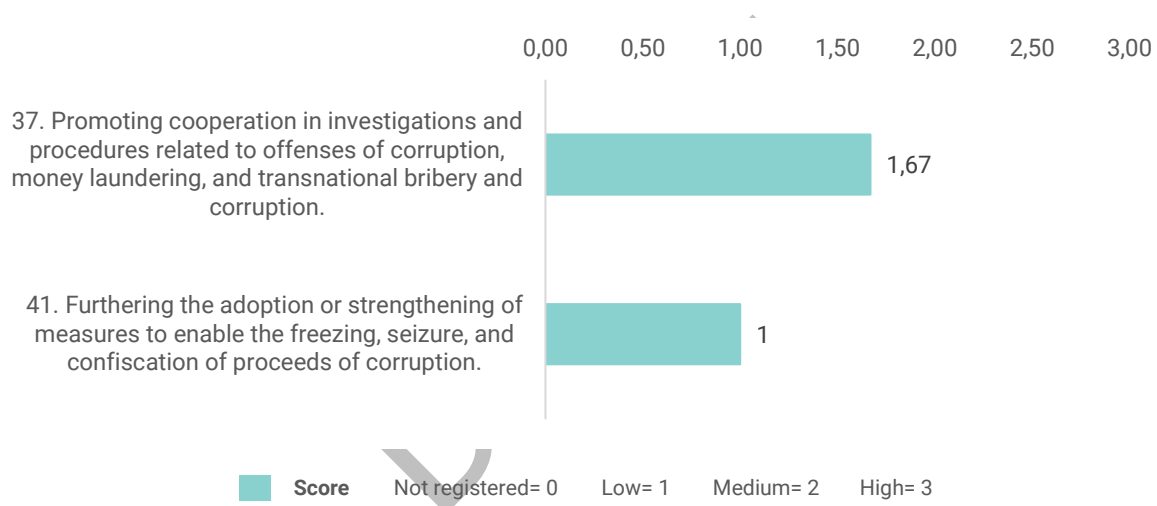
Prepared by the authors based on information provided by the CSO who participated in the CCO.

- Although no new policies have been made associated directly to the commitments in this topic, there is an important number of policies and regulations related to public procurement and transparency, digital agenda and simplification of approved and implemented procedures over the past 15 years, which are a way of progress in this subject.
- The highest score (2,00/3,00) of commitment 33 is due to the progress registry to reduce bureaucracy and the simplification of procedures, within the framework of the open government strategies and the digital government. However, some information is missing regarding the experience from the population and the evaluation of the effectiveness of the adopted measures. Within the framework of the preparation of the 4th Action Plan of an Open Government, the JUTEP was committed to setting up a unique portal for reports related to corruption. Even though the institution has not honored this commitment, it was resumed during the new process to prepare the 5th Action Plan of an Open Government. According to RAPIC, in the legislative level there are no actions for the submission, discussion or approval or regulations that allow a progress in the fight against corruption, since there are no discussions to include anti-corruption clauses in the State contracts, and on the contrary, a notorious weakening of JUTEP has been perceive, the main body in charge of the prevention of such cases. They have even presented their situation before the Parliament, but no concrete actions have been take to address the issue.

- In commitment 29 (0,33/3,00), no progress has been seen. The regulations in force do not establish the legal obligation to include anti-corruption clauses in the State contracts. Although we can say that, on a practical level, the State Purchase Agency (SPA) is drafting standard clauses to recommend its inclusion in the procurement process, once they are reviewed by the competent entities in the subject, From the Civil Society, an Open Government Commitment has been promoted regarding this subject, as well as the intention for the state public works contracts are fully open to the population (they should be published entirely in an open format).

5. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery

Chart 6. Results of the Commitments regarding the International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery



Prepared by the authors based on information provided by the CSO who participated in the CCO.

