# Title:

# Breaking Through Political Barriers: Towards a new Empowerment Agenda for Anti-corruption agencies (ACAs)

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# **Abstract**

Despite their worldwide proliferation, anti-corruption agencies (ACAs) have often failed to meet expectations because of political obstructions, undermining their effectiveness. This paper suggests that future empowerment efforts for ACAs should go beyond the traditional institutionalist paradigm prevalent in the international community of ACA proponents and instead focus on the social entrepreneurship aspect. This paper outlines measures for upskilling ACA leaders and staff in reputational management to enable them to navigate the challenges of the political environment better. Additionally, it proposes the creation of better systems, such as benchmarking league tables for ACAs’ performance, to produce more effective pressure on political actors as well as uncommitted ACA leaders. It is also suggested that systems could be developed by international ‘pro-ACA’ stakeholders for early identification of reform allies within domestic governments and public administration who would support the capacitation of the local ACA. On a broader point, this paper argues that professional communities working on the future empowerment of ACAs should broaden their disciplinary lenses and, in practice, tap more into insights and frameworks from the fields of public management, public administration, and regulatory governance, going beyond the traditional professional angle of law enforcement and criminal justice.

**Keywords**: Anti-corruption agencies (ACAs), Empowerment; Reputational management, Political interference, ACAs upskilling.

**Plain Language Summary**

Despite their global presence, anti-corruption agencies (ACAs) often struggle due to political interference. This article recommends a shift towards social entrepreneurship to enhance their impact. It suggests training ACA staff in reputation management and institutional activism within their socio-political environment, creating league tables with performance benchmarks to pressure politicians and ACA leaders, and identifying supportive figures within local governments for ACA capacitation. It also urges ACA advocates to rely more on insights from the academic fields of public management, public administration, and regulatory governance to better empower ACAs.

# **1 Introduction**

Anti-corruption agencies (ACAs), specialized anti-corruption institutions that are structurally separated from the government (OECD, 2008; De Sousa, 2012, p. 5), have proliferated worldwide in recent decades, establishing themselves as indispensable institutions in the fight against corruption. However, practices have shown that ACAs have overall fallen short of expectations (UNDP, 2005; De Sousa, 2012, p. 6; Bautista-Beauchesne, 2021; Schütte, 2023; Gong et. al., 2023), contributing far less to combating corruption than initially hoped. As new evidence has emerged about the on-ground effects of ACAs’ operations, it has become clear that political authorities or governments can undermine or hinder ACAs’ work, rendering them ineffective (Meagher, 2005; Dionisie & Checchi, 2008, p. 16; Batory, 2012; Persson et al., 2013; Mungiu-Pippidi & Dadašov, 2017; Di Mascio et al., 2020; Feldman, 2020).

Are ACAs, then, inevitably falling into irrelevance (De Sousa et al., 2009, 2010) as the realization cements that they are not as effective in the fight against corruption as initially hoped? Are possibilities to empower ACAs exhausted?

Not necessarily, this paper argues. However, for a new era of ACAs’ empowerment, we need to go beyond the institutionalist paradigm that has dominated prior professional thinking around the empowerment of ACAs. This paradigm mainly focuses on improving the legislative frameworks defining the structure, formal powers, and jurisdictions of ACAs (see, for example, Doig, 1995; Heilbrunn, 2004; Meagher, 2005, pp. 95-98; Pope & Vogl, 2006; Doig & Moron, 2000; UNODC, 2012; de Jaegere, 2012; Schütte et al., 2023). To move beyond the institutionalist paradigm, which has proven insufficient for the empowerment of ACAs, this paper sets out a set of measures for a future empowerment agenda for ACAs that pertains, on one hand, to upskilling ACA leaders in improving their reputational activism skills and, on the other hand, to creating systems and infrastructure to better address the uncommitted political authorities as well as ACA leaders, thereby reducing their negative impact on ACA performance in practice. Note that this does not suggest that institutions, i.e., their structures or frameworks, are irrelevant, but that relying on the institutionalist paradigm will hardly help address the key issue ACAs are facing today, namely their ability to prevent political interference or obstruction from hindering their work.

