



THE POWER OF TRANSPARENCY

Leveraging civil society to combat corruption risks in emergency response management: the COVID-19 experience

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Leveraging civil society to combat corruption risks in emergency response management: the COVID-19 experience

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INTRODUCTION

Governments and multilateral banks have spent unprecedented amounts of public money on the COVID-19 response. As with other public emergencies, this was no black swan event, as these loans brought increased vulnerability to corruption in public procurement and spending.

Around US\$560 billion¹ is lost to corruption in the health sector globally every year², with the procurement phase being one of the areas that is most vulnerable to corruption risks³. Public health emergencies, through the increased “urgency of needs, required flexibility and requested speed”, significantly exacerbate the corruption risks in procurement⁴.

At the onset of the COVID-19 pandemic, Transparency International clarified why procurement corruption costs lives when public funds and resources intended to benefit people’s lives and improve public services are siphoned off from their proper use⁵.

More specifically, lax procurement rules and regulations, a lack of medical supplies to tackle the COVID-19 pandemic, and rushed public tenders allowing third parties to bid to supply medical equipment all had a negative impact on the quality of the selected bidders and service delivery and increased the risk of public resources being exposed to corruption. Added to this context, the pandemic revealed an increased level of undue influence from companies with close connections to national governments resulting in price gouging.

Further, as reported by some Transparency International chapters⁶, increased restriction of access to information laws and freedom of information requests from civil society have adversely affected civic oversight of how public funds have been used in governments’ COVID-19 response.

Against this backdrop, the Transparency International secretariat, in collaboration with its

10 national chapters⁷, implemented the Adaptive, Risk-Based Approaches to Anti-Corruption in Covid-19 responses (ARBAC-19) project over the course of the past two-and-a-half years. The project aimed to identify, respond and follow up on the corruption risks in emergency response funding through tailor-made anti-corruption measures at national and international levels.

This best practice report has been compiled to share the findings from the ARBAC-19 project and the chapters that took part. It presents three best practice case studies and makes global policy recommendations with a view to improving future pandemic and emergency responses.

The report provides innovative approaches, tools and methods in assisting and guiding the Transparency International movement and other civil society organisations (CSOs) working in the field of anti-corruption. It evaluates the corruption risks stemming from a public emergency context, with stories and resources developed by 10 chapters involved in the ARBAC-19 project. These diverse chapters were selected from the Americas, Sub-Saharan Africa, Europe and Central Asia, and the Middle East and North Africa regions.

In the next section, we present the research, good practices and cases identified by the 10 chapters, and describe broader global trends and findings. A case studies section then presents cases from six chapters on topics related to open data and access to information, local action and civic engagement, and the role of investigative journalism in identifying abuse and attempted misuse of COVID-19 related public funds.

SETTING THE SCENE

The COVID-19 pandemic, like other public emergencies in the past, created fertile ground for corruption, including grand corruption implicating high-level politicians, petty corruption in the delivery of health services, and procurement corruption⁸. ARBAC-19 and the implementing chapters focused particularly on procurement corruption, including the procurement of vaccines and medical supply such as personal protective equipment. One of the main reasons why corruption risks are high for procurement during emergencies such as COVID-19 stems from Advance Purchase Agreements, also known as “no regrets buying”⁹.

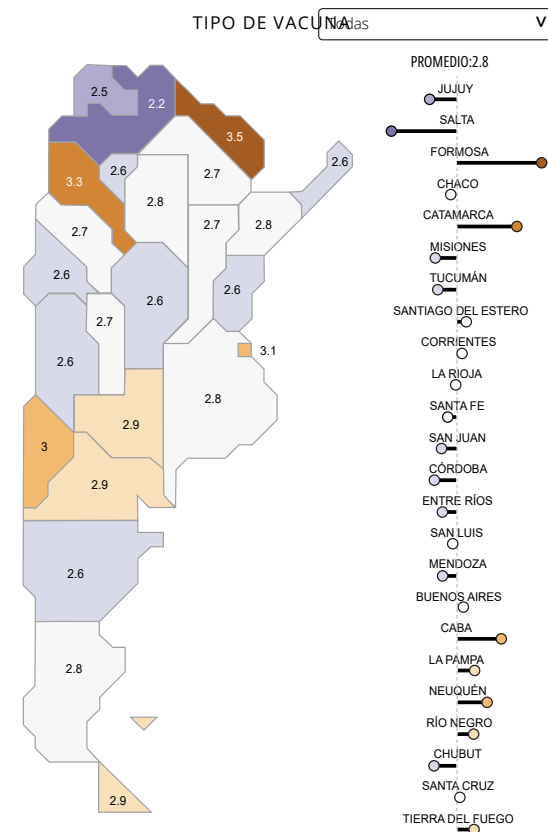
Facing reduced checks and balances, and pressure to procure and distribute the vaccines and medical supplies needed to tackle COVID-19 as quickly as possible, the 10 chapters used a variety of methods to strengthen key anti-corruption frameworks responding to COVID-19 related corruption risks. They collaborated with investigative journalists and CSOs working in the field of anti-corruption and transparency, and submitted freedom of information requests; in doing so, they also helped to identify abuse and misuse of public funds and resources earmarked for the COVID-19 pandemic.

Below is an overview of how these chapters contributed to significantly reducing corruption risks in emergency response funding (in this case, the COVID-19 response) through tailored national anti-corruption measures, tools, research, as well as collaboration with civil society and journalists.

For Poder Ciudadano, Transparency International’s chapter in Argentina, the first key step was to develop an evidence-based advocacy strategy. This meant identifying relevant documents and processes to be monitored by civil society; detecting information gaps; and using freedom of information requests as an advocacy tool.

To that end, Poder Ciudadano started collecting data on the number of vaccine doses received; the number of vaccines contracts concluded; and the sums of money invested in purchasing COVID-19 vaccines under the

COVID-19 VACCINE DISTRIBUTION AMONG THE DIFFERENT PROVINCES IN ARGENTINA



Source: COVID-19 Vaccine Observatory, Poder Ciudadano, vaccine distribution according to different provinces, <http://vacunas.poderciudadano.org/>

monitoring tool of the Observatorio de vacunas COVID-19 (COVID-19 Vaccine Observatory). The Observatory enabled Poder Ciudadano to make the information gaps on COVID-19 vaccination, procurement, and distribution publicly available. Even though Poder Ciudadano requested the contracts of the COVID-19 vaccines and information related to the negotiations, this was denied on the grounds of confidentiality clauses. Since the greater good and public resources are at stake, Poder Ciudadano continues its efforts to be given access to the contracts through strategic litigation.

Websites such as the COVID-19 Vaccine Observatory allow civil society and the general public to access vital information about the vaccines that have been purchased and how they have been distributed among different regions of the country.

Poder Ciudadano also published reports such as the [COVID-19 Vaccine Observatory: Initial findings and recommendations](#) to share analyses and diagnoses of their COVID-19 vaccine monitoring and freedom of information processes.

