



The Capacity to Combat Corruption Index

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The Capacity to Combat Corruption (CCC) Index

Assessing Latin American countries' ability to uncover, punish and deter graft

BY ROBERTO SIMON, Senior Director of Policy at AS/COA
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Almost five years into Latin America's anti-corruption push, the region's politics, business environment and civil society have been deeply transformed. The issue of corruption shaped elections last year in the two largest Latin American economies—Mexico and Brazil—and it still dominates the political conversation almost everywhere in the region. From the collapse of infrastructure projects across the region to the rapid growth of a new compliance industry, governments and the private sector are being forced to adapt to a different reality. Meanwhile, the media, academia and NGOs have been instrumental in pushing the movement forward, while cautioning against dangerous unintended consequences—particularly the rise of populism and judicial overreach.

Corruption has been a critical hurdle for Latin American countries for a long time, denting growth, weakening democracy and governance, and undermining the human rights of millions of citizens. But it's only recently that major anti-corruption investigations have begun removing the veil of impunity for political and business elites. This systemic change began around 2014 and 2015, when investigations like Brazil's Lava Jato and Guatemala's La Línea began in earnest. Fast forward to 2019, and Latin America currently has ten former presidents charged or convicted for acts of corruption. And the list is growing.

Countries that made significant progress share much more than stories about once-untouchable politicians and businessmen going to jail. What explains their success is the sustained development of a complex environment that allows them to better tackle the challenge of corruption. This environment has a number of key drivers: from better and more efficient courts and prosecutorial bodies to the strengthening of democratic institutions, from stronger civil society and investigative journalism to higher levels of education. No silver bullet made Latin American countries increase their capacity to fight corruption. The progress achieved over the past years is the result of gradual and parallel developments in government, business and civil society.

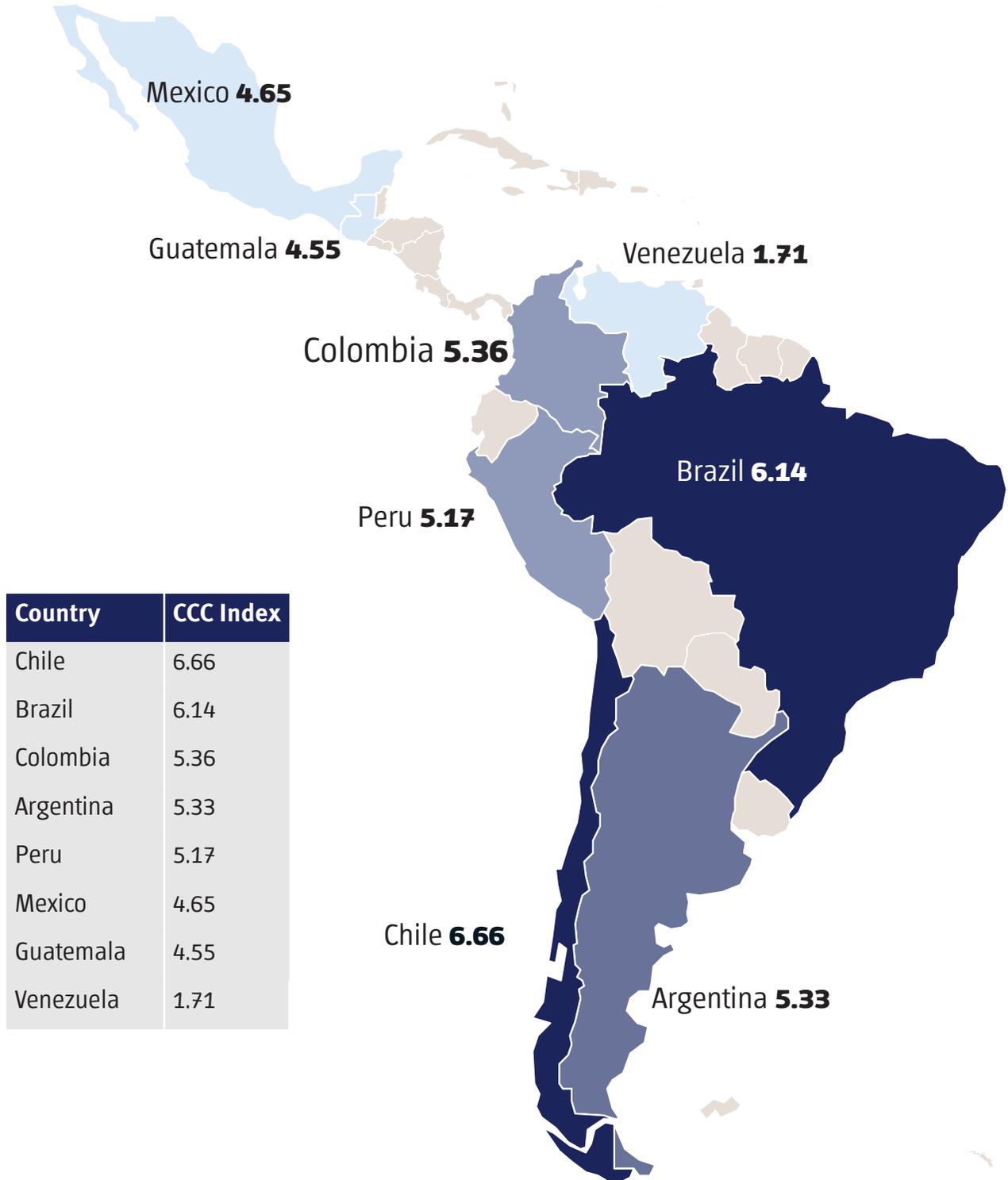
With this in mind, Americas Society/Council of the Americas (AS/COA) and Control Risks co-developed a tool to map the anti-corruption environment and assess countries' ability to uncover, punish and deter corruption: the Capacity to Combat Corruption (CCC) Index. Rather than measuring perceived levels of corruption or trying to quantify its economic damage, the CCC Index evaluates and ranks countries based on how effectively they can combat corruption. Countries with a higher score are deemed more likely to see corrupt actors prosecuted and punished. Continued impunity is more likely in countries at the lower end of the scale.

