



GOVERNANCE & INTEGRITY ANTI- CORRUPTION EVIDENCE (GI ACE) RESEARCH PROGRAMME

The Governance and Integrity Anti-Corruption Evidence (GI ACE) research programme is dedicated to advancing the understanding of what works in tackling corruption, focusing on producing actionable, evidence-based research that informs effective policy interventions. GI ACE aims to bridge the gap between academic research and practical policymaking by addressing complex governance challenges and promoting solutions that are contextually relevant and scalable.

GI ACE is a core component of the broader Anti-Corruption Evidence research programme, working alongside SOAS ACE and SOC ACE. Based at the Centre for the Study of Corruption at the University of Sussex, GI ACE collaborates with a diverse range of leading researchers around the globe, as well as civil society partners, and engages with key stakeholders to drive impactful anti-corruption strategies.

GI ACE is funded by the UK Foreign, Commonwealth & Development Office (FCDO).

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Published March 2025



First launched in 2015, the GI ACE programme has evolved over three phases of research. Starting from a focus on corruption risks in procurement and the institutional architecture underpinning corrupt activities, including the role of informal governance and the challenges of civil service reform, the programme has moved towards a more explicit focus on specific vulnerabilities. GI ACE currently focuses on four core themes that lie at the heart of major concerns globally: illicit finance and the enablers of corruption; corruption risks in trade and commerce; crisis responses and corruption in vulnerable sectors; and state capture.

Underpinning all research undertaken in GI ACE are several core principles, which include the need to focus on concrete issues to be addressed rather than just 'admiring the problem' of corruption; an emphasis on contextually informed political feasibility; a solutions-led approach to research, working closely with practitioners; and learning lessons from our findings.

To date, our research has had a significant impact, including highlighting red-flag public procurement risks through an approach that has been adopted by the World Bank and others; developing a network focus to help tackle issues of bribery and favouritism in contexts where social norms override formal governance structures; identifying key vulnerabilities in approaches to tackling money-laundering risks; and providing advice to a range of government departments in the UK and beyond.

GI ACE research is designed to identify new initiatives that can help low- and middle-income countries tackle the scourge of corruption and the negative impact it has on millions of people's lives. As it does so, the programme also seeks to reflect on existing approaches to tackling corruption and explore how we can develop more targeted and political sensitive interventions that can make a real difference.

We invite you to support us on this journey to address one of the core challenges we face globally.

Professor Paul Heywood
GI ACE Director

About GI ACE

The Governance & Integrity Anti-Corruption Evidence (GI ACE) research programme is designed to generate actionable evidence that will lead to more effective anti-corruption initiatives. This entails moving away from national-level top-down technical and regulatory approaches towards operationally relevant, problem-driven, rigorous, and actionable research that takes into account specific context and the complexity of corruption.

GI ACE has supported a total of 34 research projects. Amongst the themes explored in those projects were anti-money laundering rules, beneficial ownership, cross-border trading, medical theft, procurement risks, and urban planning. GI ACE funds research with innovative approaches tied to concrete challenges around our priority areas, promoting collaboration with practitioners who are directly dealing with these challenges (under the framing principles of ACE).

Projects have generated extensive outputs - producing over 111 policy briefs, reports, datasets, and working papers, 80 peer reviewed articles and delivering impact through over 500 engagement events (speeches, panel appearances, participation in workshops, and so forth). The research teams have provided concrete tests of anti-corruption interventions, with insights and findings presented to a range of government representatives and other organisations around the world.



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GIACE PROJECTS BY THEME

Global Finance and the Enablers of Corruption

Corruption in paradise: an ecology of money laundering through real estate in the touristic global south

Jean-Patrick Villeneuve, Università della Svizzera Italiana (USI)

This project investigates how six tourism-focused cities/regions in Brazil (São Paulo, Santa Catarina), Kenya (Nairobi, Mombasa), and Indonesia (Jakarta, Bali) tackle illicit finance in the real estate market. From the perspective of real estate professionals, it examines the challenges they face, factors influencing successes and failures, and the role of laws, policies, and industry practices in preventing illicit financial flows. The findings will provide insights into how the real estate sector can be better regulated to disrupt money laundering and financial crime in tourism-driven economies.