The report highlighted the lack of information on vaccine purchases as well as the minimal transparency and integrity requirements established in the area of vaccine procurement. In light of their findings, Poder Ciudadano recommends:

- + That the government guarantees effective access to documents through official channels and publishes information proactively (and not only following requests by citizens or civil society);
- + That proper tracing strategies are used for purchases, through consistent labelling in documents relating to the purchase, distribution and administration of vaccines¹⁰.

Based on Poder Ciudadano's experience, in parallel to monitoring and generating evidence, it is essential to create sustainable alliances with CSOs (including the other Transparency International national chapters), journalists as well as oversight and audit bodies to promote the effective [protection of rights](#) and accountability and to tackle corruption. These alliances effectively contribute to strengthening advocacy strategies and informing [non-specialised audiences about these issues](#).

Asociación para una Sociedad más Justa, (ASJ), Transparency International's chapter in Honduras, developed an [online interactive platform, Vacunas Abiertas](#), where they regularly share the results of their assessment of the COVID-19 vaccine rollout in the country. They also made a comparison within the Central American region.

■ Key learning 1

Platforms such as Vacunas Abiertas (Open Vaccines) and the COVID-19 Vaccine Observatory strengthen public oversight by allowing citizens and civil society to closely monitor vaccination rates and see who the vaccine providers are for each region or district. These databases, in turn, give Transparency International chapters and broader civil society the opportunity to have direct exchanges with relevant local and national public authorities and enable them to share their local expertise in the implementation on available transparency and accountability frameworks in preventing and responding to corruption risks in the COVID-19 context.

Transparency International Hungary

conducted research on the transparency of tourism subsidies allocated in response to the COVID-19 outbreak in the country¹¹. Their findings provided a clear picture of the cost of corruption during an emergency such as the COVID-19 pandemic. In their [analysis](#)¹², TI Hungary found that a large share of these public resources – a record amount of direct grants worth almost 219 billion Hungarian forints

Photo: Transparency International Hungary



(US\$649million) – went to a narrow circle of recipients, in which pro-government businesses and municipalities were over-represented. TI Hungary also found that the recipients of the 100 largest grants took more than 70 per cent of the total sum earmarked, equal to around 158 billion forints (US\$468 million) – while also noting that a hotel chain owned by the Hungarian prime minister’s best friend received 18 billion forints (US\$53 million).

TI Hungary’s research revealed broader weaknesses in public procurement and grant allocation, including the lack of calls for public tenders, inadequate selection criteria for beneficiaries and conflicts of interest in the final selections¹³. Following their research findings, TI Hungary resorted to litigation¹⁴ in the absence of key information on the procurement of key medical supplies (such as ventilators and vaccines) as well as the distribution of tourism subsidies in the country. As a result, TI Hungary won all three cases at the Supreme Court, which were initiated in 2021 after their freedom of information requests on grants in tourism in Hungary were refused. Subsequently, the relevant government bodies shared several thousand documents with TI Hungary concerning the disputed tourism grants. Recently, the chapter filed a complaint regarding the insufficient compliance by government authorities to release the public information requested.

■ Key learning 2

Research and data analysis conducted by civil society keeps the broader public informed about how public resources and funds are utilised and distributed, particularly in the context of a pandemic when resources are limited and there is an urgent need to respond to the public health emergency. This shows the crucial role that access to information has in protecting citizens’ rights. Strategic litigation is another tool civil society can use if public interest information is not available and if freedom of information requests are not successful.

Transparency International Kyrgyzstan, on the other hand, developed a study on the price analysis of the public procurement of medical supplies during the COVID-19 pandemic, with targeted recommendations. As part of

the study, a total of 2,710 tenders and 2,121 direct contracting method procurements were analysed for the period between March 21, 2020 and March 2022. The study made a comparison of prices of medicine before and during the pandemic. Based on its findings, TI Kyrgyzstan held several meetings with the public procurement department to discuss changes to the public procurement law to increase transparency and accountability, which were later taken into account when the new law was being drafted.

TI Kyrgyzstan also carried out a study assessing corruption risks in public procurement during the COVID-19 pandemic in the country. TI Kyrgyzstan developed their own web portal¹⁵ with 28 red flags it had identified on the government’s public procurement website. Their analysis of the government’s web platform on public procurement also paved the way for exchanges with the Asian Development Bank and European Bank for Reconstruction and Development, leading to recommendations on how it could be improved.

During the project, **Transparency International Lebanon** developed the Access to Information Index, which measures the Ministry of Public Health’s compliance with proactive disclosure regulations on issues related to the aid received as part of the state’s COVID-19 response, within the legal framework of the right to access to information.

As part of its evidence-based research and advocacy work, TI Lebanon also developed a desk report on the country’s pandemic preparedness and crisis management, including a detailed stakeholder analysis and information on other governments’ responses to COVID-19. The report also included interviews with key witnesses to provide further context on key good governance indicators in the management of the pandemic. These indicators included accountability, transparency, effectiveness, leadership, integrity, and stewardship. This detailed analysis of the Ministry of Public Health’s financial management, and of the World Bank and UN funds, as well as the access to information monitoring findings, has helped TI Lebanon develop targeted recommendations combined with advocacy communications tools

that raise awareness of their research findings among key stakeholders and the general public. These were wrapped up in a [practical guide](#), complementing the assessment report, coupled with training videos, and disseminated in a multistakeholder advocacy meeting. The meeting culminated in joint efforts between TI-Lebanon, the Knowledge To Practice institute at the American University of Beirut working on good governance in the public health sector, and relevant deputy members and representatives of local and international organisations. Stakeholders who took part in the meeting called for more transparency and accountability in the management of the public health sector, as well as for budget integration of the sector's public financial resources.

Transparency International Zimbabwe held several Parliamentary interface meetings, involving various parliamentary portfolio committees such as the Public Accounts Committee and the Committee on Health and Child Care. One such meeting from July 2022 provided an opportunity to discuss the public procurement challenges in Zimbabwe in the context of the pandemic. The Public Accounts Committee also drew attention to the findings of its own report released in May 2022, in response to a special audit report by the Office of the Auditor General on the financial management and use of public resources in tackling the pandemic.

The Committee used the meeting with TI Zimbabwe to amplify its calls for the Zimbabwe Anti-Corruption Commission, and the Zimbabwe Republic Police to investigate and prosecute the perpetrators who were found by the Office of the Auditor General to have abused COVID-19 resources. The meeting also called for the government to accelerate e-Procurement as a "mechanism to institutionalise transparency and accountability in the procurement of public COVID-19 resources".

A similar meeting on 2 February 2023 generated consensus among stakeholders on the specific policies that need to be reviewed to address the misuse of COVID-19 public resources. This included the need for urgent reforms to the country's disaster management legislation, particularly the Civil Protection Act, which has

not been amended since 1989. The Act in its current form does not reflect contemporary developments in terms of disaster management responsiveness and stakeholder inclusivity, which are necessary for the transparent use of public disaster management resources. Such engagements demonstrate the role that civil society can play as a convening power and as part of successful evidence-based advocacy initiatives. TI Zimbabwe supported these policy dialogues with four policy briefs that made key recommendations for adopting e-Procurement; implementing recommendations from the Office of the Auditor General's report on the use of COVID-19 resources; establishing the role of parliamentary oversight for monitoring abuses in the use of pandemic public resources; and examining the gender dimensions in the use of COVID-19 relief funds¹⁶. All these resources contributed significantly to TI Zimbabwe's efforts to address the integrity and accountability gaps in the public procurement system in the context of the pandemic, while also including recommendations for improving transparency and accountability mechanisms in the delivery of public services and use of public funds.

