



REGIONAL REPORT
CITIZEN CORRUPTION OBSERVATORY
FOLLOW-UP ON THE IMPLEMENTATION OF THE LIMA
AGREEMENT

Photograph: Clem Onojehuo (Unsplash)



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Summary

The Citizen Corruption Observatory (CCO) is made up of a coalition of civil society organizations and social actors from 19 countries of the American continent, all of which have jointly followed up on compliance with the agreements adopted by the governments of the region at the VIII Summit of the Americas held in 2018 in Lima, Peru, through meetings, workshops, forums, individual and collective consultations, as well as the creation of a web platform (<https://registro.occ-america.com/admin>), in order to make progress in the fight against corruption. In the framework of this summit, the countries signed the Lima Agreement, Democratic Governance Against Corruption, as a way to reaffirm that prevention of and fight against corruption are key to strengthen democracy and that corruption has a negative impact on institutions, citizen trust and the effective enjoyment of human rights, among other negative impacts. Likewise, this Agreement reaffirms the points agreed upon in the framework of other anti-corruption treaties such as the United Nations Convention against Corruption (UNCAC) and the Inter-American Convention against Corruption (IACAC)¹.

This document presents the final report of this follow-up. First, it presents the progress made in the commitments undertaken, classifying them into five central themes. The second part presents a more detailed discussion of the outcomes of follow-up by identifying some general trends, by comparing the policy and practical developments, and by ranking the countries with the best and worst scores. The third part contains the main findings of this follow-up, as well as calls for action to make more effective progress in the fight against corruption. These calls arise from the reports of each of the 19 countries participating in the CCO, but stand out because of their cross-cutting relevance at the regional level.

Overall, the outcomes of the follow-up to the Lima Agreement show that progress in corruption prevention, control and sanctioning actions in the region is still incomplete. The greatest progress, both in policy and in practice, is found in the promotion of corruption prevention measures such as the reduction of bureaucracy and the simplification of procedures. On the other hand, the inclusion of different vulnerable groups and the development of anti-corruption policies with a gender focus are among the commitments with the least progress in the region.

¹ http://www.summit-americas.org/LIMA_COMMITMENT/LimaCommitment_es.pdf



Introduction

The main purpose of the project entitled “Citizen Corruption Observatory (CCO) - Follow-up on the Lima Agreement” is to strengthen the Citizen Forum of the Americas (CFA) ² by co-creating, together with the Latin American and Caribbean Network for Democracy (LACND), the Citizen Forum of the Americas (CFA), and the Chapters of Transparency International in the region, an observatory that provides technical support for the implementation of the Civil Society Participation in the Summit of the Americas (CSPSA) Project.

The CCO is made up of a coalition of civil society organizations and social actors from 19 countries in the Americas³, which jointly followed up on compliance with the agreements adopted by the governments of the region at the VIII Summit of the Americas held in 2018 in Lima, Peru.

The outcome of this Summit was the signing of the Lima Agreement “Democratic Governance Against Corruption”, which includes 57 commitments regarding the adoption and progress of measures to fight corruption in the region. These commitments are based on the recognition that preventing and combating corruption is fundamental to strengthening democracy in the region and that corruption has a negative impact on institutions, citizen confidence and the effective enjoyment of human rights, among other negative impacts. In this sense, several of the actions included in the Lima Agreement seek to reaffirm the agreements made by the governments of the region in the framework of other anti-corruption treaties such as the United Nations Convention against Corruption (UNCAC) and the Inter-American Convention against Corruption (IACAC).⁴

From November 2020 to June 2021, over 150 social organizations participating in the CCO applied a participatory methodology to analyze and assess progress in the fulfillment of these commitments.⁵ The methodology⁶ is based on the prioritization of 19 commitments using four criteria for their selection: sustainability, inclusion of new approaches, vulnerable groups and representativeness.

² One of the objectives of the Citizen Forum of the Americas is to promote the participation of civil society organizations of the Americas in spaces for dialogue, debate and decision-making on issues of interest to them in the Organization of American States (OAS) and in the Summits of the Americas. For further information, please visit: <https://forociudadanoamericas.org/foro-ciudadano-de-las-americas/>

³ The participating countries are: Argentina, Bolivia, Brazil, Chile, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Haiti, Honduras, Mexico, Nicaragua, Panama, Paraguay, Peru, Uruguay and Venezuela.

⁴ See: http://www.summit-americas.org/LIMA_COMMITMENT/LimaCommitment_es.pdf

⁵ These organizations include chapters of Transparency International in the region and civil society organizations that are part of the Citizen's Forum of the Americas. In addition, civil society organizations with different thematic approaches related to the protection of human rights, the inclusion of LGBTIQ+ communities, indigenous organizations, organizations of African descent, progressive religious organizations, among others, were also involved.

⁶ The Methodological Guide for the follow-up of commitments can be viewed at the following link: <https://occ-america.com/metodologia/>



The 19 commitments selected are classified around the following themes:

- I. **Reinforcement of Democratic Governance;** these commitments address aspects related to the independence of the judiciary, the promotion of gender equity and the inclusion of vulnerable groups in anti-corruption policies, selection processes for public officials, the prevention of conflicts of interest, and the promotion of codes of conduct.
- II. **Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression** includes commitments associated with citizen participation, freedom of expression, open government programs, the autonomy and independence of oversight bodies, the strengthening of transparency bodies, and the development of statistics and indicators for policy monitoring, among others.
- III. **Financing of Political Organizations and Election Campaigns,** which focuses on transparency, accountability, proper accounting and banking of the income and expenditures of political organizations and parties.
- IV. **Prevention of Corruption in Public Works and Public Procurement and Contracting** addresses commitments related to the promotion of electronic government procurement systems and anti-corruption clauses and the streamlining of bureaucracy.
- V. **International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized Crime, and Money Laundering; and Asset Recovery** includes commitments for the promotion of inter-administrative cooperation and the establishment of measures to consolidate preventive attachments in corruption cases.

For an analysis of the progress made in each of these commitments, based on a series of policy and practice indicators, the methodology focuses on the inquiry into the existing policy frameworks and the contrast with the practical implementation of these policy and legal developments. In addition, this analysis was supplemented with an assessment of progress based on criteria of sustainability, effectiveness and relevance (the process of the practical application of this methodology is presented in more detail in the following section).

- Policy indicators⁷ measure the existing legislation that regulates the issues included in the Lima Summit commitments. For this indicator, the Constitution, relevant regulations and case law of each country were reviewed by means of 74 questions that inquired into developments with respect to each commitment analyzed.

⁷ In each country participating in the OCC, the collection of the policy indicators was carried out by a civil society organization that fulfills the role of national coordination, however, the results of the assessment of the policy indicators were disseminated and supplemented by the other social organizations participating in the OCC.



- Practice indicators ⁸ are concrete steps or measures taken by each government in response to the anti-corruption commitments acquired or reiterated during the VIII Lima Summit. The practical application analysis is based on verification sources including interviews, reports of compliance with anti-corruption commitments, requests for information, media reports, among others. A total of 64 questions were drawn up to inquire into the practical progress of the prioritized commitments.

The following report is divided into four parts. Part one discusses the methodology applied and the participation of civil society organizations in this process in greater detail. Part two describes the progress made in each of the five central themes of the Lima Agreement. Part three provides an in-depth analysis by identifying general trends in the results of this follow-up, comparing policy and practice developments, and classifying the results of the 19 countries by subregion, including a top 3 of the countries with the best and worst scores. Part four contains the main conclusions of this follow-up. It also includes calls for action based on the country reports⁹, which are also relevant in a cross-cutting manner for the entire region.

This final report compiles and reviews the policy and practical progress made in the implementation of the Lima Agreement, and is a supplement to the *"First Report by the Citizen Corruption Observatory: Follow-up on the Implementation of the Lima Agreement - Policy Indicators"* ¹⁰ - a document published and disseminated in July 2021.

Lima Agreement Follow-up Methodology

To follow up on the implementation of the Lima Summit commitments, 19 of the 57 commitments were selected on the basis of four criteria: (i) commitments aimed at sustainable anti-corruption actions over time, (ii) commitments that are more likely to be institutionalized, (iii) commitments that include new approaches to anti-corruption actions, and (iv) commitments that include the view of vulnerable populations or the differentiated impact of corruption on these groups in particular.

It should be emphasized that the prioritized commitments also reaffirm actions agreed upon in other anti-corruption treaties such as the 1996 Inter-American Convention Against Corruption, the 2003 United Nations Convention Against Corruption and, for applicable countries, the 1997 OECD Convention Against Transnational Bribery. Table 1 presents the 19 prioritized commitments:

⁸ Practice indicators were compiled by the social organizations participating in the CCO in each country. Altogether, around 150 civil society organizations were involved, answering the practice indicators.

