Lessons learned from anti-corruption efforts at municipal and city level

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Cities, and the public sector agencies within them, are often the main point of contact between citizens and their government. As such, cities are also typically where citizens experience corruption most acutely, with accompanying effects on trust in government.

Addressing corruption risks at the municipal and city level is thus crucial. Cities across the globe have undertaken measures to reduce corruption risks and increase integrity in local public procurement and public service delivery, two areas frequently associated with high levels of corruption risk. Successful measures to tackle widespread challenges include: the implementation of municipal codes of ethics; engaging citizens in corruption risk assessments and the development of integrity plans; digitising processes (such as procurement and licensing); introducing human resources reforms and capacity building for public sector employees; and increasing access to information for citizens and implementing open data measures.

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Query

What are the lessons learned and good practices established to counter corruption at city level? Lessons learned could be from and by all actors involved, including the city administration, donors, civil society and media. Please include examples from Ukraine if possible.

Contents

Introduction

Corruption at the local level can come at a severe cost to local governments, cities, and citizens alike, as it leads to a misallocation of public funds, to contracts going to subpar contractors, to crimes going unpunished, to a deterioration in public services, and to overspending and a dissipation of public funds (CAPI 2016 and Klitgaard et al. 2000). In developing countries it can also hamper cities' ability to reach the Sustainable Development Goals, can increase socioeconomic inequality, weaken environmental management, increase vulnerability to disasters and undermine anti-crime efforts (Williams & Dupuy 2018 and Zinnbauer 2013). Countering corruption at the city or municipal level can therefore help to raise revenues, improve service delivery, establish or strengthen trust in institutions and even win elections (CAPI 2016 and

Main points

— A thorough risk assessment and context analysis are crucial to design appropriate local anti-corruption measures.

— Engaging relevant stakeholders (including citizens) in the risk assessment and design process is paramount.

— Reforms to public procurement and public services as well as access to information are among the most common and most successful measures implemented.

— Information technology greatly assists in establishing successful transparency and citizen engagement efforts, but it needs to be implemented with the consideration of local capacities.

Klitgaard et al. 2000). This led Dieter Zinnbauer (2013:3) to conclude that the "future of the fight against corruption critically depends on cities and the future of cities critically depends on the fight against corruption".

The following Helpdesk Answer thus looks at how cities and municipalities can tackle their specific corruption challenges. It provides a general summary of corruption challenges in municipalities and cities, as well as success factors for countering them.

It then considers specific tools and measures in some more detail and provides relevant examples of successful implementation from across the globe.

Corruption and anti-corruption at the city-level

In many ways, corruption at city or municipal level mirrors corruption challenges at the national level. Bribery, facilitation payments, nepotism, and conflicts of interest can arise in cities and municipalities as they do in countries, with the resulting challenges.

However, due to the specifics of municipalities, such as their size, their level of resources, or the inter-connectedness of people within them, some corruption risks arise or get exacerbated at the local level that need consideration in designing solution approaches.

Corruption challenges in cities and municipalities

Cities are growing across the globe, with more and more people living in urban areas, especially in developing countries. At the same time, cities struggle with manifold corruption challenges, in areas from waste management to real estate development and organised crime (Williams & Dupuy 2018 and Zinnbauer 2013). In 2016, 54% of people lived in cities, and it is expected that, by 2050, 66% of the world's population will be living in cities, with 90% of the urban population growth occurring in the developing world (OECD et al. 2017 and Zinnbauer 2013).

In industrialised and developing countries alike, corruption poses particular challenges at the local and city level. The local level is where the interface between governmental entities and the public is most visible and notable. The proximity, and often acquaintance, between government representatives and the public can increase specific corruption risks. For example, a personal connection between service provider and "client" can increase favouritism and strengthen clientelistic networks in local procurement. And decentralised and dispersed control and responsibilities, for example over finances, in combination with personal proximity, can increase the risk of fraud (Minkova 2018). Especially in smaller cities, these risks can be exacerbated by the limited number of stakeholders available to deliver certain services, as well as the often limited number of staff and resources available, making adequate oversight and enforcement difficult (CAPI 2016).

The local level is also where citizens receive most of their public services and witness most interactions with government representatives. So corruption challenges at the national level, that get mirrored at the local level (e.g. public procurement, public service delivery, licensing), can have more severe effects in the latter in terms of reducing citizens' trust in their institutions (Zinnbauer 2013).

But while cities and municipalities face particular corruption risks due to tight networks and their direct interface between government and citizens, they also present a major opportunity for trust-building and participatory decision making and are a key intermediary for national governments (OECD et al. 2017 and UNDP 2017).

Consequently, tackling corruption at the city level can have positive impacts beyond city borders. According to Huberts et al (2008) citizens will evaluate their government and calculate their social

capital based on their and their community's daily experiences. This in turn will affect the degree to which they participate in political processes and build trust in their institutions.

Successfully countering corruption in cities and municipalities

Countering corruption at the local level, as elsewhere, requires a coherent and multi-pronged approach to tackle the complex challenge from different angles.

Klitgaard et al. (2000) have illustrated this with an example from Hong Kong in the 1970s. Despite repeated efforts to introduce stronger laws, more investigations, and more power and resources to the police's anti-corruption office, the city was unable to significantly tackle widespread corruption in its police force. What worked in the end, was the creation of a new and independent anti-corruption commission and a combination of a heavy focus on prevention and citizen engagement to "rupture the culture of corruption" (Klitgaard et al. 2000: 21). Hong Kong's reform efforts in the police force eventually had spill-over effects into other departments, leading to the prosecution of officials from departments as diverse as housing, public works and transportation. It also resulted in hundreds of evaluation studies and monitoring reports and the training of over 10,000 officials, leading Klitgaard et al. (2000: 24) to proclaim that "preventing corruption can be the point of leverage for reinventing city government".

Since the 70s, many more cities across the globe have launched anti-corruption journeys to tackle local challenges with locally-tailored solutions, with some notable successes (Klitgaard 2015).

However, in some places anti-corruption corruption measures came at the expense of other important efforts, or subsequent governments have rolled back efforts of previous administrations. At the same time, as Klitgaard (2015: 31) notes "progress means improvement, not eradication."

Cities have undertaken successful campaign to counter corruption in all areas of the world – from Colombia, to Rwanda, Qatar, the United States, Romania, Bolivia, Georgia, and many others.

In their extensive study on the topic of tackling corruption in cities, Klitgaard et al (2000) come to a number of conclusions. The authors first state that it is paramount to formulate a systemic strategy and to conduct a participatory assessment of the challenge in a collaborative manner. In subsequently implementing reform, they further identify a number of success factors that municipal leaders would do well to observe when attempting to tackle corruption within their communities (Klitgaard et al 2000: 74ff.).

1. **"Pick low-hanging fruit"** in the beginning to achieve visible progress at a relatively low cost

2. **"Align with favourable forces"** from national government, international organisations, business, and civil society, to make use of existing networks, resources, and efforts

3. **"Rupture the culture of impunity"** to counter the often-prevailing cynicism among the citizens that nothing will actually change

4. **"Fry the big fish"** by not shying away from naming and going after important and big corrupt actors

5. **"Make a splash"** through an appropriate and carefully planned public commitment that is effectively followed-up with (e.g. a conference, or the publicly announced launch of a Code of Conduct or new anti-corruption unit)

6. **"Change systems"** through disruption and by increasing competition and accountability, by reducing discretion, and by addressing incentives

7. **"Work with bureaucracy not against it"** by creating positive enforcements and enhancing information, competition, and evaluation.