Identifying enabler networks and their vulnerabilities

John Heathershaw, University of Exeter

This project undertakes the first ever largescale study of the Organised Crime and Corruption Reporting Project's (OCCRP) Aleph database to identify trends in how professional service providers enable cross-border corruption. The insights gained are expected to guide policy-making and influence regulatory and enforcement actions by identifying critical areas of vulnerability within the corruption enabling landscape.

Testing and evidencing compliance with beneficial ownership checks

John Heathershaw, University of Exeter

This project aims to investigate the laundering of monies and reputations of elites from African and Central Asian kleptocracies by looking at the due diligence requirements in the banking, real estate, charitable and public relations sectors. This project is global in scope, with a special focus on African and post-Soviet Eurasian economies affected by kleptocracy.

Building institutional resilience to global illicit financial flows as enablers and drivers of state capture

Ruslan Stefanov, Centre for the Study of Democracy (CSD)

This project aims to delve into how we can best craft policies and tools based on solid evidence to tackle state capture and strategic corruption. It will complete a thorough analysis into understanding how both local and foreign players, especially Russian oligarchic networks, pull the strings to wield corrupt influence in the Western Balkans, Armenia, Georgia, Moldova, and Ukraine. The research and policy action will focus on the most powerful weapon and driver of strategic corruption and state capture: illicit financial flows (IFFs).

Crisis Response and Corruption in Vulnerable Sectors

Addressing corruption in the crisis response of the Malawian health system

Claudia Baez Camargo, Basel Institute on Governance

This project aims to tackle corruption in crisis responses within the Malawian healthcare system. It will conduct a comprehensive analysis to identify and categorise various forms of corruption that arise or are exacerbated during crises. The goal is to gain a thorough understanding of the drivers and facilitators of corruption that severely hinder the effectiveness of emergency interventions in the health system.

Crisis emergencies, state responses and 'windows' of corruption in Uganda

Sabiti Makara, Kabale University

This project will study crisis responses in Uganda, examining how they create opportunities for corruption. It will analyse past emergencies to understand key patterns of corruption and develop strategies to prevent corruption in future crises, with a focus on protecting vulnerable groups like women, children, people with disabilities, and marginalised ethnic communities.

The corrupting effect of political connections in public procurement through crises

Mihaly Fazekas, Government Transparency Institute

This project examines how political connections in public procurement drive corruption, particularly in times of crisis and emergency when oversight is often weakened. It seeks to identify the conditions under which conflict-of-interest regulations effectively curb corruption and promote fair procurement practices. Using large-scale administrative datasets, validated corruption risk indicators, and causal findings, the project aims to translate research into action by informing anti-corruption policies, strengthening regulations, and enhancing transparency in public procurement systems.

Gatekeepers, enablers or technicians: the contested interpretation of lawyers as facilitators of kleptocracy and grand corruption

Tena Prelec, University of Rijeka

This project aims to provide a comprehensive analysis of the underlying principles which underpin the client take-on and retention decisions made by lawyers in acting for the beneficiaries of kleptocracy and grand corruption. The project will examine contrasting narratives around 'professional enablers' and the disconnect between those narratives, and explore and typologise the fundamental principles on which key arguments are being made.

Does transparency bring cleanliness? offshore financial secrecy reform and corruption control

Daniel Haberly, University of Sussex

This project makes use of leaked and newly constructed datasets to understand the impact that offshore financial secrecy reforms are having on the use of shell companies for the hiding of developing country corruption proceeds. By examining patterns in offshore financial activity before and after key policy changes, the project assesses whether these reforms have effectively curbed illicit financial flows or if corrupt actors are adapting with new strategies.

Hiding the beneficial owner and the proceeds of corruption

Jackie Harvey, Northumbria University

Focusing on Nigeria, this project examines current approaches and systemic weaknesses in identifying beneficial owners - those who ultimately control or benefit from companies and assets. By analysing loopholes in ownership transparency, regulatory enforcement, and institutional capacity, the project aims to uncover how corrupt actors exploit these gaps to launder illicit funds.