■ Key learning 3

As demonstrated earlier in this compilation, evidence, data, and research are key in a successful advocacy strategy and strengthen the buy-in from key (national) institutions and oversight bodies.

The good practices, tools and research shared above aim to demonstrate the important role of multi-stakeholder partnerships (civil society, journalists, oversight bodies), clean procurement, open data and access to information channels in reducing corruption risks in emergency response funding and procurement, and in strengthening anti-corruption frameworks through tailor-made anti-corruption measures that are sensitive to local contexts.

CASE STUDIES

Transparency International's global website published a best practice blog series featuring three case studies that highlight the good practices of ARBAC-19 chapters. These case studies are presented from a storytelling perspective and aim to inspire civil society to respond effectively to emergencies such as the COVID-19 pandemic.

The first case study is on open data and access to information, and their importance in protecting public resources (services and funds) during the COVID-19 pandemic.

The second blog is about the role of civic oversight and social audits in identifying the state of transparency and accountability in the governments' COVID-19 response and how some Transparency International chapters came up with innovative and visually compelling tools and indices in capturing that.

Last but not least, the third case study touches upon the role investigative journalists can play in unearthing alleged cases of misuse of public funds and resources that were meant to serve the general public and its health as a response to the pandemic, and how some Transparency International chapters collaborated with journalists by offering capacity building, training and mentoring to help them identify and develop selected stories.

CASE STUDY 1: OPEN-DATA SOLUTIONS TO GOVERNMENT OPACITY DURING COVID-19

It is early 2021, and like millions of school students around the world, Issis Reconco Moncada is learning remotely from home over a video call. Just as the teacher explains the key point of the lesson, the internet cuts out.

For the 19-year-old from Honduras, it is an all-too-frequent occurrence. There is little internet access in her village, and she relies on mobile data packets to be able to follow lessons and complete homework. This is an extra expense; so alongside her studies, she now has to work on a nearby farm pruning tomato plants.

Issis is not alone. Only four in ten Hondurans have access to the internet. Of the 1.7 million students enrolled across the country in April 2021, one million were not able to receive virtual classes due to lacking internet access. Across the country, schools remained closed because even though vaccines were available, they were not being administered to teachers in rural areas, meaning young people like Issis were cut off from their education.

Opacity in pandemic responses

Also in 2021, a series of alarming allegations reached Poder Ciudadano, Transparency International's chapter in Argentina. A nursing mother was yet to receive an appointment for her booster vaccination, yet others with lower prioritisation for vaccines had received theirs. In February, news reports emerged of a list of mid-level government officials – including young aides – and family members who had allegedly received vaccinations, “breaking with protocols that essential workers at hospitals and senior citizens be first in line”. Soon after, the resulting scandal led to the minister of health resigning from his position.

In many countries like in Honduras and Argentina, the procurement and distribution of COVID-19 vaccines were surrounded by an information deficit. Key statistics like how many doses were available, when they arrived and how they were being administered were missing. Sometimes, people weren't able to find out their health ministries' own rules and procedures for the vaccination campaign. Without this information in the public domain, it was impossible to ensure that vaccination doses weren't being used to grant political favours, that the well-connected weren't jumping the

queue, and that rules to protect the most vulnerable existed and were being adhered to.

But these opacity problems were not just limited to vaccines.

In 2020, the Hungarian government announced a programme of direct payments to tourism businesses, which were struggling from the impact of lockdowns, international travel restrictions, and economic slowdown in other sectors. The government distributed more than two hundred billion forints (US\$0.6 billion) in almost 16,000 grants during 2020. It would later be reported that one of those grants went to a hotel chain owned by Hungary's wealthiest person, a close friend of Prime Minister Viktor Orbán, who supposedly received 17.7 billion forints (US\$55 million) to renovate 14 properties. The government said the grants were designed to protect workers, but the hotel chain still laid off a third of its staff.

All told, three-quarters of the funds went to tourism companies close to the government, including those controlled by advisors to the agency that distributed the grants. According to Transparency International Hungary's analysis, the funds were often distributed without a public call for tenders and with no visible criteria for recipients or even public information about the application process. The analysis also shows that the whole process was burdened by conflicts of interest and huge layers of opacity.

Delivering critical information to the public

The COVID-19 pandemic has brought uncertainty and precarity to millions. Insufficient access to information has exacerbated these problems. The more the public is in the dark about how their resources are being handled, the greater the risks of corruption, arbitrary decision-making and unfair access to life-saving vaccines and treatments.

A key part of Transparency International chapters' response has been to bring this critical information to light.

In Honduras, La Asociación para una Sociedad más Justa compiled information about the vaccination campaign from government press releases, news reports, social media posts and conversations with contacts at the Ministry of Health to create the Vacunadas Abiertas website.

Poder Ciudadano used freedom of information requests to gather information about contracts with vaccine providers and the distribution of COVID-19 vaccines for their online vaccine information portal. They also created a tool for people to report irregularities. About a month into the campaign, the government of Argentina began to publish some information about its contracts with vaccine providers – but not how doses were being distributed. The exercise has revealed important gaps in the country's freedom of information system and differences in how the same national law is implemented regionally. Following Poder Ciudadano's work, the government audit office announced that it would examine both the vaccine procurement process and compliance with the country's strategic vaccination plan.

Transparency International Hungary published a study of the tourism grants programme to aggregate and make available data on the scheme that was buried in PDF documents. Some of the most egregious examples from the programme were presented as an alternative guide to tourism in Hungary and featured this August in an exhibition at the Sziget Festival. Major red flags became the basis for several freedom of information requests. The government of Hungary is currently appealing decisions to grant Transparency International Hungary access to these important documents.

Elsewhere, as in Honduras, government officials engaged with the chapter's work and started providing data to feed into the digital platform. In the absence of an equally user-friendly platform from official channels, journalists, civil society and even government officials turned to Open Vaccines to guide their work. This allowed the ASJ team to initiate investigations and formulate policy proposals that could impact the lives of Issis and other Hondurans for the better.

One key recommendation was to prioritise vaccinations for teachers in municipalities

that are the poorest, most rural and had fewer cases of COVID-19; places where young people like Issis were at risk of falling out of the education system. Following [ASJ's report](#), the Ministry of Health and the Ministry of Education announced in June 2021 that they would initiate vaccination for all teachers in the country and open vaccination centres in the municipalities recommended by ASJ.

The right to information underpins other human rights

The COVID-19 pandemic has reinforced that access to information is fundamental for allowing people to ensure that their governments are providing goods and services in a way that guarantees and protects their basic rights.