The UNDP has established a 'Guide to Corruption-Free Local Government' meant as a tool for municipal and city governments to design and implement anti-corruption programs (Minkova 2018). In keeping with the success factors identified by Klitgaard et al (2000) it emphasises participation, especially in risk assessment and planning, and establishing multi-stakeholder alliances. As an implementation guideline however, it generally focuses more on practical tips to build successful anti-corruption strategies at the local level. These are:

1. Leadership and commitment (for example through a public policy or Code of Ethics)
2. Risk assessment and planning, including treatment measures
3. Providing necessary resources, including in terms of competence and awareness. This should include strong multi-stakeholder partnerships and information provision
4. Implementation in a timely manner according to established plans. This should include effective controls
5. Internal and external reporting of violations, investigation, and disciplinary procedures
6. Monitoring and dealing with non-compliance, including citizen feedback mechanisms and internal audits
7. Improvement based on a consistent review and in consideration of data and feedback collected

In looking particularly at cities in developing countries, and efforts that may inform the future action of donors, Williams & Dupuy (2018) note that more research is required to establish evidence-based success factors. However, from what evidence is available, they conclude that publicising information on public finances, increasing transparency in public service provision, and advancing citizen engagement in city management, can all have positive effects on the likelihood of success of anti-corruption efforts in cities.

Islands of Integrity

Islands of Integrity have been described as "public institutions that reduce corruption despite being surrounded by endemic corruption" (Zúñiga 2018: 1). In the same line of thought as the work conducted by Klitgaard (Klitgaard et al 2000 and Klitgaard 2015), Islands of Integrity aim to reduce monopoly and discretion in public service while increasing transparency and accountability (Zúñiga 2018).

The idea of 'islands' or 'pockets' of effective and ethical performance within an environment of mismanagement has been studied by many (Zúñiga 2018). It has been 'formalised' for anti-corruption practice into a methodology by Ronald MacLean-Abaroa and Ana Vasilache, building on Abaroa's experience in successfully tackling corruption as mayor of La Paz, Bolivia. It is rooted in a participation model of public leaders, managers, employees, citizens and other stakeholders to identify solutions to root out corruption at the city level (OECD et al. 2017).

The Islands of Integrity methodology is a toolbox of sorts, to be used by local entities to tackle corruption in cities and municipalities, based on a participatory risk assessment and reform design. In addition to a focus on the inclusion of stakeholders

within the community, the approach also focuses strongly on peer learning between municipalities implementing the approach (UNDP 2017b).

The program has been applied in over 30 cities in the last ten years, most notably under the auspices of the UNDP across Eastern Europe (UNDP 2017b).

When assessing whether or how 'islands of integrity', in communities or entities, may emerge and thrive in otherwise corrupt environments, some studies have been conducted to compile relevant success factors (Zúñiga 2018). These success factors include:

- A participatory management style
- Performance expectations, incentives, and benefits
- Organisational autonomy, specifically in personnel and financial decisions
- A sense of mission

Municipalities having used the methodology and now receiving widespread praise for their successful reform efforts include Craiova in Romania, Kutaisi in Georgia, as well as Gjakovë and Pristina in Kosovo, among others, some of which are discussed in more detail below.

Successful measures and their global implementation

Successful anti-corruption measures, whether national or local, are always context specific.

This notwithstanding, there are some recurring themes when it comes to designing responses to corruption related challenges at city-level.

Some of the more general success factors have been discussed above. In the following, some specific mechanisms, tools, and processes will be looked at in some more detail, including examples for good practice implementation from around the globe.

Integrity plans and Codes of Ethics

A first step toward an integrity strategy should be a public commitment (CAPI 2016; Klitgaard et al. 2000; Minkova 2018). According to the UNDP's Guide to Corruption-Free Local Government, such a code needs a strong commitment from the top (e.g. the mayor or local parliament) and should be communicated widely. Training courses should also be considered. Municipalities should also adopt policies and supporting processes, such as restricting gifts and hospitality and dealing with conflicts of interest, as these are common risk areas in local government (Minkova 2018).

The importance of a strong code of ethics is also confirmed by the Center for the Advancement of Public Integrity (CAPI 2016) who list an easily understandable, universally applicable and publicly available code as the first crucial step to improve integrity at the city level. To ensure the code is followed in practice, thorough and regular training of government employees as well as an effective monitoring system are paramount.

Any integrity plan or code of ethics should be built on an initial risk assessment, which identifies the most pressing risks as well as measures already in place (Minkova 2018). A thorough and participatory situation analysis also forms a key part of the islands of integrity concept. Other cities have used Transparency International's Local Integrity System Assessment Tool to assess and evaluate their city's integrity environment; among these are Lisbon and Braga in Portugal, Ramallah in Palestine, and Guediawaye in Senegal.

The form of the eventual plan should be tailored to preference, national guidelines and local capacities. However, it should include the key outcomes of the

risk assessment, identify responsible personnel in different areas and map out activities to be undertaken to mitigate identified risks. Another important factor to consider in the early stages is how any strategy or code of ethics will eventually be enforced.

According to CAPI, providing oversight and enforcing sanctions for violations can be challenging for smaller cities and communities as it requires a level of resources and capacity that small cities may not have readily available. Appointing an independent ethics officer, or possibly an ethics commission, that would be responsible for oversight, determining sanctions and receiving complaints from citizens or results of investigations is one recommendation (CAPI 2016). Cities that have established ethics commissions include Minneapolis and Philadelphia in the US.

A challenge for city governments here of course is that they will not necessarily have control over all the entities that need to be involved or brought in line for the effort to be successful as some may be national or regional. So an early mapping of responsibilities is crucial (Klitgaard et al. 2000).

Codes of ethics have been established in many cities, sometimes as standalone integrity or anti-corruption policies, and sometimes as part of a wider integrity plan including detailed commitments and action plans.

Stellenbosch, South Africa

In 2015, the Department of Provincial and Local Government in South Africa published an anti-corruption strategy to introduce and improve anti-corruption strategies in South African cities and municipalities (Republic of South Africa, Department Provincial and Local Government 2015). According to an evaluation of past measures included in the strategy, many (district)

municipalities had already introduced anti-corruption policies, but they were found to be inadequate in practice. Areas considered especially high risk were municipal procurement processes, nepotism in public sector employment, inadequate financial controls and misuse of public assets. The goal of the strategy was to change municipal culture to be less accepting of corruption, to engage communities and other stakeholders in anti-corruption efforts, to build capacities, reform administrative processes, to increase detection measures and to improve enforcement.