- Uruguay is recognized by its long tradition of respecting international agreements and currently participates in multiple agreements, adhering to them voluntarily. Whereas the country has been present during the increasing development of anti-corruption international standards, by approving and implementing public policies to abide by them, some limitations have been identified, which, although do not affect the compliance of both commitments, do not allow a relevant progress towards its fulfillment.
- The commitment 37 had the best score (1,37/3,0), because Uruguay has implemented the international standards for the exchange of information and transparency; however, the country still needs to continue to improve this process. The Uruguayan

Law is not harmonized with the international norm regarding the classification of some crimes established by the international agreements and bodies, specialists in the subject²³. Furthermore, no information accounting for the proactivity of the control bodies to open corruption investigations was registered. Whereas from the CCO work we acknowledge there are some formal mechanisms that guarantee such information exchange, no cases have been registered at the judicial level that allow us to affirm that this is translated into effective measures. Conversely, several countries have made extraditions requests to process asset laundering and corruption offenses, which have been rejected by the Uruguayan Judiciary (Lava Jato from Brazil or the Odebrecht case from Panama, for instance). This fact has prevented the continuance of the investigations in these countries, and in Uruguay, there has been no effective prosecution for these international offenses.

- The low score (1, 0/3,00) of commitment 41 is because the Observatory could not deeply evaluate this commitment due the lack of available information. However, we can point out that there is no progress or changes to the regulations for their compliance.

Conclusions and calls for action

The Lima Agreement was a vital opportunity to affirm the international commitments previously taken by Uruguay, as well as to identify favorable scenarios for the discussion, preparation and implementation of anti-corruption measures in the country.

The aim of this project was to evaluate the compliance of the Lima commitments by the Uruguayan State. The commitment evaluation was done based on the effectiveness, relevance and sustainability. From this process, we conclude that in Uruguay there has been some progress in the subject, from the approval of regulations and public policy implementation that contribute to the fight against corruption and that were taken before the subscription of the Lima Agreement; we can highlight the policies towards the promotion of transparency in the State institutions by means of the policy implementation for an open government, as well as the promotion for a digital citizenship and regulations controlling access to information.

On the other hand, no further progress has been seen regarding the regulation of funding for parties to ensure their funds are legitimate, although we can note that the subject has returned to discussion in the Parliament in 2021. Also, there has not been any progress regarding the creation of monitoring indicators on the policies for the fight against corruption. It has also been brought to our attention, the lack of financial independence and autonomy of the control bodies to enforce their functions, which constitutes a setback in the long term.

²³ Even though it was discussed in the Parliament, the “illicit enrichment” offense has not been classified in Uruguay yet, as it is in other countries of the region as recommended by the United Nations and the OAS.

Another fact brought to our attention is the lack of gender mainstreaming in the regulations and policies about the fight against corruption. Neither the participation nor the empowerment of women has been proactively sought within the definition of measurements to fight corruption. Similarly, we have not seen in the current regulations or policies the existence of vulnerable groups regarding crimes related to corruption. Consequently, the corruption-related crimes have a great impact in the life of these groups, because no prevention, protection or compensation measurements are provided for them.

The international framework development regarding the fight against corruption and the agreements taken by the country lies within the next national administrations. They will be responsible to craft policies regarding public administration transparency and State accountability and also, the control and transparency in the private sector, that can deepen the previous progress made within the framework of the Lima Agreement, ensuring that there will be no setbacks.

The fight against corruption is not the responsibility of one institution or one group of specialized sectors, but the State as a whole, along with the civil society organizations, the academic sector and the entire society. In order to make new progress and to strengthen the institutions, the objectives assumed to fight corruption must engage the entire society. And to do so, we must define the need to fight it in a state policy, from which efforts, capacities and resources can be coordinated, with the purpose of moving forward to strengthen democracy from the fight against corruption.

As and observatory of the civil society, we make a call to action urging to form participation, dialog and discussion spaces that allow to make progress in the development and implementation of anti-corruption public policies and regulations that strengthen the democratic governance in the country. In Appendix 2, we present the recommendations from the CCO to the Uruguayan State and the society as a whole.

Actions and recommendations to comply with the Lima Agreement in Uruguay

These recommendations must be adapted to the responsibilities and skills of the different actors in the society. They are general recommendations based on some of the commitments, although they review the 5 topics. We encourage to open and to strengthen dialog and discussion spaces for civil society, the academic sector and the state, in order to generate information derived from new advances on these or other commitments from the Lima Agreement.

Topic 1. Reinforcement of democratic governance	
Action	Recommendations
	To develop regulations that promote the technical, administrative, budget and financial independence of the superior control bodies.

