Lessons Learned in the Implementation of the Guatemala Declaration:
A Case of the Software Missing the Hardware?

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[1]The opinions expressed herein are those of the author and do not necessarily reflect the views of any organizations he is associated with.

Introduction[2]

On November 15th of 2006 in Guatemala City, during the inauguration of the 12th International Anti-Corruption Conference, the presidents of Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua, Panama; the vice-prime minister of Belize; and on behalf of his government the Dominican Republic's ambassador, subscribed the "Guatemala Declaration for a Region Free of Corruption." It is a three-page document that lays down a series of pronouncements. The main objective of the Guatemala Declaration was the harmonization of laws and regional policies against corruption.

Fourteen (14) goals/benchmarks were outlined in the Guatemala Declaration as means to end corruption in the region by the year 2010. These goals were related to the need for national anti-corruption plans; access to information; the need to promote accountability in public sector regularly and institutionalize it; strengthening the specialized anti-corruption entities; implement procurement regulations; prevent corruption in management of public programs and social funds; emphasis on promoting ethical behavior when conducting public affairs; strengthening complaint systems and adopt witness protection laws; allocate resources and implement programs to educate, raise awareness and create values that favor transparency and accountability; promote the implementation of regulating and adopting procedures to prevent transnational corruption; promote the strengthening of supreme audit institutions; transparency in electoral and political finance; reform of the civil service; and monitoring and compliance of the Declaration.

While the Guatemala Declaration could be hailed as a unique statement of political will to fight corruption, it can also raise a host of questions related to its viability, feasibility, potential, and eventual impact. Similarly, the Guatemala Declaration can be seen as another political proclamation or also as a political statement with public policy implications. In the context of the 13th International Anti-Corruption Conference held in Greece in October 2008, it seems timely and valuable to assess after two years the Declaration of Guatemala in terms of its progress. Similarly, a number of lessons can be put forward, in order to collectively construct a reference for different regions of the world.

Progress towards achieving the 14 goals/benchmarks underlined in the "Guatemala Declaration" can be assessed and evaluated from diverse perspectives. Given the content and range of issues that are covered by the Guatemala Declaration, this paper departs from the premise that the declaration has a meaningful policy value, and therefore it is worth analyzing its progress, results and lessons from the perspective of a public-policy framework. In doing so, emphasis is placed on strategic policy issues such as planning, coordination, sustainability and institutionalization.

It is vital that implementers and observers of the Guatemala Declaration clearly understand the nature of the goals/benchmarks being proposed and their policy implications. Far from being a mechanical process of simply carrying out what has been written in the declaration, the implementation of the "written wishes" is a complex political and policy undertaking with many elements along the way that will affect the prospects for success of the initiative. Understanding

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[2] I want to thank Ximena Murillo for her research, translation and data collection.

the policy context of the Guatemala Declaration, the obstacles it faces and the potential it has is an important step in initiating a strategic approach to implementing policy change.

Policy characteristics analysis is a useful tool to help policymakers, pundits and observers to understand the dimensions and dynamics of an initiative such us the Guatemala Declaration, the policy implications, likely obstacles and where institutional elements are likely to be critical. Policy characteristics analysis may be used as a first step in developing an implementation strategy by dissecting the institutional environment in which this initiative is being implemented. The purpose of policy characteristics analysis is to provide a systematic understanding of the Guatemala Declaration that can carry over into a more detailed institutional appraisal, and identifying mechanisms for implementation.

The main objective of this paper is to provide insight into how the eight countries that have signed the Guatemala Declaration, have so far dealt with the policy implications of implementing the Declaration, to analyze what this experience can tell about this type of initiatives and to identify issues for consideration in future efforts. The plan of this paper is as follows. In the first section the focus is on providing a model to analyze progress of the Guatemala Declaration, whereas the next section focuses on how to move forward with implementation. In the third section a closer look is given to the role of institutions, institutionality and institutionalization. The last section presents some lessons and tentative conclusions.