In line with the strategy, municipalities were encouraged to adopt a code of conduct for municipal staff, committing public sector employees to serve the public interest, refrain from undue influence, bribery, and sexual harassment, and laying out reporting requirements. A separate standard code of conduct for councillors was also adopted (Republic of South Africa, Department Provincial and Local Government 2015). The strategy further lays out standards, policies and procedures to ensure the codes are followed in practice. These include risk management, internal controls, audits, human resources (HR) processes and reporting channels. A detailed integrity management framework was published by the Department of Cooperative Governance to provide detail on necessary steps to successfully implement the strategy locally (Republic of South Africa, Department of Cooperative Governance 2015).

One city that implemented a policy, most recently revised in 2018, is Stellenbosch (Stellenbosch Municipality 2018). The city's anti-corruption and fraud prevention policy includes a high-level commitment, raises awareness about the city's reporting hotline, and commits to the prevention, detection, investigation and sanctioning of corruption (Stellenbosch Municipality 2018). Efforts to implement the policy include the city's

commitment to conduct risk assessments, strengthen community participation to counter corruption, increase stakeholder engagement, ensure the effective enforcement of sanctions, and increase investigative and preventive work.

The policy further details who it applies to, what the specific responsibilities of different municipal entities are and what consequences may arise from violating the policy (including suspension, salary reductions, dismissal or criminal proceedings). In addition to the fraud hotline, the city provides for further reporting channels through direct reporting to the city's fraud response unit. All instances of fraud are to be followed up with and recorded in the city's fraud register (Stellenbosch Municipality 2018).

Netechyntsi and Slavutych, Ukraine

With the support of the Council of Europe initiative "Local initiatives on ethical governance and transparency", the communities of Netechyntsi and Slavutych in Ukraine adopted codes of conduct in close consultation with their communities. The experience of Netechyntsi of developing a code of ethics based on public discussions was later adopted in neighbouring communities. The town of Slavutych had already established a code of conduct in 2007, but revised it in 2017 based on a public discussion approach facilitated by the community initiatives support office. The office was specifically created to establish a permanent monitoring system of ethical standards by citizens and to increase communication between the city council and citizens (Council of Europe 2017).

Islands of Integrity in South-Eastern Europe / United Nations Development Programme (UNDP)

Under the auspices of the UNDP, a regional islands of integrity initiative was launched for south-

eastern Europe, encouraging cities and municipalities to draft integrity plans that map risks and vulnerabilities, and propose solutions for their implementation (UNDP 2017). Since the launch of the programme, 35 municipalities in 11 countries have adopted integrity plans, among them Pristina and Gjakovë in Kosovo, Kutaisi in Georgia and Straseni in Moldova.

With support from the UNDP and as part of this process, the city of Kutaisi in Georgia was able to create an online platform to allow citizens to submit proposals as well as pay local fees and apply for social programmes online. The city also purchased cameras and body cams for departments and inspectors to increase transparency and accountability. The city of Straseni in Moldova established a live conferencing system for city hall so that citizens can follow sessions online. The city of Veles in North Macedonia introduced a code of ethics for elected officials and introduced an e-services platform and participatory budgeting measures. In Echmiadzin, Armenia a process was initiated to include civil servants in planning activities to create more ownership and accountability. And in Vadym, Ukraine, a participatory budgeting initiative was launched where part of the budget is set aside for projects that citizens can give input on. The city then puts the status of these, as well as all other agreements and contracts, online (UNDP Eurasia 2019).

Five mayors of participating municipalities were interviewed about their experiences by UNDP in 2019. All asserted that engagement from citizens had increased substantially since initiating the reforms and that trust in institutions has grown. Several also mentioned the importance of online tools in contributing to the initiatives' success (UNDP Eurasia 2019).

Craiova, Romania

One of the early cities to adopt the approach of islands of integrity was the city of Craiova in Romania which, with the support of FPDL, applied the methodology in 2008 (Vasilache & Rata 2011). In a participatory process with municipal employees and managers, businesses, NGOs and citizens, an analysis of the most pressing systemic corruption challenges and possible solutions was developed.

Initially, 315 of the city's 500 employees were consulted to assess the processes and services most prone to corruption risks. Based on their assessment, six priority areas were identified and integrated into the strategic plan: i) issuing of urban certificates, building and demolition permits; ii) control of discipline in construction works; iii) public assets management; iv) public procurement; v) properties registration; and vi) HR management.

According to Vasilache & Rata (2011) the participatory process in which risks and issues are analysed is as important (if not more) than the actual results as it is the first essential step in creating trust, which improves relationships and networks and empowers citizens to engage. Training was included in the diagnosis process to build the capacity of stakeholders to better identify corruption vulnerabilities and to enable them to address some of the most commonly identified challenges.

Based on the extensive diagnosis, a strategic plan was developed with five objectives that were broken down into more tangible activities: improving management of public funds and assets, consolidating quality management, increasing local government transparency, implementing a modern HR management system and implementing

preventive measures to limit opportunities for the abuse of public office.

In 2010, the city of Craiova won a Romania-wide prize in the civil servants agency annual competition in the category 'Strengthening Public Service Integrity, Transparency and Accountability' (Vasilache & Rata 2011).

An independent mid-term evaluation of the process revealed a high level of awareness of the process within local government as well as the assessment that activities of the city government have improved due to the process. There were high levels of trust in the process, especially among newer members of the city administration. For participants of the process, the most important impact and useful lessons learned included: improved teamwork, improved managerial skills, improved inter-departmental relations, increased accountability and self-evaluation, improved work procedures, increased transparency and efficiency, and improved communication with citizens (Vasilache & Rata 2011).

Gjakovë, Kosovo

As part of Gjakovë's effort to establish an integrity plan, a working group within the city municipality was established. The working group was led by the mayor and included the directors of administration, economic development, finance, urbanism and others. Among other responsibilities, the working group coordinated a thorough risk assessment process that was subsequently used as a basis for developing the integrity plan (Municipality of Gjakovë/Đakovica 2015). As part of its integrity statement, published in 2015, the city committed to diversity, sustainable economic development and integrity, while recognising the particular corruption risks the community faces in terms of high public sector discretion, nepotism, high levels of administrative bureaucracy and

complex and sometimes incoherent regulatory frameworks.

Among the core goals of the integrity plan are an improvement of efficient and transparent public service delivery, encouraging reporting of violations, implementing an appropriate integrity management system based on regular risk assessments, increased enforcement of regulations and greater stakeholder cooperation (Municipality of Gjakovë/Đakovica 2015).

To achieve these goals, a variety of measures were implemented both on process reform and transparency. These included: awareness raising activities and capacity building for public sector employees, setting up a structured communications policy, facilitating the confidential reporting of violations, implementing a monitoring and review mechanisms for the new integrity management system, aligning job descriptions and processes, introducing effective performance indicators, introducing feedback opportunities for public service users, introducing electronic document management systems, improving client/citizen communication, implementing systems to track budget expenditures, improving financial controls and audits, and implementing transparency measures in public procurement (Municipality of Gjakovë/Đakovica 2015).

The city was also Kosovo's first to digitise its procurement process (see below).

Gjakovë also took part in the World Bank - Austria Urban Partnership Program (UPP) (see below), as part of which the city's reform efforts were evaluated. The World Bank found that the implementation of the city's integrity plan had been done to a "very satisfactory" degree (World Bank 2018: 38), especially with regards to increasing procurement transparency and accountability and

increasing monitoring and accountability in financial management.

