

Radiography of corruption in Colombia
2016-2022



RADIOGRAPHY OF CORRUPTION IN COLOMBIA 2016-2022.

Summary

This document presents a summary of the document “Así se mueve la corrupción: radiografía de los hechos de corrupción en Colombia 2021-2022”. The original document is available in its Spanish version [here](#). Also, you can access the [app](#) and [datasets of corruption cases here](#).

For more information and data on the fight against corruption, please visit the website of the Citizen Monitor of Corruption, an observatory of Transparencia por Colombia:

<https://www.monitorciudadano.co/>



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We are the National Chapter of Transparency International -TI-, the civil society organization leader in the fight against corruption around the world with presence in more than 100 countries.

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Introduction

Corruption is understood as the abuse of positions of power or trust, for the particular benefit of legal and/or illegal actors, or in a possible association between them, to the detriment of collective interest. Generally, this is done through offering, requesting, delivering, or receiving goods or money in kind, services, benefits, and/or favors, in exchange for actions or omissions, making or influencing decisions (Transparencia por Colombia, 2021a). In this perspective, this is a systemic and structural phenomenon and its origin and reproduction are related to different economic, social, political, institutional, and cultural conditions.

In recent years, Transparency for Colombia has contributed to understanding corruption from different approaches complementary to the traditional perspective of this problem, where corruption represents merely a loss of resources. Specifically, the analysis of the damage and victims this phenomenon generates, as well as reparation mechanisms have been increasingly considered by Transparencia por Colombia (Transparencia por Colombia, 2023g). Also, Transparencia por Colombia has carried out different analyses to understand the incidence of corruption in structural problems, such as inequality, conflict, environment degradation, social fragmentation and polarization, and the low legitimacy of the institutions.

From this comprehensive perspective, the fight against corruption is understood not only as an end by itself but as a mechanism to achieve broader objectives. For these, the Citizen Monitor of Corruption of Transparency for Colombia presents the report titled “This is how corruption moves: Radiography of the acts of Corruption in Colombia 2021-2022”. This document presents the analysis of 327 corruption cases identified in press notes published between 2021 and 2022. The acts of corruption identified and systematized in this document are based on reports from the written press, available in the Digital Press Archive of the Popular Research and Education Center (CINEP). This information was complemented by the review of reports from the Attorney General's Office, the Superintendence of Industry and Commerce, and the Colombian Supreme Court of Justice, as well as other media.

To enrich the analysis of this report, the sections related to corruption networks and illicit financial flows use the completed corruption dataset of the Citizen Monitor of Corruption. The Citizen Monitor contains information on 1,243 corruption cases identified between 2016 and 2022. The identification, systematization, categorization, analysis, and public availability in applications and databases seek, in addition to providing insights into how corruption has developed in recent years, to contribute to other research and initiatives to fight corruption by academics, social organizations, public officials, and citizens.

1. Methodology

This report was prepared using a qualitative methodological approach. The report is divided into four distinct and complementary chapters. In the first chapter, a general investigation was conducted to understand the main characteristics of corruption cases. The second chapter focuses specifically on infrastructure and corruption cases. The third chapter contains a network analysis to identify and analyze the interactions between the different actors involved. Finally, there is a chapter devoted to the study of Illicit Financial Flows. The report ends with some prioritized recommendations to enhance the fight against corruption. In every case, a review of secondary sources was carried out, complemented

with reports from official state entities. These sources ranged from national and territorial newspapers notes, compiled by CINEP, to data and reports from the Attorney General's Office, the Superintendence of Industry and Commerce, and the Supreme Court of Justice.

The identification and systematization of corruption followed the following process. The first stage was identifying the acts of corruption in 2021-2022. This was compiled by reviewing 72 descriptors from 16 categories of press notes from the CINEP Archive. These categories served as a guide for the study of the information collected, facilitating the classification and analysis of each case of corruption. In addition, this review was complemented with publicly accessible reports provided by the previously mentioned government institutions.

Once the notes that contained the acts of corruption were identified, the second stage consisted of a detailed construction of each case, documenting it in technical sheets designed from analysis categories such as type of corruption, areas, actors involved, places of occurrence, and affected human rights, among others.

