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TRANSPARENCY AND PARTICIPATION
AN EVALUATION OF ANTI-CORRUPTION REVIEW MECHANISMS

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1. INTRODUCTION

Review mechanisms for international anti-corruption standards advance the anti-corruption agenda by keeping up pressure on countries to comply with their international obligations. They aim to make a fair assessment of all countries' progress based on an agreed standard and achieve good implementation through mutual evaluation and peer pressure or exchange of experiences.

Civil society contributions to review mechanisms are crucial because they can provide valuable expertise and experience and a different perspective from that of public officials. They can also help underscore the public interest in ensuring the right outcomes and help raise awareness about the processes underway. It is not possible to tackle corruption without a well-informed and engaged civil society and this also hold true for the work of anti-corruption review mechanisms.

Beyond that, civil society has rights guaranteed under international law to participate in and access information about governmental processes, including at the international level and in review mechanisms for international anti-corruption standards. Unfortunately, it is too often a struggle to achieve respect for these rights, even by bodies that are themselves responsible for reviewing enforcement of international standards. Worse than that, in some countries, anti-corruption activists are subject to reprisals.

This report investigates levels of transparency and civil society participation in the international meetings of the review mechanisms attached to anti-corruption conventions and instruments.[1] Review mechanisms include institutions, rules and processes related to reviewing the implementation of a set of anti-corruption norms.[2]

The study is based on a review of the performance of six mechanisms – three international and three regional – and the results are presented in the table in Annex 2:

- The UN Convention against Corruption (UNCAC) Implementation Review Mechanism
- The OECD Working Group on Bribery (OECD WGB) for the OECD Anti-Bribery Convention and other instruments
- The Financial Action Task Force (FATF), which reviews member state compliance with its recommendations[3]
- The Group of States against Corruption (GRECO) for the Council of Europe instruments
- The Mechanism for Follow-Up on Implementation of the Inter-American Convention against Corruption (MESICIC) of the Organization of American States (OAS) and its Committee of Experts
- The OECD/ACN Istanbul Action Plan sub-regional peer review programme

Our findings and recommendations cover the basic framework required to allow civil society to actively and meaningfully participate in anti-corruption discussions in international meetings, namely (1) published rules on access to information and civil society participation; (2) proactive online disclosure of information; and (3) onsite access to information and participation in meetings.

[1] This report does not include findings and recommendations about the functioning of review processes at the national level.
[2] Review process is a narrower term, understood as the act of reviewing or monitoring countries and discussing and adopting the outcomes of the reviews.
[3] As noted by the FATF, corruption and money laundering are intrinsically linked and this is also the view of the G20 etc., www.fatf-gafi.org/publications/corruption/?hf=10&b=0&s=desc(fatf_releasedate)

SUMMARY OF FINDINGS AND RECOMMENDATIONS

All six review mechanisms need improvement in terms of international standards for transparency and participation and most have a considerable distance to go to meet them.

- Overall, all six mechanisms lack easily accessible rules on access to information about and participation in their meetings. Three mechanisms – **UNCAC, OECD WGB**, and **FATF**-publish no access to information rules at all about their meetings and also have no rules on participation – in the case of **UNCAC** the existing rules on participation have been challenged by a small group of states resulting in their de facto suspension without any published decision to that effect. For the other three mechanisms, the rules on access to information about and participation in meetings are at least partly covered in a range of documents, including rules of procedure (**MESICIC** and **GRECO**) and the review methodology (**OECD/ACN).** Accessibility and scope of the information could be improved.
  Recommendation 1: All review mechanisms should publish rules on access to information about and civil society participation in their international meetings.

- Four of the six mechanisms –**OECD WGB, FATF, GRECO** and **OECD/ACN**- have important gaps in the proactive online disclosure of information about their meetings. This includes lack of easy online access to the schedule of meetings, agendas, lists of participants and/or meeting documents. The **UNCAC** review mechanism does relatively well in this area, as does **MESICIC**.
  Recommendation 2: All review mechanisms should publish all information required for an understanding of and potential participation in their international meetings without prior request, including online.

- There are important gaps in five of the six review mechanisms in relation to access to documents distributed at meetings, such as draft resolutions and reports and also with respect to participation of civil society representatives in meetings as observers, including the possibility of making statements, and posing questions. The **OECD/ACN Istanbul Action Plan** is the only one with good practice in this area, welcoming civil society organisations as full partners at the table when government representatives discuss the anti-corruption performance of their peers. The other mechanisms bar civil society representatives from attending their meetings and therefore on-site access to documents is also excluded.
  Recommendation 3: All review mechanisms should allow onsite access to information and participation in international meetings.

2. INTERNATIONAL STANDARDS AND PRINCIPLES

The most important standards to consider in assessing the performance of international review mechanisms are international human rights standards, including the rights to access to information and participation. Likewise, relevant international standards, such as Sustainable Development Goal 16 and UNCAC Article 13 on the participation of society, should apply to the review mechanisms and their secretariats.

Human rights review mechanisms, such as that of the UN Human Rights Council, have high standards of transparency and civil society participation and there is no reason – based on either complexity or sensitivity – why anti-corruption review mechanisms should not achieve the same level.

INTERNATIONAL STANDARDS ON ACCESS TO INFORMATION AND PARTICIPATION

Standards on access to information and participation are well established at the international level and in relation to multilateral institutions. In 2014, Maina Kiai, the UN Special Rapporteur on Freedom of Peaceful Assembly and Association noted that:

> With the increased interconnectedness in domestic and international affairs, and with decision-making at the international level having a significant impact in national policies and practices, it is essential that such decisions are made in a transparent, accountable and participatory manner. The Special Rapporteur wishes to emphasize the legitimacy of civic action at the international level and underscores the need for States to listen to the views and voices of their constituents, whether they are expressed at the domestic or the international level.[4]

The United Nations, the Council of Europe and the Organisation of American States, which each provide a home to international anti-corruption review mechanisms, are all guardians of the right of access to information, which is recognised in human rights instruments of each of them.[5] Because it is a human right,[6] it is not only the obligation of states, but also of intergovernmental entities to ensure the free exercise of this right.