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On a broader conceptual point, this paper argues that prior considerations around empowering ACAs in professional circles have been overly focused on lessons and insights from the field of law enforcement. This focus has overlooked the wider literatures on public management, public administration, and regulatory governance, which have long entertained and examined various mechanisms for improving institutional performance and de facto autonomy, mainly outside the field of anti-corruption, and which could be beneficial and applicable to communities seeking to advance the status of ACAs worldwide. While some scholars have used concepts from these fields to understand how ACAs operate (e.g., De Sousa, 2012; Batory, 2012; Bautista-Beauchesne, 2021; Di Mascio et al., 2020), we have yet to see professional communities apply these lessons to build a stronger framework for empowering ACAs. This approach might be more effective than simply changing formal institutional structures and frameworks, especially when it comes to addressing the key challenge so far: navigating the political environment that makes the work of ACAs difficult (Meagher, 2005, p. 78; Doig et al., 2007; Doig et al., 2010, p. 264).

# **2 ACAs, institutionalism, and underachievement**

The primary expectation of Anti-Corruption Agencies (ACAs), which have gained recognition as essential anti-corruption actors worldwide over the past few decades (De Sousa, 2010), has been that their specialized focus and structural separation from political authorities will empower them to implement anti-corruption measures—be they preventive or punitive (Klemenčič & Stusek, 2007)—against public officials, even in the face of potential political backlash (Doig, 1995; Heilbrunn, 2004; de Jaegere, 2012). The belief that ACAs can successfully navigate political challenges due to their structural insulation from government (Thatcher, 2002) interference is rooted in the institutionalist paradigm, which posits that this separation protects ACAs from political pressures, thereby maintaining their effectiveness (Batory, 2012). This concept derives from the paradigm of new institutionalism (Hall & Taylor, 1996; March & Olsen, 1989; Peters, 1999), particularly its rational choice strand, which emphasizes the primacy of institutional structure in shaping actors’ behavior and resulting institutional outcomes. In the context of ACAs, the structural separation of ACAs from government is presumed to encourage ACA leaders to take on government corruption, as they cannot retaliate through formal institutional means due to the ACA's insulation and distance from the government. Similarly, the superior design of power and tools that an ACA enjoys will arguably contribute to its dedication to the fight against corruption, as its leaders will fear less pursuing effective anti-corruption action. Effective anti-corruption action refers to performative effectiveness, specifically to whether an institution – in our case, an ACA – engages with relevant cases and the tasks and measures it was supposed to carry out effectively (McConnell 2010, p. 358). Effective anticorruption action means not delaying, sidestepping, or neglecting the implementation of measures that fall within the agency's jurisdiction, as well as broader actions that can contribute to the anti-corruption policy.

Following this view, international soft law documents like the Jakarta Statement on Principles for Anti-Corruption Agencies (UNODC, 2012) outline various legislative requirements considered crucial for ACA empowerment. These requirements focus on structural separation concerning staff appointment and dismissal procedures, protection from interference in decisions and organizational matters, control over budgeting, and granting specific powers and jurisdictions necessary for effective anti-corruption policy (Heilbrunn, 2004; de Jaegere, 2012; UNODC, 2012). When evaluating the fitness of anti-corruption agencies, international oversight reports often focus on whether countries have adopted legislative measures that limit structural political control over ACAs and whether the legal framework further provides the necessary jurisdictional and policy implementation power (Doig, 1995; Rose-Ackerman, 2012; Zhu & Shi, 2019).