As these examples from Transparency International's work to [combat corruption amid the COVID-19 pandemic show](#), access to information is crucial for protecting rights, including the rights

On this International Day for Universal Access to Information, let's remember that information is power, and it belongs in the hands of the people.

CASE STUDY 2: EMPOWERING LOCAL ACTION AGAINST CORRUPTION IN COVID-19 RESPONSES

Thirty-year-old Luiz Carlos Guedes – known to everyone as Luti – lives near Marajó, a picturesque but remote island in the northeast of Brazil, where the rivers of the Amazon basin meet the Atlantic Ocean. Marajó belongs to the federal state of Pará, which has one of the [lowest human development index](#) scores in the country. Throughout the island's modern history, its largely Black and traditional population has frequently been left out of decision-making that impacts it, leaving communities vulnerable to risks like food and livelihood insecurity, says Luti.

This, in part, is why in 2020 he founded [Observatório do Marajó](#), a grassroots organisation promoting government transparency on the island.

As the COVID-19 pandemic reached Brazil in 2020, Luti watched with concern. The disease was relatively slow to arrive in this isolated region, but even so the local authorities did not seem to be taking the opportunity to prepare. When cases started to quickly spread, it seemed to Luti and his colleagues that public resources were being used more to strengthen political leaders' positions than help the most vulnerable. "We were very, very concerned because there were no structures in place to assist communities in the most rural areas, and no strategy for how resources would be used," says Luti. "Local politicians just wanted to connect their own image to the response to the crisis."

A small organisation like Observatório do Marajó could not easily reach or influence local officials. Despite their best efforts, they still did not have a seat at the table.

Meanwhile in São Paulo, Transparency International Brazil had similar concerns about how the government's response to COVID-19 was playing out at the local level.

Municipalities in Brazil have vastly differing levels of transparency and openness. Many did not publish even the most basic information about their activities and use of public resources on their websites. As local government offices became the front line in the fight against the pandemic, it became more vital than ever to ensure that resources essential for the wellbeing of the many were not abused for the benefit of the few.

Yet, even identifying where the gaps lay was an enormous challenge.

To overcome this, Transparency International Brazil developed a [system of over 90 indicators to assess municipal transparency](#) – asking whether information like officials' schedules, department budgets, and public contracts are published online. The chapter partnered with eight local non-governmental organisations around the country to put the methodology into practice. Observatório do Marajó was one of them.

These local grassroots organisations eventually [assessed over 180 municipalities](#) using the framework developed by Transparency

International Brazil. Members and volunteers from the grassroots organisations received training in how to apply the survey, and classes to develop their skills in areas like communications, fundraising and advocacy.

With [alarm bells ringing worldwide](#) over corruption in responses to COVID-19, other Transparency International chapters were also harnessing the power of engaged citizens on the ground.

In Honduras, La Asociación para una Sociedad más Justa (Transparency International Honduras) [tracked the government's roll out of COVID-19 vaccines](#). Their staff and volunteers around the country presented their findings to local health officials and pushed for greater transparency about how vaccines were being allocated, distributed and administered. The meetings put engaged local citizens in direct contact with officials and backed up their efforts with advocacy and expertise from our chapter in Honduras.

Transparency International Zambia, meanwhile, kept watchful eyes over 4 million Zambian Kwacha (over US\$200,000) that the World Bank had allocated to dozens of local health offices to support the country's fight against COVID-19. Local teams in 13 districts and seven provincial capitals helped [monitor how these funds were actually being used](#), with support from our Zambian chapter to verify data and ensure accuracy.

Together with the people in these regions, Transparency International Zambia revealed that some districts had not yet received the funds allocated to them. In others occasions they could show that the funds had been delivered but had not yet been brought into play.

As in other countries, even obtaining information about the use of funds at the local level was a challenge. Fortunately, our Zambian colleagues were able to build on the earlier success of local monitoring teams that had tracked donations pledged to the fight against COVID-19. Thanks to these existing relationships, health offices more readily shared information about the World Bank funds. As in Brazil and Honduras, the monitoring project became a way for local communities to engage with local public offices,

sharing findings and proposing improvements that benefit public health.

Back on Marajó, Luti got a seat on the table and brought his organisation's findings to officials at meetings attended by Transparency International Brazil. Positively, 12 of the 17 municipalities assessed by Observatório do Marajó have engaged with the findings and recommendations for more transparent local government. All over Brazil, municipal governments have responded to the transparency assessments carried out by grassroots organisations. Some have already begun making improvements, such as posting officials' schedules online and creating digital scheduling tools to improve public access to health services.

This, in turn, has opened doors for the local civil society organisations. Observatório do Marajó now has a bigger platform for its other work on deforestation and corruption – which is vital not just for Pará and Brazil, but the entire planet: in 2021 alone, the state of Pará [lost 692,000 hectares](#) of natural forest – equivalent to about a thousand football pitches.

Crucially, says Luti, the project put power in the hands of people who have not normally been able to influence the decisions that affect them. "It was rare and powerful to see our project manager Ediane Lima – a Black woman from a traditional riverside community – leading a process with the municipalities in her region, who listened to her recommendations on how to improve transparency."

CASE STUDY 3: EQUIPPING INVESTIGATIVE JOURNALISTS TO EXPOSE COVID-19 CORRUPTION

In 2020, with the impacts of the COVID-19 pandemic hitting Zimbabwe, investigative journalist Brenna Matendere started receiving alarming tips from members of the public.

The government had tasked the state-owned mobile telecoms company NetOne with dispersing ZW\$89 million (equivalent to US\$1 million at the time) to members of the public via

its mobile money service OneMoney, including by distributing SIM cards pre-loaded with funds. The scheme was supposed to protect some of the most economically vulnerable people in society – including people with disabilities, the elderly and chronically ill – from the worst effects of the lockdown imposed to curb the spread of the virus.

But, just a month before payments were meant to begin, some of those who were supposed to benefit told Brenna that they had been excluded from the programme. So, what would happen to the money meant for them?

For Brenna, the story was an important opportunity to expose the corruption in Zimbabwe's public institutions. Zimbabwe scores just out of 23 of 100 on the Corruption Perceptions Index, indicating that corruption is rife in the country's public sector. As the pandemic made many Zimbabweans more reliant on the state to protect their lives and livelihoods, this corruption brought extra dangers.

But digging into such a story in Zimbabwe is no easy task.

According to Brenna, funding in the Zimbabwean media is so limited that journalists must often use their own money to pursue a major investigation. If investigative teams exist at all, the time and budget needed to develop rigorous investigations is not available. Newsrooms are understaffed and under resourced; there is scarcely enough time to produce daily news coverage, let alone long and detailed investigations.

Furthermore, the state suppresses critical coverage. Zimbabwe ranks 137 out of 180 countries on the world press freedom index by Reporters Without Borders. During the pandemic, prominent Zimbabwean investigative journalist Hopewell Chin'ono was arrested three times in six months after he helped expose a US\$60 million public procurement scandal that led to the sacking of the health minister. Cases like his have a chilling effect and deter other journalists from investigating government corruption.