The right to participation is also acknowledged in numerous international instruments, including the International Covenant on Civil and Political Rights (Article 25), which recognises the right to take part in the conduct of public affairs. As interpreted by the Human Rights Committee, this right applies not only at

[4] Special Rapporteur, "Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association", Report A/69/365 (2014), http://freeassembly.net/reports/multilaterals/

[5] The right of access to information – as enshrined in the Universal Declaration of Human Rights (Article 19), International Covenant on Civil and Political Rights (Article 19), African Charter on Human and Peoples' Rights (Article 9), American Convention on Human Rights (Article 13), European Convention on Human Rights (Article 10), and the Council of Europe Convention on Access to Official Documents – is to be protected by the courts, treaty bodies, special mandates and review mechanisms of the Council of Europe, OAS and the UN. The OECD promotes this right as part of its good governance work and the FATF also says that, "complying with FATF Recommendations should not contravene a country's obligations under the Charter of the United Nations and international human rights law to promote universal respect for, and observance of, fundamental human rights and freedoms, such as freedom of expression".

[6] Paragraph 18 of the Human Rights Committee, General Comment No 34, Freedoms of opinion and expression (Article 19), CCPR/C/GC/34, 12 September 2011.

national and local levels, but also at international and regional levels.[7] The UN Charter also includes the principle of participation in Article 71.

The Sustainable Development Goals adopted in 2015 by 193 countries include Goal 16 which calls for effective, accountable and inclusive institutions at all levels. The targets for this goal include target **16.6** **"**Develop effective, accountable and transparent institutions at all levels" and **16.7** "Ensure responsive, inclusive, participatory and representative decision-making at all levels". Inclusion, participation and transparency *at all levels* are key to Goal 16.

The preamble of the Aarhus Convention articulates the rationale for participation in decision-making in the context of protecting the environment; the same explanation holds true in the anti-corruption field. It says that such participation enhances the quality and the implementation of decisions, contributes to public awareness of the issues subject to decision, gives the public the opportunity to express its concerns and enables public authorities to take due account of such concerns.[8]

The Organisation of American States (OAS) also recognises civil society participation rights based on Article 6 of the Inter-American Democratic Charter, which acknowledges that, "it is the right and responsibility of all citizens to participate in decisions relating to their own development".

The OECD recognises the valuable contribution that civil society can make to the public policy-making process, and attaches great importance to its own consultation and dialogue with civil society organisations.[9] The same is true of the OAS[10] and the Council of Europe.[11] The OECD has prepared draft Best Practice Principles on Stakeholder Engagement to promote open and inclusive policy-making[12] The Council of Europe Conference of INGOs has issued a Code of Good Practices on Civil Participation in the Decision-Making Process, endorsed by the Council of Ministers and Parliamentary Assembly, which aims at facilitating NGO participation in the political decision-making process at local, regional and national level and is based on the four principles of participation, trust, accountability/transparency and independence.[13]

[7] General Comment No. 25, The right to participate in public affairs, voting rights and the right of equal access to public service, Art. 25, 12-07-1996. CCPR/C/21/Rev.1/Add.7.

[8] United Nations Economic Commission for Europe Convention on Access to Information, Public participation in decision-making and access to justice in environmental matters, Aarhus, Denmark, 25 June 1998, 2161 United Nations Treaty Series 447.

[9] OECD Council Meetings at Ministerial Level, "Towards a Sustainable Future", Communiqué, Paris, 17 May 2001, Section 7, http://www.g8.utoronto.ca/oecd/oecd2001.htm; see also, "Civil society and the OECD", www.oecd.org/pcd/civilsocietyandtheoecd.htm. As the OECD puts it, "This continuing dialogue builds trust in public institutions and promotes public understanding of the benefits and challenges of global economic and social change".

[10] Organization of American States, "Manual for civil society participation in OAS activities", www.oas.org/en/ser/dia/civil_society/manual.shtml. The Manual cites Article 6 of the Inter-American Democratic Charter which underscores that, "it is the right and responsibility of all citizens to participate in decisions relating to their own development" and that "promoting and fostering diverse forms of participation strengthens democracy". Similarly, Article 26 of the Charter establishes that the OAS will consult and cooperate on an on-going basis with member states and take into account the contributions of civil society organisations working in those fields. See also, "Guidelines for the participation of civil society organizations in OAS activities", CP/RES. 759 (1217/99); "Strategies for increasing and strengthening participation by civil society organizations in OAS activities", CP/RES. 840 (1361/03); "Specific fund to support the participation of civil society organizations in OAS activities and in the summits of the Americas Process", CP/RES. 864 (1413/04).

[11] Warsaw Declaration of the Heads of State and Government of the Council of Europe member States, 17 May 2005, www.coe.int/t/dcr/summit/20050517_decl_varsovie_en.asp. They made specific reference to the role of non-governmental organisations as an essential element of civil society's contribution to the transparency and accountability of democratic government. In so doing, they decided to enhance the participation of NGOs in Council of Europe activities. In July 2016, the Council of Europe ; Adopted Resolution CM/Res(2016), Participatory status for international non-governmental organisations with the Council of Europe, which confirmed that position, See also Council of Europe Recommendation **CM/Rec(2007)14 of the Committee of Ministers to member states on the legal status of non-governmental organisations in Europ**e (2007),, https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d534d https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=090000168068824c.

[12] http://www.oecd.org/gov/regulatory-policy/public-consultation-best-practice-principles-on-stakeholder-engagement.htm

[13] https://www.coe.int/en/web/ingo/civil-participation

ROLE OF CIVIL SOCIETY IN ANTI-CORRUPTION EFFORTS

The role of civil society in fighting corruption is widely recognised and for good reason. Members of civil society have valuable expertise and experience to offer and can provide a perspective different to that of public officials.

The language on civil society participation in the UNCAC is especially significant. Article 13 calls on the states parties to promote the active participation of civil society in anti-corruption efforts.

There is also specific language on this subject in the Inter-American Convention against Corruption (Article III, paragraph 11) as well as in the African Union Convention on Preventing and Combating Corruption (Article 12), which says that states parties should:

> [c]reate an enabling environment that will enable civil society and the media to hold governments to the highest levels of transparency and accountability in the management of public affairs.