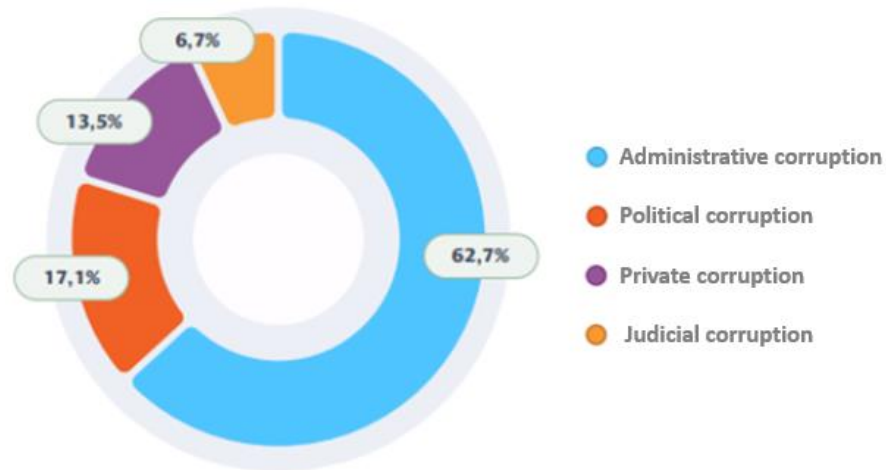
Subsequently, the fifth stage consisted of validating those cases were active and updated. To do this, source triangulation and data cross-review techniques were implemented. It involved comparing and corroborating information from various sources to confirm the trustworthiness of each corruption case recorded.

Finally, keywords about transversal issues were incorporated into the corruption cases to facilitate the search for key topics. In this way, the dataset lets the people identify specific practices and topics such as sextortion, trafficking, armed conflict, and free competence.

2. General results

The type of corruption is a central factor in understanding its behavior during 2021 and 2022. It highlights the critical areas where the abuse of power is most evident. This detailed understanding of type is important not only for the investigation itself but also for the formulation of effective strategies to prevent corruption.

Graphic 1. Type of corruption registered between 2021 -2022



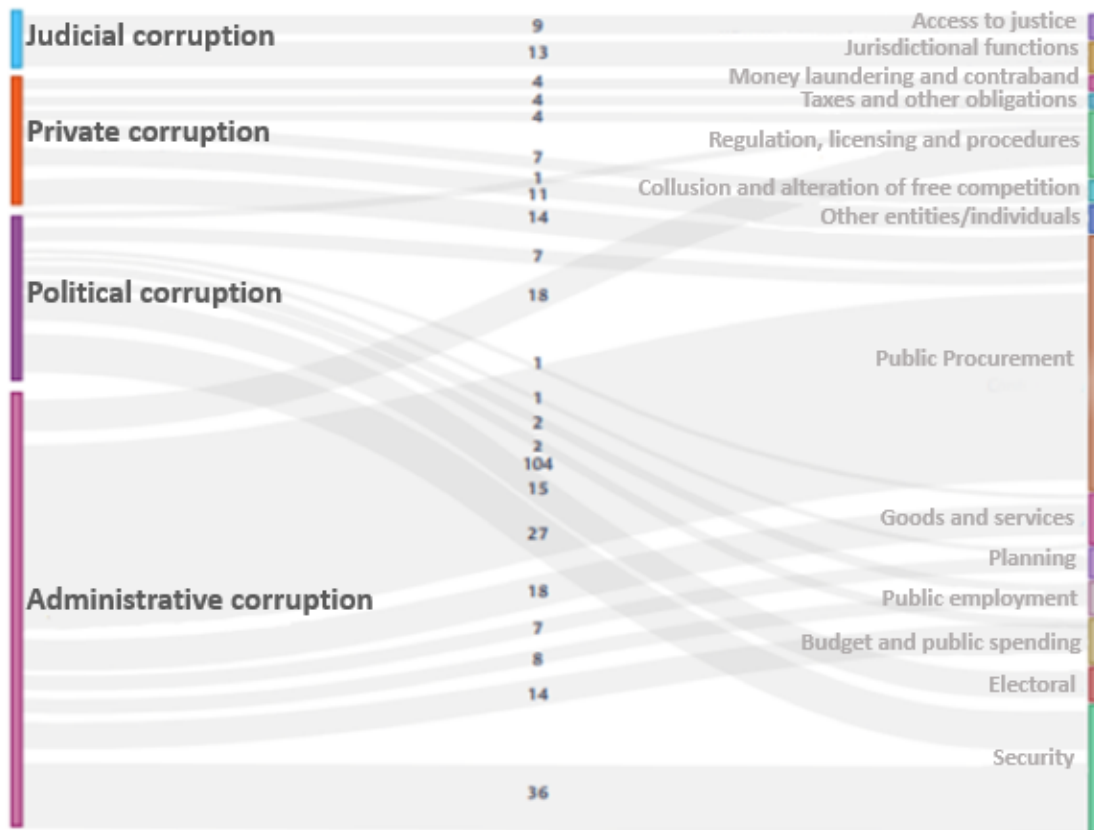
Source: Data from the Radiography of corruption 2021 -2022

Between 2021 and 2022, 327 acts of corruption were identified and classified as follows: 205 are linked to administrative corruption, 56 to political corruption, 44 to corruption in the private sector, and 22 to judicial corruption. The relevance of cases linked to administrative corruption, representing more than 60% of identified cases, reflects the consequences of failures in state processes, procedures, and control systems. This trend shows weaknesses and critical areas in public institutions.