A Model to Analyze the Progress of the Guatemala Declaration

All policy reform initiatives, including the Guatemala Declaration, require paying attention to both the consequences they will have on the public and on institutions. Policy initiatives, like the Guatemala Declaration, can be thought as the software that is necessary to achieve governance performance. Software by themselves cannot influence governance performance and/or results; they have to have an adequate hardware that permits not only the implementation of specific parts of the software (programs/actions), but also the articulation of all parts (policy) so the entire software (policies) package performs optimally and produces maximum governance results. Most of the 14 goals/benchmarks listed in the Guatemala Declaration require public policy design, bureaucratic capacity, and technical complexity, among others. Thus the implementation of the Guatemala Declaration should be understood as an interactive process.
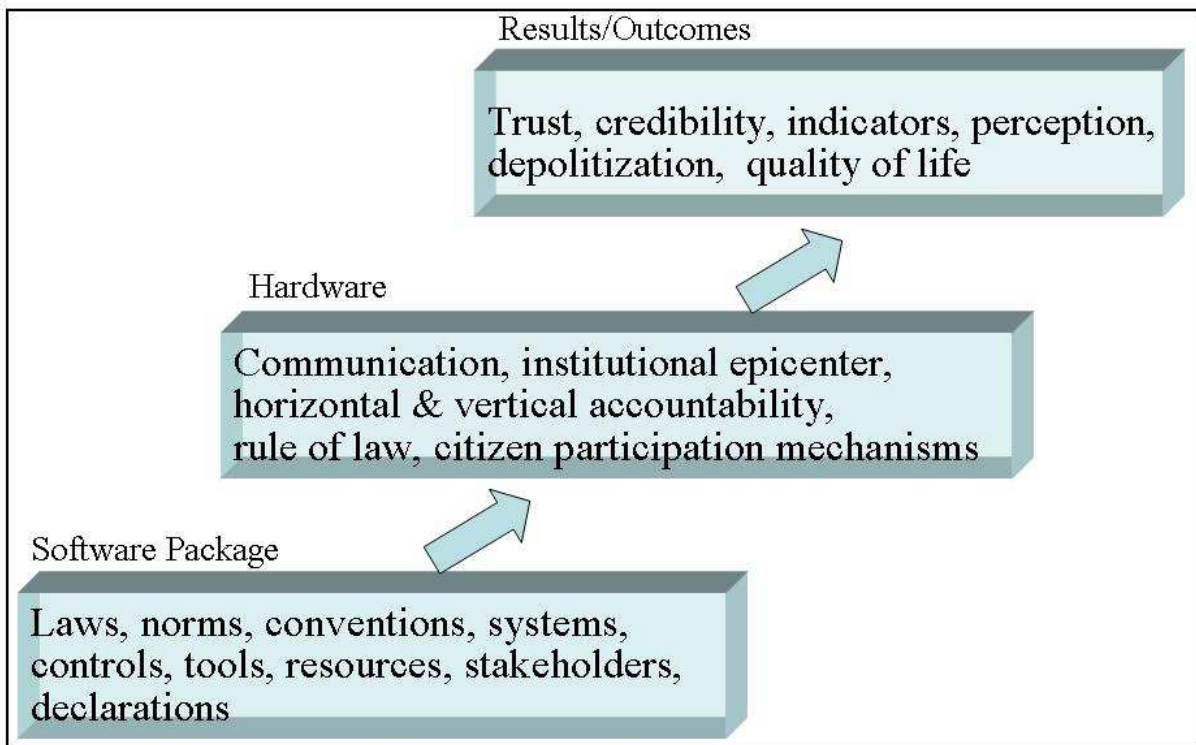
Some policy initiatives proposed in the Guatemala Declaration, such as the design of national anti-corruption plans, entails little administrative complexity, can be designed and implemented relatively quickly and may generate an immediate tangible visible public results. Other initiatives, such as access to information, procurement and civil service reform, require a great deal of administrative time and effort, and may not have an immediate impact. The response and eventual results to a policy pronouncement such as the Guatemala Declaration are dependent on many variables such as political will, institutional capacity, administrative intensity, ability to communicate processes, progress and results, and the degree to which it encourages citizen participation. For these variables to be activated, the hardware needs to match the software.

The main policy implication that comes out of this analytical framework is that the institutional hardware matters as mechanisms that help convert inputs (software) into results. The

institutional hardware is also important as related to transparency and anti-corruption policy, because they can help true reformers and champions to emerge and to signal their good intentions and thereby gain continued political support to fulfill goals/benchmarks. Policy-makers and politicians with bad intentions (viruses) can generally find ways to circumvent the hardware to derail anti-corruption policy initiatives. However, what has to be an innovative argument is that the institutional hardware should matter for political credibility. That is, for the ability of champion policy-makers with good intentions to convince constituencies of their honest pursuit and thereby get the necessary support to accomplish the goals/benchmarks, they need a solid and viable institutional hardware.