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¹⁰ Se2e: <https://occ-america.com/2021/07/29/primer-informe-del-observatorio-ciudadano-de-corrupcion-revela-avances-y-retos-normativos-para-la-lucha-anticorrupcion-en-la-region/>



Table 1. Prioritization of the Lima Commitments

<p>A. Reinforcement of Democratic Governance</p>	<p>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.</p>
	<p>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.</p>
	<p>8. Including different vulnerable groups in defining measures to strengthen governance and combat corruption, recognizing their serious impact on these populations.</p>
	<p>9. Ensuring transparency and equal opportunities in the selection processes of public officials, based on objective criteria, such as merit, equity, and aptitude.</p>
	<p>10. Promoting the adoption of measures to prevent conflicts of interest, as well as the submission of declarations of assets and financial information by public officials, as appropriate.</p>
<p>B. Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression</p>	<p>11. Furthering codes of conduct for public officials that contain high standards of ethics, probity, 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.</p>
	<p>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.</p>
	<p>14. Promoting and/or strengthening the implementation of national and subnational policies and plans 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.</p>



	<p>15. Consolidating the autonomy and independence of high-level oversight bodies.</p> <p>16. Implementing and/or strengthening of bodies responsible for transparency and access to public information, based on applicable international best practices.</p> <p>18. Developing statistics and indicators in our countries for assessing the impact of transparency and anti-corruption policies and advancing government capacity in this field.</p> <p>21. Promoting the adoption and/or strengthening of legislative measures to criminalize acts of corruption and related offenses consistent with the United Nations Convention against Corruption (UNCAC), the United Nations Convention against Transnational Organized Crime, and the Inter-American Convention against Corruption (IACAC).</p> <p>22. Protecting whistleblowers, witnesses, and informants of acts of corruption from intimidation and retaliatory actions.</p>
<p>C. Financing of Political Organizations and Election Campaigns</p>	<p>25. Encouraging adoption and/or strengthening of measures to 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.</p>
<p>D. Prevention of Corruption in Public Works and Public Procurement and Contracting</p>	<p>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.</p> <p>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 ensuring that they are not contracted.</p> <p>33. Implementing measures to reduce bureaucracy and simplify administrative processes at all levels of government in order to prevent corruption.</p>
<p>E. International Legal Cooperation; the Fight Against Bribery, International Corruption, Organized</p>	<p>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 corruption, money laundering, and transnational bribery and corruption.</p>

**Crime, and Money
Laundering; and Asset
Recovery**

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

Source: Prepared by author

The timeframe selected for the follow-up of the commitments takes into account the existing measures, tools and policies in the 19 countries participating in the CCO as of June 2021, emphasizing those actions promoted by the countries since the signing of the Lima Agreement in 2018. However, at the policy level, the standards in force as of the same date were reviewed, even if they had been approved prior to the signing of this Agreement.

In the 19 countries, participating Civil Society Organizations (CSOs) verified 74 policy indicators based on a review of current legislation, case law developments and statutory regulations from other hierarchical levels, as appropriate. On the other hand, a total of 64 practice indicators were compiled through interviews, anti-corruption compliance reports, information requests, media reports, among other sources.



Photograph from social media of the CCO - Meeting of the Organizations in Chile.



Photograph from social media of the CCO - Meeting of the Organizations in El Salvador

Compilation of information on the policy and practice indicators involved a participatory process through the development of spaces for dialogue (face-to-face and online) among Civil Society Organizations in each country, to share findings and individual perspectives on the actions

implemented by the governments to comply with the 19 prioritized commitments.

The information collected from these processes was systematized through an online platform that made it possible to visualize the results for each country and also for the region.



It should be noted that in each country the civil society organizations that are part of the CCO carried out a coordinated and organic effort where, based on the specific conditions and situations of their country, they established an internal strategy for the compilation, dissemination, discussion, drafting and validation of the report.

Lastly, the compilation of information, both on standards and practices, was supplemented with the Civil Society Organizations' evaluation of the commitments based on three criteria:

- **Effectiveness:** this criterion establishes the extent to which the actions taken by the government as a result of the Lima Agreement contribute to the fight against corruption in the country.
- **Relevance:** accounts for the timeliness and appropriateness of the actions taken by governments to fight corruption, taking into account the economic, institutional and/or social context of the country.
- **Sustainability:** assesses the continuity over time of the actions taken by the government in respect of the commitments analyzed.

Based on the above, each commitment was assigned a score, which is the result of averaging each criterion according to the following scale:

Table 2. Commitment Follow-Up Scale

Effectiveness	0 No records	No evidence exists of any government action for the development of the commitment.
	1 Low	Progress in this area partially develops some of the provisions of the commitment, but no progress has been made beyond proposals or considerations contained in the regulations or policy documents.
	2 Medium	The policy and practice information shows progress; however, there are significant gaps and/or delays in complying with the provisions.
	3 High	The policy and practice information shows that the commitment has been fulfilled. Furthermore, in practice these actions have represented significant progress in the fight against corruption in the country.
Relevance	0 No records	No government actions are found in the policy and practice indicators.
	1 Low	Government actions do not account for previous progress in this area. Furthermore, in practice it is not feasible to apply the provisions of policies or government planning documents.

	2 Medium	Developments do not clearly establish implementation and follow-up mechanisms or are not consistent with existing capacities. Furthermore, in practice there are constraints to the application of the provisions of the standards that would allow compliance with the commitment.
	3 High	Regulatory developments are coherent, timely and strengthen the administrative, financial, human, technical and technological capacities of the bodies and institutions entrusted with compliance with the commitment. Furthermore, progress in this area is in line with the capacities of the entities, institutional designs and past developments in this area.
Sustainability	0 No records	No government actions are found in the policy and practice indicators.
	1 Low	Government actions do not account for previous progress in this area. Furthermore, in practice it is not feasible to apply the provisions of policies or government planning documents.
	2 Medium	Developments do not clearly establish implementation and follow-up mechanisms or are not consistent with existing capacities. Furthermore, in practice there are constraints to the application of the provisions of the standards that would allow compliance with the commitment.
	3 High	Regulatory developments are coherent, timely and strengthen the administrative, financial, human, technical and technological capacities of the bodies and institutions entrusted with compliance with the commitment. Furthermore, progress in this area is in line with the capacities of the entities, institutional designs and past developments in this area.

Source: Prepared by the author based on the Follow-up Methodology.

Annex 1 contains the “Lima Agreement Follow-up Assessment Matrix”, which is essential for the development of this report, as well as for a comparative analysis of the results by country, according to the central themes and commitments analyzed.

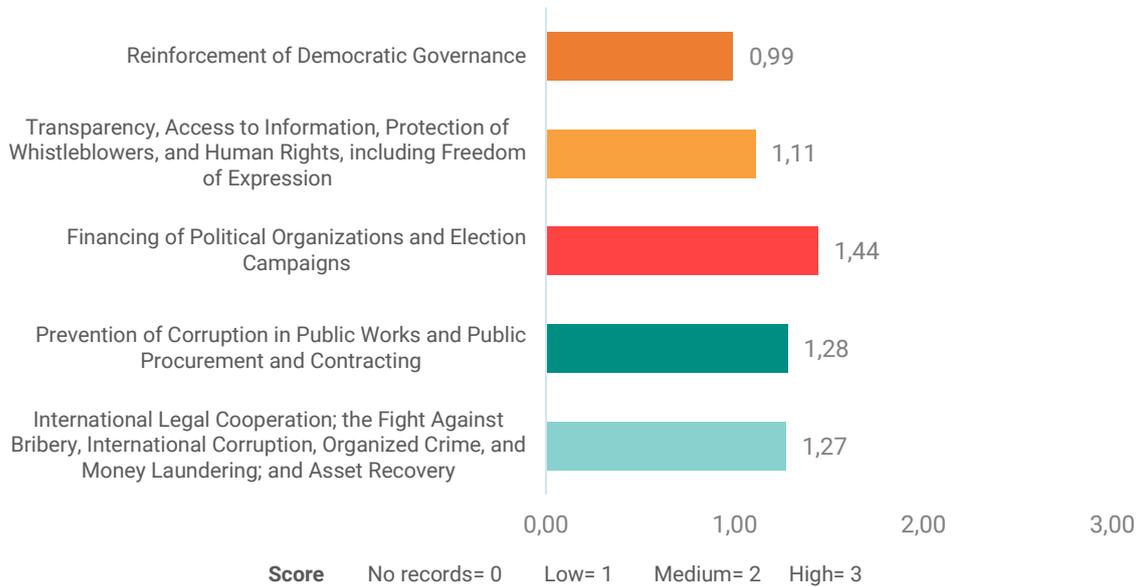
1. Progress of the Lima Agreement by Central Theme.