2.1 Type and areas of corruption.

As shown in the next graphic, Public Procurement stands as the most affected management area by corruption. Indeed 38% of corruption cases occurred within the framework of a deficient monitoring of contracting processes, and/or deficiencies in the planning, selection, and execution of procurement processes. In the previous Radiography (2016-2020), public procurement was also the most prominent area with 42% of the total events. These data highlight the need to prioritize regulatory and institutional adjustments, as well as public procurement management mechanisms at all stages.

Graphic 2. Type vs ambit/scope of corruption between 2021 -2022



Source: Data from the Radiography of corruption 2021 -2022

It is important to mention that, in the incidents related to public procurement, and regulation, licensing, and procedures, three types of corruption were identified: administrative, private, and political. This reflects the complexity of undue influences that affect contracting processes and the implementation of regulations in Colombia.

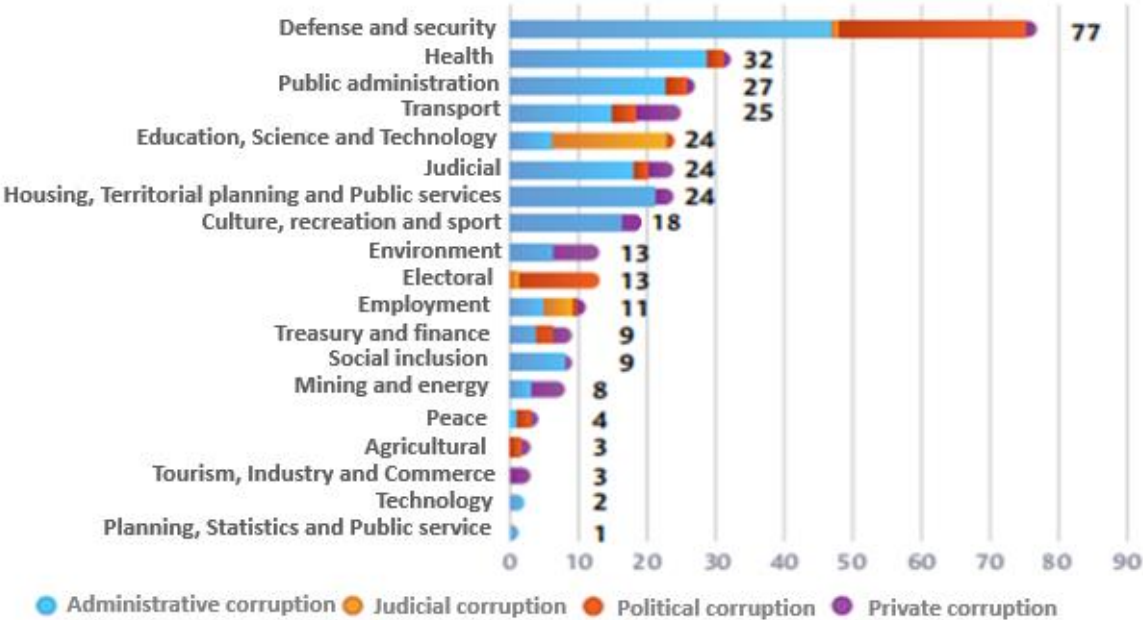
Likewise, among the different interactions that occur between the types of corruption and areas, it is relevant to highlight the relationship between political corruption, public procurement, and elections. There are seven cases in which the abuse of power in public procurement occurs for political reasons and 15 in which the abuse of power and the appropriation of resources is intended to directly interfere in electoral processes, generally from the illegal use of public resources to finance political campaigns.

2.2 Affected sectors

The next graphic shows the sectors most affected by corruption. The defense and security sector stands out as the most affected, followed by health, public administration, and transportation sectors. It is essential to recognize that corruption in the defense and security sector is not limited to administrative irregularities, but is closely linked to the violation of Human Rights, particularly affecting the right to life. This is in the context of the internal armed conflict where abuse of power from security and defense

officials led to harm specific communities. Most affected sectors by corruption in Colombia are related to social services sectors. In this way, the damage caused by corruption contributes to the low quality and accessibility of some social services.