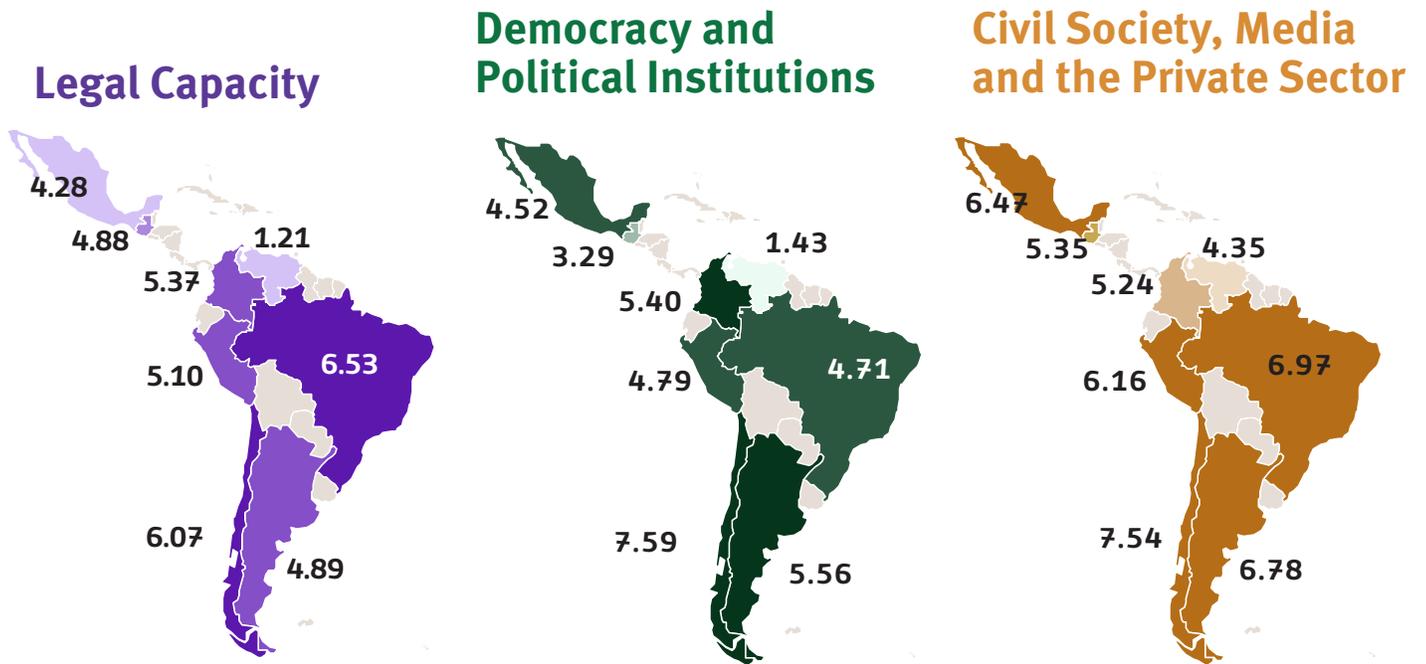
The CCC Index looks at 14 key variables, including the independence of judicial institutions, the strength of investigative journalism, and the level of resources available for combating white-collar crime. The index relies on extensive data and on a proprietary survey conducted among leading anti-corruption experts from Control Risks, academia, civil society, media and the private sector.