The Anti-Corruption Action Plan adopted in 2003 by members of the OECD Anti-Corruption Network for Transition Economies (this later became the OECD/ACN for Eastern Europe and Central Asia) had as one of it's three pillars "Supporting active public involvement in reform" and this included quite extensive language encouraging participation of citizens in preventing corruption and ensuring their access to information.[14] Governments of the Istanbul Action Plan countries have also recognised the importance of public participation in anti-corruption efforts.[15]

As for the Council of Europe, in a resolution on corruption as a threat to the rule of law, its Parliamentary Assembly recognised "the important role of the media and NGOs in contributing to the evolution of the general attitude towards corruption and in tracking and denouncing this phenomenon".[16]

Some of the secretariats of review mechanisms also recognise the role of civil society in combating corruption and the importance of their participation in anti-corruption efforts. An example is the OECD, which recognises that:

> Civil society has a key role to play in fighting corruption, from monitoring public services, denouncing bribery and raising awareness of all economic and political actors. Since most cases of corruption involve public officials and private companies, civil society as an independent actor representing the interests of the general public is uniquely positioned to investigate and bring to light cases of corruption. Governments therefore have to take measures to enable and strengthen civil society participation and civil society has to be aware of its role and make use of its potential leverage.[17]

[14] Anti-Corruption Action Plan, 2003, www.acrc.org.ua/assets/files/biblioteka/ANTI_CORRUPTION_ACTION_PLAN.pdf
[15] The Istanbul Anti-Corruption Action Plan, progress and challenges, OECD, 2008, www.oecd.org/corruption/acn/42740427.pdf
[16] Resolution 1943 (2013) Final version, www.assembly.coe.int/nw/xml/XRef/Xref-XML2HTML-en.asp?fileid=19948&lang=en
[17] OECD CleanGovBiz, "Civil society empowerment", www.oecd.org/cleangovbiz/toolkit/civilsocietyempowerment.htm; see also, OECD, "Fighting corruption – What role for civil society?", 2003, www.oecd.org/daf/anti-bribery/anti-briberyconvention/19567549.pdf

3. PUBLICATION OF ACCESS TO INFORMATION AND PARTICIPATION RULES

The publication of access to information and participation rules and procedures is the foundation of participation, as no one can fully exercise their rights without understanding their scope and the remedies available if they are violated. This holds true for anti-corruption review mechanisms.

SURVEY FINDINGS

Overall, all six mechanisms lack easily accessible stand-alone rules on access to information about and/or participation in their international meetings and in some cases there are no detailed rules at all.

The **OECD/ACN Istanbul Action Plan** has clear access to information rules for civil society organisations participating in its monitoring processes, including at its international meetings, but it does not have rules for broader constituencies that are not formally participating. For **GRECO** the Council of Europe's general rules on access to information apply and GRECO's rules of procedure have a section on confidentiality, including confidentiality of meeting reports. General OAS rules apply to **MESICIC** and its constituting document (Report of Buenos Aires) also contains references to access to information. For all three of these mechanisms the rules are publicly accessible.

The three remaining review mechanisms – the **UNCAC**, **OECD WGB** and **FATF** – do not publish any access to information rules on their international meetings. This means that interested citizens and civil society organisations cannot rely on any available norms to assist them in accessing the details of these meetings.

With regard to participation rules **OECD/ACN Istanbul Action Plan** publishes rules online regarding civil society attendance at meetings, but they are embedded in a section of its review methodology, which is a highly technical document and not easily accessible to citizens.[18] The rules of procedure for the **MESICIC** Committee of Experts have a section on participation, but this lacks detail about on-site participation[19]. **GRECO**'s statute says its meetings are to be held "in camera".The **OECD WGB** and **FATF** lack published rules on participation and in the case of **UNCAC** the existing rules on participation have been challenged by a small group of states resulting in their de facto suspension without any published decision to that effect. The UNCAC review mechanism has established a side meeting for a limited category of NGO representatives – the annual Briefing for NGOs - but the rules for participation are not easily accessible.

[18] Istanbul Anti-Corruption Action Plan methodology for the 4th monitoring round, www.oecd.org/corruption/acn/Methodology-4th%20Round-Istanbul-Action-Plan-ENG.pdf

[19] MESICIC Committee of Experts Rules of Procedure and other Provisions, http://www.oas.org/juridico/PDFs/mesicic4_rules_en.pdf; ;The OAS Guidelines for the Participation of Civil Society Organizations in OAS Activities provide some additional detail but not all necessary information. http://www.oas.org/council/resolutions/res759.asp

PRINCIPLES AND STANDARDS TO APPLY

To ensure a reliable basis for the exercise of any right, the relevant norms must be published. For right to information these norms include the extent of the right, the scope of the rules, the procedure for requesting information, the exceptions and refusals, possible appeals, promotional measures and archival rules.

Right to information norms also entail rules on proactive disclosure, both in general terms such as categories of information, time or frequency of publication, as well as the entity responsible for publication and information specific to the review mechanism.

It is also essential that the review mechanisms publish relevant norms on participation. The rules should cover access standards, ways of reaching out to potential and actual participants and forms of participation, among other items.

The lack of published rules does not mean that these fundamental rights enshrined in international law do not exist, but it does demonstrate that these rights are not being respected by states parties and secretariats when adopting rules for their various review mechanisms.

RECOMMENDATION 1

All review mechanisms should publish rules on access to information about and civil society participation in their international meetings.

4. PROACTIVE ONLINE DISCLOSURE OF INFORMATION

Proactive online disclosure of information is an essential component of the right of access to information. It is central to the public's ability to understand and support review processes, and to the ability of organised civil society groups to participate.

SURVEY FINDINGS

Our survey found important gaps in proactive disclosure of information in relation to international meetings in four of the six mechanisms. This included deficiencies in access to timetables and agendas, lists of participants and meeting documents. The **UNCAC review mechanism** has the best online access to information about its meetings of the six mechanisms and **MESICIC** also performs well compared to the other mechanisms.

Timetables: Timetables of the meetings for the current calendar year are published for each mechanism. These are useful to provide at least a minimal level of information on the work of these meetings.

Agendas: Ahead of the meetings, the **UNCAC review mechanism** makes available the full provisional agenda of Implementation Review Group sessions, as does the **MESICIC**. The **OECD/ACN Istanbul Action Plan** publishes in advance online information about its monitoring meetings.[20] The provisional agenda of the **OECD WGB**, **GRECO** and **FATF** meetings are partially accessible; the review schedule indicates which country reports will be discussed at their meetings. (This is a recent development for the FATF.)

Lists of participants: None of the mechanisms publish a preliminary list of participants before their meetings, which prevents civil society from initiating any discussions in advance with the representatives of their countries due to attend. This may be because states parties do not provide this information to the secretariat of the review mechanism in time for the secretariat to prepare such a list

Only the **UNCAC**, the **GRECO** and **MESICIC** review mechanisms publish the final list of participants after their meetings. With respect to the other mechanisms, the public cannot find out who was present.