Graphic 3. Sectors affected by type of corruption between 2021 -2022



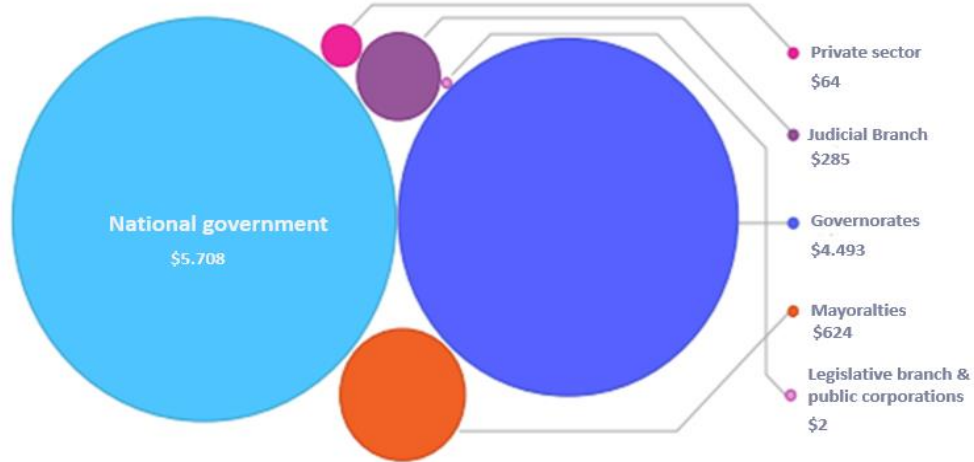
Source: Data from the Radiography of corruption 2021 -2022

Each sector exhibits high participation in administrative corruption, while private corruption prevails over other types of corruption in areas such as tourism, agriculture, mines, and the environmental sector. Likewise, acts of political corruption are mainly concentrated in the defense and security, electoral, public administration, and transportation sectors. The impact of different types of corruption in particular sectors highlights the need to examine differentiated analyses of corruption.

2.3. Money compromised and lost according to the affected entities

It is difficult to estimate the compromised money by corruption. This is because of the illegal nature of corruption and the lack of information. For this reason, this investigation determined the compromised money only in 149 cases out of 327, amounting to the staggering figure of 59 trillion Colombian Pesos (COP), equivalent to 14.572.929.200 (USD).

Graphic 4. Lost resources by affected entity between 2021 -2022. (Figures in billions)



Source: Data from the Radiography of corruption 2021 -2022.

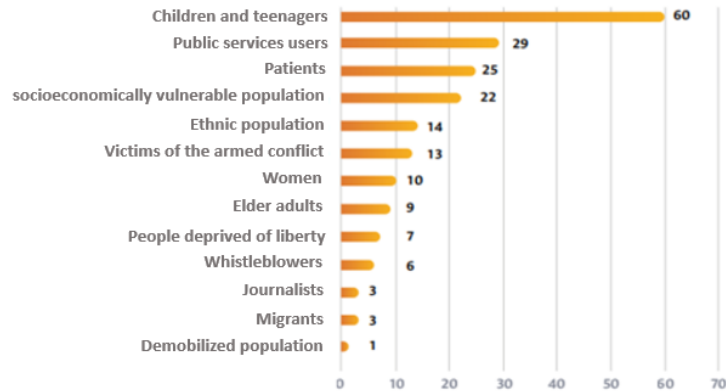
The lost money was identified only in 118 cases, surpassing \$11 trillion COP, equivalent to 2.717.212.300 USD. This money was effectively diverted and ended up in the hands of corrupt actors. Although most of the diverted money comes from central government entities, the amount of money effectively lost in the regional governments is comparable to the lost money in central government entities.

2.4 Affected populations

Corruption not only impacts society as a whole but also produces specific effects on population groups, especially those in vulnerable situations. These communities often experience a deeper and more direct impact from corruption, deepening inequalities and weakening their socioeconomic situation.

In the cases where a direct impact on a population was identified, there was a significant impact on underage minors (children and teenagers). Consequently, these acts involve early childhood social programs, the construction of schools, and other infrastructure such as parks and sports fields, which has made them the social group with the highest impact from acts of corruption, doubling the frequency of other affected groups.