Worryingly, recent draft legislation to protect whistleblowers in Zimbabwe is at risk of being

neutralised by a bill that will shrink the space for civil society organisations. In February, the parliament passed the Private Voluntary Organization (PVO) Amendment Bill, which human rights organisations have warned will give the executive branch wide-ranging powers to interfere in civil society organisations' affairs and undermine citizen engagement in anti-corruption.

To respond to these challenges and promote accountability for the abuse of public COVID-19 resources, in April and May 2022, Transparency International Zimbabwe trained 35 journalists to produce high quality and high impact investigative stories on corruption in public procurement involving COVID-19 funds.

The chapter supported six investigations, including Brenna's work on NetOne, which was published in The News Hawks, an independent reader-funded digital newspaper. Brenna and the other journalists received a grant to cover the time and cost of the investigation. Three experienced investigative journalists acted as their mentors. This helped strengthen Brenna's reporting, which focused on two regions where NetOne payments went missing.

Brenna obtained the lists allegedly used by NetOne to distribute SIM cards. Sources in NetOne also gave her information. Whereas SIM cards were meant to be collected from government offices, reportedly they were sometimes collected from NetOne offices directly by third parties. According to Brenna's reporting, this was "a major loophole that resulted in leakages of the funds to the benefit of NetOne employees and their connections."

Her reporting found that in the two years since the scheme was implemented, the mistakes made have not been corrected. A report by the Auditor General – in charge of auditing government programs in Zimbabwe – detailed this and other abuses of COVID-19 relief funds. In an interview for Brenna's News Hawks article, they called for tougher measures to prevent funds ending up in the wrong hands.

Zimbabwe is not alone in facing these challenges. In Zambia, official reports have pointed to the scale of corruption and mismanagement in the public sector, including the health system.

Like in Zimbabwe, the media's capacity to investigate and hold power to account is severely constrained by a lack of resources and supportive legislation, such as a freedom of information law. That's why Transparency International Zambia trained 20 journalists, and has supported an investigation into [fraud involving COVID-19 vaccine certificates](#).

In Zimbabwe, the NetOne scandal appeared in [another of the](#) investigations supported by the chapter, helping the public gain a detailed picture of the corruption that undermined

the programme. For Brenna, the funding and support provided by Transparency International Zimbabwe made a vital difference, and skills gained from the mentor – such as reporting fact checking, balancing the sides of the story, sticking to a hypothesis and using multi-media – will help her future work.

Now, the government of Zimbabwe should play its part, and support the country's brave and talented investigative journalists, recognising the vital role they play in protecting public resources meant for the most vulnerable.

CONCLUSIONS AND RECOMMENDATIONS

Emergencies require public authorities to respond rapidly and efficiently, in many cases in a context of reduced public scrutiny, less stringent procurement mechanisms and fewer controls in the expenditure of funds. This opens the door for resources to be allocated discretionally and to be captured by private interests.

COVID-19 was not an exception. The amount of funds lost during the pandemic due to mismanagement and malpractices highlighted the importance of transparency, accountability, and strong anti-corruption frameworks in managing public resources during emergencies. The lack of civic monitoring and anti-corruption controls directly undermined countries' capacity to face the challenges posed, and significantly affected access to vaccines, medicines, and medical supplies for their populations. This section builds upon the lessons learned from the ARBAC-19 project and the efforts our chapters have made to safeguard COVID-19 funds. Its scope extends beyond the pandemic, aiming to emphasise policy recommendations and best practices to guarantee the protection of funds in emergencies and crises.

The pandemic highlighted the corruption risks that can emerge in the management of resources in emergency scenarios. Governments receive a significant influx of resources to be spent in a timely and efficient way in response to the crisis, in a context of flexible controls, limited accountability, and a lack of oversight. In addition, many countries that receive humanitarian and emergency funds suffer from weak institutions, low absorptive capacity, instability, and kleptocratic and clientelist networks.

Countries with higher challenges in terms of governance are also predicted to be the most affected by crises, including natural disasters, armed conflict and health emergencies. To face future challenges derived from crises, and guarantee that emergency resources

are used in the best manner, strong anti-corruption, accountability, and transparency frameworks must be put in place. The policy recommendations included in this compilation report aim to contribute to the transparent management of resources. These are not limited to the health sector but rather seek to strengthen the capacity of donors, governments, CSOs and citizens to minimise corruption risks in emergency contexts.

RECOMMENDATIONS TO MANAGE EMERGENCY FUNDS

Combating corruption, enabling accountability mechanisms, and promoting transparency in the management of emergency funds requires prolonged and committed engagement by multiple stakeholders. These include the donor community, governments recipients of funds, CSOs and citizens. The policy recommendations and best practices included in this section use open data and open contracting, civic oversight and multi-stakeholder approaches to achieve this goal.

Fostering transparency: open data and open contracting

To build trust, guarantee the effective use of resources and enable effective coordination among stakeholders, donors and governments should be "open by default"¹⁷. Using existing technology to publish open data, all financial contributions, expenditure, and activities should be published in a clear, accurate and

timely manner. In a crisis, in which strict controls and procedures may be suspended, providing open and transparent information is key for identifying and mitigating possible corruption risks, and ensuring effective monitoring and accountability.

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- + Digital tools should be used to integrate information systems on publicly accessible platforms. As well as financial contributions and a registry of emergency funds, donors and governments should publish activity plans and clearly link spending commitments to objectives and desired outcomes in the framework of the crisis.

- + Governments should publish all information regarding the decision-making process. This will allow citizens, CSOs and academia to scrutinise the data and understand the reasoning behind the decisions that are being made.

- + All information should be centralised in a publicly available and dedicated information platform, updated in a timely manner, and made available in all local languages.

- + A map of the emergency needs and resource flows should be developed, enabling policy makers and practitioners to integrate and visualise data, increasing the traceability of resources and making it easier to identify red flags in their disbursement. A variety of information systems should be used to inform beneficiaries of the nature and level of support they are entitled to. The methods in which support is being delivered should be clearly communicated as well.

- + Disbursement of resources and support should be transparently tracked and communicated (particularly in regard to conditional transfers). The information published should be broken down by key

During the project, **TI Lithuania** focused on the monitoring and publication of the EU’s Recovery and Resilience Facility (RRF) funds¹⁸. The Facility will disburse €672,5 billion in loans and grants to the Member States to mitigate the economic and social impact of the COVID-19 pandemic and make European economies and societies more resilient and better prepared for future challenges. According to a study carried out by the Open Spending EU Coalition to which TI Lithuania belongs, there is a general lack of commitment to the transparent spending of national RRF funds. Of the 22 EU Member States analysed, it was found that 13 were intending to create a single portal to proactively publish the information; however, only two countries provided accessible and open data on the spending, one committed to publishing audit reports, and two promised to publish full information on final recipients¹⁹.