Corruption Risks in Global Trade and Commerce

Lessons for combating illicit cross-border trade and money laundering from the Congo

David Szakonyi, Anti-Corruption Data Collective (ACDC)

This project aims to bridge gaps in leveraging large-scale data leaks for anti-corruption efforts, particularly in academic research. Focusing on Congo Hold-Up, the largest financial leak from Africa, it will coordinate new cross-sectoral partnerships to uncover previously unknown practices of cross-border money laundering. This will identify new red flags and inform actionable policy and programmatic recommendations to combat illicit financial flows.

Interrogating corruption risk in the climate transition: trading in voluntary carbon markets

Cathy Haenlein and Dan Marks, Royal United Services Institute (RUSI)

This project conducts an in-depth analysis of corruption risks in voluntary carbon markets, focusing on verification, certification, and AML/KYC compliance. By generating new evidence on fraudulent practices, weak oversight, and regulatory loopholes, the research aims to inform more effective interventions and controls in the sector. The research seeks to address a critical gap in the anti-corruption evidence base, ensuring greater integrity, transparency, and accountability in global carbon markets.

International deal-making, beliefs, and local social norms

Thorsten Chmura, Nottingham Trent University

The international community has established key anti-corruption frameworks, including the OECD Anti-Bribery Convention and UN conventions on corruption and organised crime. However, enforcement varies significantly across countries, with differing levels of commitment and resources, leading to gaps in global anti-corruption efforts. This project tests how norms and beliefs about the behaviour of others, including ‘monitors’ or

enforcement agents, affect the willingness of individuals to engage in bribery.

Ethical border trading between Kenya and Uganda for small-scale businesses

Jacqueline Klopp, Earth Institute Columbia University

Small-scale trade between Kenya and Uganda is critical to livelihoods and well-being in border towns. Despite official efforts to promote more open and efficient borders, small-scale traders—most of whom are women—face serious challenges, including arbitrary extraction of payments and goods. This makes small-scale trading hazardous and reduces its socio-economic benefits. This project explores how to leverage cellphones to reduce corruption challenges for small-scale traders in East Africa.

State Capture

Building resilience to state capture

Elizabeth Dávid-Barrett, University of Sussex

This project aims to provide governments, civil society, and international organisations with insights on identifying reform priorities in states that have experienced state capture—where narrow interest groups seize control of institutions for personal gain. The project investigates how countries can best exploit ‘windows of opportunity’ to build resilience to state capture, focusing on the IMF’s evolving role in post-capture reforms since 2018 and its impact on domestic bargaining and anti-corruption efforts.

Integrity Systems

Cities of integrity: urban planning and corruption in Africa

Vanessa Watson[†], University of Cape Town

This project focuses on how professional communities of planners in South Africa and Zambia live up to their roles as drivers of integrity. The New Urban Agenda urges all countries to strengthen local and subnational governments through capacity-building programs, emphasising financial planning, institutional coordination,

environmental sensitivity, and anti-corruption measures.

Can positive public recognition lead to good governance?

Mark Buntaine, University of California

This project explores whether fostering collective pride in good governance and providing positive recognition for local leaders who resist corruption can reduce corruption in a national park revenue-sharing program in western Uganda. While rarely studied in the public sector, positive recognition—such as awards for ethical leadership—is widely used in other areas, from workplace incentives to community honors. The project tests whether such approaches can encourage integrity and strengthen accountability in public resource management.

Harnessing informality: designing anti-corruption network interventions and strategic use of legal instruments

Claudia Baez Camargo, Basel Institute on Governance

Building on earlier work that exposed how informal networks of political, business, and social actors undermine anti-corruption efforts, this project examines how anti-corruption interventions can account for these networks. Using case studies from East Africa and Central Asia, it explores how networks persist due to deeply embedded principles such as trust, reciprocity, solidarity, and loyalty, which align with prevailing social norms and values.

Centralised versus decentralised monitoring to reduce corruption: insights from comparisons across Indian states

Amrita Dhillon, King's College London

Most countries have different agencies performing top-down audits and social audits. This project investigates the interaction between different types of audits and the effects on service delivery, using evidence on leakages in two major public works programmes across states in India.