Graphic 5. Number of acts of corruption by affected actor



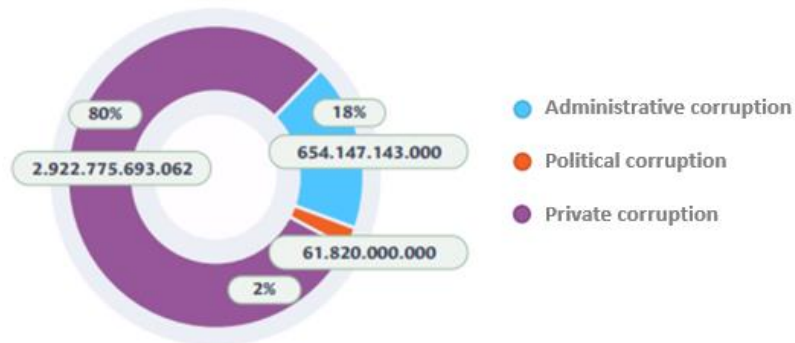
Source: Data from the Radiography of corruption 2021 -2022

3. Corruption in Infrastructure projects

The construction of public infrastructure, whether for road projects or civil works, is of great relevance in a country with a significant delay in the matter. It should also be considered that investment in infrastructure is crucial to boost local and regional economies. Therefore, the impact of corruption on infrastructure projects, regardless of its scale, generates a significant economic and social negative impact.

For the 2021-2022 period, 59 acts of corruption related to infrastructure were identified, exposing the significant impact of corruption in this type of project. The magnitude of the economic repercussions is significant: \$18 trillion COP (equivalent to 4.446.246.600 USD) was compromised. This is aggravated by the lost money equivalent to \$3.6 trillion COP (equivalent to 889.249.320 USD), it represents a considerable loss of resources intended to promote development and strengthen the country's basic infrastructures.

Graphic 6. Lost resources (COP) by type of corruption in infrastructure



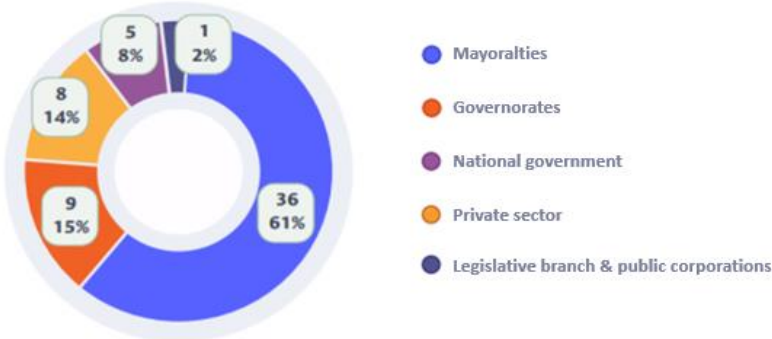
Source: Data from the Radiography of corruption 2021 -2022

It should be noted that private corruption is less prevalent with 13 cases identified but those caused the greatest loss of resources in this kind of project, reaching a total value of \$2.9 trillion COP (equivalent to 716.326.100 USD), which represents 80% of the total lost money lost. In contrast, administrative corruption (42 cases) represents 18% of the lost resources.

On the bright side, it was possible to identify the partial recovery of the lost money, reaching \$1.2 trillion COP (equivalent to 296.463.000 USD). This is the 34% of the lost money. It is important to note that, only in 30 of the 59 identified cases, was available information about the amount of money lost.

Regarding the affected entities, municipalities represent the most affected institution with 36 acts of corruption identified, followed by the governorates (9 acts), and the national government entities (9 acts).

Graphic 7. Acts of corruption by affected entity



Source: Data from the Radiography of corruption 2021 -2022

The corruption cases in infrastructure involved 12 sectors, as detailed in the next graph. A significant impact is observed in sectors such as transportation, especially in road projects, as well as in housing, particularly in subsidized housing, and basic public services initiatives. Its presence is also evident in sectors such as culture, recreation, and sport in acts that involve the construction or maintenance of cultural and sports centers.

Graphic 8. Acts of corruption in infrastructure by type and sector



Source: Data from the Radiography of corruption 2021 -2022

The report presents an in-depth analysis of corruption acts across the project cycle of public infrastructure. In most recorded cases, the exploitation of vulnerabilities in different stages across the project cycle is evident, especially in the early stages of these projects. These stages present risks where corruption finds fertile ground to develop.

This approach allows us to identify and visualize, the risks associated with infrastructure projects through real examples, showing the impact they have had on the use of public resources. Furthermore, it provides valuable insights into possible mitigation measures that could be implemented in future projects to minimize the risk of corruption at different stages. As Adam & Fazekas (2023) point out, these projects are especially susceptible due to their scale, duration, complexity, and number of actors involved. Likewise, the main tools to combat these risks, such as transparency and citizen participation are minimized.

These findings stress the critical need to address corruption in infrastructure projects, by strengthening control mechanisms, increasing transparency, and promoting a culture of integrity to ensure appropriate and effective use of public resources. Only through this approach, it would be possible to mitigate the devastating impact of corruption on infrastructure provision and ensure that public resources are used effectively and equitably.

