TECHNICAL BRIEF

Promoting a Culture of Integrity in Peru

LESSONS LEARNED FROM APPLYING THE ACCOUNTABILITY ECOSYSTEM APPROACH

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Abstract

In a world where corruption and injustice have eroded public trust and weakened democracy, strengthening accountability has never been more important. Accountability is not a solitary endeavor; rather, it involves an intricate interaction among different individuals, organizations, and power structures within a specific context.

Recognizing this, Chemonics International has increasingly embraced the Accountability Ecosystem (AES) Approach to project implementation, which offers a holistic and powerful framework for improving the effectiveness and sustainability of donor-funded governance projects. This technical brief dives into the complexities of this approach, identifies key challenges, and unearths the lessons from the USAID Transparent Public Investment (TPI) project. In analyzing the project's progress, we uncover how we can develop more effective strategies for promoting transparency, justice, and a more accountable society — ultimately cultivating a culture of trust where institutions serve their citizens.

Introduction

Corruption undermines the foundations of a just and equitable society, blocking progress in development, democracy, and human rights while fostering injustice, environmental degradation, public resource loss, social instability, and power asymmetries. Accountability, meanwhile, counteracts this by ensuring transparent, inclusive, and responsive democratic governance based on a social contract. Traditional methods of increasing accountability often narrowly focus on a specific technical challenge or set of actors, leaving gaps in impacts and opening the door to future corruption.[1] The AES approach goes beyond these models, recognizing accountability as a complex, inherently political process that emerges from the relationships and interactions in an intricate web of actors and mechanisms. Political landscapes, social norms, and economic systems collectively shape accountability.

This brief will explore the AES approach and its practical applications through examples from past and current projects implemented in diverse operational environments. By highlighting these cases, we will illustrate how AES principles foster sustainable accountability mechanisms and counter corruption. We will then take an in-depth look at the Transparent Public Investment (TPI) project in Peru, analyzing its implementation strategies and sharing key lessons learned to provide actionable insights for future accountability-focused projects.

The six fundamental elements of an AES approach (see textbox) provide a framework to address the root causes of corruption more effectively, holistically, and sustainably by responding to a lack of accountability and unchecked power.

Six Fundamental Elements of the AES Approach

1. Analysis and mapping of accountability systems, including formal and informal actors, institutions, mechanisms, norms, and processes, and their underlying power dynamics.

2. Emphasis on approaches, both vertically and horizontally, across accountability mechanisms and processes.

3. Strategic use of varied and complementary tactics, such as litigation, media coverage, citizen monitoring, social behavioral change, freedom of information requests, etc.

4. Embedded co-creation, learning, and adaptation in organizational approaches.

5. Politically and when relevant conflict-informed focus on addressing and shifting power relations and behaviors that underpin accountability.

6. Integration of gender and social inclusion principles into accountability processes through an intersectional approach.

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[1] Fox, Jonathan, Joy Aceron, and Arantxa Montero, *Doing Accountability Differently: A Proposal for the Vertical Integration of Civil Society Monitoring and Advocacy* (2016), 10.13140/RG.2.2.20746.26568, 7

The AES approach was first piloted on USAID's [Strengthening Advocacy and Civic Engagement (SACE) Project,](#) which enhanced accountability by fostering horizontal and vertical relationships within Nigerian civil society organizations (CSOs). By building strong networks across the ecosystem, SACE helped tackle deep-rooted issues, including corruption and abuse of power, laying the groundwork for sustainable change. Using a cluster/anchor model, SACE convened diverse groups — including CSOs, donors, media, private sector partners, social influencers, policymakers, researchers, legal representatives, and community mobilizers — in collaborative networks to jointly identify and address accountability challenges in areas such as public financial management, healthcare, environmental resources, and education. By promoting horizontal relationships — connections between organizations working at the same level (such as advocacy-focused CSOs and the media) — SACE encouraged shared learning, capacity-building, and collective action. These efforts helped create self-sustaining networks built on trust and common goals. At the same time, vertical relationships — which linked organizations across levels, such as education-focused CSOs and key Nigerian government stakeholders — offered strategic mentorship and access to influential stakeholders, strengthening the clusters' impact and sustainability. By the project's close, 16 organizations showed significant capacity growth, and eight partners had received more than $3 million in direct funding from the U.K. and other international and local donors, with the SACE project cited as a contributor to the strength of the organizations.

