

Anti-Corruption Network for Eastern Europe and Central Asia (ACN) Matrix of High-Level Cases

Law Enforcement Network for Eastern Europe and Central Asia (LEN)

The Law Enforcement Bribery Network (LEN) operates as an informal group of ACN practitioners, drawing on the experience of the OECD Working Group on Bribery's informal network of law enforcement officials allowing for practitioners within the ACN region to exchange experiences in detecting, investigating and prosecuting corruption cases.

Why does the ACN region need a Matrix of High-Level Corruption Cases?

The [Fourth Round of Monitoring of the Istanbul Action Plan \(IAP\)](#) underlined that most ACN countries demonstrated quite limited efforts in the detection, investigation and prosecution of high-profile corruption and found that tackling high-level and complex corruption remained a challenging task for many countries in the region. Looking for possible instruments that would help to address these problems, the ACN Steering Group endorsed the proposal of the Secretariat to create a Matrix of high-level corruption cases and the methodology was adopted in November 2022.

The creation of the Matrix is focused on two key objectives; firstly, to provide thorough in-depth analysis for evidence-based policy development; secondly to enhance law enforcement agencies capacity to counter high-level corruption. Additionally, it will also be used during IAP monitoring as a potential source of information to better understand the problem of high-level corruption in respective countries.

What is the Matrix of High-Level Corruption Cases?

The Matrix of high-level corruption cases is a database of allegations, investigations, prosecutions and sanctions of high-level corruption which will only be open to designated practitioners of ACN member countries. The definition of high-level corruption used in the Matrix mirrors the definition used in the [IAP's Fifth Monitoring Round](#). The Matrix Methodology defines high-level corruption as an offence defined under Chapter III of the United Nations Convention against Corruption. In addition, high-level corruption cases must alternatively involve a high-level official or result in a substantial benefit for the official or his family. If a substantial benefit or damage is of a pecuniary nature, it should be equal to or exceed the amount of 1000 monthly statutory minimum wage fixed in the respective country.

No personal information of either natural persons or legal persons will be included in the Matrix. Instead, the ACN has adopted the approach of focusing on the position of the public official and the sector of activity of the legal persons involved.

How will Allegations of High-Level Corruption be selected for the Matrix?

Allegations of high-level corruption, which occurred or were detected after 1 January 2022, will be collected biannually by the ACN Secretariat. The main source of Matrix will be the collection of allegations found by the ACN Secretariat in media reports or other publicly available information. Other sources of information are submissions made by civil society organisations based on public source information and submissions or updates during LEN sessions from ACN member countries. In addition, information obtained through the IAP Monitoring may also be used in the Matrix. After collecting submissions from all these sources the ACN Secretariat will analyse them to ensure they meet the selection criteria set out in the Methodology (the definition and the time frame) and provide individual feedback on the status of submissions to relevant stakeholders.

Annual Enforcement Report

The Matrix of high-level corruption cases will also allow for an annual enforcement report to be prepared by the ACN Secretariat on emerging law enforcement trends and good practices in the ACN region that will be used for developing further analytical work on identified challenges, best practices and trends. In particular, the report will include statistics, typologies of corruption offences, high-risk sectors and positions within the public sector by countries and the region. These reports are intended to provide regional snapshots and not individual case studies.

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