The following chart shows the results of the Lima Agreement progress follow-up results to fight corruption in the region:



Graph 1. Follow-up Results by Central Theme ¹¹

Results by theme under the Lima Agreement



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO

- On average, the five central themes of the Lima Agreement in the 19 countries analyzed received a score of 1.17/3.00. This relatively low score is based on the fact that, while at the policy level legislation to fight corruption is in place, in practice the desired progress has not been made in terms of drawing up government plans, public policies and practical tools to ensure compliance with these standards.
- As already mentioned, the Lima Agreement reiterates priority actions contained in other international instruments aimed at advancing in the fight against corruption, while at the same time presenting a number of innovative approaches in this area. However, these low results show that greater progress has yet to be made, both on issues prior to the VIII Summit of the Americas and on the new commitments included in this Commitment.

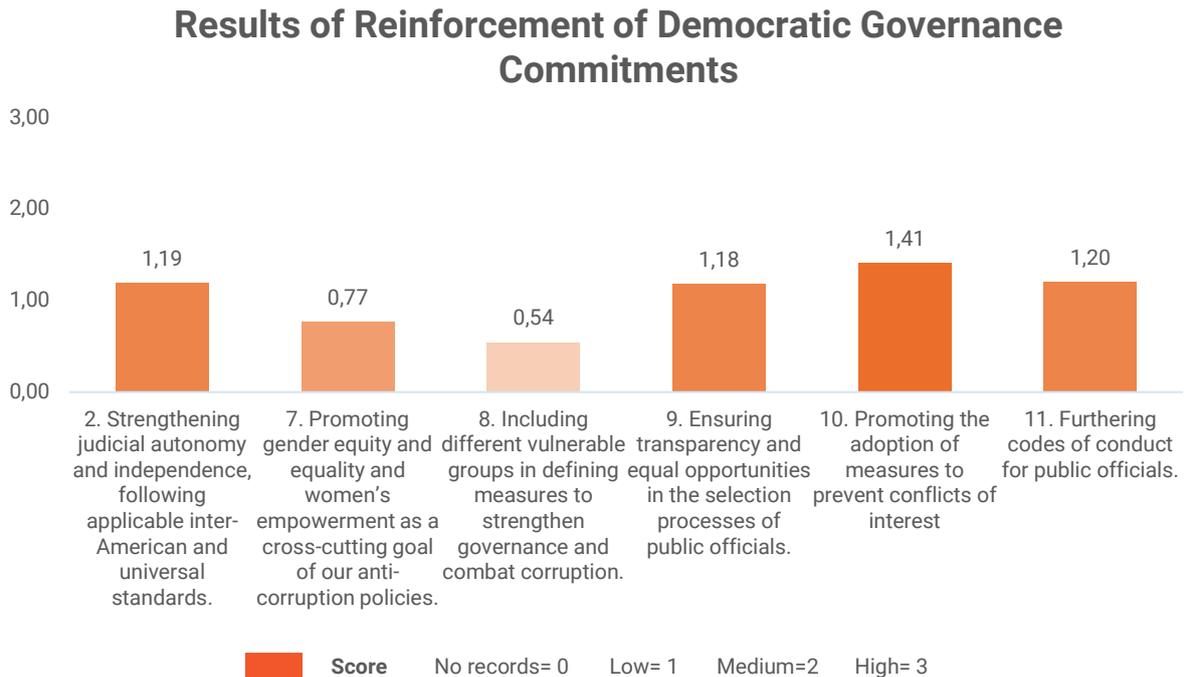
To view these outcomes in more detail, the results for each of the 5 central themes are presented below:

¹¹ The colors shown in the graphs of this document reflect the color assigned to each of the themes for the OCC and do not reflect a numerical scale.

1.1. Reinforcement of Democratic Governance Commitments

In the area of Reinforcing Democratic Governance, six specific commitments were analyzed by analyzing 20 policy indicators and 18 practice indicators. The following graph shows the results of averaging this assessment for each commitment:

Graph 2: Results of Reinforcement of Democratic Governance Commitments



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO

- These results confirm that none of the commitments related to Reinforcing Democratic Governance received an average score for the region that exceeds the average scale score (2.00/3.00). Moreover, the two commitments with scores between 0 and 1 are those that propose new approaches and the inclusion of the differential perspective in the fight against corruption (commitments No. 7 and No. 8), showing that the participating countries have encountered challenges in the development of both regulations¹² and national programs and policies with this approach.
- Regarding Commitment No. 8, which received the lowest score in this follow-up for the entire region (0.54/3.00), the cases of Honduras and Uruguay stand out, since in these countries there is no progress at all (0.0/3.0). In other words, no government mechanisms and actions have been developed to promote the inclusion of vulnerable groups in the development of anti-corruption measures.

¹² 64.9% of the proposed policy indicators obtained a negative response, indicating the absence of a policy. See more in the document First Report by the Citizen Corruption Observatory.



The two countries with the greatest progress with respect to commitment No. 8 are Argentina (1.80/3.0) and Costa Rica (1.33/3.0). In Argentina, even though no regulatory developments focused on the inclusion of vulnerable populations were found, in practice, anti-corruption policies have managed to include these groups in the implementation of projects (Argentina Report. 2021).

Costa Rica does have regulatory developments focused on the inclusion of vulnerable groups; however, constraints are found in practice, since the provisions do not comprehensively cover the needs of vulnerable groups, as stated by the Costa Rican CSOs that carried out this follow-up (Costa Rica Report. 2021).

- In turn, commitment No. 10, focused on promoting the adoption of measures to prevent conflicts of interest, received the highest score in this thematic axis for the region. The case of Costa Rica stands out, where this commitment was valued with a medium scale score (2.0/3.0), since they have a regulation that makes it mandatory to publish the income tax returns of persons holding public office.

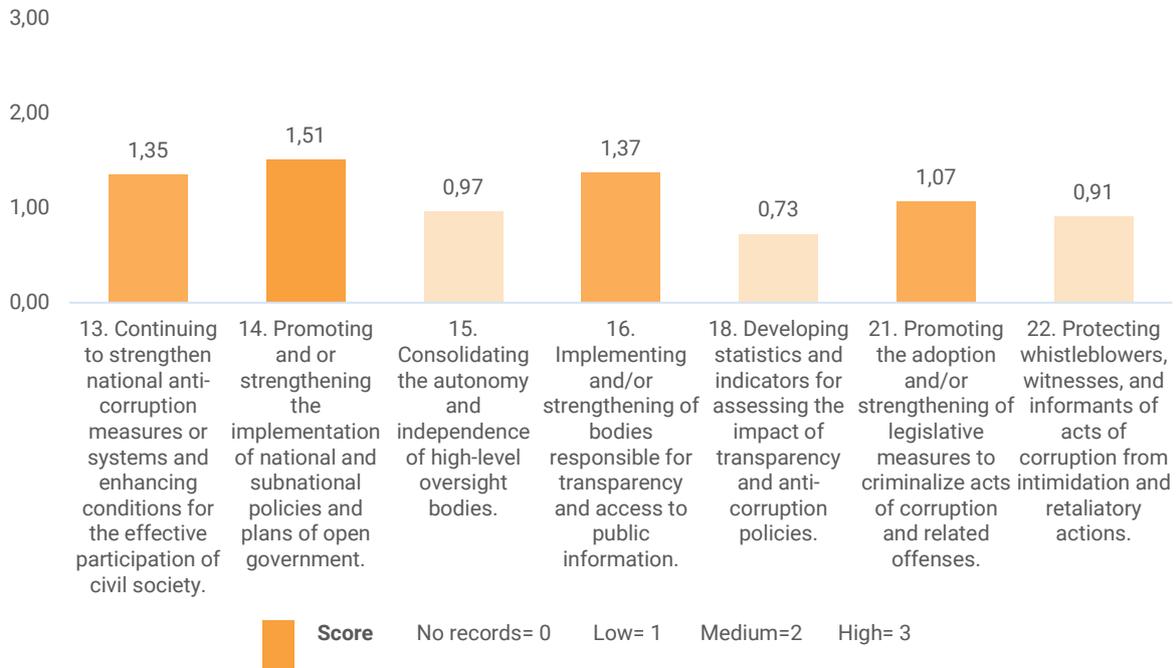
In Costa Rica, in addition to the regulation, training spaces have been developed that are consistent with the code of ethics for public officials and the development of a measures system for the prevention of conflicts of interest in the framework of disclosure and transparency (CCO Platform - Costa Rica).