An evaluation by the Kosovo Democratic Institute in 2017 that ranked 11 different municipalities regarding their level of transparency ranked Gjakovë as number one, with an overall score of 83.8% (World Bank 2018).

Public sector and administrative reform

To successfully implement an integrity management system at the local level, several reform aspects need to be considered that together form a coherent set of policies and procedures. According to Minkova (2018) it is crucial that all corruption prevention measures and integrity objectives are embedded into all relevant aspects of local government, such as, management process of public finances, human resources, public services delivery, and procurement.

Specific adequate reform processes depend on the context and the goals. But there are some processes and issue areas that are commonly the focus of reform approaches due to their high corruption risks or because they are considered paramount in addressing them. These include reforming and increasing enforcement, reforming public procurement, improving public service delivery and building the capacity of public servants.

Enforcement reform, New York City, New York, US

Sanctioning violations of integrity standards is a crucial deterrence (Minkova 2018). Most of the code of ethics and integrity plans discussed above include penalties for code violations (e.g. Stellenbosch Municipality). However, municipalities often struggle to implement the level of oversight and enforcement needed due to their lower level of resources, both in terms of personnel and funding (CAPI 2016). Introducing citizen

complaint mechanisms and increasing transparency in the public sector (see below) can provide a level of monitoring and oversight that can reduce the burden of monitoring on the city. Introducing management reform in enforcement agencies and increasing cooperation between relevant entities can also increase levels of prosecution.

New York city is an example of a city that has implemented reforms to counter corruption and reformed aspects of its anti-corruption process. The city's department of investigation (DOI) implemented a performance management system (Compstat) that was adapted from the city's police force (Gill Hearn 2008).

The system allows for the collection and comparison of information to deploy resources more effectively. Implementing the new management system significantly increased the number of cases acted upon and closed. The system also increased synergies and allowed for a better information flow between agencies.

Citizens can file complaints with the DOI through a hotline, online or in person. Since 2008, the DOI has received between 10,000 and 12,000 tips and complaints each year. In 2002, the DOI also instituted a lecture programme, where they held sessions for city agencies on the DOI's anti-corruption mandate and the responsibility of city employees to report any witnessed wrongdoing to the DOI.

When the DOI concludes a corruption case in a city agency and in the process identifies systemic shortcomings, they will make recommendations to the respective agency to prevent a recurrence. According to Rose Gill Hearn, the former commissioner of the New York City DOI, this ongoing inter-agency collaboration is successful in creating trust and ensuring high levels of

awareness of the DOI's function across agency lines. In addition to their own monitoring efforts, the DOI requires high-risk contractors to work with independent integrity monitors reporting directly to the DOI (Gill Hearn 2008).

Business Ombudsman Council, Ukraine

A business ombudsman was established in Ukraine to provide private sector stakeholders with a point of contact for filing complaints and seeking redress against unfair treatment. The Business Ombudsman Council receives complaints and opens an investigation into the issue reported if deemed credible and relevant. It is funded through a multi-donor account that was set up for Ukraine by the European Bank for Reconstruction and Development (EBRD).

Complaints can be made against state or municipal authorities as well as state-owned enterprises and can be made online as well as by mail. So far, the business ombudsman's office has received 6,060 complaints, of which 4,032 were closed, 1,747 dismissed, and 223 are still under investigation. On their website, cases are broken down by their status as well as by the region where they were made (Business Ombudsman Council 2019).

The Business Ombudsman Council publishes quarterly activity reports, the last one of which, published in July 2019, focused on the analysis of complaints on local government authorities (Business Ombudsman Council 2019). Since 2015, 273 complaints were made against local government entities, making up around 5% of complaints received overall.

Out of 273 complaints made against local government entities, the Business Ombudsman Council opened 167 investigations, 153 of which (93%) were closed. The cases were successful in obtaining refunds for companies, as well as

obtaining licences and contracts, and in ceasing malpractice (Business Ombudsman Council 2019).

The Business Ombudsman Council also makes recommendations to different government entities. Since 2015, 109 recommendations were made to local government authorities, with an overall implementation rate of over 70% in the last three quarters. A systemic report was compiled in 2017 on challenges in dealing with local government. So far, 41% of recommendations have been implemented, relating, among others, to the closure of legal gaps, improvements in service delivery, the introduction of evaluation measures for local state administrations and increased information provision.

The Business Ombudsman Council further cooperates with a wide range of stakeholders in media, academia, business and government in conducting outreach, awareness raising and capacity-building efforts on their issue areas (Business Ombudsman Council 2019).

Public procurement

Procurement is often considered one of the most corruption-prone processes. This is due, among other reasons, to an often overly complex process, regulatory incoherence, the multitude of diverse stakeholders involved, as well as often high discretion and low transparency. At the local level, these risks can be exacerbated due to the closeness of public officials to the community and limited competition resulting from few players in the market. This can increase existing risks and add additional risks of conflicts of interest and nepotism. While these can exist at the national level as well, they can be more entrenched and harder to tackle at the local level, due to an often personal proximity between relevant stakeholders, over-lapping of responsibilities, and lesser oversight (Minkova 2018).

To mitigate these risks, according to the UNDP's *Guide to Corruption-Free Local Government*, municipalities should institute clear procurement rules with accompanying guidelines and establish effective control mechanisms, such as approval processes, separation of duties, internal reporting mechanisms and staff rotation where feasible, to ensure their implementation. The guide further implores municipalities to implement transparency measures, by making procurement information accessible as much as possible (e.g. online, through notice boards, through public hearings). This should include information on procurement budgets, tender opportunities, selection criteria, award decisions, oversight, dispute settlement mechanisms, and others (Minkova 2018).

Aside from digitisation, a way to increase transparency and accountability in procurement is entering into integrity pacts. These pacts, which bind buyers and bidders to a set of integrity standards under the monitoring and oversight of civil society, have been used by cities to ensure integrity in municipal procurement (e.g. Vilnius in Lithuania, the municipalities of Madonie in Italy and Budapest in Hungary)

The city of Gjakovë was the first local government in **Kosovo** to introduce an e-procurement tool. This came as part of a wider digitalisation and transparency initiative, introduced through the city's online portal. The portal offers citizens a wide array of information on services, activities, institutions and the city's infrastructure projects. It also includes a feedback opportunity for citizens to leave questions or comments on the local government. The city also introduced an online register of administrative procedures and their legal basis, to provide citizens with the relevant information needed to access municipal services. This includes information on required documents for submission, fees and

charges, and processing times. To further increase transparency, an e-spending section was added in 2016, disclocing department spending (World Bank 2018).

According to the UNDP (2017), the city cut expenses in city offices by 77% through the digitisation and simplification of its procurement process.

In addition to digitisation, the city also introduced other reform efforts in procurement, such as building the capacities of public procurement officials, establishing communication protocols, introducing performance indicators, and empowering citizens, civil society organisations (CSOs) and the media to scrutinise municipal procurement (Municipality of Gjakovë/Đakovica 2015).