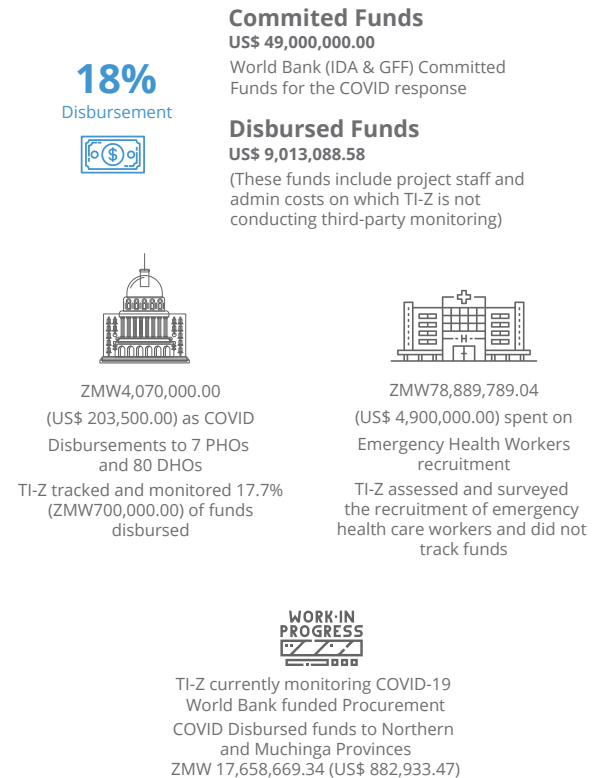
With the Coalition, TI Lithuania jointly developed an open-data methodology to increase the levels of transparency in the spending of RRF funds. They also coordinated monitoring action in 11 countries: Bulgaria, Croatia, Czechia, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia, and Slovenia. The methodology measures: 1) What information is made public, and 2) How information is published. TI Lithuania and Open Contracting Partnership prepared a [report](#) with detailed country scoring, main insights, lessons, recommendations and solutions aimed both at the EU institutions and the Member States, as well as an interactive self-assessment tool for other Member States.

socio-demographic indicators such as sex and geographical distribution, among others. This will help to avoid “ghost beneficiaries” and guarantee that the resources are being allocated to those who need them the most.

Clean procurement

Public procurement is one of the areas most vulnerable to corruption risks during a crisis. The need to act quickly and efficiently often results in accelerated public procurement and contracting, leading to non-competitive procedures in the allocation of major contracts and resources ending up in the pockets of well-connected groups²⁰. Donors and governments are encouraged to maintain anti-corruption safeguards as much as possible in procurement processes, and to find a balance between safeguards and a swift emergency response.

COMMITTED VS. DISBURSED WORLD BANK FUNDS FOR THE COVID-19 RESPONSE IN ZAMBIA



Source: CODOT website, Transparency International Zambia, <https://codot.tizambia.org.zm/>

TI Zambia undertook an integrity screening of the COVID-19 suppliers, analysing possible malpractices from businesses that were awarded major contracts by government ministries during the pandemic. The screening was developed in response to the irregularities identified in audit reports carried out by the Office of the Auditor General and TI Zambia's COVID risk maps. Among the key findings included in the report are the disregard of due diligence rules by state authorities; inconsistencies in procurement processes; the lack of beneficial ownership information disclosure; and identifiable links between business shareholders and people involved in politics.

Furthermore, TI Zambia developed a tracker to monitor the flow of World Bank funds. The exercise was carried out by third party district monitoring teams in seven provinces and 13 of the 80 district health offices in the country. Among the recommendations for future disbursements, TI Zambia emphasised the importance of better management and guidance in the use of funds, stronger reporting mechanisms to support the monitoring of resources, and the importance of continuously engaging with civil society organisations. As a result of this work, the Zambia National Public Health Institute followed up with initiatives to strengthen its financial reporting mechanism and systems for disbursing funds. Field visits to monitor the performance of health offices were also carried out, following the report's results.

To strengthen procurement during emergencies, the following points should be taken into consideration:

- + All public contracts should be published using open-data and information systems. These should include all key details on the goods and services provided, such as technical data, prices, dates, information on the natural or legal persons providing them, including beneficial ownership information and unique identifiers of the companies' awarded contracts.
- + In the framework of flexible controls and speedy procurement procedures, Integrity Pacts act as a key tool to prevent corruption risks in the expenditure of resources. An Integrity Pact, as a standardised collective action tool, is a collaborative mechanism in which public authorities, bidders and CSOs collaborate to enhance transparency and accountability in a public contracting project. In the pact, the bidders and authorities publicly commit to refrain from corruption in the process, and an independent CSO monitors the process and informs the public²¹.
- + After key needs, goods and services have been identified, a price analysis and centralised procurement process should be implemented as far as possible at a national level. The price analysis will help prevent unfair competition and overpricing of key supplies needed to deal with the emergency.
- + Technical and economic justification for the procurement should also be published, including information on any deviations from usual procurement rules, and the reasons for any non-competitive bids. By publishing all information in a timely manner, CSOs can oversee, highlight and follow up on irregularities.
- + Although during emergencies and crises it is difficult for procurement, anti-corruption agencies, and other entities of control to fully oversee the procurement and contracting processes, all supporting information should be kept in place. As established by the International Monetary Fund during the COVID-19 pandemic, countries should "do whatever it takes [to save lives], but make sure to keep the receipts"²².
- + Clear audit procedures should be in place, as required by donors and multilateral financial organisations, to be carried out after the crisis and facilitate post evaluations. Stronger controls and audits implemented in a later stage will make it possible to pursue disciplinary sanctions in the event of irregularities, and deter malpractices in public procurement and contracting.
- + In speedy procurement and resource allocation, it is strongly recommended to involve highly professional procurement staff working in at least two different areas of the contracting authority, and to clearly differentiate financial oversight from decision-making.
- + To reduce corruption risks in the disbursement of resources, donors, development organisations and multilateral financial organisations should develop joint funds.

In 2022, **TI Sierra Leone** in partnership with the Anti-Corruption Commission in the country, analysed and monitored the implementation of recommendations derived from audit reports monitoring COVID-19 funds. The audits were carried out in 2020 to oversee state institutions entrusted with managing pandemic-related funds. The reports issued recommendations for improving their systems, processes and activities. As highlighted in the study, acting on audit recommendations has not been a priority for public institutions. TI Sierra Leone found that over 46 per cent of the recommendations were not yet implemented. Among the issues identified were the mismanagement of procurement procedures (including the payment and management of suppliers) and conflicts of interest in the awarding of contracts. After the study was published, key stakeholders including the Anti-Corruption Commission, the Audit Service, and the National Public Procurement Authority made a commitment to investigate and follow up on the report's recommendations. The Anti-Corruption Commission also ordered an investigation of the non-resolved issues highlighted in the report.

These should be centralised in established mechanisms, controlled, and overseen by representatives from the government, CSOs, donors and international organisations.