However, reality indicates that ACAs remain vulnerable to political obstruction (Meagher, 2005; De Sousa, 2010; Batory 2012; Author 2018), regardless of their structural separation. Even when their mandates, jurisdictions, and powers align with what the institutionalist paradigm identifies as key factors for success, ACAs face challenges in resisting government interference. Authorities often resort to informal tactics to influence personnel appointments or intimidate ACA officials, even when they lack formal institutional power (Author, forthcoming; Ömürgönülşen & Doig, 2012; Xu & Xu, 2023, p. 2; Batory, 2012). This is particularly common in high-informality settings, which undermine formal institutional separation from the government. Informal influence tactics can compromise ACAs' efficacy, especially when political authorities manipulate procedural and structural elements of other institutions like law enforcement and the judiciary (Author, forthcoming). These factors complicate ACAs' ability to transform their actions into the expected anti-corruption outcomes, ultimately questioning the effectiveness of the institutionalist framework defining their design in empowering them to address political corruption.

Political will is often cited as a key driver for empowering ACAs (Meagher, 2005, p. 78), but, in practice, this political will is frequently absent (Doig et al., 2007; Doig et al., 2010, p. 264). It soon became evident to scholars and practitioners that structural separation from government alone is insufficient for ACAs to achieve policy success (Meagher, 2005; de Sousa, 2012). Essential elements for ACA effectiveness extend beyond structural factors; aspects such as effective leadership, community engagement, and adequate resources are seen as vital (de Sousa, 2012; Batory, 2012; Lee et al., 2022, p. 1).

There is particularly an established understanding in both academic and professional circles that effective ACAs require strong leadership. However, the hard question is: how to cultivate the necessary leadership skills among ACA leaders? Support systems that would extend beyond the institutional focus on ACA structure—such as training programs or practical engagement opportunities for leaders—are, in most countries, limited or entirely absent. While some ACAs have independently initiated programs to enhance their leadership, public relations, and investigative skills (e.g., Kuris, 2015; Author, 2019), these efforts are often ad hoc and lack a comprehensive support network.

Consequently, the existing framework that informs professional and support systems for ACAs has not evolved significantly beyond an institutionalist focus. Key international declarations, including the Jakarta Declaration (UNODC, 2012), reaffirm the importance of structural separation from government as a prerequisite for ACA success, along with calls to ensure ACA autonomy. This autonomy is typically regarded as being secured by minimizing government involvement in the appointment and removal of ACA leaders, as well as ensuring budgetary and operational independence (De Sousa, 2010). Repeated calls urge political authorities to amend the legal and institutional framework to provide domestic ACAs with the necessary tools and powers (Doig & Norris, 2012). Unfortunately, when these changes do not materialize in practice, it leads to stagnation in ACA progress due to persistent political obstruction. ​

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# **3 Towards a new Focus in ACAs Empowerment**

Future practices for supporting ACAs need to address two crucial aspects. The first is how to develop better systems to mitigate the political obstruction or non-support that hinders ACAs’ work. The second is how ACA leaders can be compelled to maximize their efforts in executing the anti-corruption mandate, whether preventive or repressive (Klemenčič & Stusek, 2007). Often, the former issue exacerbates the latter—where political pressure or obstruction exists, ACA leaders either back down or, even if willing to confront the obstruction, find themselves helpless against the extensive formal and informal mechanisms the government can use to obstruct the ACA's work.

It would, therefore, be useful to differentiate between situations in which ACA leaders are unwilling to commit to effective performance and those in which leaders are willing but politically hindered. In the following sections, several measures are proposed for a future empowerment agenda for ACAs addressing these crucial aspects.

***Upskilling committed but politically hindered ACA leaders***

For those willing to diligently implement their anti-corruption mandates but are politically hindered, it is crucial that they master the skill of reputational activism. This skill combines several abilities, including effective communication, coalition building, and social entrepreneurship, with elements of public advocacy. From the public administration literature, it has been established that the key for institutions, including various agencies, to fend off political authorities' intrusion is to cultivate supportive audiences and, more broadly, to develop coalitions of support. A positive reputation and the ability to mobilize audiences will protect the agency from overt political intrusion or interference (Carpenter, 2002; Wæraas & Byrkjeflot, 2012; Rimkutė, 2022; Maor, 2014; Author, 2018).