Topic 1. Reinforcement of democratic governance	
Action	Recommendations
To promote the independence and autonomy of the different superior control bodies.	To grant appropriate budget, technical and administrative resources to the superior control bodies and the comptroller's office to fulfill their institutional goals.
	To promote the report and proper processing of the conflicts of interest as a prevention measure for potential corruption offenses among the members of the superior control bodies and their associated entities.
	To strengthen the transparency and independence of the nomination and election processes for the superior control bodies' authorities and technical teams regarding corruption, taking into account meritocracy criteria and possible conflicts of interest.
To include an intersectional perspective (gender, race, national origin, socioeconomic and generation profile, etc.) to form work teams to make and/or modify regulations, and to make, implement and evaluate public policies.	To promote the coordination between the superior control bodies and the entities in charge of the gender-based approach at a national, department and municipal level, so the Anti-corruption Public Policy implementation properly includes the gender perspective.
	To promote the participation of experts, multilateral bodies, the academic sector and organizations with a gender-based approach and racial and ethnic diversity, in public policy making basic processes to prevent and fight corruption.
	To ensure the participation and empowerment of women in work teams to analyze and define measurements to fight corruption.
To provide and generate information on groups in a vulnerable situation and the impact of corruption in their life projects in order to come up with strategies to promote their participation in stages to monitor and evaluate anti-corruption policies.	To turn to the regional and international community to obtain information about best practices to approach the protection and engagement of groups in a vulnerable situation regarding corruption-related crimes in participative stages for the development, implementation and evaluation of public policy to prevent and fight corruption.
	To develop national quantitative and qualitative studies about groups in a vulnerable situation and the impact of corruption-related crimes in their life projects.
To implement actions to promote the participation of civil society, academic sector and groups in a vulnerable situation in stages of discussion, design, evaluation and monitoring of anti-corruption policies.	To promote a broad dialog process for a comprehensive anti-corruption Public Policy making, with the participation of the civil society, the academic sector, politicians, business owners, State references and groups in a vulnerable situation.

Topic 2. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression

Action	Recommendations
To generate and/or strengthen dialog spaces between the State and the Civil Society in the different areas where anti-corruption policies are seen.	To favor the creation of a multistakeholder dialog space that involves all the State actors in charge of corruption-related topics and the civil society organizations.
	To create an anti-corruption observatory formed by civil society actors, the academic sector and State bodies in charge of the anti-corruption fight, as well as the Judiciary and the Legislature.
To improve the active and passive transparency of the State bodies, by providing updated, reliable, important and statistically relevant information.	To strengthen the financial and technical powers of the JUTEP, to analyze, process and publish data regarding implementation of anti-corruption policies.
To make progress in the real and effective compliance of the commitment 3.1 taken by the JUTEP in the 4th National Plan of an Open Government.	To strengthen the financial and technical powers of the JUTEP, for the enforcement of commitment 3.1 for the implementation of a reception and processing of reports.
	To distribute and disclose the memos of the diagnose, reception and processing of anti-corruption reports done by the JUTEP.
To develop specific policies for the protection of whistle-blowers, witnesses and informants who report cases of corruption.	To broaden the protection policy to victims and witnesses and turn it into a comprehensive Public Policy about reports and protection to whistle-blowers, witnesses and informants of cases of corruption.
	To draft a bill for the protection of whistle-blowers by involving the Ministry of Internal Affairs, the Office of the Attorney General - through their witness and victim protection Unit - and with the advice of gender, racial and ethnic discrimination specialists and the organized civil society.

Topic 3. Financing of political organizations and election campaigns

Action	Recommendations
To move forward in the approval for laws regarding parties funding, which includes the principles of transparency in their funding and campaigns, as well as accountability of the political parties.	To establish accurate criteria on information that must be submitted on the donors to improve their identification and to effectively ensure the transparency in the donors' information.
	To include the political parties as mandatory subjects for an active transparency and to give powers to the UAIP to perform such control.

Topic 3. Financing of political organizations and election campaigns

	To establish control mechanisms, obligations and appropriate penalties so the political parties and their members effectively comply with the transparency and accountability principles; and so they can be penalized in an effective way and as an example if necessary.
To favor the participation of different actors of the civil society and the academic sector in the process of discussion the regulation on parties funding.	To generate stages of dialog between the political parties, the civil society, the Parliament, the academic sector, the electoral authority, so this can contribute to make an effective policy regarding surveillance and control of political actors' transparency and accountability, with the purpose of avoiding the illicit funding of political parties, candidates and campaigns.