The AES approach also incentivizes systemic change by prioritizing co-creation. By facilitating citizen-government dialogue, addressing community needs, and equipping citizens to hold authorities accountable, interventions can build trust, increase transparency, and support lasting accountability. For example, the USAID Iraq Maa'an (Together) Project held workshops with government agencies, provincial councils, private sector representatives, activists, social media influencers, and community leaders from six provinces. The workshops identified critical needs for improvement in the three service areas — water, solid waste management, and sewage — and aimed to enhance community engagement in government-led improvement efforts while promoting community-led initiatives. Through co-designing and validating interventions, stakeholders contributed to a collaborative process that strengthened buy-in and contributed to sustainability. Additionally, by incorporating community feedback and co-creating solutions, Ma'an embedded learning and adaptation into its approach, allowing the project to evolve in response to real-time insights and stakeholder needs. Stakeholders agreed to a shared commitment of equity — ensuring that service improvements reach all citizens, including women, people with disabilities, youth, the elderly, religious and ethnic minorities, and internally displaced persons — supporting an inclusive and adaptable framework for accountability.

Contextual understanding is another critical element of the AES approach. Implementation of tools such as political economy analysis (PEA) enables a deeper understanding of the specific

context in which accountability efforts are being implemented. The U.K.-funded [Transparency and Accountability for Inclusive Development Mozambique](#) (POTENCIAR) program supports civic participation and collective action to address accountability and governance problems that are undermining healthcare service delivery in Mozambique. POTENCIAR conducted a thorough analysis and mapping of accountability systems in the health sector, examining both formal and informal actors, institutions, mechanisms, and power dynamics to identify key issues undermining care quality in Nampula province. To address these, they developed pilot initiatives focused on strengthening maternal health grievance mechanisms, fostering collaboration among public, private, and community stakeholders, and improving health professional training. By partnering with civil society and health providers, POTENCIAR has improved methods for users to report issues and for providers to improve services in response.

Promoting Transparency for a More Equitable Peru

The AES approach emphasizes the interconnectedness of actors in fostering transparency and accountability. By recognizing that no single entity can drive change alone, the approach encourages collaboration, strengthens institutional frameworks, and empowers citizens to demand better governance. TPI built upon Chemonics' decade of experience implementing the AES approach to refine and advance its own methodology in Peru. The project offers a concrete example of how this ecosystem can be leveraged to promote more transparent governance and improve public trust.

Despite decades of anticorruption initiatives, the Odebrecht scandal revealed that some traditional approaches were insufficient (see box).[2] On the 2023 Corruption Perceptions Index (CPI) by Transparency International, Peru scored 33 out of 100, ranking it 121st among 180 countries and far below the global average score of 43.[3]

The Odebrecht Scandal

The Odebrecht scandal was a significant corruption case involving the Brazilian construction firm Odebrecht. The company paid billions of U.S. dollars in bribes to politicians and officials across Latin America in exchange for lucrative contracts. In 2014, the Brazilian investigation *Operation Car Wash* (Operação Lava Jato) revealed widespread corruption, implicating presidents, political leaders, and business executives in Peru, Mexico, and Venezuela. It led to arrests, political upheaval, and significant fines for Odebrecht, exposing deep-rooted corruption in the region.

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[2] Campos, Nicolás, Eduardo Engel, Ronald D. Fischer, and Alexander Galetovic, "The Ways of Corruption in Infrastructure: Lessons from the Odebrecht Case," *Journal of Economic Perspectives* 35, no. 2 (2021): 171-190.
[3] Transparency International, "2023 Corruption Perceptions Index – Peru," Transparency.org, accessed November 11, 2024, https://www.transparency.org/en/cpi/2023/index/per.

Public procurement proved to be particularly vulnerable to corruption due to high economic incentives and discretionary decision-making. TPI identified the AES approach as the most strategic framework to harness public political will, private sector demand, and civil society engagement to combat corruption effectively. As Susana Silva Hasembank, the secretary of public integrity of the Presidency of the Council of Ministers, noted, "Many recipes have been applied that prioritize the punitive side to fight corruption...nevertheless, I'm convinced the most effective tools center on transparency and citizen participation."[4]

Many Peruvians felt powerless in the face of corruption, which presented an opportunity for TPI to strengthen the citizens' capacity and motivation to hold the government accountable. To address these challenges, TPI promotes a community-focused approach, emphasizing transparency as a shared value and collective responsibility through integrity networks and public awareness campaigns.