The city of Sala in Slovakia has introduced an e-auction software for tenders for goods and services (Transparency International Slovensko 2016). The percent of tenders making use of the e-auction increased from 15% in 2008 to 100% by 2010. The savings for the city were estimated by Transparency International Slovensko to be 30% of the original prices, or €2.3 million in the first three years. The system proved so successful, that it was replicated at the national level, first through an e-auction system in 2011, and then in 2013 through the Slovak electronic contracting system.

In **Hong Kong**, invitations to tender in public procurement are published through a government gazette, newspapers or the internet (Law 2008). A role separation is also instituted between officers preparing tender specifications and those evaluating and accepting tenders. Tender assessments are conducted by a panel of experts, based on pre-determined assessment criteria. A conflict of interest procedure is also in place. Outcomes of tendering decisions are again published online, and at times through the

government gazette. Unsuccessful tenderers are informed of the evaluation and may lodge a complaint to the tender board.

According to Law's (2008) assessment, the general strengths in Hong Kong's integrity system lie in the city's strong political will, its common integrity framework for civil servants, a pluralistic civil society with a critical media, and a strong independent anti-corruption commission with wide-ranging investigative powers and adequate resources.

In a study evaluating the effectiveness of anti-corruption measures in infrastructure public procurement in Hong Kong, Kingsford Owusu et al. (2019) evaluated 26 unique anti-corruption variables grouped into six categories (probing measures, regulatory measures, compliance measures, managerial measures, reactive measures and promotional measures). While all six categories where considered effective, probing measures, with the five variables – i) rigorous supervision; ii) rigorous technical auditing; iii) contract monitoring; iv) efficient reporting system; and v) whistleblowing mechanism – were rated most effective. Promotional measures, with the variables education, training, awareness raising, information technology, access to information, and communication, while still effective, scored lowest among the six categories assessed. Out of the 26 individual variables, the five most effective ones were transparency mechanisms, harsh punishments, rigorous supervision, technical auditing and the monitoring of contractual performance (Kingsford Owusu et al. 2019).

In the Czech Republic an interesting approach to increasing transparency in procurement with the aid of information technology was established in the form of the **zIndex.**

zIndex is not an online procurement tool but rather a "public procurement benchmarking tool for

contracting authorities" (Skuhrovec & Soudek 2016: 2), which ranks municipal contracting agencies according to their integrity and transparency. In a cooperation between a Czech NGO (Econlab) and the Faculty of Social Sciences at Charles University in Prague, datasets are analysed to form a composite score for contracting authorities on 11 indicators regarding openness (are contracts easily accessible?), competition (do several bidders compete on each contract?) and transparency/oversight (are details on cash flow publicly available?). A low score does not necessarily indicate that corruption occurred at a given contracting authority but that insufficient safeguards and transparency measures were in place, indicating a lack of efficiency and potential for corruption. The approach of zIndex is to criticise controversial contracting authorities and praise exemplary ones through publication.

According to the initiative's founders, the outputs of zIndex research and scoring contributed to the ban of anonymous ownership in the country, the strict regulation of single-bidder procurement, and institutional level changes improving the quality of publicised information (Skuhrovec 2015).

ProZorro **in the Ukraine** is a multi-stakeholder e-procurement system that ensures open access to public tenders . Established in 2016, it was built on a civil society movement launched two years prior, that later grew to forge alliances with the public and private sectors. It provides an open market place for all procurement notices (above a certain threshold announcements are also available in English). It is not a decidedly municipal or city level effort. However, it has been widely hailed as a model for e-procurement reform and has become a "trademark of transparency in the country" (Granickas 2018) that is applicable at both national and regional levels.

ProZorro is now a mandatory procurement tool for all public procurement entities. According to its website, the procurement system's success is due to the successful collaboration of a variety of members and partners, such as government agencies, international financial institutions, educational organizations, businesses, and civic organizations. Among others, the project received financial support from the EBRD.

Building on the success of ProZorro, follow-up tools to complement the platform were launched, such as a citizen monitoring platform, a business intelligence tool, and a tool helping to identify corruption risk.

As a result of this comprehensive initiative, interest in procurement in the country grew, several government institutions reformed their monitoring policies, competition and savings increased, and the general population (including the business community) held very positive perceptions of ProZorro (Granickas 2018).

Oslo, Norway /United Nations Global Compact (UNGC) Cities Program

Under the UN Global Compact's Cities Programme, private sector stakeholders join forces with stakeholders from government and civil society to tackle issues under the UNGC's principles (including corruption) at the city level.

One such initiative was undertaken in Oslo, where the city municipality joined forces with private sector consulting companies, such as Deloitte and KPMG, under a framework agreement for monitoring ethical standards in goods procurement. More specifically, the goal of the initiative was to conduct an extensive audit in the City of Oslo's supply chain to ensure compliance with the city's ethical standards in the production of work and foot wear. The audit was conducted by

KPMG on the city's supplier and their sub-contractors in China. It identified several standard violations by the subcontractor. Corrective Action was taken and monitoring efforts were increased. Social Audits undertaken were published through the city's procurement portal and a renewed procurement strategy was adopted in 2017, which includes thorough risk assessments and monitoring strategies (City of Oslo, 2019 and Scott, 2016).

Public service provision

Corruption risks at the public private interface are high in many countries, and many of these interactions occur at a local or municipal level. A multitude of crucial public services, from healthcare and drinking water to secure housing, are put in jeopardy where policymaking and management of public resources is corrupted or captured by vested interests (Zinnbauer 2013).

According the UNDP's Guide to Corruption-Free Local Government (Minkova 2018), municipalities should strive to reduce discretion and the number of interactions at the public and private interface, or otherwise increase efficiency and transparency in service provision. Measures to do so can include one-stop-shops or e-solutions. Increasing transparency (see below) and collecting customer feedback through customer satisfaction surveys or other mechanisms can further help improve service delivery and identify weak points.

In Albania, Azerbaijan, Uzbekistan and Ukraine one-stop-shops have been created with the support of UNDP to receive public services in one place, increasing efficiency and reducing corruption risks. These one-stop-shops have been found to be of crucial importance to citizens as they increase the effectiveness of people's interactions with municipal structures. However, because one-stop-shops in many municipalities have only recently been established, they often lack the required staff

capacity and technological resources (Shutina et al. 2017).

In Ukraine, as part of the country's decentralisation process following the 2014 revolution, one-stop-shops have been opened in several cities, among them Odessa, Mariopol and the country's second largest city of Kharkiv. In the latter, over 400 administrative and social services are provided through a centralised service operating as a regional structure available to the 2.7 million citizens of the Kharkiv region. The project was developed with support from IDLO and USAID and is able to service 2,000 citizens per day. Among the 450 services provided at the centre are the issuing of biometric passports, registration of companies, transfer of real estate ownership, the issuing of birth, marriage, and death certificates, as well as other licenses (IDLO, 2017).

In Moscow, citizens had struggled to receive government services and licences due to a cumbersome process often involving several administrative offices, unclear procedures, lengthy waiting times and insufficient accessibility, especially for citizens with mobility issues. To tackle this challenge a two-pronged approach was implemented that included streamlined in-person service delivery through city-wide service centres and the transfer of government services to online.