1.2. Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression Commitments

In this area, 7 commitments were prioritized by means of 28 policy indicators and 22 practice indicators. The following graph shows the results of averaging this assessment:

Graph 3. Results of Transparency, Access to Information, Protection of Whistleblowers Commitments

Results of Transparency and Access to Information Commitments.



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO

- Most of the issues covered by this theme are based on commitments made prior to the VIII Summit of the Americas, such as the Inter-American Convention Against Corruption signed in 1996. Therefore, it would be expected that progress would be greater, however, results show that none of the prioritized commitments received a score equal to or higher than 2.0/3.0 (medium scale). Moreover, commitments No.15, 18 and 22 do not even reach the low scale score.
- The highest rated commitment in this theme is No. 14, which refers to the implementation of national open government policies and plans. As mentioned in the report from the Inter-American Commission on Human Rights -IACHR-, *“the implementation of data generation strategies and various forms of open government is a growing trend in the region.”* (2019. page 29). In this regard, the follow-up found that of the 19 countries analyzed in the CCO, 26% (Argentina, Brazil, Ecuador, Peru and Uruguay) rated this commitment with scores above 2.0/3.0.

In these five cases, the implementation of the Open Government Plans is positively rated, since they have allowed progress in the prevention of the fight against corruption. However, they also highlight the need for updates to ensure that these

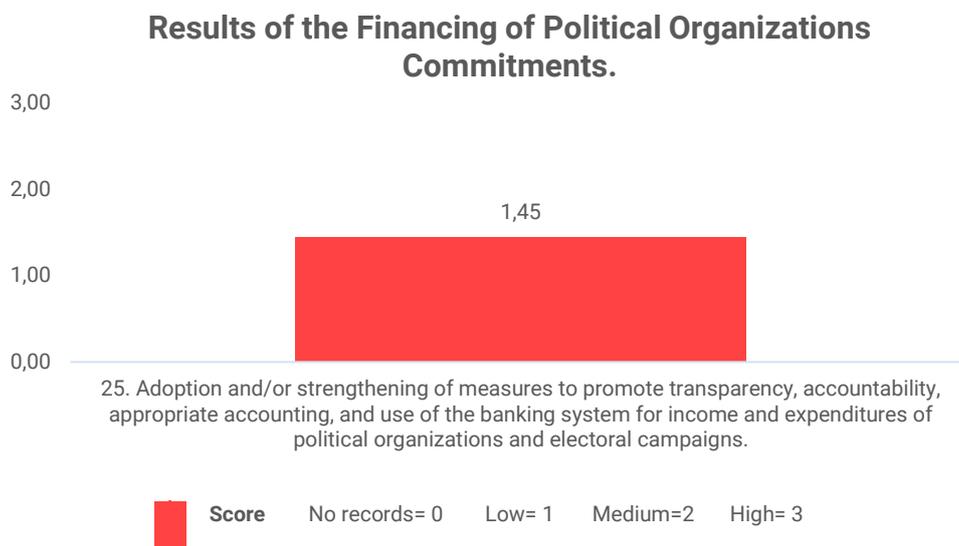
developments do not become bureaucratic steps, but that they are effectively integrated with society and strengthen the fight against corruption.

- In this theme, commitment No. 18 “Develop statistics to evaluate transparency policies” is the worst rated. None of the 19 countries exceeds the low scale score (1.0/3.0), which shows a lack of both policy¹³ and practical developments in the region. Particularly noteworthy are the cases of Costa Rica and Honduras, since in both cases a score of 0.0/3.0 was given to the progress of this commitment, which confirms the absence of mechanisms for the generation of statistics or control records.
- Argentina, Colombia, Peru and Paraguay stand out as the countries that effectively have bodies in charge and manuals or formats to evaluate the impact of transparency and anti-corruption policies (CCO Platform).
- This shows that progress is needed in the implementation of programs and plans to assess the impact of anti-corruption measures, including aspects such as the frequency of evaluations, among others.

1.3. Financing of Political Organizations and Election Campaigns Commitments

Commitment No. 25 was prioritized in this area, and 11 policy indicators and five practice indicators were reviewed. The following graph shows the results of averaging this assessment:

Graph 4. Results of the Financing of Political Organizations and Election Campaigns Commitments.



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO

¹³ The first balance of policy indicators showed that for commitment No. 18, 63.2% of the indicators obtained a negative response, indicating the absence of regulations in this regard.

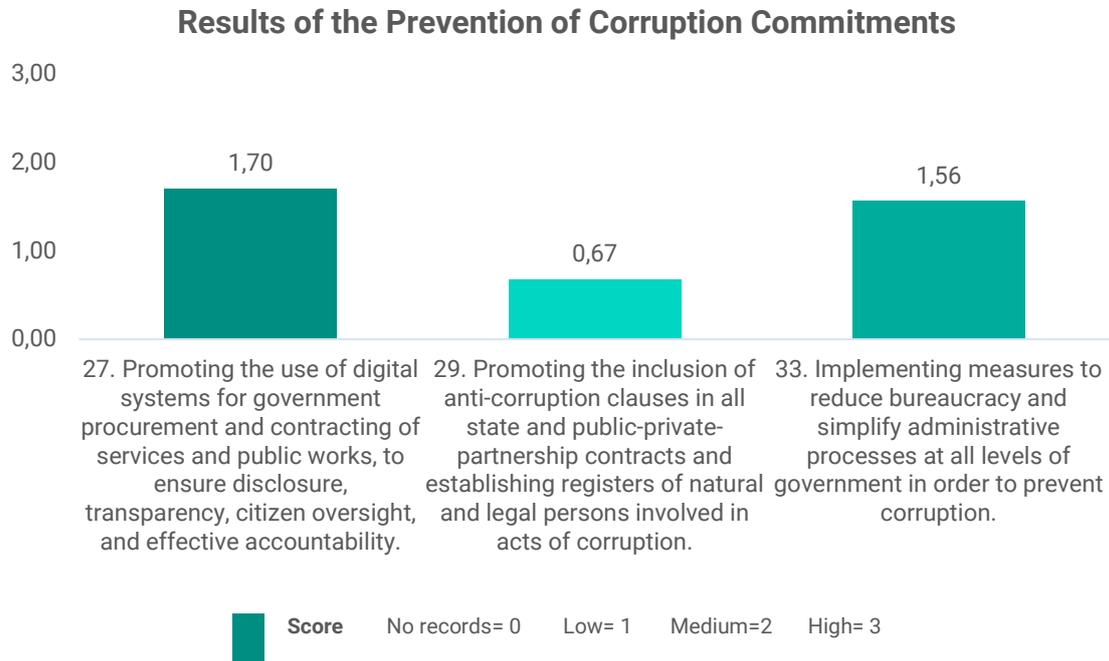


- Commitment No. 25 received the highest score of all the analysis carried out by the CCO. At the policy level, 87% of the questions on the existence of laws guaranteeing transparency, accountability, accounting and sanctioning irregular financing of political campaigns, obtained positive responses. When asked about the implementation of tools, plans and programs for the fulfillment of the commitment, positive responses dropped to 52%. This difference between policy and practice is reflected in the fact that the final score of the commitment does not exceed the medium scale evaluation (1.45/2.0).
- In general, the public has the tools to access campaign accountability reports and online platforms are available for the accountability of political campaign financing. However, there is still a need to strengthen the processes of investigation and punishing irregular campaign financing, which is also accompanied by greater oversight of the origin, amount and allocation of these resources.
- At the individual level, only six of the 19 countries participating in the CCO (Brazil, Costa Rica, Ecuador, Mexico, Paraguay and Peru) received scores of 2.0/3.0 or higher. In contrast, Bolivia, El Salvador, Guatemala, Nicaragua and Venezuela are the countries that scored this commitment below 1.0/3.0.
- Particularly noteworthy is the case of El Salvador, where at the policy level, there is no obligation to fill out forms for the accountability of campaign income and expenditures. In addition, at a practical level, citizens cannot access campaign reports, nor is there an online platform for the accountability of political financing. (El Salvador Report. 2021).