Accountability through practical norms: civil service reform in Africa from below

Gerhard Anders, University of Edinburgh

The objectives of the study were twofold: to examine the extent to which official rules were being applied and to what degree everyday practices in health and education ministries, district hospitals and health centres, district education offices and schools were governed by practical norms; and to examine the interdependence between site-specific norms, profession-specific norms and general practical norms of bureaucratic culture.

Civil service reform and anti-corruption: does ethics training reduce corruption in the civil service?

Jan-Hinrik Meyer-Sahling, University of Nottingham

The project designs and implements state-of-the-art ethics training courses with civil servants in Nepal and Bangladesh and evaluates their effects on corruption and (un)ethical behaviour in a field experiment. These findings build on insights from the Civil Service Reform and Anti-Corruption Project under the ACE programme, which examined effective management strategies for reducing corruption in government institutions.

Sectors/Institutions

Corruption prevention: strategic challenges, tactical solutions

Jennifer Widner, Princeton University

The project examines the key obstacles faced by governments, institutions, and organisations in curbing corruption, including weak enforcement mechanisms, political resistance, and gaps in accountability structures. It also explores how limited resources, bureaucratic inefficiencies, lack of transparency, and entrenched patronage networks hinder anti-corruption efforts. Additionally, the project assesses the role of public trust, civil society engagement, and technological innovations in strengthening governance and promoting integrity within public institutions.

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Fighting high-level corruption in Africa: learning from effective law enforcement

Gerhard Anders, University of Edinburgh

This project is the first comparative study of law enforcement efforts against high-level corruption in Africa, focusing on Nigeria, Tanzania, and Malawi. By analysing investigations, prosecutions, and enforcement practices, it aims to generate new evidence on the effectiveness of anti-corruption measures. The research examines the investigative and legal tools used in criminal proceedings, as well as innovative legal strategies that enhance accountability.

Addressing bribery in the Tanzanian health sector: a behavioural approach

Claudia Baez Camargo, Basel Institute on Governance

This project uses behavioural approaches to develop and test an anti-corruption intervention in the Tanzanian health sector, recognising that social norms of gift-giving and reciprocity can fuel practices of bribery in the provision of health services in public facilities. The intervention utilised environmental cues and a peer-led network approach to deliver messages aimed at disincentivising bribery.

Detecting and deterring medication theft: a field study in health clinics in Malawi

Ryan Jablonski, London School of Economics and Political Science

This project evaluates two interventions to reduce medication theft in Malawian health clinics: one targeting clinic officials and another empowering citizen monitors. It tests the impact of providing officials with information on a government drug-