To this end, an agency and its leadership need to have apt public communication skills, which include the ability to think through what resonates with the audience and when and what messages to deliver to them; how to undertake actions and political messaging to build, consolidate, and galvanize their support; and how to motivate supportive audiences and stakeholder groups to take further action, as needed, to press the government into taking the required measures (see e.g. Boon et al., 2020). Reputational school reasoning and historical evidence (e.g., Carpenter 2001) suggest that agencies might have lower structural separation from the government, but they will be more protected if they have managed to cultivate supportive audiences.

Anticorruption scholars and professionals have long recognized the importance of public communication and the credibility of ACAs’ leadership as key to community engagement and the acquisition of community support (Byrne et al., 2010), representing crucial factors for tackling political obstruction. However, despite its importance, today no developed support systems exist in the support community for anticorruption actors to provide training for ACA staff on reputational management skills.

Therefore, the first step for professional communities operating in the international domain, including international aid organizations, would be to lay out infrastructure and establish support systems and programs to train ACA leaders in reputational management techniques. There might be insufficient conceptual clarification regarding what reputational management training should consist of. At first glance, it might include traditional public communication training from the corpus of classic communication textbooks and training, originally developed in the corporate sector but later branching out across other contexts including public institutions’ and public leaders’ communication, not least through branches such as crisis communication, crisis management, political branding, and PR (Wilcox et al., 2015). However, for ACAs’ successful reputational management, reputational activism training needs to go beyond the usual public communication training. It needs to be tailored specifically to the anti-corruption sector and enable ACA leaders to understand how their models influence their communication strategies. One trap that many ACA leaders fall into in their desire to enhance their reputation is turning into “barking dogs,” meaning they harshly criticize political authorities through aggressive public communication. While this can be an effective means of pressure in some situations or contexts (see, e.g., Kuris, 2015; Author, forthcoming), it is important to remember that it can be counterproductive in others. For instance, research shows that suppressive ACAs are better off having a more restrained communication approach compared to preventive ACAs (Author, 2019), since their mandate and authority bring different “blame game” constellations for poor anti-corruption outcomes. Consequently, communication training, particularly regarding political authorities, needs to be tailored to account for these specifics of the anti-corruption domain, just as it must be sensitive to local culture (de Sousa, 2012, p. 7). For example, in some societies, openly criticizing those in political power is viewed favorably, whereas in others, any criticism—even when justified—of political power is seen as an unwelcome intrusion into socially accepted authorities (Author, forthcoming). Thus, aggressive criticism of political power holders can diminish rather than enhance an ACA’s reputation.

Additionally, knowledge of communication psychology and dealing with hostile political subjects—ideally when they need to be transformed into some sort of collaborative entity or at least a non-hostile entity—would be useful for such training. On the broader issue of coalition building, reputational management training for ACA leaders would benefit from insights into social mobilization and social and policy entrepreneurship, which could be derived from the social movement literature (see, e.g., Ganz, 2010, 2011), social and policy entrepreneurship literature (Navot & Cohen, 2015), coalitions advocacy literature (Weible and Ingold, 2018), and others. Here, an intersection with public communication scholarship concerns the phenomenon of issue framing and its use for political messaging and mobilization (Benford & Snow, 2000). This skill might represent a powerful tool for ACA leaders (Doig & Norris, 2012), and instrumental reputation management training and support for ACA leaders across the world would ideally enable them to better understand the sort of issue framing to utilize, as well as when and how to undertake it, in the specific field of anti-corruption. This would be particularly valuable for those ACA leaders and staff with a legal background, including prosecutorial roles, whose occupational culture proverbially makes them reserved for public appearances and oftentimes reluctant to the idea of proactive public and societal engagement (Author, 2018). ​

***Benchmarking***

The second measure proposed here is that of benchmarking – creating tables that would compare the work of ACAs and thereby create pressure on ACA leaders and political authorities alike. Benchmarking is a well-known mechanism in public management, which has been said to be capable of producing several benefits for benchmarking subjects, including creating better insights into successes and shortcomings of their wor; identifying aspects where greater progress is possible; and also creating reputational pressure for improvement in their operations (Ammons & Roenigk, 2015; Ki, 2021, p.612). Reputational pressure could be particularly fruitful when the observed and benchmarked actors are part of norm-driven communities, where being seen as failing might incur major reputational and professional costs.