The inaugural edition of the CCC Index covers Argentina, Brazil, Chile, Colombia, Guatemala, Mexico, Peru and Venezuela, which collectively represent almost 90 percent of Latin America and the Caribbean's GDP. The country with the highest overall score in the 2019 CCC Index is Chile (6.66 out of 10), meaning it is deemed the most likely country in the study for corruption to be uncovered, punished and deterred. Chile was followed by Brazil (6.14), a virtual tie between Colombia (5.36) and Argentina (5.33), Peru (5.17), Mexico (4.65), Guatemala (4.55) and, in a distant last place, Venezuela (1.71).

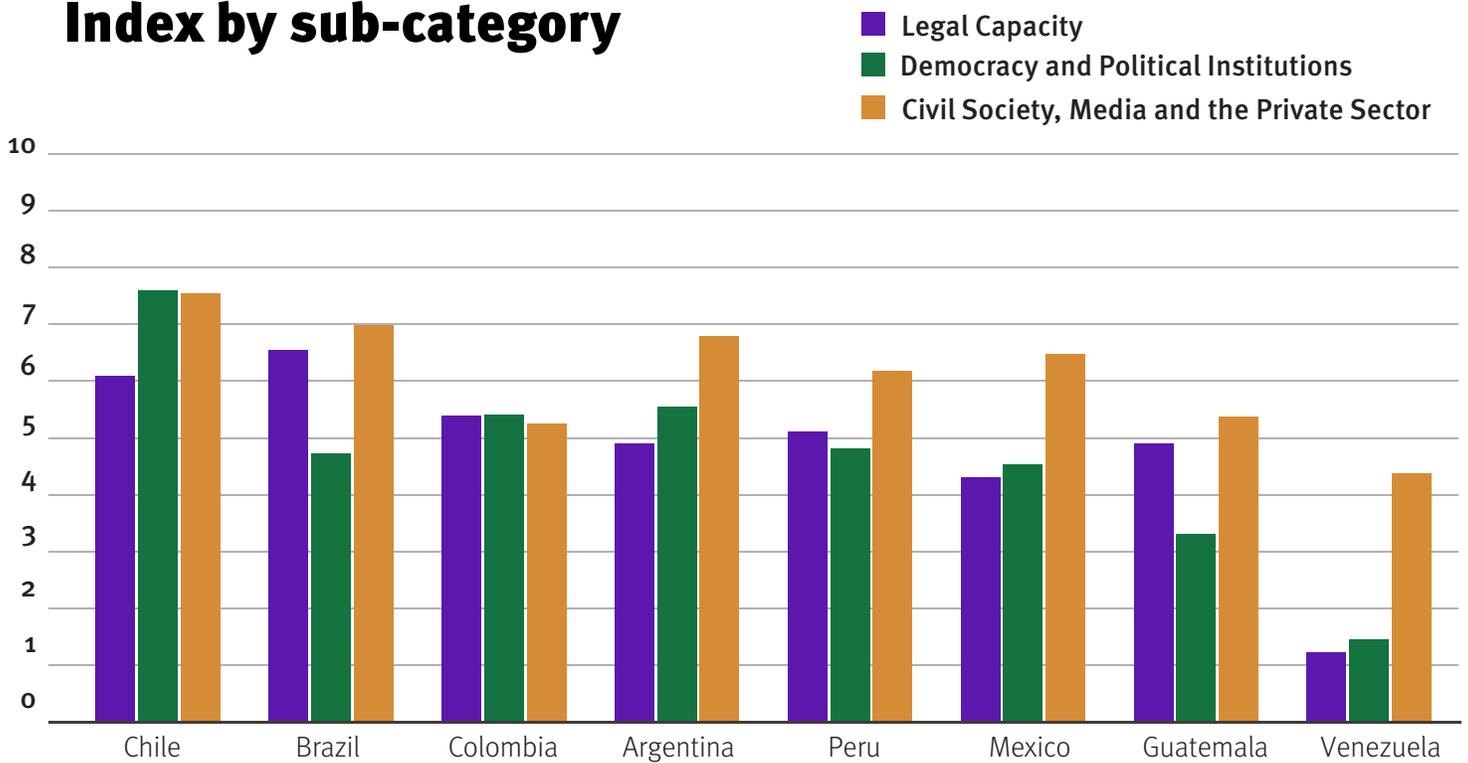
The 14 variables that compose the index are grouped into three sub-categories—legal capacity (I); democracy and political institutions (II); and civil society, media and the private sector (III). Legal capacity variables are mostly focused on judicial and prosecutorial instruments to combat corruption. The democracy and political institutions sub-category looks at electoral campaigns, policymaking and overall quality of democracy. The civil society, media and the private sector category analyzes factors contributing to anti-corruption efforts in these three areas. For more information, please refer to the methodology section.