Integrity Networks: Strength Through Partnerships

Peru has taken strides toward establishing a legal framework that guarantees the independence of several key institutions that contribute to the accountability ecosystem. This includes activities such as auditing the financial accounts of public institutions, investigating corruption, and granting citizens the right to public information, as well as enacting laws governing the functioning of the Comptroller General's Office, the Public Integrity Secretariat, and the Transparency Authority. Furthermore, Peru has incorporated mechanisms — including public participation rights and access to information laws — that guarantee transparency and enable citizens to access relevant data to hold institutions accountable. Independent monitoring bodies such as the Organismo Supervisor de las Contrataciones del Estado (OSCE) also play a crucial role in overseeing compliance with regulations. Adopting and adhering to international standards and norms on transparency and accountability further ensures that accountability efforts are not undermined by political or economic pressure. Peru has requested admission to the Organisation for Economic Co-operation and Development (OECD) and has adopted a roadmap to gain admission, which provides external validation and support for local accountability efforts.

The TPI project harnessed public political will, private sector demand, and civil society engagement to combat corruption in public sector investments by strengthening seven regional

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[4] Network for Integrity, "Secretariat of Public Integrity of the Presidency of the Council of Ministers – SIP," NetworkForIntegrity.org, accessed December 2, 2024, https://networkforintegrity.org/continents/america/secretariat-public-integrity-presidency-council-ministers-sip.

provincial governments' capacities to effectively combat corrupt practices. During the co-creation phase, TPI, USAID, and key local stakeholders mapped existing accountability systems and developed 15 public procurement integrity standards for public works projects. These standards were then piloted in five selected regional governments to reduce risks to efficiency or integrity in public works. In the proof-of-concept phase, alongside local partners Transparencia and Proetica, TPI established integrity networks that convened regional governments, the private sector, CSOs, and journalist associations to create an environment that supported increased accountability.

TPI provided training and technical assistance to help integrity networks in target regions understand the intricacies of the public procurement cycle. Despite the initial challenge presented by the arrival of new government administrations, the integrity networks were well-positioned to deploy oversight strategies that strengthened their relationships with both regional governments and other public and private institutions. These networks could proactively engage with the newly appointed regional governors and general managers to effectively present their ongoing work and propose a collaborative agenda. Ultimately, even in the face of subsequent turnovers among government officials, with TPI's technical support, the integrity networks successfully obtained a regional government agreement for subjecting new investment projects to citizen oversight. This achievement vividly illustrates their adaptability in navigating these transitional phases.

Lambayeque Integrity Network members, including Pina Mundaca (center), conduct citizen oversight of a school in the José Leandro Ortiz district. Credit: Enrique Castro and Aldo Vera, TPI

As a result of TPI's guidance and oversight, more than 100 CSOs in the seven target regions were better trained to monitor and advocate for accountability. Women, men, and young people strengthened their skills in public procurement, access to public information, ethics and integrity, spokesmanship, and advocacy with regional government authorities, officials, and employees. This allowed them to exchange information, make recommendations on applying integrity standards to public procurement, and promote best practices for strengthening a culture of integrity in the regions — all from a citizen perspective.

Similarly, the project trained individuals and organizations to participate more effectively in the accountability processes themselves. To reach new audiences in a flexible way, TPI produced an asynchronous integrity training kit focused on promoting public-private collaboration and integrity standards for multi-stakeholder oversight of public works. The use of integrity tools helps improve governance, raise awareness of measures to prevent corruption, and ensure that resources are used efficiently.

Keys to Sustained Progress

The project identified weaknesses in public investment processes, including limited resources, capacity constraints, and governmental resistance to change. Together, these challenges can limit the effectiveness of integrity networks if not properly addressed. For example, when resources are scarce, it can be difficult to maintain support for accountability initiatives. TPI

From left to right: Guido Mamani, Guianina Calla, Joseph Apaza, and Zaira Félix, members of the Cusco Integrity Network, provide oversight of the Río Blanco-Mollepata highway, a public investment work in Cusco. Credit: Enrique Castro and Duber Gonzales, TPI

found that national agencies that have greater capacities, experience, and resources are more likely to implement corrective or preventive measures. However, robust partnerships among government, civil society, and the private sector were key to tackling these challenges.