Some of the international actors that monitor the progress of domestic anticorruption bodies often employ some variation of benchmarking, for instance when they create lists of expected standards for overseen states (see e.g. Council of Europe, n.d.) and then compare to what extent those lists have been fulfilled, including potential mutual comparisons with other lists. A variant of this example is used by GRECO of the Council of Europe, but other organizations also include it in their progress reports, particularly for Chapter 23 (“Judiciary and Fundamental Rights”) . However, such projects are not ACA specific, but generally pertain to a broader corpus of measures within the anti-corruption landscape of institutions; where benchmarks do exist for ACAs, they are of a more general nature and non-obligatory.

So, what would be the criteria for one such benchmarking system? Obviously, comparing ACAs' work across states – just like comparing any corruption-related phenomenon – is notoriously difficult. However, instrumental benchmarking criteria can still be developed to credibly capture at least two key aspects: 1) the quality of work of ACAs and their leaders; and 2) the treatment of ACAs by the government and political authorities. The former would serve to pressure ACA leaders, either from peer groups or international overseers, to be more effective and engaged in their dealings with authorities; the latter would be useful for international overseers in the first place – but also for domestic pressure makers ranging from civil society to opposition parties – to pressure the government to provide better treatment and conditions for ACAs.

As challenging as it may be to develop concrete criteria for comparability and methodological validity that genuinely capture the behavior of Anti-Corruption Agencies (ACAs) and authorities, it is still possible to establish them. For ACAs, these criteria might include behavioral indices that reveal how ACAs address raised suspicions of public officials’ misconduct. This could range from early ACAs’ reactions (e.g., public commentary) to reports of an official’s misconduct or corruption to the time needed to take up the case and the nature of this engagement including, how they conduct different phases of investigation, and how they handle the case later in the process. Schütte et al. (2023), in a recent report by the International Anti-Corruption Academy numerous range of indicators for measuring the investigative performance of ACAs, which examine a range of steps taken by ACAs, from complaint receipt through investigation, indictment, conciliation, outcome, and sentencing stages (Schütte et al., 2023, p. 10). For each of these stages, one might measure, per an observed ACA, the number of cases (e.g., a total on an annual basis), their processing time, and outcomes. A subsequent breakdown could provide a better account of the nature of criminal acts—e.g., whether a convicted official is high-ranking or not; how much time each stage lasted; the number of dismissals, acquittals, and convictions; fines, confiscations, or custody; the value of losses prevented; assets recovered; and the source of cases (public vs. private sector).

To account for contextual differences, the type of agency, its powers and jurisdictions, as well as other contextual factors, need to be considered through an adequate formula to allow for meaningful comparisons. ​It is feasible, for instnace through careful statistical modeling, to isolate the role of contextual features—whether related to the type of political system, other broader societal factors, or ACA-related political factors—and to develop formulas that account for the role and weight these factors and produce comparable rankings that would factor in the major contextual differences across states (see, e.g., Harrington, 1996; Bogeloft, 2012). From a technical perspective, this form of 'comparativization' of behavioral and performance-related data across different contextual settings is not only feasible but has already been demonstrated in prior practice in numerous instances in other areas and for different types of institutions (see, e.g., Krause and Douglas, 2006; Friedrich & Friede, 2024; Lnenicka et al., 2024; for one application of a region focused, small-N, benchmarking analysis for ACAs, see Quah, 2009).

Similar indices and benchmarkign tables could be producd regarding the nature of support a government is providing to the domestic ACA. These indicators could include, but are not limited to, how the government responds to the local ACA’s requests for capacity-building, whether it has created a supportive anti-corruption environment, and how it engages with the ACA’s involvement in anti-corruption cases. If so, how? Does it criticize or downplay the ACA’s involvement in a given case? Does it collaborate institutionally, such as when documents or data need to be shared, etc.). Establishing clear indicators for the regional or international league tables and properly contextualizing them are essential to avoid common mistakes with benchmarking and ensure the system's credibility and motivational impact.