4. Corruption Networks

In this chapter, a network analysis methodology is implemented in order to examine the composition of corruption networks identified in the events recorded between 2016 and 2022. The results were integrated into the Citizen Monitor of Corruption app. This allows the identification and analysis of interdependencies between the actors involved in corruption cases, according to the type of actor involved: individual, collective, legal, or illegal. In opposition to the traditional approach to corruption,

which focuses on individuals acting in isolation, this review highlights the influence of various structures in which one or more individuals promote the materialization of acts of corruption.

The analysis focuses on key actors at two levels: 1) all those nodes with multiple connections, from which the systematicity of corruption can be investigated, and 2) the enablers, who play a crucial role in the execution of the corruption cases.

In the first level, a network of 740 nodes/agents is identified (see next graph 15). They were classified according to the two large categories that correspond to the type of participation: individual or collective. This network has a density of 286 links based on 167 corruption cases.

Graphic 9. Networks of corruption registered between 2016 -2022



Source: Data from the Radiography of corruption 2016 -2022

The network visualization highlights the presence of peripheral nodes. These nodes represent acts of corruption with fewer connections, that is, a reduced number of links between actors, that range from 2 to 5 links between them. In many cases, these nodes connect a maximum of five actors in the same event or the same actor in several cases of corruption.

4.1. Participation of actors according to their role

The next chart details the classification of actors according to individual or collective participation, along with the frequency and percentage of their appearance in the 167 acts of corruption identified. This table offers a specific perspective of how actors are distributed.

Chart 1. Type of corruption registered between 2021 -2022

Classification by type of actor	Actor	Frequency	Percentage
Individual	Public servant	212	20,48%
Individual	Authority elected by popular vote	179	17,29%
Individual	Private sector	133	12,85%
Individual	Illegal economy or illegal armed group	95	9,18%
Collective	Private companies	82	7,92%
Individual	High dignitary not elected by popular vote	80	7,73%
Individual	Personal	67	6,47%
Collective	Illegal economy or illegal armed group	66	6,38%

Source: Data from the Radiography of corruption 2016 - 2022

In 72% of corruption cases analyzed here, at least two different types of actors participated, whether individual or collective. This highlights the relevance of studying corruption networks and corruption from a broader perspective. Taking into account not only the public officials involved, but also their relations with other officials, private agents, and even criminal agents.

Also, this leads to the need to identify the centrality of the actors, according to the frequency of their appearance and the characteristics of their participation in the events. Furthermore, individual actors tend to be more centrally connected in a corruption network, which indicates a more influential or strategic role in the development of acts of corruption, while collective actors tend to have slightly more peripheral participation.

It is observed that public servants account for 20.48% of the cases, it is significant not only because of the frequency but also because of the responsibility they have in taking care of public goods and institutions. It is also worrying that the authorities elected by popular vote are in second place in participation (17.29% of cases), especially because they held that position by gaining the trust of the voters. This panorama highlights, on one hand, the need to implement specific measures aimed at strengthening public employment and, on the other, the need to address political integrity.

The participation of members of the private sector, representing 12.85% of the analyzed cases, reveals the complexity of the relationships between the public and private sectors in resource management and decision-making. It is essential to recognize that private companies play a significant role in the economy and development of the country and that their participation in acts of corruption has a direct impact on economic and social stability. All this led to emphasizing the importance of promoting a culture of business integrity.

Moreover, the presence of actors linked to illegal economies or illegal armed groups represents 9.18%. It highlights the urgency of addressing corruption at the institutional level and in relation to illegal economies and security.

Organized crime in Colombia has left a profound mark on corruption phenomena. This is evident in the wide repetition of actors linked to illegal economies or illegal armed groups, such as Clan Úsuga or guerrilla groups like FARC and ELN as well as other criminal actors. When analyzing the relationship between corruption and other criminal practices, the need to articulate efforts, share intelligence, and coordinate actions between the entities in charge of combating these crimes became urgent. Coordinated preventive and operational measures could contribute to achieving effective results in the fight against these crimes, as well as reducing the risks of corruption.

5. Illicit Financial Flows

In the current context of a globalized economy in which exchanges between different countries are carried out more frequently and more quickly, corruption has been transformed by increasingly using sophisticated methods. These methods have not only allowed the development of favorable frameworks for the appropriation of public resources but have also been related to networks that aim to hide and manage the income resulting from acts of corruption.