It can be assumed that the Guatemala Declaration was a good intention on the part of eight governments that subscribed to it, which added to a number of other governance inputs already in place (part of a software package) that encompass an extremely wide array of inputs. It can also be assumed that when these eight governments targeted the 14 goals/benchmarks they were certainly aware of the institutional implications. Nonetheless, often the key to successful transparency and anti-corruption policies is to close the gap between good intentions (software) and the institutional policy implementation capacity (hardware). One initial hypothesis could be that the Guatemala Declaration is one more element of a package of inputs that are now driving the demand for more transparency and accountability in Central America, and its success and impact is highly dependent on an adequate institutional hardware (Figure 1).

Figure 1
Transparency and Anti-Corruption Public Policy Model

Results/Outcomes

Trust, credibility, indicators, perception, depolitization, quality of life

Hardware

Communication, institutional epicenter, horizontal & vertical accountability, rule of law, citizen participation mechanisms

Software Package

Laws, norms, conventions, systems, controls, tools, resources, stakeholders, declarations

Hence, a key general lesson that emanates is that what is important is not so much the specific pronouncements and calls for reform, but rather, the institutional ability and capacity to use broader accountability and transparency elements to build political and policy credibility to move the agenda of the Guatemala Declaration forward and to produce key results related to trust, perceptions and well being.

Helping to Move the Guatemala Declaration Forward

The implementation of the Guatemala Declaration is a process that is not only linked to the availability of norms, tools, systems and ideas, but also to the institutional and management capacity of a given country to translate these inputs into substantive and meaningful policy outcomes. In order to achieve the 14 goals/benchmarks, it is necessary to go through different steps. The first step is to recognize that the lack of transparency and the presence of corrupted practices is a public policy problem. In its introduction the Guatemala Declaration does that with eloquence. A second relevant step is to discuss how to improve current strategies in conjunction with the development of a detailed strategic plan to manage transparency and corruption issues. So far after two years, the governments that signed the Guatemala Declaration have not taken collective action to take this crucial second step. While a number of anti-corruption activities are being promoted, in some cases as part of a plan, a specific implementation plan for the Guatemala Declaration would help organize, prioritize and monitor implementation.

An additional step of equal importance is to design a road map that shows the sequence of actions leading to a more institutionalized implementation process. The road map could also help connect the political rhetoric of the Guatemala Declaration with an operational agenda to improve transparency and accountability. The basic questions that should be answered by the road map are: What is the starting point? And, how do we get from starting point in 2006 to the end point in 2010? Again, so far there is no evidence that the 8 governments have designed such a tool, although the coalition of Transparency International Chapters of each country is promoting a dialogue with governments to discuss among other issues, how to get them to agree on a strategic agenda.

The strategy should be articulated, coordinated and systematically implemented. Therefore, the analysis of the implementation of the Guatemala Declaration and its progress on the goals/benchmarks must also include some performance and institutional capacity indicators. When any economic policy is being analyzed, the three "e's" (efficiency, economies of scale and effectiveness) are important measures in relation to outcome and results. In governance, the analysis of the three "i's" (institutions, institutionality and institutionalization) has the same applicability and can be use to provide inputs to implement the policy areas of the Guatemala Declaration.

When the Guatemala Declaration is analyzed using the three "i's," a number of elements emerge not only to draw the institutional design needed, but also the elements to help move forward its implementation and ultimately its impact. The **institutions** are abstract and largely intangible elements comprising of norms, laws and rules that structure a government's daily life. The institutions generate certainty or reduce uncertainty through constraints and enabling incentives, in such a way that conditions the behavior of both individuals and organizations. The institutions

not only determine procedures (rules of the game), but also to whom they are applied, as well as the consequences and sanctions. They also contribute to articulate the interaction among actors. Finally, institutions in democratic regimes are the expression of the relationship between power and interests, which then play an important role in creating competencies, mental processes and behaviors. The institutions are not a product of a voluntary action but the result of a social learning process, expressed in the rule of law.