An accompanying measure that could strengthen the effects of the benchmarking system and also serve as a separate measure for the future empowerment of ACAs is the creation of a broader, well-connected epistemic community (Haas, 1992) that would be vital for empowering ACAs. A robust epistemic community can enable stronger peer pressure, offering mutual protection among ACAs, and generally creating an environment in which ACA leaders are both supported and held accountable. Such a community would incur reputational costs for underperforming ACA leaders and provide an external voice to communicate their underperformance to domestic audiences. It would also offer protection, as seen with the international networks and associations of other types of oversight institutions, such as the International Organization of Supreme Audit Institutions (INTOSAI) for supreme audit institutions and the International Ombudsman Institute (IOI) for ombuds institutions (Author, forthcoming), which tend to protect their members against in-country political attacks. Developing a strong oversight community akin to INTOSAI or other well-institutionalized networks for other types in the sector of public sector oversight/control requires strategic entrepreneurship and coordination.

Currently, oversight of ACA performance in Europe is handled to an extent by certain programs or institutions, such as GRECO (the Group of Countries against Corruption of the Council of Europe) and the European Commission and Parliament (e.g. through their progress reports for EU candidate countries). However, these programs and institutions do not form a cohesive ACA community with a shared identity and support mechanisms. Alongside designing its system of comparison indices, it is also crucial to clearly designate leadership for an effective international benchmarking system. This means specifying which actors, from across the international community, will pursue this mandate. This could involve members of civil society, formal international institutions or associations (e.g., those gathering anti-corruption bodies or ACAs), international organizations, or a combination of these. Additionally, it is important to determine how the benchmarking findings will be used by those exerting pressure over domestic agencies. Overall, despite prior efforts, more needs to be done to create a distinct and consolidated international identity for ACAs to address professional diversity and the lack of shared norms within the community.

***Search for and domestic anticorruption ‘willers’***

Handling political authorities that hinder or refuse to support the ACA presents a key challenge for its empowerment. Traditionally, international actors have addressed governments reluctant to support anti-corruption agencies through external conditionality (Doig, 1995; Rose-Ackerman, 2012; Zhu & Shi, 2019). These actors leverage their ability to sanction or reward countries based on their progress—or lack thereof. However, domestic authorities often establish an ACA mainly for signaling purposes (de Sousa, 2012; Sampson, 2010; Prenzler & Ransley, 2023). Governments usually create an ACA for demonstration rather than operational support, which can lead to undermining its effectiveness (Batory, 2012). This ineffectiveness is partly due to the government undermining the ACA in less overt ways, such as through jurisdictional manipulation, inadequate capacity-building, or even indirect attacks through media coverage and pressures exerted via informal channels (Author, fortchoming). Although structurally separate, it is common in practice for the executive branch to interfere informally in the appointment or dismissal of members of the domestic ACA, thereby influencing its staffing policies. This approach can undermine genuine empowerment of the ACA, especially when the government perceives its interests to be threatened. Over time, it has become clear that, in many cases, conditionality has proven ineffective in empowering ACAs in a durable and sustainable way.

To act preventively to mitigate the ‘political obstruction’ factor, the pro-ACA epistemic community could work on anticipating and steering the ‘supply side’ of political obstruction. Alongside a proposed benchmarking system, they might develop a framework for identifying and grooming potential reform allies within a state. Even if the highest political leadership—e.g., the Prime Minister and/or President of the State (where they exist)—does not support the ACA, reformers may still exist within the government, such as ministers overseeing portfolios related to public administration, justice, or police, or in other areas of the administration apparatus in the criminal justice system and beyond.