Moscow residents can now receive 98% of licences in a one-stop shop. Government services can also be obtained online through the website of the mayor's office, where citizens can also track the status of their applications and pay certain fees.

Through the website of the mayor's office, citizens can also submit requests or complaints about city services, such as garbage collection, infrastructure, etc., and will be notified once the issue has been addressed (World Economic Forum 2017).

According to the UN Public Services Award Initiative, which recognised the project in 2017, the initiative greatly improved accessibility of government services in Moscow. According to the nomination profile, some 70,000 people use 127 service centres across the city every day. As a result, waiting times have been reduced to an average of three minutes, making Moscow a world leader in government service centre waiting times.

As of 2017, 97% of government services that could be moved online were available online, and by the same time 5.8 million residents of Moscow (or half of the city's population) had registered on the service website. To enable citizens with no computers at home or with low computer literacy to use the online services, computer stations were opened in the one-stop-shop centres for citizens to use on-site with the assistance of a public official if needed.

According to the UN Public Services Award Initiative, two different public opinion and customer service surveys have found a satisfaction rate with the quality of government services of over 90%.

Building municipal capacities

According to the World Bank (2018: 7) a "well-functioning public administration is a precondition to transparent and effective governance". To ensure public officials have the relevant knowledge and willingness to implement adopted reform programmes, anti-corruption efforts may require both a professionalisation of human resources processes and capacity building (Minkova 2018). HR measures include safeguards against nepotism and conflicts of interest as well as transparency in hiring and objective performance evaluation to ensure fair competition and merit-based hiring and promotion. Clear and comprehensive job descriptions are also recommended. Additionally,

training should be instituted based on a needs analysis and training attendance should be monitored to build the capacity of existing staff (Minkova 2018).

Including requirements for asset disclosure of applicants or staff in HR processes can also be a way to reduce corruption risk (Municipality of Gjakovë/Đakovica 2015 and Republic of South Africa, Department Provincial and Local Government 2015). Especially in high-risk areas where municipalities often lack capacities, capacity building is crucial (Minkova 2018).

Public servants from municipalities in Moldova, Georgia and Ukraine received anti-corruption training with support from UNDP to identify corruption risks in their cities and municipalities and understand ways to address them.

From 2015 to 2017, the **Council of Europe and European Union** ran the **Partnership for Good Governance: Strengthening Institutional Frameworks for Good Governance** to build local governance capacities.

Under the initiative, Armenia, Azerbaijan, Georgia, Moldova, Ukraine and Belarus were supported to, among others, increase leadership capacities of local elected representatives, strengthen the capacities of local authorities and foster citizen participation to increase accountability.

Under the initiative, the sub-programme "Local Initiatives on Ethical Governance and Transparency" conducted capacity-building initiatives for public sector and other stakeholders in, among others, Tianeti in Georgia, Budesti in Moldova and Slavutych in Ukraine.

As part of the effort, a training seminar was held in December 2017 in Minsk, to introduce modern HR concepts to local and regional administrators. A

variety of other training efforts were also conducted as part of the programme, such as a workshop on local finance benchmarking in Tbilisi.

During the project's closing and evaluation, the need for systematic training approaches for local governance was stressed and the value of e-learning tools was emphasised.

The World Bank and Government of Austria have launched the **Urban Partnership Program (UPP)** with the aim of strengthening the capacity of local governments in south-east Europe. The goal is to foster urban development and sustainable growth by instituting peer learning forums, and providing practical tools for decision-making and city management.

Through the UPP's integrity building initiative, seven counties in south-east Europe (Albania, Bosnia and Herzegovina, Croatia, Kosovo, Macedonia, Montenegro, and Serbia) received support to implement social accountability efforts and to build capacities. Between 2016 and 2017, 23 cities were involved in the programme and conducted surveys, received training, attended monitoring and evaluation workshops and took part in the Integrity Leadership Training Program (World Bank 2018).

Additionally, several workshops and conferences were held, such as the city-to-city dialogue conferences, where municipalities discussed improving municipal revenues, modernising public expenditure management, modernising legal and regulatory frameworks, and enhancing transparency and accountability. Cities in the region noted how Municipal Finance Self-Assessments and urban audits helped in increasing efficiencies, fostering collaboration, and improving investment ratings. During the programme, over 60 municipalities in the Western Balkans have undertaken Municipal Finance Self-Assessments,

to improve their cities' financial management and investment programming (World Bank, 2017).

Karlovac in Croatia joined the UPP programme in 2016 during its second phase. In a series of workshops, attended by members of the city council, chambers of commerce, civil society and media, a participatory problem and solution identification process was conducted (World Bank 2018). Public procurement, recruitment and advancement of public officials and management of city property were identified as areas in need of improvement. As part of the Integrity Leadership Program, stakeholders received capacity building through a series of multi-stakeholder workshops as well as through peer learning opportunities with other Croatian cities that were simultaneously undergoing (or had previously undergone) the programme. In this process, Karlovac updated its website to be able to better communicate with citizens and adopted an anti-corruption plan in March 2017 (World Bank 2018).

The city of Tivat in Montenegro implemented reform efforts to strengthen the organisational integrity of their local governments, also as part of the UPP programme (World Bank 2018). In the process, they received technical support and attended capacity-building workshops to help them develop individual integrity plans and implement relevant reform efforts. As part of the programme, municipal staff were trained on integrity building and on how to conduct integrity assessments and develop action plans. Representatives from the city also took part in the UPP's Integrity Leadership Training Program jointly with participants from Herceg Novi (also Montenegro) and Zenica (Bosnia Herzegovina). The training included awareness raising elements to increase the understanding of corruption and integrity, and taught participants how to develop an integrity framework and change process, and manage integrity in their day-to-day

practical work. Similar training efforts were also conducted in two cities in Serbia (Ruma and Pančevo) and in other cities in the region (World Bank 2018).

Increasing transparency and citizen engagement

Transparency is a crucial element in curbing city level corruption as it gives citizens access to relevant information, increases citizen engagement with the government, and thus "creates more watchdogs" (CAPI 2016: 9).

Cities should strive to make as much information as possible available to the public, ideally online, and where feasible open it up to commentary or feedback. This should include the publication of budgets, expenses and related documentation above a certain threshold, urban plans, city council meeting minutes and agendas, audit reports, licence applications, relevant contracts, lobbying regulations, asset declarations and others (CAPI 2016; Minkova 2018; Williams & Dupuy 2018).

Some initiatives have used multi-method approaches to increase transparency and engage citizens. The city of Valencia in Spain for example, embarked on anti-corruption reforms in 2015 that have included an "open door municipality" campaign, in which citizens were invited to visit the city council and several other facilities. Simultaneously, online tools were launched to increase citizen participation, allowing citizens to vote on initiatives and propose new initiatives that they would find valuable. The city also created an open government portal though which citizens can access relevant information and participate in decision making (Uraía 2017).