Institutions contribute to the stability of a democratic government because they can guarantee fairness, equality, autonomy, balance of power, political freedom, human and civil rights, transparency and accountability. Constitutions are institutions by nature and therefore, institutions can neither be replicated nor change by decree. Institutions are not only based on a formal legal frameworks and statements by policymakers and/or members of political parties, but also on the actual behavior of formal and informal actors. Only as such, it is possible to explain that in spite of institutions, corrupt practices and the lack of transparency still persist in all societies around the world, but with different levels of intensity. Indeed, institutions are not only the base of a state apparatus governed by law, but also of an authentic democratic state based on the rule of law. The Guatemala Declaration not only has addressed the issue of institutions broadly, but also more specifically has targeted a number of institutions such as laws on access to information procurement, conflict of interest, witness protection, political party finance, and civil service reform.

Institutionality is a more concrete reality than an institution. Institutionality is the formal arrangement of actual resources (human, financial, technical and organizational) for the consecution of governmental objectives. Institutionality cannot be confused with institutions because it is not a rule, norm or legal framework, but an aggregate (capacity, ethics, public service, systems, internal controls, self--evaluations) that partially accounts for institutions. Institutionality is a governance mean that helps to organize the administration and management of resources as well as the design, implementation and evaluation of public policies. Institutionality is the engine of any anti-corruption and transparency policy, as it promotes and deepens institutional capacity, ownership and leadership.

Institutionality has a greater margin of maneuverability than institutions. Therefore, it is more feasible to modernize it and strength it to make it more efficient, and even to adapt it to various circumstances and contexts. Institutionality is the most instrumental part of anti-corruption and transparency policies and therefore, it produces concrete results and indicators. Similarly, the Gordian knot of transparency and anti-corruption policies can be located in this dimension of policymaking. A strong capacity to formulate, coordinate and implement policies should exist in this dimension. It should be the less politicized and the most technical part of public policy. The Guatemala Declaration does not explicitly and/or specifically address the issue of institutionality, although more implicitly and indirectly does point to the need to work towards institutionality. As such, it highlights the issues of transparency plans, periodic accountability exercises, ethical behavior of civil servants, complaint systems and witness protection.

Finally, **institutionalization** is ultimately the result of the relationship between institutions and institutionality. When institutionalization works, it has the capacity to condition behavior, diminish uncertainty and reduce risk. It also opens opportunities to design and implement an

anti-corruption communication strategy, as institutionalization provides inputs for clear messages and for promoting transparency and accountability. Institutionalization can also guarantee mechanisms for participation and demand canalization through which interests and demands can be organized, expressed, negotiated and conciliated. For example, a dimension in which the institutionalization plays a vital role in relation to transparency and corrupt practices is in the administration of justice, which, based on a good body of laws and norms, can make it possible to strengthen the rule of law above the arbitrariness and discretion, guaranteeing a minimum level of liberties, citizen's rights and transparency. Ownership is an important ingredient of institutionalization, as it encourages initiative and proactivity.

Thus, institutions, institutionality and institutionalization will determine the totality of limits and opportunities for the Guatemala Declaration. It can not be denied that politics is the basis and the conditional factor for the design and implementation of transparency and anti-corruption policies. Therefore, often relaying only on administrative means to promote transparency and anti-corruption policies can be counterproductive. Similarly, when the approach to transparency and anti-corruption issues is made wholly within the political sphere, the result is not always the ideal.

The reality is that in many countries, public administration is still subordinated to the political sphere and the issues of anti-corruption and transparency are still being managed from purely political platforms. More often now than before, most leaders who obtain their power through elections, include anti-corruption themes or "slogans" in their political campaigns, often despite a lack of substantive and strategic content. For example, "zero corruption", "with clean hands", "a transparent and clear government", and "zero impunity" are some of the most popular "slogans" used during political campaigns. In some ways the Guatemala Declaration and its 14 goals/benchmarks can be said that it has some level of political rhetoric, "A region Free of Corruption by 2010."

This obviously relates more to impulse and political rhetoric than to a coherent platform and to a strategy of policies. The gap between what it is said or promised and what it is done in relation to anticorruption and transparency becomes apparent once the time for implementation arrives. The major problem is that the political rhetoric in relation to transparency and anti-corruption cannot always be turned into policies, unless it is incorporated into an institutional policy model. Therefore, overcoming this possibility is a great challenge to the implementation of the Guatemala Declaration.