Meeting documents: The **UNCAC** and the **MESICIC** mechanisms also publish the list of documents tabled at the meeting and the documents themselves. The other mechanisms do not do this, which prevents the public and civil society from accessing concrete information about the content of their meetings.

For those mechanisms that adopt resolutions, decisions or statements, these are available online. Summaries or minutes of the meetings are also posted online by all the mechanisms except the **OECD WGB**.

A further issue is whether civil society submissions are published by the review mechanisms, in particular online. The **MESICIC** has the best practice of displaying all the documents of a country's review on a

[20] For example, information on the latest meeting, www.oecd.org/corruption/acn/anti-corruptionnetworkforeasterneuropeandcentralasiaseptember2016meetings.htm. The list of meetings and relevant materials are available, www.oecd.org/corruption/acn/istanbulactionplan/

country page, including the civil society submissions. Not only that, but its review timetable includes suggested timing for such inputs.

It was not possible to find any civil society submissions about country compliance on the websites of the other mechanisms; however, they could be found on the web pages of the biennial UNCAC CoSP, which oversees the **UNCAC review mechanism**. Such civil society submissions are expressly encouraged only in the **MESICIC** and **OECD/ACN Istanbul Action Plan** review mechanisms but are also sometimes submitted in the **OECD WGB**, **GRECO and UNCAC** mechanisms. Leaving aside civil society reports on compliance, the **UNCAC** review mechanism does publish civil submissions on less country-specific subjects and the **OECD WGB** occasionally organises consultations on cross-cutting topics and in those cases receives and publishes submissions from civil society.

PRINCIPLES AND STANDARDS TO APPLY

The right to access information held by public authorities is a fundamental human right, "which should be given effect at the national level through comprehensive legislation (for example Freedom of Information Acts) based on the principle of maximum disclosure, establishing a presumption that all information is accessible subject only to a narrow system of exceptions".[21] Fundamental human rights should also be given effect at the international level, which means the principle of maximum disclosure applies to international meetings of anti-corruption review mechanisms.

There are three main areas of activity of the international meetings of anti-corruption review mechanisms that can be distinguished and any exception to the principle of maximum disclosure has to be limited to the extent to which it is indispensable for the success of any of these activities.

Reviews of implementation of international anti-corruption standards

With the exception of the **UNCAC review mechanism**, international meetings of anti-corruption review mechanisms discuss draft reports on individual country implementation of international anti-corruption standards. International reviews are comparable to national reviews of the implementation of (anti-corruption) legislation.

In the international reviews, experts of other governments review the implementation of international law and a body consisting of representatives of states parties discusses the findings of the review. In the national reviews, experts of the government review the implementation of domestic law and parliamentary bodies discuss the findings of the review.[22] At national level, it is well recognised in practice that the full findings and recommendations of domestic reviews of implementation should be made public. The same logic applies to the international review of the implementation of international standards.

Policy work of international review bodies

These bodies also adopt recommendations, resolutions, decisions and statements that define anti-corruption policies and priorities for national and international level efforts and future tasks. The general

[21] Joint Declaration by the UN Special Rapporteur on Freedom of Opinion and Expression, the OSCE Representative on Freedom of the Media and the OAS Special Rapporteur on Freedom of Expression, 6 December 2004, www.oas.org/en/iachr/expression/showarticle.asp?artID=319&lID=1

[22] At the national level, it is recognised that such reviews are key to improving the quality of policy formulation and delivery methods. For example the Statutory Instruments Committee of the House of Lords of the UK Parliament pointed out that, "[i]f Departments do not know whether their previous legislation is effective, they are missing opportunities to improve the quality of both their policy formulation and delivery methods. In particular departments need to do more to evaluate how the original instrument performed before bringing forward amending regulations", www.parliament.uk/business/committees/committees-a-z/lords-select/secondary-legislation-scrutiny-committee/inquiries/parliament-2005/post-implementation-review-inquiry/. See also examples of German, www.bundestag.de/presse/pressemitteilungen/2016/neuer-inhalt/402782; Spanish www.msssi.gob.es/eu/ssi/violenciaGenero/Documentacion/seguimientoEvaluacion/home.htm; and EU law-makers www.europarl.europa.eu/RegData/etudes/etudes/join/2013/493014/IPOL-JURI_ET(2013)493014_EN.pdf

rule is one of maximum disclosure with a possible exception with respect to “the deliberations within or between public authorities concerning the examination of a matter”.[23]

Looking again at the experience at national level, the exception concerning deliberations of public bodies allows a frank exchange of opinions between public officials before the public entity publishes (a draft) document for wider consideration by parliament or another policy- and law-making entity. However, in all jurisdictions tests of public interest and harm determine whether the exception applies.[24]

Once draft policies are being discussed by parliaments or other collective entities they must be open to the public, including details of the underlying texts and reasoning. Similarly, international anti-corruption convention review mechanisms in their policy-making functions can preserve some level of confidentiality during the early preparations of texts. However, they cannot exclude the public entirely from the process and only allow access to the final products.

Criminal justice cooperation

Some of the anti-corruption review mechanisms provide forums for cooperation in concrete criminal investigations and prosecutions. Among the three areas of activity this is where most confidentiality is warranted under national and international law. Any exception has to be in line with Article 19 paragraph 3 of the International Covenant on Civil and Political Rights, which sets out the criteria for such restrictions.[25]

RECOMMENDATION 2

All review mechanisms should publish all information required for an understanding of and potential participation in international meetings without prior request, including online. This should include all the information listed in the table below.