Open data initiatives

To better communicate between municipalities and citizens, there has been an increase in recent years in efforts to publicise relevant data for citizens in an actionable manner. The ability for citizens to attend legislative and other relevant meetings as well as demand access to physical documents is an important way to increase transparency. However, an exclusively manual and physical way of disseminating information is often cumbersome, costly and will not reach many citizens. Digital dissemination of information, which takes into account the specific population's modes of and access to communication tools, will greatly facilitate transparency (Governing Institute 2014). Ways to achieve this can include distributing dates, agendas and minutes of city meetings through email or online tools and video streaming of public meetings. Several online/software solutions are now available that can be used by cities and local governments to publicise information in a digestible and useable format (e.g. Opengov, Uraía). Some cities have also implemented their own tools.

Nicosia in Cyprus has launched e-Nicosia to increase access to information. The tool gives citizens access to their taxes, an opportunity to file complaints, and to pay taxes and fines. It further gives information on licensing fees and relevant charges for public services (such as garbage collection, alcohol licences, property taxes, etc.). Despite challenges in collecting a professional tax from companies registered in Nicosia, the system was successful in improving the efficiency of municipal services and was tailor-made to meet citizen requirements (Uraía 2017).

The city of Providence in Rhode Island, U.S. implemented a legislative management solution in 2013 where audio recordings of city council meetings are uploaded and accessible through the

city's open meeting portal within a day of the meeting. Through the portal, citizens can also access meeting minutes and voting records and can request the information packages available to city officials through email (Governing Institute 2014). This process facilitated information sharing for recipients as well as for the city, who had previously had to share information manually and on demand.

According to a clerk in Atlas County, Michigan, another city that implemented an online solution to share public records, the increased ease with which citizens are now receiving information at a faster pace and lower costs, has increased their trust in their government (Governing Institute 2014).

The city of Martin in Slovakia launched an anti-corruption initiative in cooperation with Transparency International Slovensko in 2008, to counter corruption and increase transparency and accountability, (Transparency International Slovensko 2016). The effort included a situation analysis and assessment of existing policies, policy recommendations regarding whistleblower protection, information disclosure, and the introduction of an electronic register. The city introduced the website transparenttown.eu and a specialised website for communications between town hall and its citizens. Through the websites, citizens can directly access information on relevant contracts, invoices and orders, as well as demographic information, a list of tax defaulters and a direct communication channel with town hall. In 2010, Martin received a UN Public Service Award and, according to Transparency Slovakia's transparency ranking of Slovak municipalities, Martin was ranked the most transparent town in 2014 (Transparency International Slovensko 2016).

After a legislative change by the national government in 2010, which mandated the

publication of all public contracts online, 2,700 Slovak municipalities are estimated by Transparency International Slovensko to have published over 1 million contracts on their websites in the course of a four-year period. According to a study conducted by Transparency International Slovensko, the initiative showed initial successes, both in the number of citizens checking contracts and receipts online, as well as in increased and more immediate reporting on procurement issues by the media. Due to these successes, the perception of corruption levels is said to have improved and other regions are looking to Slovakia as an example (Šispoš et al. 2015).

Netechyntsi in Ukraine is a good example of how small towns can implement open data initiatives. As part of the "local initiatives on ethical governance and transparency" project supported by the Council of Europe, the town established an open data website and two open access laptops were put in the city library for citizens to use free of charge to ensure access to the new information. The website provides citizens with information about council work and decisions, and gives citizens an opportunity to send in public appeals and information requests (Council of Europe 2017).

Open Government Partnership

The Open Government Partnership was launched in 2011 by national governments and civil society advocates to promote accountable, responsive, and inclusive governance. Governments of countries joining the Open Government Partnership commit to developing regular action plans in consultation with civil society that will be published online, as well as regular progress reports on implementation. Issue areas are broad and range from anti-corruption and gender to digital governance and civic space, and others, but always with a focus on increasing transparency and citizen engagement and defining priorities based on

individual needs and focus areas. While the target audience for the initiative was initially governments (who remain the largest number of members), cities and regions increasingly join the initiative too, among them Madrid in Spain, Buenos Aires in Argentina, Paris in France, and Tbilisi in Georgia.

Madrid is currently in the process of implementing its second action plan under the Open Government Partnership for the period of 2018-2020 (City of Madrid 2018). Under this action plan, five commitments are under way:

1. Introduction of an anonymous and digital complaints mechanism for citizens to report cases of corruption. This was deemed necessary as informants were previously at a high risk of reprisals.
2. Launch of "Madrid en Datos". While Madrid had previously published a wide array of data through its transparency portal, a consultation process revealed that the information provided was not always easily understandable or detailed enough. Through the introduction of an interactive web interface, the city hopes to provide information in a clearer and more user friendly manner.
3. Dashboard to control government commitments. The City Council of Madrid had already been publishing information about its government plans and evaluations online through an open data portal. However, the process was found to lack visualisations and interactive consultations in order to be clear and easy to use. Access to this information was thus to be reformed to provide graphic presentations that clearly show activities at a neighbourhood and district level and information on their planning phases and levels of progression.

4. Waste management transparency and creation of a waste information platform. Through a dedicated web page, regular reports and different interactive tools, citizens are to receive relevant information on waste generation, waste disposal and recycling, and waste management systems, including bids and contracts.
5. Creation of a city observatory. The city observatory aims to create a new space for citizens to monitor municipal activities. Members of the observatory will be chosen from among the citizenry at random and in a way to compose a representative sample of the city's demographic. The observatory meets periodically to review government and citizen proposals to ensure effective citizen consultation.

For activities conducted under its first action plan, Madrid received a star rating from the Open Government Partnership, which is awarded to reform efforts that "have shown evidence of early results, representing major steps forward in relevant policy areas and transforming 'business as usual'" (Open Government Partnership 2018). The reform effort praised was the introduction of a lobbying register. Spain, like many European countries, lacked lobbying regulations and faced repeated corruption scandals, leading citizens to distrust government officials. To increase transparency and give citizens an insight into who influences their government, the City of Madrid created a mandatory registry, where lobbyists have to record all meetings held with members of the city council (Open Government Partnership 2018). Through the registry citizens can also request alerts, view calendars and request appointments

Social accountability and citizen monitoring

Klitgaard et al. (2000: 65) argue that "the greatest enemy of corruption is the people" as they are

crucial sources of information on where corruption occurs. Including citizens in the process, through oversight committees, public debates, focus groups, participatory budgeting, educational programmes, reporting mechanisms, social audits and others is thus crucial (Klitgaard et al. 2000; Minkova 2018; Williams & Dupuy 2018; Zinnbauer 2013).

Social Accountability includes any measure, formal or informal, "through which citizens engage to bring state officials or service providers to account" (Baez Camargo 2018: 1). This can include citizen charters, social audits, community scorecards and citizen report cards, as well as approaches to participatory budgeting (Baez Camargo 2018).

Especially in contexts where local authorities have weak monitoring and enforcement capabilities, citizen participation can be helpful to "assess public service quality, and monitor and denounce corrupt practices" (Baez Camargo 2018: 1).

However, the "engagement challenge" of building and sustaining a sufficient level of citizen engagement needs to be considered, as this can be difficult in practice (Zinnbauer 2013: 24). This requires background and planning work to ensure measures are implemented that fit the local context as well as citizens' demands, capacities, existing networking and participation activities, social norms, and levels of trust between different stakeholders (Baez Camargo 2018).