Open communication can, in itself, improve transparency. An accountability ecosystem recognizes the need for collaboration from private sector leaders, including civil society, the media, and government agencies, to co-create solutions that effectively address corruption and improve transparency. Through partnerships with journalists and other media representatives, TPI published radio, television, print, and social media pieces that bolstered transparency and generated public interest in the project's work. A series of engaging dialogues brought together key journalists and government stakeholders to exchange insights and strategies. This ensured that the principles of integrity were not only upheld but also effectively communicated. This approach created an open platform for dialogue, encouraging rigorous examination of the public works projects and reinforcing the commitment to uphold high ethical standards in all initiatives.

Public-private sector collaboration is key to integrity networks' success. A 2022 survey conducted by TPI revealed that public officials, private sector participants, and civil society members alike recognized the potential of integrity networks to improve transparency and accountability. Incredibly, more than 80% of respondents believed that integrity networks significantly contributed to improved integrity within prioritized investment projects by creating spaces that encourage both public and private sector participation. TPI encouraged government officials to engage in local reform efforts by providing technical support, structured frameworks, and promoting public visibility. One successful strategy was the adoption of "binding legal directives," which enabled officials to enforce integrity standards within a defined accountability framework. This approach established a solid foundation for reform while assisting officials in fulfilling transparency and accountability requirements.

Data-driven monitoring systems enhance oversight. At the request of Lambayeque's regional governor, TPI designed a digital dashboard to track competitiveness metrics, including integrity. By implementing integrity tracking at the governor level, the dashboard offered further insights into areas where adherence to the Public Integrity Model was lacking and allowed him to support his staff to meet integrity standards. Additionally, using regional benchmarking and peer learning through platforms like the Public Integrity Secretariat Comparative Reports strengthened collaboration in the San Martin, Piura, Cusco, and Lima regions, which were then ranked highest among regional governments. Through TPI's accountability ecosystem approach, public, private, and civil society stakeholders in the seven target regions have been equipped with the necessary tools and methodologies.

> We see the public-private proposal roundtable as a major step in the right direction for open government, and our role as the integrity network is to make sure that the opportunity that the regional government has given to civil society and businesses to participate is a lasting and sustainable space.
>
> **– Sonia Arteaga, technical secretary for the Lambayeque Integrity Network**

Citizen participation is essential for sustainability. TPI embedded integrity networks in existing institutional frameworks, including the Roundtable for the Fight Against Poverty (Mesas de Concertación para Luchas contra la Pobreza, or MCLCP), to ensure their continuity and stability. MCLCP, which already serves as a platform for dialogue and coordination between the Peruvian state and civil society, enjoys broad-based public and institutional support. The legitimacy of the MCLCP as a well-established, legally recognized mechanism for consensus-building has provided the networks with institutional support and created opportunities to foster engagement from both civil society and government representatives.

In Lambayeque and Cusco, TPI initially coordinated the integrity networks with the regional anticorruption commissions. However, these commissions prioritized raising awareness, while integrity networks focused on direct action and proactive advocacy. Recognizing this distinction, TPI recommended transitioning the integrity networks to the MCLCP, which provides a sustainable, locally led platform more aligned with their advocacy-focused objectives.

Ultimately, the success of the accountability ecosystem approach relies on three crucial factors:

1. There must be robust political determination and dedication from government officials to adopt transparency and accountability as fundamental pillars of governance.

2. CSOs must feel empowered to create and maintain a culture of government oversight and integrity.

3. The framework should receive sufficient resources and capacity to guarantee its sustainability and efficient implementation.

The accountability ecosystem approach in Peru presents a promising path forward for those aspiring to become more transparent and accountable, even in the face of significant challenges. The approach provides a structured framework to ensure that those in positions of authority are held responsible for their actions and the public interest is served. Most importantly, by addressing power imbalances and ensuring inclusivity, the approach provides citizens the opportunity to actively participate in shaping the trajectory of their country's future.

Acknowledgments

We want to thank Chief of Party Paola Barragan for sharing project experiences and lessons learned. We also want to thank those who provided technical reviews: Todd Diamond, Bridget Newell, Belinda Glenn, and our editor, Carrie Schwartz.

We would also like to extend our gratitude to Lejla Kolenovic Ismail for her invaluable vision, leadership, and guidance capturing lessons from AES and TPI. Lejla's meticulous reviews and thoughtful recommendations were instrumental in producing this brief and ensuring findings were effectively communicated.

Cover image caption: *Members of the Cusco Integrity Network provide collaborative oversight on the Mollepata-Río Blanco road project in the province of Anta, Cusco.*