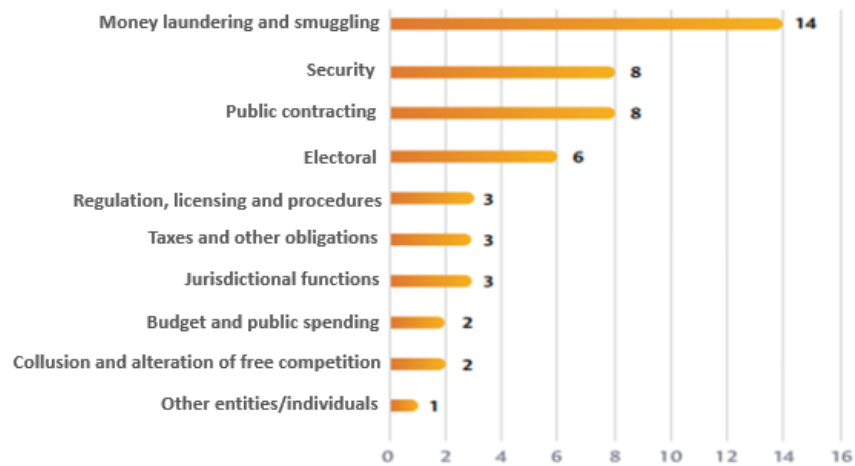
Illicit Financial Flows (IFFs) directly erode tax collection, generate economic distortions, and strengthen the use of income resulting from illicit economies, with the environmental impact that these generate when related to the illegal exploitation of natural resources. Likewise, at the social level, IFF leads to higher levels of inequality, since, among other reasons, it shifts the tax burden from the richest people to people with lower incomes (Bak, 2020). IFFs can refer to:

- **Origin:** when the money is the product of illegal or criminal activities, such as corruption, tax evasion, drug trafficking, and human trafficking, among others.
- **Transfer:** In this case, even though the funds may be legal, the money transfer process involves avoidance of surveillance and control mechanisms.
- **Use/purpose:** This refers to Flows that are used for illegal purposes, such as terrorist financing.

In this way, for this document, IFF are understood as transactions of money, both domestic and cross-border, whose origin, transfer and/or use is explicitly illegal.

In total, 50 corruption cases related to FFI were identified in the 2016 and 2022 period. The next graph highlights the incidence of corruption cases related to money laundering practices, which is consistent with the nature of IFFs as movements. Likewise, the events linked to the security field show the context of illicit economies in the country. In the third place, the number of events related to the electoral sphere is particularly striking as it shows the link between IFF and irregularities within the framework of political system.

Graphic 10. Ambits of corruption in acts related to IFF



Source: Data from the Radiography of corruption 2016 -2022

The next chart presents the 2016-2022 corruption cases classified according to the type of IFF. In the first place, there were 22 cases where financial flows had an illegal origin. Even though the origin of the money involved in these events is illegal, different illegal practices are also used to transfer and move the money. In these cases, “the money involved comes from criminal activities, such as corruption or drug trafficking, so the transfers of funds are clearly illegal” (Meyer & Mullard, 2019, p.4). In this way, the events classified in this category present a greater emphasis on the illegal origin of the money, which does not imply that they are exempt from irregularities in the transfer of the money.

Chart 2. Characterization of corruption acts related to IFF

Scale IFF	Number of acts of corruption
Origin	22
Transfer	13
Use	15
Total	50

Source: Data from the Radiography of corruption 2016 -2022

In the second place, there are the financial flows with illegal uses identified in 15 cases. These not only highlight the movement of money with the purpose of financing illegal armed groups but also with the illegal financing of political campaigns and the payment of bribes to public officials to obtain favors.

Lastly, there are 13 cases related to illegal transactions of money. In general, these events are characterized by their association with the illegal movement of money to secret jurisdictions' bank accounts, the use of shell companies to divert funds and hinder their traceability, and the transportation of cash money.

As measures to prevent and/or mitigate the risks that could lead to the consummation of the acts of corruption, it is important to address the following:

- The central role of cooperation between countries is a transversal element for the judicialization of the actors involved in corruption cases involving the cross-border IFFs. This cooperation is also central to tracking and recovering assets.
- In several corruption cases, shell companies were used to illegally move money. It remarks the relevance of having additional information regarding the real beneficiaries of private companies.
- Given the complex interplay between illicit economies, corruption, and FFI, it is important to have highly the role of some entities, like the Financial Information and Analysis Unit, to detect anomalies in suspicious money transactions and, at the same time, cooperate with the authorities in charge of the criminal investigation of these cases.
- The role played by enablers, professional or not, and therefore the importance of investigating them as they can be key in dismantling criminal networks
- IFFs have a significant impact on the quality of democratic processes, by interfering in electoral processes in favor of corrupt candidates, particularly at the subnational level.