For this purpose, a system must be established to monitor domestic political developments, identify potential reform alliances, and foster collaboration opportunities between identified reform allies and the international pro-ACA community. This includes tracking personnel changes in government, particularly at the ministerial level, as well as recognizing potential upcoming political leaders from both the government and the opposition. Those in charge of running the monitoring system for engaging domestic reform allies would gather insights on the willingness of new personnel to support anti-corruption policies and empower the ACA. They may obtain this information from sources such as civil society groups, diplomatic representatives, or other stakeholders familiar with local dynamics. In developing this system, it is essential to assign specific responsibilities to organizations at the international level, including within the pro-ACA epistemic community, to implement these measures. Alternatively, a less formalized approach could involve formal or informal leaders from the international level who oversee or support domestic ACA capacity-building and anti-corruption reforms. These leaders would be responsible for implementing a tracking system and collaborating with potential political reform allies. ​

Furthermore, part of the strategy to manage political authorities may involve the ‘opportunistic capacitation of ACAs.’ This concept acknowledges that governments typically act in their self-interest, prioritizing public interest only when it aligns with their political benefits. This alignment is rare but can happen when an outgoing administration prepares to transfer power to the opposition in an upcoming election. In these cases, the outgoing government may have a heightened interest in empowering the ACA as a ‘hand-tying’ mechanism (Adler & Walker, 2019), placing restrictions on future political rivals. A ‘planting control’ strategy ‘against’ the future government may involve adopting legislative changes, capacity improvements to the ACA or removing various institutional and other obstacles to its operational effectiveness.

In anti-corruption studies, political opportunism is often viewed in the context of abuses of anti-corruption efforts to discredit opponents (Siddiquee & Zafarullah, 2022). However, the ‘hand-tying’ type of political opportunism can be seen as positive from the perspective of ACA empowerment and the fight against corruption. To encourage such developments, it would be necessary for the pro-ACA community to establish a system to identify imminent government turnovers, whether through the analysis of domestic public opinion polls, expert estimates, or other valuable sources. Once a likelihood of government turnover is identified, it is crucial to persuade the outgoing government to strengthen the ACA during these pre-turnover periods. ​

# **4 Conclusion**

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​This paper argues that future efforts to empower anti-corruption agencies (ACAs) need to move away from the prevalent institutionalist paradigm (Doig, 1995; UNODC, 2012; de Jaegere, 2012) and focus more on upskilling ACA leaders and staff in political entrepreneurship (Navot & Cohen, 2015). This approach will enable them to navigate the political environment and challenges more effectively, develop better systems to create pressure—not only hard but also soft—on uncommitted political actors and ACA leaders alike, and identify potential willing political allies for efforts to empower the domestic ACA. To that end, this paper has outlined several directions with practical considerations regarding their implementation. These directions include the development of support systems to empower ACA leaders in reputational activism, the creation of better systems for monitoring and comparing the performance and effectiveness of ACAs—with careful capturing and factoring in of local contextual specifics that should be incorporated into comparison considerations—and the establishment of systems for identifying potential reform allies as well as windows of political change where the domestic ACAs might opportunistically be strengthened.

These measures could contribute towards mitigating the key problem observed so far in ACAs’ work, namely hostile or non-supportive political environments (Quah, 2010). To develop such systems, however, concerted action needs to be taken at the international level among communities working on ACAs’ status and empowerment. These communities range from formal international organizations to communities of practitioners and experts specializing in the operation of ACAs—from scholars to consultants and (former) professionals in relevant fields, such as criminal policy or public sector oversight. This also requires a sustained effort in resourcing and a clear assignment of responsibilities and tasks, formalized to a greater or lesser extent.

On a broader disciplinary point, this paper calls for an expansion of the disciplinary lens and framework when considering ACA empowerment. Efforts to strengthen ACAs would benefit from incorporating evidence and ideas from public management, public administration, and regulatory governance. While relevant concepts and analyses from these literatures have been acknowledged as useful for the study of ACAs' empowerment, this recognition has primarily come from scholars in those fields (such as De Sousa, 2010; Batory, 2012; Author; Bautista-Beauchesne, 2021, 2022). However, these ideas are still underutilized by professionals who are informing and working on practical strategies and tools for empowering ACAs.

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