Which specific approach of citizen engagement is best suited in a given setting will depend on expectations and local needs, as well as on citizens' awareness and capacity. Where social accountability is a new concept and/or citizen awareness about their rights low, initial capacity building will be required to ensure citizens are aware of their rights as service recipients and to be able to identify corrupt behaviour and how to successfully confront it (Baez Camargo 2018).

Individual approaches such as scorecards or reporting measures might also be more appropriate than collective citizen engagement efforts (Baez Camargo 2018).

Innovative technological solutions are also increasingly used to streamline processes and increase transparency, accountability and citizen participation.

The city of Odessa in Ukraine established a citizen complaints mechanism (online and via a hotline) that gives citizens the opportunity to report corruption or mismanagement. The website established for this purpose tracks all complaints received and categorises them according to their status and subject area (e.g. infrastructure/roads, water supply, parks, etc.). The website also provides a map and "before and after" pictures of issues that have been addressed after a complaint was received. This visual follow-up is meant to increase trust in the system to show that making a complaint can bring about change (Council of Europe 2017).

The Transparent Cities Initiative, launched by **Transparency International Ukraine**, ranks the 100 biggest cities in the country according to their transparency. Cities are rated based on the openness and transparency of the work of the local public sector, to what extent citizens are involved in decision-making processes, and how transparent procurement, budgeting and investment processes are.

In addition to publishing the city rankings, Transparent Cities also offers support to local governments and activists to improve government openness in their municipalities. This includes providing civil society with advocacy tools and other measures to start local activities, providing tools for local government to improve their transparency, assist in the development or

improvement of e-services, and conduct local training on transparency and accountability for municipal governments, civil society and business representatives.

The **World Bank Social Development Unit** has launched the **Social Sustainability and Citizen Engagement (SSCE) Initiative**, in continuation of the World Bank's Urban Partnership programme (see above). The extension of the initiative included a broadening to cover seven countries and nine cities, among them **Elbasan in Albania**. UPPII also put a stronger focus on citizen engagement, social accountability and participation, with an emphasis on reaching and including marginalised groups and making sure their voices are reflected in government action (Shutina et al. 2017 and World Bank 2018b). The goal of the initiative was to measure social accountability in local governance, fostering cooperation between different actors at the local level, and expanding social participation of marginalised groups (World Bank 2018b).

As part of the initiative focus group discussions were held throughout 2016 in Elbasan with citizens and NGOs, with a particular focus on marginalised communities, such as unemployed people, ethnic minorities and low-income citizens. During the focus groups, the opinion prevailed that the city provided relevant information to its citizens through different channels (such as website and a city newspaper). However, participants felt that information sharing could be improved by making websites more user friendly and making the information more accessible.

The city executed an extensive consultation on strategic and planning processes, conducted participatory and gender budgeting, held open hearings and public consultations, instituted a Citizen Advisory Panel, and included citizen

satisfaction surveys and reporting opportunities on its website. Additionally, with support from the UNDP, the use of ICT was increased through the introduction of e-newsletters, an institutional website, and an e-participation platform (Shutina et al. 2017 and World Bank 2018b).

However, not all of these rather extensive opportunities for citizen engagement were sufficiently known to all citizens, and very few of the participants in the focus group meetings had participated in any of the in-person measures such as public hearings (Shutina et al. 2017). While technological tools were emphasised as important, it was also noted in the focus group discussions that relying exclusively on new technology was not recommended. Especially among lower income and elderly citizens as well as remote villages belonging to the municipality, internet and technology penetration was still low, thus making more traditional measures such as TV programmes and newspapers still crucial (Shutina et al. 2017).

Despite a large number of measures adopted and engagement opportunities made available, a key challenge remained the relatively low capacity and resource level of CSOs to effectively make use of the measures introduced (Jashari et al. 2016).

Conclusions and lessons learned

Corruption and integrity risks at the city or municipal level often mirror the corruption challenges of the respective country, with challenges including corruption in procurement, nepotism, opaque and inefficient service delivery, and a lack of monitoring and oversight.

However, due to the specifics of the socio-economic and political make-up of cities – the close proximity and often personal acquaintance between public servants and citizens and the often lower resources and capacities – tackling such

challenges at a city level requires special consideration.

Public procurement and public service delivery are among the most common corruption challenges at municipal level. This is where corruption (including favouritism and nepotism) are most visible to citizens, and it is also where their lives are most adversely affected by it. Efforts to reduce corruption risk in procurement and public service delivery are thus among the most common approaches undertaken to increase integrity at the local level.

Other common reform efforts are general transparency initiatives to increase information sharing between local governments and their citizens. These approaches hope to build trust and increase oversight over public conduct.

All of these efforts have seen new innovation with the onset of online solutions, which are widely believed to facilitate efficiency, accountability and oversight while being easy to roll-out widely.

To ensure relevant stakeholders are adequately engaged, informed and equipped with the necessary information, a comprehensive outreach and communication strategy is paramount, as is, where needed, a training programme for relevant stakeholders (Klitgaard et al. 2000 and Minkova 2018). In that regard, transparency and open data endeavours are crucial to ensure citizens have the necessary information to access their rights and can fulfil crucial monitoring and accountability efforts. Information technology has greatly assisted these efforts in providing instant and low cost access to relevant information and providing a low-barrier way to engaged while simultaneously making it easier for city administrations to provide necessary documentation (Governing Institute 2014 and Uraía 2017).

Many cities have been able to streamline service delivery, make procurement processes more transparent and effective, and allow for citizen oversight by introducing online solutions. However, especially in smaller towns and remote areas, the more "traditional" approaches of transparency, such as focus group meetings, newspapers, or in-person-training, should not be entirely discarded. Depending on the geographic context and the demographic make-up of communities, internet usage can be less widespread than anticipated and many citizens may not be reached with online measures (Shutina et al. 2017).

While social accountability measures can be an effective (and cost effective) way to ensure monitoring and oversight, citizens and CSOs do not always have the capacity or resources to fulfil the role envisioned for them. Including capacity building and awareness raising elements in reform efforts, as well as designing measures that are relevant and approachable, can thus be as important as building the process itself (Baez Camargo 2018; Jashari et al. 2016; Shutina et al. 2017; Zinnbauer 2013).

A comprehensive risk assessment and context analysis should be the base of any measure undertaken, to ensure that reforms match the city's needs and ensure that the stakeholders required to implement the plan have the will and capacity to execute as desired (Klitgaard et al. 2000; Minkova 2018; Municipality of Gjakovë/Đakovica 2015).

Throughout the examples discussed above, engaging citizens and other relevant stakeholders in a meaningful way from the early stages of a reform process has been a key requirement for success. And a substantial number of initiatives have reported an increase of trust of citizens in

their local government through the increased engagement, accountability, and transparency.

One-stop-shops are also considered an important tool to increase transparency, accountability and citizen access, but need to be outfitted with sufficient resources, capacity and technology to be useful (Shutina et al. 2017),

Several tools, methodologies and guidelines are now available to give communities and implementers guidance. But ultimately reform processes will have to be adapted to the local context, in consultation with the relevant stakeholders, to be effective (Minkova 2018 and Baez Camargo 2018)

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