Building and Strengthening the Hardware for Anti-Corruption by Focusing on Institutional Capacity

Like the satellite signal, corrupt practices and the opaqueness are elements always present in the surroundings. Its reception or rejection is linked to the capacity of the public sector apparatus to allow the signal to enter or be diverted. Therefore, it is necessary to have a public sector able to process the signal and/or control it. It is clear that many individuals, no mater what, will seek to take advantage of the government to receive benefits when they are not entitled to. Government employees, members of political parties and business people can take advantage of the

"monopoly", discretional nature of the government and the lack of transparency to seek opportunities for personal gain through the use of corrupt practices.

While the Guatemala Declaration, and other such pronouncements, like the Inter-American Convention against Corruption, and the United Nations Convention against Corruption, have been responses to this recurrent possibility, many governments around the world have gone further and created what could be denominated an anti-corruption "**institutional epicenter,**" to prevent, manage and sanction corrupt practices.

The institutional epicenter is nothing more than the focal point of anti-corruption policy, where information is collected and symmetrically distributed, where policies and strategies are defined and prioritized, where institutional efforts are coordinated, where complaints are managed, where the investigation of cases is invigorated and where the rewards and sanctions are implemented. The epicenter should not necessarily be centralized into one entity, nor should its dynamic be only up-down. It should be a group of specialized and decentralized entities (for example comptroller's office, legislatures, attorney general's office) coordinated by an institutional, independent mechanism that allows the performance of several preventive duties. This means that it is necessary to think of this as a mechanism that is not only able to assess the risk and to raise the alarm, but to also collaborate in risk management and play a protagonic role in relation to prevention and coordination.

This "institutional epicenter" is a means to prevent, reduce and sanction corrupt practices in public administration, politics and the private sector. In many cases, this institutional anti-corruption apparatus is considered an investment for the benefit of democratic governance. The most basic institutional epicenter can include enforced laws, strong independent entities and branches of government for control (vertical accountability), transparent and participative budgets, competitive and meritocratic civil service, transparent procurements and purchases, an efficient and credible judicial system, access to public information and citizen participation (horizontal accountability). The Guatemala Declaration needs such an institutional epicenter as a hardware to help translate its pronouncements into actions and policies, which encompasses the institutional interconnections and devices required to execute (or run) the software.

In the last decade there have been many attempts, in almost every country that subscribed to the Guatemala Declaration, to generate some form of anti-corruption institutional epicenter, with various and divergent results. It has often been hard to sustain them. In most cases, budgetary restrictions, lack of independence and "teeth" have determined the success and/or failure of these mechanisms, their efficiency and sustainable success. Most public administration of the Guatemala Declaration zone still show managerial weaknesses, and are still embedded in a complex interdependent political system. While the Guatemala Declaration charges a Central American/regional entity with the responsibility to monitor compliance, in practice such element has not been fully operational.

How Much of the Guatemala Declaration has been Implemented?

As it is illustrated in Annex 1, there has not been a consistent, systematic and integrated result so far from the Guatemala Declaration. Based on an analysis of regional reports, observations, and

interviews with some key stakeholders, the following are some findings about the implementation Guatemala Declaration.

What national and regional progress has been made two years after the signing of the Guatemala Declaration?

- Progress is **uneven** across countries and the 14 goals/benchmarks.

- **Most progress** has been registered in adoption of Freedom of Information Laws (FOILs) (6 out of 8 countries with FOILs; in regulating procurement (most have a legal framework); strengthening Supreme Audit Institutions (SAIs); National Anti-Corruption Plans (3 have specific anti-corruption plans, 3 have generic anti-corruption frameworks, and 2 have broad frameworks).

- **Least progress** in monitoring compliance and implementation, electoral and political finance, transnational corruption, witness protection and social funds transparency.

- **Too early to judge** in civil service reforms, education/awareness, conflict of interests, strengthening specialized bodies and periodic accountability

2. What obstacles have been confronted in the coordination of efforts directed to carry out the compromises agreed to in the Guatemala Declaration?

- Coordination itself, or the lack there of, among participating countries.
- Lack of strategic plan and respective Road Map.
- Lack of performance indicators.
- Lack of political will, as reflected in the lack of allocating resources.
- Lack of ownership.