Table1. Information and timetable

INFORMATION	SUGGESTED TIMING FOR PUBLICATION
Timetable of the meetings	Within two weeks after it is decided or adopted
Provisional agenda	Before the meeting, when the states parties receive it
Final agenda	When the states parties receive it
Preliminary list of participants	When the states parties receive it
Final list of participants	Within two weeks following the meeting
List of documents to be tabled at the meeting (as far as known)	Three weeks before the meeting

[23] See Article 3 of the Council of Europe Convention on Access to Official Documents, Council of Europe Treaty Series - No. 205, www.coe.int/en/web/conventions/full-list/-/conventions/rms/0900001680084826

[24] All right to information legislation includes a public interest test. It is a balancing exercise between the public interest in everybody’s right to information and the public interest in withholding information for a variety of reasons (such as national security, public order or public health) described as exceptions in the law. The exception regarding deliberations of public bodies is a common feature of right to information laws. In some legal systems the law-maker performs the public interest test and writes into the law which one prevails in case of conflicting public interests, while in other systems the requested public bodies and the courts have to strike a balance. See country level indicators 29-34 of the Global Right to Information Rating, www.rti-rating.org/by-indicator/

[25] Human Rights Committee, General Comment No. 34, Freedoms of opinion and expression (Article 19), CCPR/C/GC/34, 12 September 2011, paragraphs 21 and 22, www.ohchr.org/EN/ProfessionalInterest/Pages/CCPR.aspx

Documents tabled at the meeting*	Upon receipt of the secretariat of the meeting
Submissions by observers and stakeholders**	Upon receipt by the secretariat of the meeting
Resolutions of the meeting	Promptly, preferably within two weeks after the meeting
Summary/minutes of the meeting	Promptly, preferably within two weeks after the meeting
Plenary/sessions of the meeting streamed online***	Live
Archived video recording of plenary/sessions	Available at the end of the live online streaming and remains available at least until the consecutive meeting

* Exceptions may apply for parts of documents or entire documents, based on published rules on access to information.

**The reference to observers and stakeholders relates to groups who attend and/or make submissions to meetings, not including states parties and secretariats and other entities of the international organisation hosting the review mechanism.

*** Exceptions may apply for sessions that cannot be attended by observers, based on published rules on access to information.

5. ONSITE ACCESS TO INFORMATION AND PARTICIPATION

A crucial aspect of participation in anti-corruption efforts is the ability to join inter-governmental discussions by entering the room where they are taking place, taking a seat at the table and having the opportunity to express views.

Clearly such participation also presupposes access to any documents in circulation at those meetings as the basis for discussion. Making information available on the meetings is the only way of ensuring transparency and participatory nature of the mechanism and thereby increases the legitimacy of the review process.

SURVEY FINDINGS

The survey of the six review mechanisms found important gaps in the approaches of five of them in relation to onsite access to information and more active forms of participation.

Most importantly, with the exception of the **OECD/ACN Istanbul Action Plan,** civil society representatives may not participate in the formal plenary meetings of any of the review mechanism bodies, whether as active participants or observers.

The best standard in this area is established by the **OECD/ACN Istanbul Action Plan** review mechanism, covering countries in Eastern Europe and Central Asia.[26] This mechanism allows civil society representatives to attend its plenary meetings as more than observers; they are active participants. As the review manual for the Istanbul Action Plan process says:

> Participation of civil society is promoted through contribution to the preparation of the monitoring report, participation in the on-site visits and in the plenary meetings. The civil society may also contribute to the monitoring by preparing "shadow" reports which will be taken into account in the country assessment. Public participation, transparency of the monitoring process and the publication of the reports remains an important advantage and outstanding feature of Istanbul Action Plan.[27]

Further, in its practical guide for civil society, the Istanbul Action Plan states that:

> Representatives of the civil society can take part in the plenary meeting, including presenting their opinions and proposing amendments to the draft monitoring report.[28]

In the case of the **UNCAC**, civil society representatives are excluded from participating as observers in meetings of the UNCAC Implementation Review Group even though participation is foreseen by the rules of procedure of the UNCAC CoSP,[29], and even though the terms of reference for the UNCAC mechanism inclusion recognises "inclusion" as one of its guiding principles and characteristics. [30] Moreover, the IRG

[26] The countries that can participate include Albania, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Bulgaria, Croatia, Estonia, Georgia, Kazakhstan, Kyrgyzstan, Latvia, Lithuania, FYR of Macedonia, Moldova, Mongolia, Montenegro, Romania, Russia, Serbia, Slovenia, Tajikistan, Turkmenistan, Ukraine and Uzbekistan.
[27] Istanbul Action Plan, "Manual for monitoring experts", www.oecd.org/corruption/acn/IAP-Manual-Monitoring-Experts-EN.pdf; see also the "Work programme 2013 -2015", www.oecd.org/corruption/acn/ACNWorkProgramme2013-2015_EN.pdf
[28] Istanbul Action Plan, "Practical guide: How to conduct monitoring by civil society", 2014, www.oecd.org/corruption/acn/ACN-Civil-Society-Monitoring-Practical-Guide-ENG.pdf
[29] Rules of Procedure for the Conference of States Parties to the United Nations Convention against Corruption, Rule 17, www.unodc.org/pdf/crime/convention_corruption/cosp/07-80230_Ebooke.pdf
[30] "3. The Mechanism shall: (a) Be transparent, efficient, non-intrusive, inclusive and impartial", Terms of reference of the mechanism for the review of implementation for the UN Convention against Corruption, p.4,

does not discuss individual country reviews, unlike the other review mechanisms. The IRG offers civil society organisations a separate briefing day, with ambiguous and restrictive participation rules. This briefing day offers some opportunity for dialogue and exchange of views.

As to the other systems, despite the fact that the **MESICIC**[31] explicitly recognises the importance of civil society participation in a section of the rules of procedure of the Committee of Experts, representatives of civil society are generally excluded from its international meetings, although the rules provide that the Committee may invite or accept the request of a civil society organisation to be invited togive a verbal presentation of the documents they have presented. Occasionally **GRECO** and the **OECD WGB** allow an invited civil society representative to enter the room to make a statement, possibly respond to questions or comments and then leave

FATF holds formal meetings with the private sector, but not with civil society. It appears to have plans to include civil society in workshops in discussions at future Experts Meetings, but to our knowledge this has not yet materialised.[32]

PRINCIPLES AND STANDARDS TO APPLY

As noted above, the right to participation is covered in numerous international instruments and notably in the International Covenant on Civil and Political Rights (Article 25) and applies not only at national and local levels but also at international and regional levels.[33] The principle of public participation is also present in the Charter of the United Nations (Article 71).

More than a decade ago, the UN High-Level Panel on UN-Civil Society Relations issued a report specifically on civil society engagement in multilateral processes. It stated clearly,

> The growing participation and influence of non-State actors is enhancing democracy and reshaping multilateralism… [We] see this opening up of the United Nations to a plurality of constituencies and actors not as a threat to Governments, but as a powerful way to reinvigorate the intergovernmental process itself.[34]

More recently, the UN Human Rights Council, in its sessions from 2013 to 2016 passed resolutions with language that recognised the important role of civil society at the local, national, regional and international levels and "the crucial importance of the active involvement of civil society at all levels, in processes of governance and in promoting good governance, including through transparency and accountability, at all levels, which is crucial for building peaceful, prosperous and democratic societies".[35]

Human Rights Council resolutions also urge, "States to create and maintain, in law and in practice, a safe and enabling environment in which civil society can operate free from hindrance and insecurity"[36] and emphasise,

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www.unodc.org/documents/treaties/UNCAC/Publications/ReviewMechanism-BasicDocuments/Mechanism_for_the_Review_of_Implementation_-_Basic_Documents_-_E.pdf; see also, Article 13 UNCAC.