Oversight and accountability mechanisms

In order to prevent corruption risks during emergencies and crises, strong oversight and accountability mechanisms are key. These mechanisms bring a watchful eye, monitoring how the decisions, actions and spending are taking place, and help bring policy makers and government officials to account. In contexts in which anti-corruption controls are loosened to respond quickly and efficiently to the crisis, strong oversight mechanisms can lead to a higher vertical (led by civil society) and horizontal (led by parliaments and oversight bodies) accountability.

To ensure greater accountability in the management of and response to emergency contexts, emergency spending and stimulus measures should be accompanied by adequate auditing, oversight, accountability, and reporting mechanisms. The following points should be taken into consideration when establishing mechanisms:

- + Parliamentary oversight over the allocation and spending of emergency funds should be strengthened. In the framework of existing checks and balances, the parliament has a mandate to supervise the executive government and ensure that policies and actions are efficient and commensurate with the public's welfare²³. To expedite the process, and avoid overburdening existing finance and budget committees in an emergency situation, it is recommended to put in place an *ad hoc* special parliamentary committee specialised in the oversight of response and recovery funds.
- + The work of specific oversight bodies, including supreme audit institutions, should be integrated within emergency measures, with a specific focus on their availability of resources and capacity to act in an independent manner.
- + CSOs play a key role in overseeing the management of emergencies. They hold governments to account by acting as watch dogs in the monitoring of funds and procurement processes, tracking budgets, informing citizens, and advocating for higher transparency, answerability and enforceability.
- + In order to ensure compliance with high-quality freedom of information laws and standards, CSOs, the media and citizens need to supervise the allocation and disbursement of emergency funds and benefits, and uncover wrongdoings. In contexts in which the freedom of information is threatened, Transparency International chapters have submitted information requests to judiciary entities to access and publish relevant information (see the case of Poder Ciudadano highlighted in the introduction).
- + There should be clearly established whistleblowing and public reporting channels, such as hotlines and online platforms, to guarantee that all those who detect corruption practices and wrongdoings are able to report them. Whistleblowers must be properly protected and the channels must be easy to access. This will ensure that all those who detect, investigate and report corruption – particularly those involved in key sectors, including procurement and emergency response, essential workers, and beneficiaries – are actively encouraged to report corruption through established, reliable, and easily accessible mechanisms, while receiving protection from retaliation and appropriate feedback mechanisms. Transparency International's Advocacy and Legal Advice Centres have been established as a safe space in which to report corruption and seek support and redress. In 2020, more than 1,800 people sought support on issues related to the pandemic.
- + Donors and development agencies should advocate to guarantee accessible whistleblower mechanisms and measures to protect those who report irregularities, especially in kleptocracies or countries with a tightly controlled civic space, in which there is limited protection for whistleblowers, and people are afraid to speak up.

TI Brazil collaborated with local grassroots organisations who evaluated 187 municipalities in seven Brazilian states (Bahia, Espírito Santo, Pará, Paraná, Piauí, Rio Grande do Sul and São Paulo), using the Transparency and Public Governance Index, a methodological tool developed by TI Brazil. Based on the results of the assessment, the team came up with best practice recommendations to strengthen integrity, transparency, and citizen participation in Brazilian municipalities.

TI Brazil followed up with the municipalities assessed, and the results were highly encouraging:

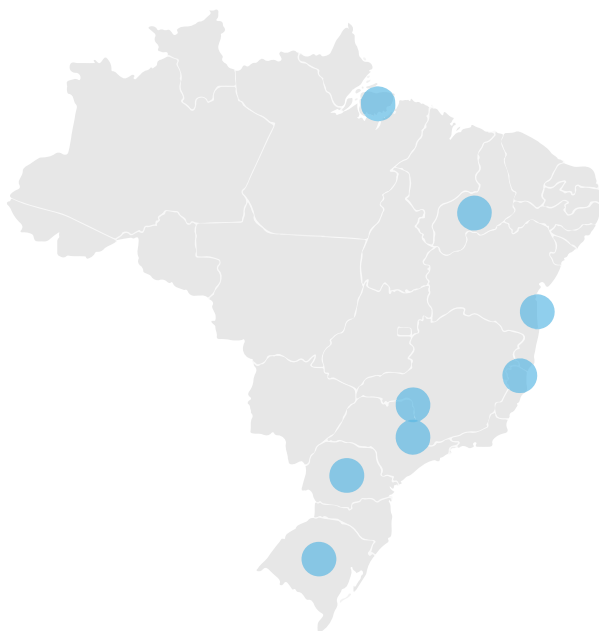
- + 92 per cent of the responding municipalities evaluated TI Brazil's methodology as pertinent or very pertinent.
- + 73 per cent of the municipalities reported that they have improved their practices after the assessment.
- + More than 120 legal measures, transparency and public governance practices have been improved or implemented, according to information from the municipalities involved in the survey.

Tools developed and assessed by civil society, such as the Transparency and Public Governance Index enable civic oversight and help the relevant local and national governmental bodies to strengthen anti-corruption frameworks, especially in an emergency context such as the COVID-19 pandemic. Importantly, such indexes and rankings also make it possible to assess the progress made in establishing, implementing and improving frameworks, policies and guidelines, which are crucial for monitoring transparency and accountability in municipal governments.

Photo: Observatório do Marajó



MAP OF THE ASSESSED REGIONS UNDER TRANSPARENCY AND PUBLIC GOVERNANCE INDEX (ITGP) DEVELOPED BY TI BRAZIL



REGIÃO AVALIADA
BAHIA LITORAL SUL
ESPÍRITO SANTO
PARÁ ARQUIPÉLAGO DE MARAJÓ
PARANÁ 17ª REGIONAL DE SAÚDE
PIAUI
RIO GRANDE DO SUL REGIÃO DE POA
SÃO PAULO REGIÃO DE FRANCA
SÃO PAULO REGIÃO DE LIMEIRA

Source: Transparency and Public Governance Index (ITGP) Assessed regions, Transparency International Brazil, <https://indice.transparenciainternacional.org.br/municipal/>

Multi-stakeholder partnerships and collective action

The array of initiatives deployed to tackle emergencies risk being undermined by a lack of coordination and the duplication of efforts, further increasing the risk of corruption. In order to address these challenges, it is vital to develop partnerships and collective action in the management of emergencies. Moreover, to counter the challenges posed by systemic corruption, collective approaches have proven to be more effective than individual actions,

in which the actors involved have higher incentives to act in a corrupt manner. Collective action brings together stakeholders from the donor community, government, civil society and the private sector, encouraging them to act collaboratively and sustainably to prevent corruption and foster transparency and accountability. It encourages the creation of an alliance of organisations and increases the impact and legitimacy of their individual actions.

TI Hungary carried out a [study](#) on the misuse of tourism funds during the COVID-19 pandemic. Based on the results, the team published a [database](#) and an analysis of grants awarded to cronies of the government from the tourism sector. To carry out the study, TI Hungary submitted several freedom of information requests for cases of misused funds. These cases were significantly covered by the media and were accompanied by the work led by TI Hungary with investigative journalists.