3. What are the lessons learned in the implementation of the Guatemala?

- Matching software to hardware and the role of the 3 "is."
- Capacity to convert ideas into policies.
- Key role of an independent specialized body to coordinate and lead the effort.
- Enforceability and implementation of existing laws.
- Importance of vertical and horizontal accountability.
- Key role of civil society.

4. Which are the efforts and results more relevant regarding the regional follow up of the declaration of presidents, both from the perspective of the public sector and civil society?

- FOILs

- Procurement

- Political Party Finance reform

- Anti-corruption plans

Key Lessons, Some Recommendations and Tentative Conclusions

1. There are **no quick fixes**. Addressing corruption is a complex endeavor requiring governance and economic wide reform. Long-term commitment is required to gain public confidence in efforts to prevent and control corruption and institutionalize transparency policies;

2. The need to **balance** between prioritizing short-term, immediate visible targets that create momentum but merely scratch the surface of the problem with deeper, more difficult, as well as time and resource intensive systemic reform that attack the root causes of corruption;

3. Anti-corruption activities can be **encouraged and fostered** by outside partners and donors, but the drive and the leadership must come from within;

4. Anti-corruption strategies, whether national or regional, require a **long-term vision** and clear understanding that fundamental change can begin to take place now, but only come to fruition within one or two generations. Nonetheless, visible early victories, such as successful prosecution of high-level officials, may be critical for building credibility and generating sustained pressure for reform.

5. It is good to have **broad anti-corruption strategies**, but with a realistic vision. The broad strategies help to influence a long-term vision. At the same a realistic vision helps to link long-term policies with immediate decisions. Broad anti-corruption strategies can help to mobilize support for anti-corruption policies that while necessary, can be unpopular.

6. **Prioritize** critical issues and analyze its viability in the context of time and resources. This helps recognize urgent from important issues and vice-versa. Priorities can be short, medium and long-term.

7. Emphasis on **coordination** and **communication**.

In general, initiatives like the Guatemala Declaration show high importance at first, then back to business as usual, and ultimately lack of attention and follow-up. Thanks in great part to the leadership and effort from civil society organizations, the Guatemala Declaration has not suffered yet the fate of other initiatives. The high-level political will that gave birth to the Guatemala Declaration in 2006 has to be maintained within the governments that signed the declaration and to be continued into the agendas of new governments that came to office since the signing. Some possible recommendations to sustain momentum to implement the Guatemala Declaration could be:

- Promote ownership among implementers (governments);

- Encourage key public sector entities to actively participate in the design of strategies and political agreements and hence in the implementation commitments;

- Establish short, medium and long terms approaches and encourage prioritization and sequence linked to capacity and resources;

- Strengthen the anti-corruption institutional epicenter with authority, independence and capacity to encourage and coordinate public entities to implement goals/benchmarks and to mainstream other complementary issues;

- Governments reporting mechanisms on progress, information and communications;

- Articulate goals/benchmarks with the Inter-American Convention against Corruption and the United Nations Convention against Corruption provide a complementary framework of preventive policies and strategies as well as comprehensive dimensions to follow-up and monitor compliance. Moreover, both conventions play a relevant role in making civil society participate as well as being a provider of alternative information sources that facilitate a complementary and independent evaluation of the conventions' fulfillment.

- Technical assistance to help remedy the institutional shortcomings and capacity needs;

- More civil society involvement in monitoring compliance;

- Genuine partnerships (commitments from key stakeholders, including donors, government, civil society and private sector); and

- Numbers, data and performance indicators.

Like many other initiatives, these findings confirm that there are still a number of actors and players in each country willing to be engage policymakers in topics related to anti-corruption and transparency. Often grand pronouncements can be easily derailed by being too ambitious and by not taking into account the institutional capacity that is needed to make it happen. "Software" policy proposals will not succeed, unless they have modern "hardware" mechanisms that will enable policy implementation and outcomes. Furthermore, the idea that anti-corruption initiatives are intimidating to many stakeholders and constituencies, should be replaced with a renew hope and spirit to empower transparency and accountability. It is time to start thinking that accountability and transparency are good for governance, and that policies in these two areas can increase the political credibility of, and thereby the political support for, a government with honest intentions to undertake governance reforms.