[31] "Continue to facilitate the participation and contributions of civil society organizations in the activities of the MESICIC Committee of Experts and Conference of States Parties, in accordance with their corresponding Rules of Procedure, and, when applicable, in processes relating to the implementation of the recommendations in each of the States Parties, in accordance with their domestic legislation." Inter-American Program of Cooperation to Fight Corruption, Mechanism for follow-up on the implementation of the Inter-American Convention against Corruption (MESICIC), Second Meeting of the Conference of States Parties, 20-21 November 2006, Washington DC, OEA/Ser.L/XXIII.2.2. MESICIC/CEP-II/doc.5/06 rev. 2, 21 November 2006, www.oas.org/juridico/english/mesicic_conf_est_parte_II_prog_intam_en.pdf; see also Chapter V of MESICIC Rules of Procedure, www.oas.org/juridico/PDFs/mesicic4_rules_en.pdf

[32] FATF, "Annual report 2013 -2014", www.fatf-gafi.org/media/fatf/documents/brochuresannualreports/FATF%20Annual%20report%202013-2014.pdf

[33] See Human Rights Committee, The right to participate in public affairs, voting rights and the right of equal access to public service (Article 25): 12-07-1996. CCPR/C/21/Rev.1/Add.7, General Comment No. 25. (General Comments).

[34] Report of the Panel of Eminent Persons, "United Nations – Civil society relations", "We the peoples: The United Nations, civil society and global governance", 2004, www.globalpolicy.org/images/pdfs/0611report.pdf

[35] Resolution adopted by the Human Rights Council, 1 July 2016 - 32/31. Civil society space, A/HRC/RES/32/31

[36] "Civil society space: creating and maintaining, in law and in practice, a safe and enabling environment", A/HRC/24/L.24, http://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/24/L.24

> … the essential role of civil society in sub-regional, regional and international organizations, including in support of the organizations' work, and in sharing experience and expertise through effective participation in meetings in accordance with relevant rules and modalities, and in this regard reaffirms the right of everyone, individually and in association with others, to unhindered access to and communication with sub-regional, regional and international bodies, in particular the United Nations, its representatives and mechanisms.[37]

UN Special Rapporteur Maina Kiai, in his 2014 report to the UN General Assembly on the exercise of the rights to freedom of peaceful assembly and of association in the context of multilateral institutions, observed that the rights to association and assembly apply at both national and international levels.[38]

RECOMMENDATION 3

All review mechanisms should allow onsite access to information and participation in international meetings as indicated in the two tables below.

Table 2. Onsite access

	LEVEL OF ACCESS
1	CSOs have onsite access to draft documents of the formal meeting
2	CSOs have onsite access to hard copies of all final documents of the formal meeting (if hard copies are available)

Table 3. Active participation

	TYPE OF ACTIVE PARTICIPATION
1	Formal meetings[39] are open to CSO observers[40]
2	Formal meetings allow for CSO representatives to participate in discussions; CSO participants can make interventions
3	Formal meetings are open to the media
4	The secretariat of the meeting actively reaches out in order to ensure broad CSO presence – invitations are sent to all known CSOs – and provides an enabling environment for CSOs at the meeting
5	The secretariat of the meeting announces opportunities for making written submissions
6	CSOs can submit written statements to the meeting that are distributed to the participants

[37] Human Rights Council Agenda Item 3: "Promotion and protection of all human rights, civil, political, economic, social and cultural rights, including the right to development", UNHRC, 2014, A/HRC/27/L.24, para 3., http://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/27/L.24

[38] Special Rapporteur, "Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association", Report A/69/365 (2014), http://freeassembly.net/reports/multilaterals/

[39] Formal meetings assessed in this document are sessions of the UNCAC Conference of the States Parties and of the UNCAC Implementation Review Group; meetings of the OECD Working Group on Bribery; plenary meetings of the FATF and of GRECO and meetings of the MESICIC Committee of Experts and the Istanbul Anti-Corruption Action Plan.

[40] "CSO observers" means as a result of a fair selection process a manageable number of CSOs can participate.

* Exceptions may apply for parts of documents or entire documents, based on published rules on access to information.

** Exceptions may apply for sessions that cannot be attended by observers, based on published rules on access to information.

6. CONCLUSION

Anti-corruption review mechanisms and their processes seek to determine national compliance with international anti-corruption standards and to formulate policies and priorities. However, the mechanisms are themselves performing badly when it comes to respect for international human rights standards on access to information about and civil society participation in their international meetings .

The findings of this study indicate that civil society organisations are not welcome at the table when governments discuss the anti-corruption performance of their peers, with only one exception – the **OECD/ACN Istanbul Action Plan**.

This is bad news because excluding civil society diminishes the effectiveness of review mechanisms. If they gave due respect to international human rights standards on transparency and participation, the review mechanisms would benefit from civil society expertise, experience and increased ability to reach citizens and would yield better results.

Transparency International calls on the states parties and secretariats in charge of these anti-corruption mechanisms to set a better example of how to comply with international obligations.

ANNEX 1: METHODOLOGY

This report focuses on the international meetings of the review mechanisms for anti-corruption instruments and does not assess national level processes of those review mechanisms.

The findings of this report are based on a desk review of the performance of the international meetings in relation to transparency and participation criteria drawn from international norms. The international norms considered are those in international human rights instruments, international anti-corruption instruments, as well as the principles and policies of international anti-corruption review mechanisms.

The findings were provided to the secretariats of all the review mechanisms for review and comment. The FATF declined to comment on the grounds that it does not consider itself an anti-corruption review mechanism.[41]

The findings with regard to the six mechanisms are not fully comparable because of differences in the mechanisms. One notable difference is that the meetings of the UNCAC Implementation Review Group do not discuss country review reports, whereas the meetings of the other review bodies do so.

The UNCAC CoSP is also included in our survey for purposes of comparison because it has a role in the UNCAC review arrangements: the Implementation Review Group submits recommendations and conclusions to the CoSP for its consideration and approval. However, we have not included some comparable international meetings related to review mechanisms, such as the MESICIC Conference of States Parties.