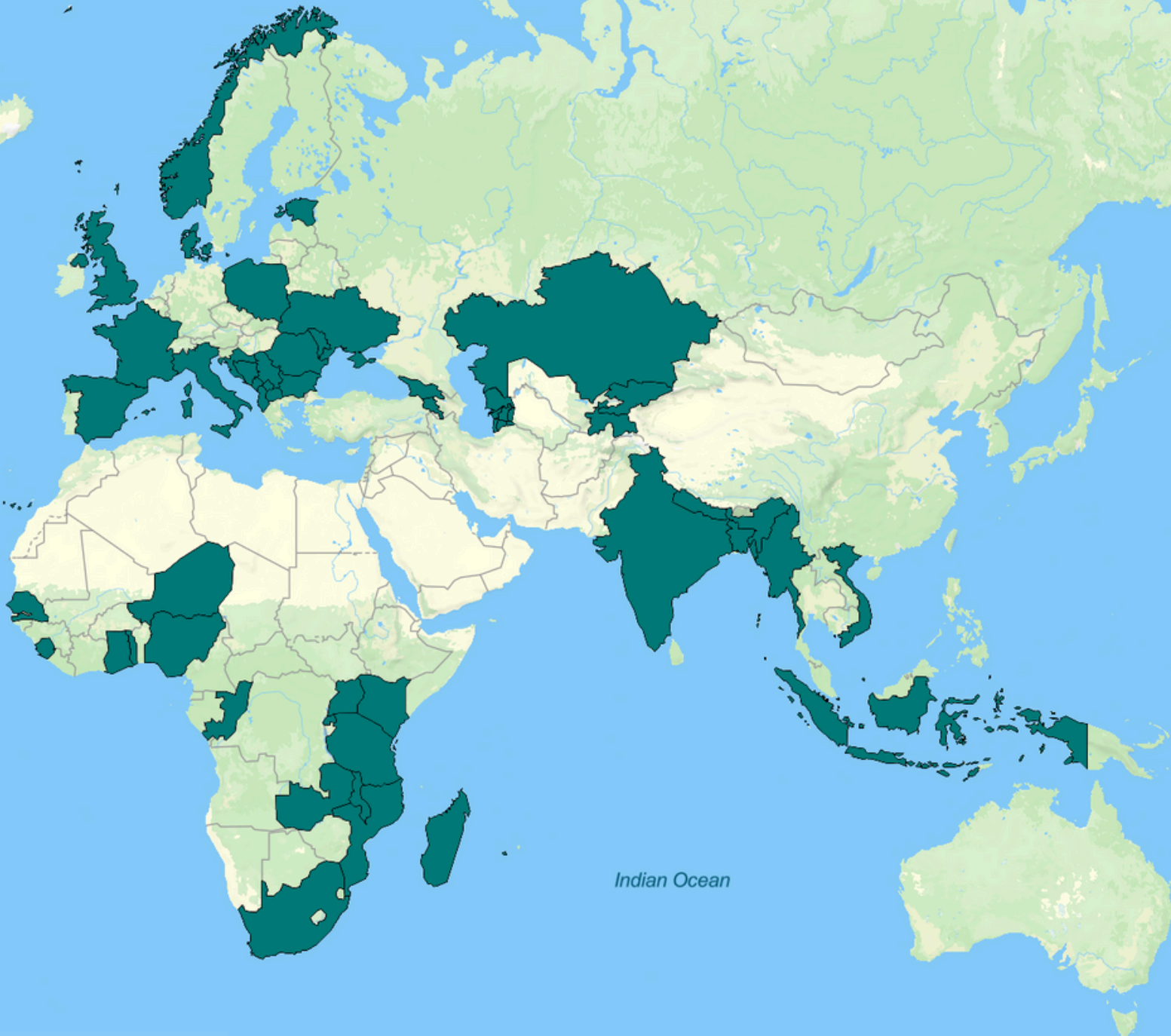
tracking program and associated penalties, training communities to monitor and report drug deliveries and availability, and a combined approach to enhance accountability.

Curbing corruption in procurement and using the red flags approach

Elizabeth Dávid-Barrett, University of Sussex

This project used big data from major aid agencies to develop a tool to calculate red-flag indicators of corruption risk in aid-funded procurement. The research went on to use this methodology to explore how sociopolitical contexts and donor-led control mechanisms affect corruption risk. The project team have also used the red-flags methodology to develop procurement data analytics portals to help various stakeholders monitor their country's procurement and identify high-risk or suspicious patterns.

GI ACE RESEARCH ACROSS THE GLOBE



Indian Ocean



Arctic Ocean

Pacific Ocean

Pacific Ocean

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A PRIVILEGED PROFESSION?

HOW THE UK'S LEGAL SECTOR ESCAPES EFFECTIVE SUPERVISION FOR MONEY LAUNDERING

by Helen Taylor and Daniel Beitzley



OCTOBER 2022

CRISIS RESPONSES AND CORRUPTION IN EMERGENCIES

POLICY BRIEF

TRAINING FOR BUREAUCRATS IMPROVES TRANSPARENCY IN PUBLIC PROCUREMENT AMONG UGANDAN DISTRICT GOVERNMENTS

Mark T. Buntaine
Alex Babago
Paul Bukuluki
Brigham Daniels
Gerald Auku Padde



GI-ACE Working Paper
November 2023

CORRUPTION, SHELL COMPANIES AND FINANCIAL SECRECY:

Providing an evidence base for anti-corruption policy

CSC Working Paper No. 16

JUNE 2023