6. Priorities for the fight against corruption.

Ever since the Radiography of Corruption 2016-2020, Transparencia por Colombia (2021a) has drawn attention to the need to address different structural measures that impact corruption. Considering this new version of the Radiography, it is important to return to these recommendations through a general overview of the implementation status as of April of 2024:

Recommendation	Status
Reform the public procurement system to simplify and unify contracts.	Low
Pass a law to protect whistleblowers from violence and social reprisals.	Low
Pass a political reform with emphasis on the integrity of political financing.	Does not register
Promote transparency and access to information.	Low
Strengthen transparency of the national budget throughout the whole cycle.	Low
Increase the capacity of investigation and oversight entities.	Middle
Strengthen capacities and independence of justice.	Low
Pass a profound reform of public employment.	Does not register
Modify institutional arrangements to prevent and combat corruption.	Low
Deepen the reparation of the damages caused by corruption.	Middle
Increased transparency in the private sector.	Middle

There is a significant percentage of recommendations in which there is little or no progress (45%). It highlights the need to resume measures that have not been taken into account in the public agenda but are essential to advance in the fight against corruption, such as budget transparency, political financing, and public employment. In this way, the complex, systematic, and structural nature of corruption leads to the need for a strategic and comprehensive approach to the phenomenon. For these, an agenda that integrates structural measures must be implemented. This would lead to sequentially addressing the recommendations in the short and medium term.

In this context, there are five essential minimum measures to advance in the fight against corruption in Colombia.

1. Public integrity mechanisms.

The regulation of the Transparency and Public Ethics Programs, which are applied to all public entities in the country, represents an opportunity to organize, coordinate, and strengthen different mechanisms for the prevention of corruption, as well as to promote a culture of integrity in the public entities. These programs must include differentiated guidelines for different levels and capacities of public entities, which will contribute to their effective implementation, and be adapted to the specific needs of each public entity (Transparencia por Colombia, 2023e).

Likewise, it is necessary to strengthen the management mechanisms of risks in public administration, particularly in relation to procurement, including strengthening due diligence processes.

2. Resource tracking and traceability.

Transparencia por Colombia has highlighted the importance of addressing risks associated with the use of extra-budgetary mechanisms and exceptional contracting regimes (Transparencia por Colombia, 2022; Transparencia por Colombia, 2024b; Transparencia por Colombia, 2023d). These exceptional regimes should not exclude minimum requirements for competitive processes and information publicity.

In this scenario, it is important to highlight the possibility of improving the availability of information and the monitoring of public resources outside the contracting regime, based on the available regulations.

3. Criminal sanction for electoral financing crimes.

Law 1864 of 2017 introduced three criminal offenses in Colombian law linked to irregular political financing: financing of electoral campaigns with prohibited sources (Art. 396A), violation of spending ceilings or limits during electoral campaigns (Art. 396B), and omission of donor information (Art. 396C). Despite this inclusion in the Penal Code, the progression in the criminal investigation of cases related to electoral financing has been scarce.

Transparencia has proposed the following measures to the National Electoral Council: the creation of a registry of private contributors to campaigns, the creation of a registry of suppliers of goods and services for campaigns, and a portal to consult information on those who cannot contribute to campaigns, such as public officials, contractors, and accused persons.

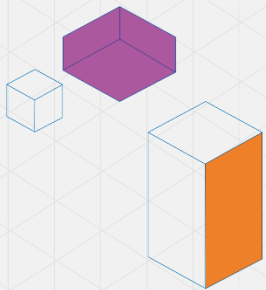
In addition, it is important to expand and strengthen the role of the Financial Information and Analysis Unit (UIAF) to manage the risk of prohibited resources in political campaigns, and their subsequent risk of money laundering. Finally, improving the coordination and exchange of information between the UIAF and other relevant institutions, such as the National Electoral Council (CNE) and the Attorney General's Office would facilitate the early detection and investigation of possible financial crimes related to political campaigns.

4. Follow up to territorial infrastructure.

In this matter, efforts to strengthen integrity in local infrastructure include timely access to public information and data on infrastructure projects, preventive actions that can be undertaken by control bodies, including territorial control bodies such as legal entities and territorial controllers; supporting the monitoring from communities.

5. Fight against corruption in the environmental sector.

To address the lack of impartiality and transparency in environmental management, it is essential to implement comprehensive solutions. One of the main strategies lies in the development of capabilities, both at the institutional level and of the public officials to identify, prevent, and mitigate corruption risks. Additionally, clear and rigorous policies and procedures are required to ensure impartiality and accountability in the management of resources directed to the environment. Likewise, it is important to promote citizen participation and civil engagement in the monitor and oversight of environmental activities.



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