Overall score





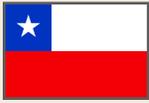
Index by sub-category



The CCC Index will be updated annually, tracking countries' trajectories in the field of anti-corruption. This will allow us to observe progress over time in different areas, which itself goes to the heart of this index's mission. We seek not to shame countries that are at or near the bottom of the rankings, but to drive a debate around the policies and factors that help countries structurally address the issue of endemic corruption. Indexes—as all kinds of exercises trying to measure and quantify human behavior—are inherently imperfect. In our case, we faced some degree of subjectivity, endogeneity and other limitations. To better address those, we have based the index on empirical data where possible and used a rigorous fact-based survey for experts. We remain open to debate and suggestions on how to improve our methodological choices and conclusions.

This report is divided in two sections. First, we analyze each country in the index and highlight critical issues to monitor moving forward. The second section explains the index's methodology in more detail.

This extensive exercise would not have happened without the generosity and competence of several collaborators. At AS/COA, we want to thank in particular Brian Winter (Vice-President for Policy and Editor in Chief of *Americas Quarterly*), who idealized the project with the authors, as well as Emilie Sweigart (Policy Consultant), who helped coordinate the research effort, and Pía Fuentealba (Media Relations Manager), who helped us publicize the index. At Control Risks, Thomaz Favaro (Director), for coordinating the input from its internal experts and for being a thoughtful sounding board throughout the project, and the media relations team for their support in getting the report published. Last but certainly not least, we want to thank the 14 experts in the region who responded to the CCC Index survey.



1

RANKING

CHILE

6.66

Overall Score

6.07 Legal Capacity

7.59 Democracy and Political Institutions

7.54 Civil Society, Media and the Private Sector

Chile's leadership in the CCC Index is unsurprising. With higher socioeconomic indicators and stronger institutions, Chile has consistently scored above its Latin American peers in indexes measuring all aspects of governance and perception of corruption. However, a closer look at the three sub-categories leads to a more nuanced picture. Having a more stable and functioning democracy, Chile leads in the "Democracy and Political Institutions" sub-category, with Argentina coming in second place. Chile also comfortably tops the list in the "Civil Society, Media and the Private Sector" sub-category, propelled by higher educational levels, a strong press and a vibrant civil society.