In order to attract a younger audience and mobilise the general public around the results of the study, TI Hungary created a photo exhibition and a tour entitled “What was left out of the guidebook”, about opaque granting mechanisms in the tourism sector. In alliance with professional photographers who took photos of the venues featured in the stories, TI Hungary staff wrote the stories, and a graphic designer designed the tables presented. The photo exhibition was presented at the [Sziget Festival](#), one of the biggest music festivals in Europe, with 100,000 daily visitors, and later in Szentendre, a popular tourist destination near Budapest. The team also shared their study with the European Anti-Fraud Office and the Directorate-General for Competition at the European Commission.

TI Hungary also submitted freedom of information requests in several public health procurement cases. It published a [report](#) summarising its experience of corruption risks in the procurement of ventilators and vaccines.

It is key for development agencies, governments, donors and CSOs to explore ways of cooperating during their crisis responses. The following points clarify different ways in which stakeholders can cooperate to jointly manage emergencies:

- + It is essential to share relevant information and thereby enhance cooperation between the various stakeholders. Those involved in the crisis should ensure that all information on corruption schemes identified in their operations is made available to other organisations working in the field. This cooperation will help, among others, to reduce the risk of wrongdoings such as “double-dipping”, which involves the duplication and overlap of emergency support²⁴.
- + There should be a combined effort to make an initial assessment of corruption risks in the disbursement and stream of resources. This assessment will help identify vulnerable risk areas and define “early” controls and targeted preventive actions.
- + In the framework of emergencies, in which a high flow of resources comes from a variety of sources, stakeholders should set up a joint multi-stakeholder mechanism that coordinates and receives the funds from the different donors and organisations, monitors the disbursement to the government and oversees all subsequent expenditure. This central mechanism should be monitored by a representation of donors, the government

and civil society organisations²⁵. This type of mechanism, among others, should provide guidance on how to strike a balance between rapid response actions that deal with the immediate challenges of the emergency, and critical investments for long-term recovery focusing on societal outcomes and access to public service delivery.

- + To make progress in the effective protection of rights, accountability, and the fight against corruption, it is vitally important to develop close partnerships with journalists and civil society. These partnerships successfully underpin the flow of information and enhance advocacy efforts to reach non-specialised audiences. Partnerships aiming to strengthen investigative journalism are key to monitor corruption practices and mobilise the citizenry around these topics, especially in kleptocracies and captured states.
- + Partnerships should be forged with the broader media, and innovative communications methodologies should be used to reach citizens and call on the general public to advocate against corruption malpractices. Among others, “new media” such as blogs, Telegram, documentaries, etc., have proven to be highly useful in shedding light on procurement abuses involving COVID-19 funds.

Photo: Transparency International Hungary



Acknowledging the role that allies can play in disseminating and simplifying research and evidence findings for the broader public, **TI Zimbabwe** collaborated with the media and the graphic and performing arts industry to give visibility to its key advocacy messages on COVID-19.

Noting the lack of in-depth reporting on the use of COVID-19 resources, TI Zimbabwe trained 35 local journalists, and then shortlisted and mentored six investigative journalists from this group, who wrote stories on the use of the COVID-19 funds in the country.

The trained journalists discovered that the COVID 19-funds intended to support citizens and vulnerable sectors of society were allegedly misused. The first article showed that the telecommunications company, Net One, misused funds in violation of the Public Finance Management Act and related regulations. Another article revealed that equipment donated through the United Nations Population Fund and the Embassy of Japan was lying idle at the United Bulawayo Hospitals. Anomalies in the process to procure COVID-19 goods and services and the misuse of the Special Drawing Rights funds were highlighted in another article. A fourth article focused on loopholes in the policy and institutional framework for public procurement which enabled the looting of COVID-19 goods. The last article uncovered a property in Buhera District allegedly used by 1,000 beneficiaries as a residential address for claiming COVID-19 relief funds.

Investigative journalists and TI Zimbabwe made information about abuses of public COVID-19 funds available to the public. They created engaging content such as comedy sketches, infographics and a documentary to spread key messages about COVID-19 on social media. Relatively high internet penetration rates in Zimbabwe (around 60 per cent) made it easier for people to access information and participate in national debates.

Photo: Transparency International Zambia



ENDNOTES

- 1 Transparency International takes “billion” to refer to one thousand million (1,000,000,000).
- 2 <https://ti-health.org/content/elusive-data-can-unlock-the-anti-corruption-impasse-in-global-health>
- 3 www.ohchr.org/sites/default/files/Documents/Issues/Business/A_HRC_44_43_AdvanceEditedVersion.pdf, p.5.
- 4 www.unodc.org/documents/corruption/COVID-19/Policy_paper_on_COVID-19_vaccines_and_corruption_risks.pdf, p.4.
- 5 www.transparency.org/en/news/first-response-procure-medical-supplies-at-any-cost-and-risk
- 6 www.transparency.org/en/blog/open-data-covid-19-argentina-hungary-honduras
- 7 The project was normally implemented in 11 countries, however, due to TI Russia being an undesirable organisation and for the safety of its personnel, they are not included in this report.
- 8 www.u4.no/topics/covid-19-and-corruption/basics
- 9 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9204686/>
- 10 www.transparency.org/en/projects/countering-corruption-amid-covid-19/timeline
- 11 https://transparency.hu/wp-content/uploads/2022/02/TIHu_tourism_Subsidies.pdf
- 12 The findings and recommendations of this study are reflected in further detail as part of Case Study 1 below.
- 13 https://transparency.hu/wp-content/uploads/2022/02/TIHu_tourism_Subsidies.pdf
- 14 https://transparency.hu/wp-content/uploads/2023/02/position_paper_egeszsegugyi_beszerezsek_08_en.pdf
- 15 <https://tender.transparency.kg/>
- 16 The first brief was on the COVID-19 Pandemic and Public Procurement in Zimbabwe; the second was on Procurement as a Mechanism to Institutionalize Transparency and Accountability; and a third paper was entitled Transparency Accountability and Integrity (TAI) in the Public Health Care Sector: The Role of Parliamentary Oversight.
- 17 <https://knowledgehub.transparency.org/helpdesk/corruption-in-times-of-crisis>
- 18 www.europarl.europa.eu/recovery-and-resilience-facility/en/
- 19 www.open-contracting.org/wp-content/uploads/2021/06/RRF_report.pdf
- 20 <https://knowledgehub.transparency.org/helpdesk/corruption-in-times-of-crisis>
- 21 www.transparency.org/en/projects/integrity-pact-global-standard
- 22 www.imf.org/en/Blogs/Articles/2020/04/15/blog-fm-fiscal-policies-to-contain-the-damage-from-covid-19
- 23 <https://knowledgehub.transparency.org/assets/uploads/kproducts/Parliamentary-oversight-assessment-tool.pdf>
- 24 https://knowledgehub.transparency.org/assets/uploads/helpdesk/Anti-corruption-strategies-for-development-agencies-during-the-COVID-19-pandemic_PR.pdf
- 25 https://knowledgehub.transparency.org/assets/uploads/helpdesk/Anti-corruption-strategies-for-development-agencies-during-the-COVID-19-pandemic_PR.pdf

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