1.4. Prevention of Corruption in Public Works and Public Procurement and Contracting Commitments

Three commitments were prioritized in this area, through nine policy indicators and twelve practice indicators. The following graph shows the results of averaging this assessment:

Graph 5. Results of the Prevention of Corruption in Public Works and Public Procurement and Contracting Commitments



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO

- The results show the policy and practical progress made in respect of Commitment No. 27, which obtained an average score of 1.7/3.0, since, in general terms, the region has implemented online systems for public procurement and measures to streamline bureaucracy.
- With respect to this commitment, eight of the 19 countries in particular scored above 2.0 points -Argentina, Brazil, Chile, Colombia, Ecuador, Haiti and Paraguay-. This shows progress in the region in terms of access to information on public procurement and contracting through online platforms that allow citizen oversight. However, these countries also note the need to improve the quality of the information published so that it complies with open-contracting open data standards, and also to seek options for accessing information in regions where Internet connectivity is weaker.
- Nicaragua and Venezuela are the only countries with scores below 1.0/3.0. In Venezuela, for example, the recording of government contracting processes is minimal and in general public institutions do not publish tenders or contract awards. (Venezuela Final Report. 2021).
- While commitment No. 33 on measures to streamline bureaucracy and simplify procedures at the regional level received a low score (1.56/3.00), Paraguay received the highest score (3.00/3.00), making it the only commitment of the 19 assessed that

received this score. Some of the aspects that stand out for this rating in Paraguay are the adoption of measures to carry out the streamlining of procedures at all levels of government for the prevention of corruption, which has been supplemented with the continued reinforcement of online tools in procurement processes, and the adoption of new tools such as the e-shop and sustainable public procurement (Paraguay Report. 2021).

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

Two commitments were prioritized in this central theme, which were analyzed by means of six policy indicators and seven practice indicators. The following graph shows the results of averaging this assessment:

Graph 6. International Legal Cooperation Commitments Results.



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO

- Foreign bribery, forfeiture and preventive attachment are actions that are traditionally prioritized in the fight against corruption, as envisaged in the Inter-American Convention against Corruption of 1996¹⁴. However, commitments No. 37 and No. 41 failed to exceed the medium progress barrier (2.0/3.0), which shows that, despite the call for more than two decades to make progress in this area, the current result for the region is insufficient. The cases of Chile, Nicaragua and Venezuela stand out, whose

¹⁴Article 8 urges the signatory states to adopt bribery as a corruption offense. In the same vein, Article 3(10) provides for the commitment of the signatories to take steps to allow for preventive attachments in cases associated with corruption.



averages for the area are below 1.0/3.0¹⁵, showing that a policy framework has not been developed to group the initiatives in this regard, and that the practical measures implemented are not efficient, effective and sustainable.

- Regarding commitment No. 37 concerning the promotion of cooperation between authorities in investigations and proceedings related to corruption offenses, the case of Argentina stands out as the country with the highest score for this commitment (2.17/3.00). The Argentina report (2021) notes that the Public Prosecutor's Office, within the framework of the OECD, has implemented inter-institutional and international cooperation channels, achieving significant progress in the number of investigations for transnational bribery¹⁶. The activities highlighted include the development of technical roundtables with the actors involved to draw up action plans in accordance with the 2009 OECD recommendation, and the opening of international institutional exchanges to define mechanisms to strengthen the capacity of entities to react to cases of transnational bribery.
- As to Commitment No. 41, Promote measures to allow preventive attachment, forfeiture and confiscation of assets resulting from corruption, Brazil was the country with the highest score (2.5/3.0). Responses to the policy and practice indicators from Brazilian organizations highlighted the existence of tools such as the “Judicial Branch Asset Search System” (JBASS), which allows different institutions to verify, monitor and update information related to assets resulting from crimes, not only corruption; and the enactment of Act 13.964/2019 called the “Anti-crime Package” which instituted extensive asset forfeiture and other measures to combat organized crime.

¹⁵ The average for Chile was 0.55/3.0, for Nicaragua 0.66/3.0 and for Venezuela 0.20/3.0.

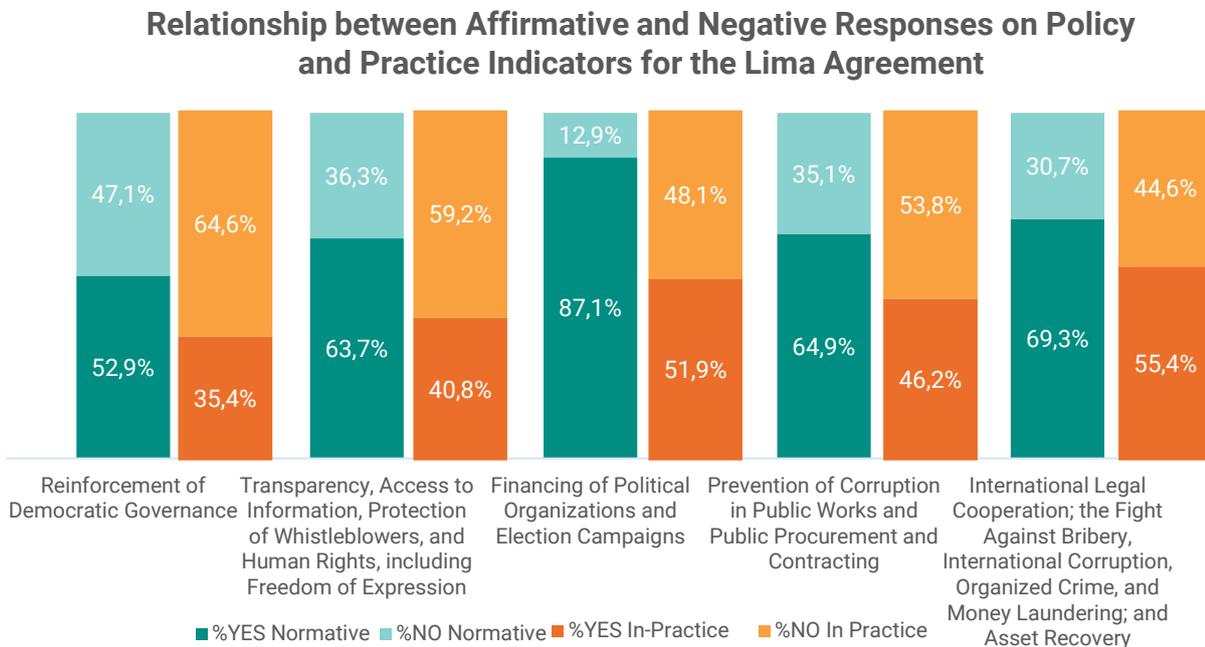
¹⁶ See more on the accountability of the Public Prosecutor's Office. Available at: https://www.mpf.gob.ar/coordinacion/files/2021/02/MPF_IA_2020.pdf

2. Trends in the Progress of the Lima Agreement in the Region.

2.1. Differences between policy and practice in the fulfillment of the Lima Agreement

The following graph compares the policy and practical progress of all the commitments, grouped into the five themes, according to the percentage of affirmative and negative responses:

Graph 7. Relationship between Affirmative and Negative Responses on Policy and Practice Indicators for the Lima Agreement



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO.

- A first report on the existing policy frameworks in the 19 CCO participating countries¹⁷ shows that the region has broad developments at the constitutional, policy and/or jurisprudential level to control, prevent and punish corruption. In fact, an average of 64% of the policy indicators had a positive response. Of these, campaign finance regulations stand out as those with the most developed policies in the region.
- With respect to the progress of practical measures, which include regulations of standards, public policies, adjustments in institutional designs, among others, there is

¹⁷ See the first report on policy indicators at the regional level at: <https://occ-america.com/2021/07/29/primer-informe-del-observatorio-ciudadano-de-corrupcion-revela-avances-y-retos-normativos-para-la-lucha-anticorrupcion-en-la-region/>



less development. In this case, only 43% of the practice indicators had affirmative responses, with the commitments related to international legal cooperation, combating bribery, foreign bribery, organized crime and money laundering showing the most practical developments in the region.