Topic 4. Prevention of corruption in public works and public procurement and contracting

Action	Recommendations
To strengthen the public procurement process by developing purchase and contract monitoring mechanisms for all public bodies.	To include, as a vital part of the public contracts, anti-corruption clauses as a preventive measure against possible corruption cases.
	To draft an effective control plan about the application of resources assigned by contracts and/or direct purchase.
	To publish all the available information about purchases, procurement, application of emergency resources and others, which have been justified due to the COVID-19 sanitary emergency.
To develop state purchase and procurement monitoring mechanisms at all government levels.	To establish dialog mechanisms between the three government levels (national, by departments and municipal) to identify the existing gaps and differences in the purchase and procurement process, in order to unify the transparency and accountability process and criteria for the entire country.
	To develop purchase and procurement monitoring mechanisms in all public bodies, agreed upon with the contribution of civil society actors, the academic sector and the State, within the framework of the 5th Plan of an Open Government.
	To publish in the electronic platforms relevant information to disclose the selection criteria of the best providers, and to allow a citizen auditing by providing information about: the provider's experience, whether a person or entity, the status of previous contracts signed by public entities - in any of the three levels of the government - with the provider; reports of difficulties during the process or execution of previous

Topic 4. Prevention of corruption in public works and public procurement and contracting	
Action	Recommendations
	contracts - in any - with the provider. Information about contributions to political campaigns from the provider, whether a person or entity; if they belong to administrative bodies of private companies. To publish the main relationships of the provider, whether a person or entity, that may alert on possible conflicts of interest for the public sector in any of the three government levels. Among other relevant information.
To move forward regarding the development of measures for the control, transparency and accountability of the private sector.	To develop an corruption risk identification mechanism by economic sector.
	To identify the most sensitive economic sectors for the society and to prioritize the counseling of the relevant bodies in the subject, about tools and mechanisms to prevent corruption.
	To provide a budget and technical resources to the relevant entities with the specific purpose of advising and training the private entities on tools, mechanisms for the prevention and report of corruption cases.

Topic 5. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery	
Action	Recommendations
To strengthen and to approach the operation of the asset laundering suspicious transaction report system.	To enable the information exchange between the government entities to avoid entering into contracts with natural and legal persons under investigation (previously or currently) and/or with a record of corruption offenses, particularly, asset laundering.
	To provide technical and financial resources to control bodies such as JUTEP, UIAF and SENACLAFT, so they can fully reach their goals, by extending them to the private sector control.
To promote learning platforms on corruption by encouraging courses oriented to officers, the civil society, chambers of commerce and the population.	To provide distance learning platforms to train officers, the civil society, chambers of commerce and the population on corruption offenses, the regulations in force; measures regarding preventive seizure, the administration of funds subject to asset forfeiture as a consequence of corruption. Among other information.

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Appendixes

Appendix 1. Evaluation of the Lima Agreement in Uruguay

Reinforcement of Democratic Governance

Table 1. Follow-up criteria of Commitments regarding the Reinforcement of Democratic Governance

Commitment	Relevance	Effectiveness	Sustainability	Country average
2. Strengthening judicial autonomy and independence, following applicable inter-American and universal standards on this matter, to promote respect for the rule of law and access to justice as well as to promote and encourage policies of integrity and transparency in the judicial system.	1.00	1.00	0.00	0.67
7. Promoting gender equity and equality and women's empowerment as a cross-cutting goal of our anti-corruption policies, through a task force on women's leadership and empowerment that will actively promote cooperation among inter-American institutions and synergies with other international agencies.	0.00	0.00	0.00	0.00
8. Including different vulnerable groups in defining measures to strengthen governance and combat corruption, recognizing the serious impact it has on these populations.	0.00	0.00	0.00	0.00
9. Ensuring transparency and equal opportunities in the selection processes of public officials based on objective criteria such as merit, fairness, and aptitude.	2.00	1.00	1.00	1.33
10. Promoting the adoption of measures to prevent conflicts of interest, as well as the public filing of financial disclosure statements by public officials, as appropriate.	1.00	2.00	2.00	1.67
11. Furthering codes of conduct for public officials that contain high standards of ethics, honesty, integrity, and transparency, using as a point of reference the "Guidelines for the Management of Policies for Probity in the Public Administrations of the Americas" and urging the private sector to develop similar codes of conduct.	1.00	2.00	1.00	1.33