[41] Email exchanges between Transparency International and the FATF Secretariat took place in December 2016 and January, February 2017.

ANNEX 2: SURVEY TABLE[42]

	UNCAC CoSP	UNCAC IRG	OECD WGB	FATF	GRECO	MESICIC	ISTANBUL ACTION PLAN
Onsite access to information and participation							
Rules on civil society participation are published	Yes: on UNODC website under "Information for participants"[43] and on the host-country's website.	NGOs and many experts take the view that the CoSP Rules of Procedure cover IRG attendance, but some countries dispute this. There are published rules for the NGO briefings on the margins of the IRG sessions[44] in Resolution 4/6, but they are not entirely clear and arguably contradictory.	No	No	Yes: NGO Participatory rules for the Council of Europe.[45]	Yes	Yes

[42] African Union Advisory Board on Corruption, the ADB/OECD Anti-Corruption Initiative for Asia and the Pacific and the SADC Protocol against Corruption have no functioning review mechanisms; that's why these are not included in the table.
[43] www.unodc.org/documents/treaties/UNCAC/COSP/session6/V1504782e.pdf
[44] www.unodc.org/unodc/en/treaties/CAC/CAC-COSP-session4-resolutions.html
[45] https://wcd.coe.int/ViewDoc.jsp?p=&Ref=Res(2003)8&Language=lanEnglish&Ver=original&Site=CM&BackColorInternet=DBDCF2&BackColorIntranet=FDC864&BackColorLogged=FDC864&direct=true

Formal meetings[46] are open to any CSO[47]	Yes: plenary sessions of the Conference are accessible to NGOs in consultative status with ECOSOC and also “other relevant NGOs”.	No	No	No	No	No	Yes[48]
Formal meetings include discussions with CSO participants	Yes: CSOs can make statements in plenary. And discussions at Special Events.	No.	No	No	No	No	Yes
Formal meetings are open to the media	No: media representatives are invited to attend the press conference only.	No	No	No	No	No	No

[46] Formal meetings are Conference of the States Parties to the United Nations Convention against Corruption; Meetings of the Implementation Review Group of the United Nations Convention against Corruption; Meetings of the OECD Working Group on Bribery in International Business Transactions; Plenary meeting of the FATF; Plenary meeting of the GRECO; Meetings of the Committee of Experts of the Mechanism for Follow-up on Implementation of the Inter-American Convention Against Corruption; Istanbul Anti-Corruption Action Plan Meetings.
[47] “Any CSO” means as a result of a fair selection process a manageable number of CSOs can participate.
[48] www.oecd.org/corruption/acn/ACN-Civil-Society-Monitoring-Practical-Guide-ENG.pdf (page 10)

Review body holds meetings[49] with CSOs separate from formal meetings	N/A	Yes: briefings on the side-lines of the IRG[50] (Resolution 4/6). Only for NGOs that attended the previous CoSP.	Yes: periodic consultations.	Yes in principle but if so the format in which it takes place is not clear.	Yes: periodic consultations.[51]	Yes. Before the official meeting starts and only for those CSOs that have responded to the questionnaire.	N/A Since CSOs may attend the formal meeting, no separate meeting is required.
Meetings referred to in previous point are open to the media	No	No	No	No	No	No	N/A
The secretariat of the meeting actively reaches out in order to make possible broad CSO presence	Yes	Yes	No	No	No	Yes: they reach out to civil society registered under the OAS.	Yes
CSOs can deliver oral statements at the formal meetings	Yes[52]	No	No	No	Yes: occasionally.	No	Yes
Opportunities for CSO submissions are announced	Yes: but only in Rules of Procedure.[53]	Yes: to those NGOs that register.	Yes: but only when there is a public consultation.	No	No	Yes	Yes

[49] This refers to meetings on international level. An example is the UNCAC IRG's civil society briefing. http://uncaccoalition.org/en_US/uncac-bodies/implementation-review-group-irg/7th-irg/#fifth-irg
[50] www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/18-22June2012/V1254390e.pdf
[51] There are meetings organised ad hoc with CSOs, typically at the launching or closure of an evaluation round. The four evaluation rounds were launched 01.01.2000, 01.01.2003, 01.01.2007, 01.01.2012 respectively, so these meetings take place every four years on average. These meetings take the form of an "exchange of views". The only example available on GRECO's website was in 2010, www.coe.int/t/dghl/monitoring/greco/news/index_en.asp#2010. In March 2017 the High-Level Launch of the Fifth Evaluation Round included a debate with civil society participation, www.coe.int/en/web/greco/conferences/high-level-launch-fifth-evaluation-round
[52]http://uncaccoalition.org/en_US/uncac-bodies/conference-of-states-parties/sixth-cosp-st-petersburg/#coalition-oral-statements
[53] www.unodc.org/unodc/en/treaties/CAC/CAC-COSP-session6.html

CSOs can submit written statements to the meeting that are distributed to the participants	Yes	Yes: but country-specific submissions not permitted.[54]	Yes: selected CSOs can submit documents and request that they be circulated.	No	No	Yes: CSOs can submit their responses to the questionnaire.	Yes
CSOs have onsite access to draft documents of the formal meeting	Very limited: only one set of documents for all NGOs present. Increasing efforts to prevent any NGO access to draft documents previously granted.	No	No	No	No	No	Yes
CSOs have onsite access to hard copies of all final documents of the formal meeting	Very limited. Only one set of documents for all NGOs present.	No	No	No	No	Hard copies are not distributed at the meeting to anyone, but these documents are available online.	Yes

[54] www.unodc.org/unodc/en/treaties/CAC/IRG-session6.html

Proactive online disclosure of information (also for those who are not present at the event)							
	UNCAC CoSP	UNCAC IRG	OECD WGB	FATF	GRECO	MESICIC	ISTANBUL ACTION PLAN
Rules on access to information are published	No	No	No	No	Yes: general rules of the CoE apply to GRECO.[55]	Yes: general OAS rules apply to MESICIC and its constituting document also has some references to access to information.[56]	Partly: rules for NGOs participating in the monitoring are available, but not for those not participating in the process.[57]
Timetable of the meetings for the current calendar year is published	Yes: on UNODC website[58] in the 'Events' section.	Yes: on UNODC website[59] in the Events section.	Yes, but the exact dates are not indicated and it can be deduced from the Monitoring Schedule only.[60]	Yes[61]	Yes[62]	Yes[63]	Yes[64]