- However, a disaggregated look at the progress made in complying with the Lima Agreement based on each theme provides a more detailed view of the imbalance between existing policy frameworks and the implementation of practical measures. In this regard, the two themes that showed the greatest variation between policy and practice are Political Financing (policy 87% and practice 52%) and Transparency and Access to Information, Protection of Whistleblowers (policy 64% and practice 41%).
- Regarding the financing of political organizations and campaigns in the region, it is evident that, at the policy level, almost all countries have forms for recording campaign income and expenses, as well as obligations to bank the resources and control the private origin of the same. However, the analysis in practice shows weaknesses in the audit of the information provided through the recording forms. In addition, although there is an obligation to open bank accounts for the recording of campaign contributions, these are not used by the candidates.
- Colombia is a clear example of the difference between policy and practice in political campaign finance measures. Despite having a broad policy framework, which includes aspects of transparency, accountability, equity, among others, and with the Cuentas Claras platform as an accountability tool for political campaigns, the country did not achieve a medium scale score (1.67/3.00). This is mainly because Colombian civil society organizations expressed “the existing difficulty in understanding the information and how to consult the data recorded in the Cuentas Claras platform (...) as well as the identification of shortcomings in the quality of the information available on political campaign income and expenditures and the lack of effective and timely sanctions for illegal political financing”. (Colombia Report. 2021).
- In the results of the theme of Transparency and Access to Information, Protection of Whistleblowers, the case of Bolivia stands out, where 64% of the policy questions were positive, however, the follow-up by Bolivian CSOs to this commitment shows that the lack of consistency between the policy and the practice has different reasons:

“The separation between rule and practice, as the main, albeit not the only problem of compliance with commitments in Bolivia, can be understood in terms of institutional weakness based on different types of weaknesses such as insignificance, lack of compliance, and instability (Brinks, Levistky, & Murillo, 2019). Insignificance refers to the fact that, despite compliance with the rules, they do not affect the behavior of the actors. At this point compliance with



sworn statements of assets and income may be mentioned as an example, which, even though they are developments in public policy, they do not deter or prevent acts of corruption”. (Bolivia Report. 2021. P. 23)

2.2. Analysis of Results by Subregion.

The general results by commitment and theme allow us to identify some general trends for the region with respect to effective progress in the fight against corruption. However, certain conditions are characteristic of each country, which require a disaggregated view by subregion -Caribbean, Mexico and Central America, and South America- distributed as follows:

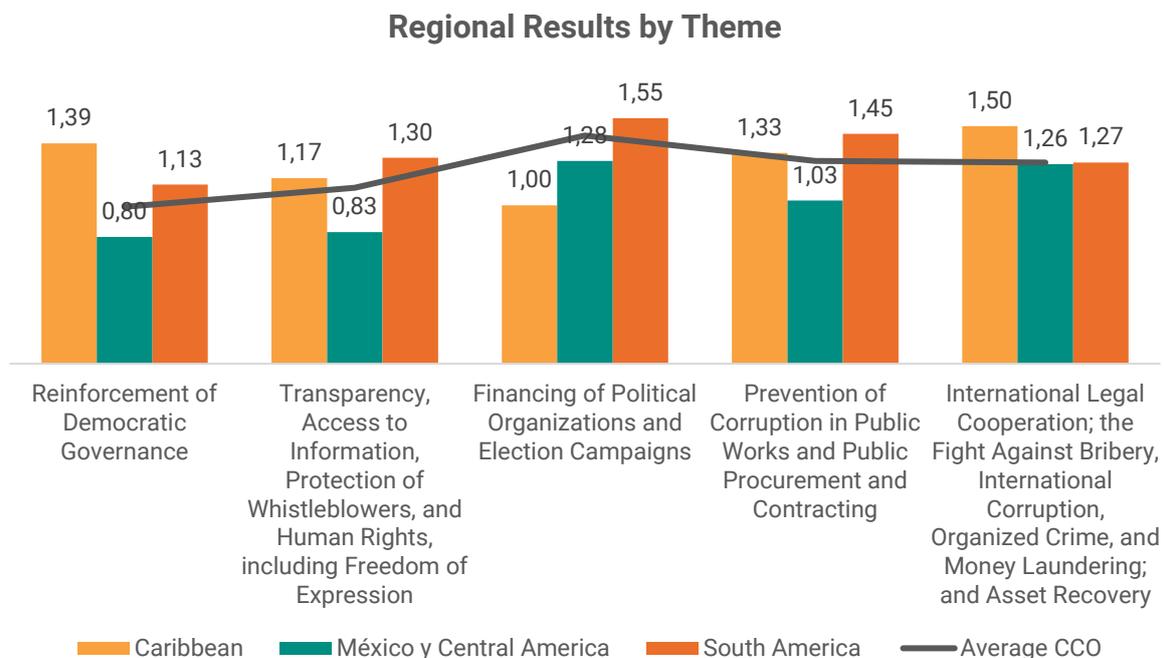
Table 3: Distribution of countries participating in the CCO by region.

Caribbean	Mexico and Central America		South America	
Dominican Republic Haiti	Costa Rica El Salvador Guatemala Honduras	Mexico Nicaragua Panama	Argentina Bolivia Brazil Chile Colombia	Ecuador Paraguay Peru Uruguay Venezuela

Prepared by the authors based on countries participating in the CCO

The following chart shows a comparison by subregion of the progress made in the fight against corruption in the five themes analyzed in the Lima Agreement:

Graph 8. Regional results by theme



Source: Prepared by the author based on information filled out by the CSOs participating in the CCO



- At the subregional level for Latin America, some differences can be observed, with the Mexico and Central America region receiving the lowest scores in four of the five central themes. In fact, in this region, none of the areas scored higher than the CCO average and, in particular, the area of Reinforcement of Democratic Governance is the worst rated for this subregion.

The cases of El Salvador, Guatemala and Nicaragua stand out, as none of the six Reinforcement of Democratic Governance commitments exceeded a rating of 1.00/3.00, which shows very weak progress both in the policy and in practice.

- In the South American region, all the thematic themes obtained results that exceeded the mean of 1.17/ 3.00, but none exceeded the score of 2 points (medium scale). In this case, the theme with the lowest score is Transparency and Access to Information, Protection of Whistleblowers.

In this regard, it is worth noting that seven of the ten countries that comprise the subregion (Argentina, Bolivia, Chile, Colombia, Paraguay, Uruguay and Venezuela) recorded scores below 1.0/3.0 in commitment No. 22 related to whistleblower protection, ranking as one of the lowest-rated commitments in the entire South American region. Colombia, for example, does not currently have a policy framework to protect corruption whistleblowers (Colombia Report. 2021).

- The Caribbean region has only one theme evaluated below the average, that of Financing of Political Organizations and Electoral Campaigns, a surprising situation given that, at the regional level, this is the commitment with the highest score.

In this regard, two cases in particular are noteworthy: on the one hand, Haiti, which, despite having regulations in force in this regard, has not managed to implement effective controls for the financing of political organizations and campaigns, due to the weakness with which its institutions have been formed. On the other hand, the Dominican Republic has implemented measures for the accountability of income and expenditures, however, the implementation of these measures is far from having institutional and financial capacities, so they are not sustainable over time (Dominican Republic Report. 2021).

2.3. Countries with the Highest Scores – Top 3

In total, 10 of the countries analyzed (Argentina, Brazil, Colombia, Costa Rica, Dominican Republic, Ecuador, Haiti, Mexico, Panama, Paraguay, Peru and the Dominican Republic) obtained scores higher than the regional average of 1.17/3.00. Among these, Peru (1.84),



Argentina (1.69) and Costa Rica (1.57) ranked as the countries with the best scores in the entire CCO, but in none of the cases did they reach a score of 2.00/3.00.

In Peru, 13 civil society organizations participated in the entire follow-up exercise to the Lima Agreement. Notwithstanding a challenging context given the impact of the Car Wash case, the country has made great strides in its prosecution. An example thereof is *“the creation of a special system to judge crimes of corruption, from the Public Ministry (Car Wash Special Team), in the Judiciary (specialized courts) and in the State Defense (Car Wash Ad-Hoc Prosecutor's Office)”* (Peru Report. 2021. P. 22).

In general, all the commitments analyzed in Peru's case received a score close to the medium level. However, the best scores are found in commitment No. 13 related to strengthening national anti-corruption systems or measures (2.15/3.0) and No. 25 on measures that promote transparency and accountability in electoral campaigns (2.05/3.0).

Argentina stands out, both at the policy and practical levels, for its developments reported on the inclusion of citizens in anti-corruption measures. This country had the highest rating in commitment No. 7 related to promoting gender equity and equality in anti-corruption policies (2.27/3.0), and commitment No. 8 on including various vulnerable groups in anti-corruption measures (1.80/3.0).

However, the main challenges for this country lie in strengthening the systems for preventing and combating corruption. As Argentina's report points out, the capacity for the protection of whistleblowers or witnesses to acts of corruption is almost nil, which adds to the weakness in the independence and autonomy of corruption control and sanction agencies, and the lack of development of robust and enforceable mechanisms, such as, for example, within the anti-corruption clauses, among others (Argentina Report. 2021).

In Costa Rica, the highest scored commitments are those that involve progress in policy developments, such as No. 21 on the criminalization of acts of corruption (2.33/3.0), followed by No. 9 related to complying with the principles of equality, transparency and publicity in the selection processes for public officials, and No. 10 on the existence of initiatives on the prevention of conflicts of interest.

On the other hand, those commitments that involve the development of specific mechanisms for the fight against corruption, such as No. 27 on the adoption of anti-corruption clauses, and No. 18 on the compilation of statistics to assess transparency policies, do not show any progress. In fact, both commitments received a score of 0.0/3.0.