Transparency, Access to Information, Protection of Whistle-blowers, and Human Rights, including Freedom of Expression

Table 2. Follow-up criteria of Commitments regarding the Transparency, Access to Information, Protection of Whistle-blowers, and Human Rights, including Freedom of Expression

Commitment	Relevance	Effectiveness	Sustainability	Country average
13. Continuing to strengthen national anti-corruption measures or systems and enhancing conditions for the effective participation of civil society, social organizations, academia, the private sector, citizens, and other social actors in monitoring government performance, including the development of prevention mechanisms, channels for reporting possible acts of corruption and facilitating the work of watchdogs including other citizen oversight mechanisms, and incentivizing the adoption of digital means of participation.	2.00	2.00	2.00	2.00
14. Promoting and/or strengthening the implementation of national policies and plans, and, as appropriate, subnational plans, in the areas of open government, digital government, open data, fiscal transparency, open budgeting, digital procurement systems, public contracting and a public registry of state suppliers, considering towards that end the participation of civil society and other social actors.	3.00	3.00	2.20	2.73
15. Consolidating the autonomy and independence of high-level oversight bodies.	1.00	0.00	0.00	0.33
16. Implementing and/or strengthening of bodies responsible for transparency and access to public information, based on applicable international best practices.	1.00	2.00	1.00	1.33
18. Developing statistics and indicators in our States for assessing the impact of transparency and anti-corruption policies and advancing government capacity in this field.	1.00	0.00	0.00	0.33
21. Promoting the adoption and/or strengthening of such legislative measures as are necessary to criminalize acts of corruption and related offenses consistent with the United Nations Convention against Corruption (UNCAC), the United Nations Convention on Transnational Organized Crime, and the Inter-American Convention against Corruption (IACAC).	1.00	1.00	0.00	0.67
22. Protecting whistle-blowers, witnesses, and informants of acts of corruption from intimidation and retaliatory actions.	1.00	0.80	1.00	0.93

Financing of Political Organizations and Election Campaigns

Table 3. Follow-up criteria of Commitments regarding the Financing of Political Organizations and Election Campaigns

Commitment	Effectiveness	Relevance	Sustainability	Country average
25. Encouraging the adoption and/or strengthening of measures that promote transparency, accountability, appropriate accounting, and use of the banking system for income and expenditures of political organizations and parties, especially those related to their electoral campaigns, in order to guarantee the licit origin of the contributions and penalizing anyone involved in accepting illicit contributions.	2.00	1.00	1.00	1.33

Prevention of Corruption in Public Works and Public Procurement and Contracting

Table 4. Follow-up criteria of Commitments regarding the Prevention of Corruption in Public Works and Public Procurement and Contracting

Commitment	Effectiveness	Relevance	Sustainability	Country average
27. Promoting the use of digital systems for government procurement and contracting of services and public works, to ensure disclosure, transparency, citizen oversight, and effective accountability.	1.00	1.00	1.00	1.00
29. Promoting the inclusion of anti-corruption clauses in all state and public-private-partnership contracts and establishing registers of natural and legal persons involved in acts of corruption and money laundering with a view to ensure that they are not contracted.	1.00	0.00	0.00	0.33
33. Implementing measures to reduce bureaucracy and simplify administrative processes at all levels of government in order to prevent corruption.	2.00	2.00	2.00	2.00

International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery

Table 5. Follow-up Criteria of Commitments regarding the International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery

Commitment	Effectiveness	Relevance	Sustainability	Country average
37. Promoting the broadest possible cooperation among judicial, police, and prosecutorial authorities, financial intelligence units, and administrative authorities in investigations and procedures related to offenses of	1.00	2.00	2.00	1.67

corruption, money laundering, and transnational bribery and corruption.				
41. Furthering the adoption or strengthening of measures through relevant institutions to enable the freezing, seizure, and confiscation of proceeds of corruption.	1.00	1.00	1.00	1.00

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