[55] www.coe.int/en/web/documents-records-archives-information/rules-and-procedures
[56] AG/RES. 1784 (XXXI-O/01) Report of Buenos Aires on the Mechanism for Follow-Up of Implementation of the Inter-American Convention Against Corruption, Sections 3d and 7a, www.oas.org/juridico/english/ag-res_1784_2001.pdf
[57] www.oecd.org/corruption/acn/Methodology-4th%20Round-Istanbul-Action-Plan-ENG.pdf
[58] www.unodc.org/unodc/en/corruption/index.html?ref=menuside
[59] www.unodc.org/unodc/en/corruption/index.html?ref=menuside
[60] www.oecd.org/daf/anti-bribery/Phase-4-Evaluation-Schedule-2016-2024.pdf
[61] www.fatf-gafi.org/calendar/eventscalendar/?hf=10&b=0&s=asc(fatf_date1)
[62] www.coe.int/t/dghl/monitoring/greco/meetings/Greco(2016)2%20Dates%202016.pdf
[63] www.oas.org/juridico/PDFs/mesicic5_schedule.pdf
[64] www.oecd.org/corruption/acn/istanbulactionplan/

Provisional agenda is published before the meeting	Yes: on UNODC website.[65]	Yes: on UNODC website.[66]	Partially in that the countries to be reviewed are listed in advance.	Partially in that the countries to be reviewed are listed in advance.[67]	Partially in that the countries to be reviewed are listed in advance.[67]	Yes: in the general OAS calendar.[68]	Yes[69]
Final agenda is published after the meeting	Yes, as part of the conference report.[70]	Yes, as part of the conference report.	No	No, though it can be partially deduced from the outcomes.[71]	Yes, as part of the plenary meeting summary report.[72]	Yes, linked to the meeting minutes.[73]	Yes[74]
Preliminary list of participants is published before the meeting	No	No	No	No	No	No	No
Final list of participants is published after the meeting	Yes[75]	Yes[76]	No	No	Yes[77]	Yes[78]	No
The list of documents tabled at the meeting is published	Yes[79]	Yes	No	No	No	Yes	No

[65] www.unodc.org/documents/treaties/UNCAC/COSP/session6/V1505911e.pdf
[66] www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/1-5June2015/V1501966e.pdf
[67] www.coe.int/t/dghl/monitoring/greco/meetings/Greco%282016%292%20Dates%202016.pdf
[68] www.apps.oas.org/oasmeetings/default.aspx?Lang=EN
[69] www.oecd.org/daf/anti-bribery/ACN-Plenary-Meeting-October-2015-Agenda-ENG.pdf
[70] www.unodc.org/documents/treaties/UNCAC/COSP/session6/V1508646e.pdf
[71] www.fatf-gafi.org/publications/fatfgeneral/documents/plenary-outcomes-june-2016.html
[72] www.coe.int/t/dghl/monitoring/greco/documents/2016/Greco%282016%298_Summary%20Report_GRECO%2071_EN.pdf
[73] www.oas.org/juridico/PDFs/mesicic5_acta_xxvi_en.pdf
[74] www.oecd.org/daf/anti-bribery/ACN-Plenary-Meeting-October-2015-Agenda-ENG.pdf
[75] www.unodc.org/documents/treaties/UNCAC/COSP/session6/FINAL_LOP_COSP_6.pdf
[76] www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/1-5June2015/Final_List_of_Participants.pdf
[77] www.coe.int/t/dghl/monitoring/greco/documents/2016/Greco%282016%298_Summary%20Report_GRECO%2071_EN.pdf
[78] www.oas.org/juridico/PDFs/mesicic5_acta_xxvi_en.pdf
[79] www.unodc.org/documents/treaties/UNCAC/COSP/session6/V1508646e.pdf (Annex II)

The documents tabled at the meeting are published	Yes:[80] although the draft resolutions are not published on the UNODC website and it is very challenging to find them on a UN website.	Yes	No	No	No	Yes	Yes
Resolutions, decisions or statements of the meeting are published	Yes[81]	N/A: IRG does not generally adopt resolutions.	N/A: OECD WGB does not adopt resolutions, but issues press releases.	Yes	Yes[82]	Yes	N/A: Istanbul Action Plan does not adopt resolutions, but issues press releases.

[80] www.unodc.org/unodc/en/treaties/CAC/CAC-COSP-session6.html
[81] www.unodc.org/unodc/en/treaties/CAC/CAC-COSP-session6-resolutions.html
[82] www.coe.int/t/dghl/monitoring/greco/meetings/plenarymeetings_en.asp

Summary of the meeting is published	Yes: the UNODC final report on CoSP 6[83] contains a summary of the CoSP overall in a mainstreamed language, side events[84] are summarised very succinctly in a very short way about four lines.	Yes: in the Final Report.[85]	No	Yes[86]	Yes:[87] on GRECO website a summary of the Plenary meetings.	Yes	Yes
CSO submissions are published	Yes: on UNODC website under "NGO documents".[88]	Yes[89]	Yes: on some occasions when they are invited to submit statements.[90]	No	No	Yes[91]	Partly: they are published in some cases.
Plenary/sessions of the meeting is online streamed and no registration or other screening is need	Yes	No	No	No	No	No, only the CSO part.	No

[83] www.unodc.org/documents/treaties/UNCAC/COSP/session6/V1508646e.pdf
[84] www.unodc.org/unodc/en/treaties/CAC/CAC-COSP-session6-specialevents.html
[85] www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/1-5June2015/V1504265e.pdf
[86] www.fatf-gafi.org/about/outcomesofmeetings/
[87] www.coe.int/t/dghl/monitoring/greco/meetings/plenarymeetings_en.asp
[88] www.unodc.org/unodc/en/treaties/CAC/CAC-COSP-session6.html
[89] www.unodc.org/unodc/en/treaties/CAC/IRG-session7.html
[90] www.oecd.org/daf/anti-bribery/OECD-ABC-Responses-Phase4.pdf
[91] For example: http://www.oas.org/juridico/spanish/mesicic4_hnd.htm

Plenary of the meeting is video recorded and remains online for at least until the consecutive meeting	Yes: recorded, but it is up to the host country how long these remain accessible[92]	No	No	No	No	No: only the CSO part.	No

[92] www.uncorruption.ru/en/agenda/daily/352/#broadcast ()