2.4. Countries with the Lowest Scores – Top 3

Of the 19 countries analyzed in the follow-up to the Lima Agreement, three received an average score of less than 1.0/3.0: Venezuela (0.28), Nicaragua (0.41) and Honduras (0.63). In these three cases, the low scores are found in most of the 19 commitments analyzed.



Venezuela is the country with the lowest score in the entire CCO. In fact, none of the commitments achieved a score higher than 1.0/3.0. Indeed, the highest rated commitment was No. 13: Strengthen national anti-corruption systems or measures (0.74/3.0). The country has reporting channels, but these are not exclusively for acts of corruption. For example, *“the Public Prosecutor’s Office has a telephone line where complaints can be made, 0800-FISCA-00, and an email address, ministeriopublico@mp.gob.ve, which has been used to file some complaints of acts of corruption by the Anticorruption Legal Assistance Team (ALAC) of Transparency Venezuela (...) citizens can learn about these channels through social media, however, there is no knowledge of statistics on acts of corruption”* (Venezuela Report. 2021. Pp. 21-22).

Now, it should be noted that for nearly two decades the political, economic and social context of Venezuela has led to a concentration of power that prevents the consolidation of progress in anti-corruption matters: *“The Supreme Court of Justice, the Office of the Comptroller General of the Republic, the Attorney General’s Office and the Ombudsman’s Office are controlled by the Executive Branch and have been accomplices in legalizing opacity and establishing corruption”* (Venezuela Report, 2021. P. 11).

This institutional weakness explains the low scores obtained. Of the 19 participating countries, Venezuela is the only one that received a score of less than 1.0/3.0 in all commitments, which shows that there is no evidence of progress, but on the contrary, *“there are setbacks in the transparency of public institutions; restrictions on the right of access to public information and no investigation into the facts and acts of grand corruption in Venezuela, which is responsible for the complex humanitarian emergency that the country is going through”* (Venezuela Report. 2021. P. 17)

In Nicaragua, all commitments, except commitment No. 33 focused on implementing measures to streamline bureaucracy, received a score of less than 1.00/3.00. Regarding this commitment, the CCO highlighted that there are procedure manuals in the General Directorate of Revenue (GDR) and in the Comptroller General of the Republic (CGR) that are updated and are tools for the streamlining of procedures (Nicaragua Report, 2021).

Commitment No. 22 related to the protection of whistleblowers, witnesses and informants of acts of corruption, received the lowest score of all the follow-up in this country. In the last two decades Nicaragua has regressed in terms of governance, generating a worrisome panorama in terms of human rights. The country report notes that the state apparatus uses the media and legal mechanisms not to attack corruption, but to incriminate those who denounce it. The Nicaragua report also highlights the *“direct relationship between corruption, poverty and inequality. Corruption implies that citizens have nowhere to turn if they are violated or to demand the satisfaction of their basic rights such as education, health, food security, water, etc.”* (Nicaragua Report, 2021. P. 7).

In the case of Honduras, although eight of the 19 commitments received a score higher than 1.00/3.00, there are three commitments that did not record any progress either in policy or in



practice and therefore have a direct effect on its overall result, including No. 7, focused on promoting gender equity and equality in anti-corruption policies; No. 8, related to the inclusion of various groups in vulnerable situations in anti-corruption measures; and No. 18 on the development of statistics to assess transparency policies.

The lack of progress on these commitments is a reflection of the stagnation in the adoption of new approaches to fight corruption such as, for example, adopting a gender equity approach and the inclusion of vulnerable groups in anti-corruption measures.

In addition, the country's context shows a strong democratic deterioration in the last decade that has led to institutional weakening, suppressed rule of law and social fragmentation, which has resulted in corruption being one of the three main ills afflicting the Honduran population and its social effects being one of the main causes of high levels of migration of the population. The progress in the fight against corruption and impunity that Honduras had achieved in the framework of international cooperation scenarios has not been continued: *“Despite the progress in investigating and prosecuting high-profile corruption cases, the agreement establishing the Mission to Support the Fight against Corruption and Impunity in Honduras signed between the Organization of American States (OAS) and the State of Honduras was not renewed in January, 2020. After its termination, there has been a strong setback in the fight against corruption, evidenced by the closure of emblematic cases followed by the Mission, which included high-level politicians and businessmen”.* (Honduras Report. 2021. P. 10).

Conclusions

The Lima Agreement “Democratic Governance Against Corruption” includes several anti-corruption guidelines, some of which have been recently developed, such as the addition of the differential approach, as well as other guidelines that have been echoed in different instruments; for instance, the 1996 Inter-American Convention against Corruption, the 2003 United Nations Convention against Corruption and the 1997 OECD Convention against Transnational Bribery.

On average, the results obtained in the follow-up to the Lima Agreement show that the progress made is insufficient. There are particular actions in some of the commitments analyzed, which vary according to the country and the context analyzed. However, we can hardly conclude that the Lima Commitment has led to progress in the fight against corruption at the regional level.

An initial assessment of the policy indicators highlighted the existence of broad and sufficient policy frameworks to make progress in the fight against corruption. However, the comparison with the practice indicators shows a low implementation of these policies, as well as institutional weakness and lack of political will to develop human, technical, technological and financial administrative capacities to make progress in this area.



In fact, the average score for the Lima Agreement was 1.17/3.00. Even though several of these countries have been implementing anti-corruption regulations and actions for many years, this score is not even close to the average scale (2.00/3.00) of progress in this area. This being the case, it is necessary to question the sustainability, effectiveness and relevance of these actions in relation to the results obtained.

Based on the evaluation of the commitments, the greatest progress, both in terms of policy and practice, is found in those that promote measures for the prevention of corruption, such as commitment No. 27 on the promotion of electronic systems for government procurement and public contracting, and commitment No. 33 on measures for the reduction of bureaucracy and the simplification of procedures.

In contrast, the incorporation of different groups and the differential impact on the fight against corruption, in the terms indicated in Commitments No. 7 and No. 8, have the least progress for the region. The inclusion of new approaches is essential for anti-corruption strategies to be comprehensive, efficient and effective; this is the conclusion of the Inter-American Commission on Human Rights in reiterating the need to include as principles of anti-corruption strategies: the guarantee of equality and non-discrimination, participation and social inclusion, and the inclusion of gender and diversity perspectives. (IACHR. 2019. P. 194).

Access to information is another issue that does not show significant progress and was severely affected by the context of the pandemic. Consistent with what was pointed out by the Regional Alliance for Free Expression and Information (2020), the follow-up carried out by the CCO also showed a series of structural limitations to the enactment and implementation of Access to Public Information (API) legislation:

"In those countries where regulations and a certain exercise of API do exist, enjoyment thereof is limited by various practices: in addition to the extension of the usual response deadlines, non-compliance with them is common; and in addition, the guarantor bodies do not regularly process the appeals that are made in the event of non-compliance in the delivery of information."

Regional Alliance for Free Expression and Information (2020). Know More XI. Page 5.

On the other hand, in general, the inclusion of citizens in anti-corruption policies is one of the main challenges that the governments of the region will have to address in the coming years. The strengthening of spaces for citizen participation and consultation for the implementation of anti-corruption measures in the countries has been highlighted by Transparency International as one of the fundamental steps for the building of political integrity to end corruption. Hence:

"Promoting more inclusive policy-making processes, with wider ranges of consultation, is one way to prevent the disproportionate influence of groups with more economic power over government decision-making processes. By allowing all groups affected by a specific decision or discussion to participate in the debate, decision-makers gain



access to different points of view and can better assess where the public interest lies. Having all relevant information before making decisions also makes it more difficult for politicians to justify a course of action that favors narrow interests over the public good.”
(Transparency International, 2020)

All this leads to the conclusion that, in general, the regional trend points to a lack of progress, stagnation and, in several cases, weakening of anti-corruption measures, commensurate with the absence of spaces for participation and social control, as well as with the imbalance and concentration of power in the executive branch. These findings reinforce the findings highlighted in the Corruption Perceptions Index -CPI-¹⁸ (2020, a), regarding a region characterized by weak governance institutions, in which Covid-19 deepened the already existing social and economic inequalities affecting the most vulnerable populations (women, girls, indigenous people, Afro-Americans) and contributed to a democratic regression throughout the Americas.

In this sense, emphasis should be placed on the adverse conditions that many of the civil society organizations that comprise the CCO are facing in terms of reduced civic space: in some cases, this situation is evidenced by the difficulty in accessing public information, while in the most complex cases, threats and difficulties in the exercise of oversight and social control have been reported. Particularly noteworthy are the limitations faced by CSOs in Nicaragua, Venezuela and El Salvador.