Yet Chileans are behind Brazil in "Legal Capacity" due to two major factors: comparatively underdeveloped leniency and plea bargain instruments and less established channels for cooperation with foreign partners (particularly the U.S. and Europe). One explanation for these relative deficiencies is that, with lower levels of corruption, Chile has had fewer incentives to develop its legal capacity than Brazil has had in recent years.

Overall, Chile faces low downside risk in all the variables assessed. Should Chile pass legislation or administrative changes to boost its legal capacity in the areas discussed above, it will likely see its leadership position in the CCC Index consolidate further.

CRITICAL ISSUES TO MONITOR

Debate about new legislation to increase transparency in the Armed Forces and national police, following a series of scandals in recent years (including the so-called "Milicogate").

President Sebastián Piñera's call for a "national agreement to strengthen institutions", including more transparent norms for promotions in the legal system. The president has also sent a bill to Congress to prevent nepotism and address "revolving door" issues between the public and private sectors.

Next year's first election of regional governors, in a further push towards decentralization. It is still unclear how this change will affect institutional checks and balances, particularly given the absence of regional legislative bodies directly overseeing the new governors.



2

RANKING

BRAZIL

6.14

Overall Score

6.53 Legal Capacity

4.71 Democracy and Political Institutions

6.97 Civil Society, Media and the Private Sector

Brazil's progress in the anti-corruption space over the past decade is clearly reflected in the CCC Index, with the country ranking second behind Chile. Notably, Brazil received the highest score in the “Legal Capacity” sub-category, driven by factors such as the independence of its judicial system and anti-corruption agencies, the level of expertise in tackling white-collar crimes, the established channels for international cooperation and the use of plea bargain and leniency instruments.

The Lava Jato probe is a consequence of this structural progress. The investigation proved to be remarkably resilient despite pressure caused by its focus on once-untouchable politicians and businessmen. Though the investigation has itself faced increased scrutiny and allegations of political bias, Congress and other groups have repeatedly failed in their efforts to interfere with or undercut Lava Jato—by curtailing the use of plea bargain testimony, for example. Other prosecutors and courts throughout Brazil have also become more aggressive in their prosecution of corruption in recent years.

Brazil's strengths go beyond the public sector, and include an active civil society and a vigilant press—two contributing factors to its good performance. The country however scored relatively low on the “Democracy and Political Institutions” sub-category, ranking fifth overall. Brazil's deficiencies relate to below-average scores on enforceability of campaign financing legislation and the quality of lawmaking and ruling processes, reflecting a relatively fragmented party system.

CRITICAL ISSUES TO MONITOR

Increased scrutiny and criticism of prosecutorial and judicial overreach, also prompted by the recent *Intercept* leaks. This controversy can impact the evolution of Justice Minister Sérgio Moro's “anti-crime package” in Congress.

The appointment of a new general prosecutor (attorney general) in September; the selection of a candidate not endorsed by prosecutors could signal a politicization threat.

The Supreme Court's pending decision on whether defendants can still be sent to jail after a failed first appeal.

New restrictions to the census and reports of increased problems in the application of Brazil's FOIA (*Lei de Acesso à Informação*) could point to a worrisome trend in terms of government transparency.



3

RANKING

COLOMBIA

5.36

Overall Score

5.37 Legal Capacity

5.40 Democracy and Political Institutions

5.24 Civil Society, Media and the Private Sector

The CCC Index exposes contrasting factors behind Colombia's relative progress in combating corruption. Colombia is among the top three countries in the "Legal Capacity" sub-category, with relatively high scores in areas like expertise in fighting white-collar crime, international cooperation and access to information. Yet regarding the independence of the Chief Prosecutor's Office and investigators, Colombia is significantly behind Chile, Brazil, Argentina and Peru. The data was collected amid mounting controversies surrounding the outgoing Attorney General Néstor Humberto Martínez, but the index also points to the lack of clear rules and procedures compared to other countries to protect prosecutorial bodies from politicization. In this context, leniency and plea bargain instruments have not been developed to the extent seen in Brazilian or Peruvian investigations—the Odebrecht case being one of the examples available.