Transparency and accountability policies are key elements for good governance, as well as to strengthen institutional capacity to prevent, reduce and sanction corrupt practices. Consensus on this issue can help move the debate beyond narrow aspects of corruption and broaden the debate

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to discuss not anti-corruption actions, but transparency and accountability policies. The adoption of transparency and accountability policies implies a wide range of institutional preconditions to improve good governance and for corrupt practices to be significantly reduced. Promoting transparency and accountability policies calls for action that touches virtually all aspects of the public sector. That is, institutions, decision-making structures, organizations, systems, human resources and citizens. It calls for political leadership, government ownership, and public-private partnerships.

The Guatemala Declaration laid down a course of action embedded in 14 goals/benchmarks to be taken in order to control corrupt practices. However, concrete targets, responsibilities, timelines, priorities and required resources have as yet to be identified. Moreover, the policy and institutional visions, which can help implement the declaration in a more strategic manner, is also missing. In order to avoid having a well-conceived if ambitious initiative (Guatemala Declaration) turn into yet another disappointment because the "software" did not match the "hardware," urgent action and support is needed to facilitate the setting of transparency policy priorities and sequences as well as the identification of feasible targets in line with capacity and available resources.

Annex 1: Summary of Progress of the Guatemala Declaration (October 2008)

	Goals/Benchmarks	EL SALVADOR	NICARAGUA	DOMINICAN REPUBLIC	COSTA RICA	HONDURAS	BELICE	PANAMA	GUATEMALA
1	NATIONAL PLANS OF TRANSPARENCY AND ANTI-CORRUPTION	orange	light green	dark green	dark green	dark green	orange	light green	light green
2	ACCESS TO PUBLIC INFORMATION	yellow	olive green	olive green	orange	olive green	olive green	dark green	olive green
3	ACCOUNTABILITY REQUIRED ON A REGULAR BASIS	yellow	red	yellow	green	yellow	red	yellow	yellow
4	STRENGTHEN AND INSTITUTIONALIZE THE SPECIALIZED AC BODIES	yellow	red	yellow	yellow	yellow	red	yellow	yellow
5	IMPLEMENT THE LEGAL REGULATIONS REGARDING PUBLIC PROCUREMENT	dark green	light green	dark green	dark green	dark green	dark green	dark green	dark green
6	PREVENT CORRUPTION IN MANAGEMENT OF PROGRAMS & SOCIAL FUNDS	red	red	yellow	yellow	red	red	red	yellow
7	RULES OF CONDUCT GOVERNING ETHICAL BEHAVIOR (CONFLICT OF INEREST)	yellow	red	yellow	yellow	yellow	red	yellow	yellow
8	MECHANISMS FOR REPORTING ACTS OF CORRUPTION AND MEASURES TO PROTECT WITNESSES	orange	red	red	yellow	red	red	orange	orange
9	ALLOCATE RESOURCES TO IMPLEMENT EDUCATION PROGRAMS AND PUBLIC AWARENESS TO PROMOTE A CULTURE OF ETHICAL VALUES IN SOCIETY	light yellow	orange	light yellow	yellow	yellow	red	light yellow	light yellow
10	PROMOTE THE IMPLEMENTATION OF REGULATIONS AND ADOPTING PROCEDURES TO PREVENT TRANSNATIONAL CORRUPTION.	red	red	red	light green	red	red	red	yellow
11	PROMOTE THE STRENGTHENING OF SUPREME AUDIT BODIES TO BE EFFECTIVELY INDEPENDENT, WITH FUNCTIONAL AND FINANCIAL AUTONOMY	light green	yellow	light green	light green	light green	light green	light green	light green
12	ELECTORAL AND POLITICAL FUNDING	red	red	red	yellow	red	red	red	yellow
13	REFORMING THE CIVIL SERVICE	yellow	yellow	yellow	yellow	yellow	red	red	yellow
14	SG-SICA, TO MONITOR THE IMPLEMENTATION OF THE COMMITMENTS	red	red	red	red	red	red	red	red

Color	Meaning
Red	No evidence of Progress in Specific Goals/Benchmarks
Orange	Some related evidence of progress but not exactly the goal/benchmark outlined in the Declaration
Yellow	Some Evidence of Progress (Ongoing Processes with different degrees/shades of implementation)
Green	Evidence of Progress (With different results and degrees/shades of implementation)