Despite the above, one of the main results of the CCO in promoting the anti-corruption movement in the Americas is the creation of a network of organizations working together in 19 countries. Being established as a participatory space and process, the CCO has allowed the coordinated action of approximately 150 civil society organizations (regional, university, African, LGBTIQ+ , faith-based, women, indigenous-based organizations, among others), which besides following up on the policy and practical actions carried out by governments to comply with the Lima Agreement, have also participated in capacity building spaces for monitoring and assessing the effectiveness, relevance and sustainability of these actions, taking into account that *“(...) corruption generates a differential impact with respect to those who report acts of corruption, who are generally victims of threats, harassment and in some cases serious violations, such as the right to life.”* (IACHR. 2019. Page 13).

Calls to Action

In each of the 19 countries that participated in the follow-up to the Lima Agreement, a final report of national results was prepared, which reflects the particular context of each country, as well as the identification of specific recommendations and calls for action to advance and strengthen the fight against corruption. The reports are available on the Observatory's web site at (see: <https://occ-america.com/#>)

¹⁸ This index measures the levels at which corruption in the public sector is perceived. More information at: <https://transparenciacolombia.org.co/wp-content/uploads/indice-de-percepcion-de-corrupcion-2020-1.pdf>



Reinforcement of Democratic Governance:

- I. Take steps to ensure financial and legal security conditions for the development of oversight and social control initiatives carried out by civil society and respect for the human rights of those who develop such initiatives.
- II. Promote the inclusion of the gender approach and vulnerable populations in anti-corruption measures, from the planning process, through implementation and assessment.
- III. Reinforce the appointment of public officials, through open and meritocratic processes, reducing the provisional nature and the use of direct contracting mechanisms.

Transparency, Access to Information, Protection of Whistleblowers, and Human Rights, including Freedom of Expression:

- I. Establish tools to encourage the reporting of irregularities and acts of corruption, including all the guarantees and protection measures needed for the professional and personal life and physical integrity of whistleblowers in accordance with international conventions.
- II. Based on what was stated in the 2020 Corruption Perceptions Index, it should be important that the States commit to implement actions related to the budgetary strengthening, independence and autonomy of the judicial branch, as well as of the oversight and control bodies in the countries of the region.
- III. Develop statistics to evaluate the results of transparency and access to information policies in order to identify their actual impact. Ensure the creation of spaces for the dissemination of these statistics and evaluation results with civil society.

Financing of Political Organizations and Election Campaigns:

- I. Increase oversight and control by the respective electoral authorities and oversight bodies of the information reported by candidates and political parties, in order to increase penalties for illicit financing of political campaigns.
- II. Make concrete progress in the inclusion of the gender perspective in political campaign financing policies, in order to equalize the conditions of competition and access to resources between men and women candidates.



Prevention of Corruption in Public Works and Public Procurement and Contracting:

- I. Continue with the implementation of policies, platforms and tools that ensure open, transparent and accessible contracting processes for all types of population, bearing in mind data quality standards and which can be monitored in real time.
- II. Take steps to explicitly include anti-corruption clauses in all public contracts.
- III. Develop, in a participatory manner, tools for monitoring and evaluation of anti-corruption public policies, so as to enable two-way accountability, follow-up and timely social oversight by citizens.

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

- I. Establish inter-institutional cooperation relationships that render forfeiture and preventive attachment in court proceedings over corruption cases viable in practice.
- II. Ensure that the administration of assets subject to asset forfeiture proceedings over corruption offenses promotes due reparation for the victims of corruption.



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Annexes

Annex 1. Lima Agreement Follow-up Assessment Matrix.

No records	0
Low	1
Medium	2
High	3

Commitments	Argentina	Bolivia	Brazil	Chile	Colombia	Costa Rica	Ecuador	El Salvador	Guatemala	Haiti	Honduras	Mexico	Nicaragua	Panama	Paraguay	Peru	Dominican Republic	Uruguay	Venezuela
2. Strengthening judicial autonomy and independence	1.13	0.79	1.83	1.29	1.33	1.59	1.70	0.93	0.52	1.00	1.31	1.44	0.14	1.40	1.77	1.87	1.67	0.67	0.19
7. Promote gender equity and equality in anti-corruption policies.	2.27	1.15	0.83	0.00	1.17	1.67	0.07	0.52	0.42	2.00	0.00	1.00	0.38	0.67	0.17	1.44	0.56	0.00	0.33
8. Include the various groups in vulnerable situations in anti-corruption measures.	1.80	0.58	0.50	0.48	0.67	1.33	0.07	0.41	0.24	1.00	0.00	0.28	0.14	0.62	0.20	1.10	0.67	0.00	0.26
9. Ensuring transparency and equal opportunities in the selection processes of public officials	1.27	1.09	2.00	1.29	1.80	2.00	1.04	0.74	0.91	1.33	0.08	1.17	0.29	1.00	1.93	1.62	1.39	1.33	0.15
10. Promoting the adoption of measures to	1.87	1.24	1.83	1.76	1.83	2.00	1.37	0.96	0.91	2.00	0.33	1.89	0.33	1.44	1.20	1.95	1.67	1.67	0.44





prevent conflicts of interest																				
11. Furthering codes of conduct for public officials	1.73	0.79	2.00	1.24	1.57	1.67	0.48	0.37	0.76	1.00	0.94	1.50	0.24	1.28	2.00	1.82	1.87	1.33	0.30	
13. Strengthen national anti-corruption measures or systems	1.80	1.18	1.33	1.19	1.70	2.00	1.30	0.52	0.48	1.00	1.00	1.50	0.43	1.73	1.73	2.15	1.87	2.00	0.74	
14. Implement national policies and plans for open government.	2.47	1.18	2.33	1.62	1.83	1.41	2.07	1.00	0.91	1.00	0.97	1.14	0.24	1.80	1.77	2.08	1.87	2.73	0.22	
15. Autonomy and independence of higher oversight bodies.	1.00	0.82	1.00	0.62	1.13	2.00	0.89	0.89	0.33	1.00	0.06	1.00	0.48	0.93	1.60	1.97	2.07	0.33	0.26	
16. Strengthen transparency and access to public information bodies.	2.20	0.33	1.17	1.62	2.03	1.67	1.70	1.22	0.27	1.00	1.06	1.94	0.48	1.88	2.03	1.87	2.20	1.33	0.11	
18. Develop statistics to assess transparency policies.	1.40	0.36	0.50	0.81	1.50	0.00	0.93	0.37	0.12	1.00	0.00	0.83	0.24	0.87	1.07	1.97	1.37	0.33	0.15	
21. Promote legislative measures to criminalize acts of corruption.	2.00	1.15	0.50	1.10	1.39	2.33	1.63	1.04	0.58	0.00	0.39	1.61	0.33	1.67	0.40	1.77	1.47	0.67	0.33	
22. Protect whistleblowers, witnesses and informants of acts of corruption.	0.87	0.70	1.00	0.57	0.87	1.33	1.63	0.63	0.24	2.00	0.06	0.94	0.1	1.13	0.77	2.00	1.07	0.93	0.48	
25. Promote measures that promote	1.73	0.85	2.00	1.71	1.67	2.00	2.04	0.85	0.94	1.00	1.39	2.17	0.33	1.61	2.03	2.05	1.53	1.33	0.33	





transparency and accountability in electoral campaigns.																			
27. Promote the use of electronic systems for government procurement and contracting.	2.00	1.82	2.17	2.29	2.13	1.92	2.15	1.07	1.30	2.00	1.33	1.38	0.81	2.07	2.90	1.97	1.87	1.00	0.11
29. Promote the inclusion of anti-corruption clauses in all government contracts.	1.13	0.82	1.67	0.14	1.33	0.00	0.07	0.41	0.21	1.00	1.00	0.76	0.43	0.87	0.07	1.64	0.67	0.33	0.26
33. Implement measures for the reduction of bureaucracy.	2.07	1.58	1.67	2.33	1.67	2.00	1.41	1.59	1.48	1.00	0.08	0.90	1.05	2.00	3.00	1.74	1.80	2.00	0.30
37. Promote cooperation between authorities in investigations and proceedings related to corruption offenses.	2.13	1.24	2.00	0.71	1.60	2.00	1.37	1.22	1.42	1.00	1.00	1.56	0.9	1.53	1.10	1.97	1.87	1.67	0.19
41. Promote measures to allow preventive attachment, asset forfeiture and confiscation of assets resulting from corruption.	1.27	0.85	2.50	0.38	1.77	1.00	0.70	1.59	1.36	2.00	1.06	1.61	0.43	1.13	1.10	2.05	1.53	1.00	0.22
TOTAL	1.69	0.97	1.52	1.11	1.53	1.57	1.19	0.86	0.71	1.23	0.63	1.30	0.41	1.35	1.41	1.84	1.53	1.09	0.28