Colombia scored close to Argentina—and ahead of Brazil—in the "Democracy and Political Institutions" sub-category, trailing only behind Chile on quality and enforceability of campaign financing legislation and lawmaking and ruling processes. Yet the Colombian score for "Civil Society, Media and the Private Sector" was surprisingly low—slightly behind Guatemala. This was mainly due to relatively low educational improvements and an underdeveloped NGO environment facing serious threats of political violence.

CRITICAL ISSUES TO MONITOR

The selection of a successor to Attorney General Néstor Humberto Martínez, who announced his departure in May. Although the Attorney General allegedly left due to the release of former rebel leader Jesús Santrich, he had faced intense accusations of conflict of interest in the context of the Odebrecht case.

The seven anti-corruption proposals presented to Congress in September 2018, which are moving slowly due to President Iván Duque's minority in Congress. Only two had progressed by June, and five are likely to go under. These include jail sentences for corruption, greater budget transparency, and a three-term limit on public office.

The fallout of the recordings of conversations captured by the U.S. Drug Enforcement Administration exposing a network of high-level corruption in the Colombian judiciary. Progress in these investigations could represent an important step forward in efforts to clean up Colombia's courts system.



4

RANKING

ARGENTINA

5.33

Overall Score

4.89 Legal Capacity

5.56 Democracy and Political Institutions

6.78 Civil Society, Media and the Private Sector

A push under the government of Mauricio Macri to strengthen the legal framework for combating corruption in Argentina brought positive changes, which are reflected in the CCC Index. Yet some critical challenges remain. Having passed new plea bargain legislation for corruption-related offenses in 2016, Argentina is ahead of countries like Chile and Colombia in this particular area. A significant number of defendants are cooperating with the authorities in the “Notebooks Case”—which investigates a major bribery scheme around federal public works.

However, Argentina has lower scores than Brazil, Chile and Colombia on variables such as judicial independence and efficiency: members of the judiciary lack enough resources while courts are overloaded. Despite the Notebooks Case, anti-corruption enforcement is perceived as generally weak by the public. Also, international cooperation remains inconsistent—an area where Argentina ranks seventh.

The country’s greatest strength is its democratic credentials: Argentina is among the top three on all variables in the “Democracy and Political Institutions” sub-category. This area has also gone through positive developments. For example, a new campaign finance law approved in 2019 mandates that contributions must be made through the banking system to facilitate tracking the origin of funds.

CRITICAL ISSUES TO MONITOR

The campaign and the outcome of the October presidential election can further increase polarization (*la grieta*) around the fight against corruption.

The evolution of the Notebooks investigation, which involves high-ranking business leaders as well as former president Cristina Fernández de Kirchner and her former advisors.

The approval of a new penal code by Congress, which includes stricter punishment of bribery-related offences and penalizes private-to-private corruption.



5

RANKING

PERU

5.17

Overall Score

5.10 Legal Capacity

4.79 Democracy and Political Institutions

6.16 Civil Society, Media and the Private Sector

Peru scored in the middle of the CCC Index ranking: close to Argentina and Colombia and ahead of Mexico and Guatemala, but below the three Southern Cone countries. In several areas which have been key to the Odebrecht investigation, Peru ranked amongst the top countries. For example, Peru is ahead of Argentina and Chile on international cooperation—which has been key for pushing forward the investigation into Odebrecht’s crimes in the country since the 2000s. Also, Peru scores at levels similar to Argentina’s on issues like quality of leniency and plea bargain instruments, independence of and resources available to investigators, access to public information, and anti-corruption agencies’ independence and efficiency. Another area where Peru is close to Argentina (and above countries like Guatemala and Mexico) is the quality of the press and investigative journalism.

The sub-categories where Peru has relatively lower scores are “Democracy and Political Institutions” and “Civil Society, Media and the Private Sector”. The functioning of the Peruvian political system is the most critical issue. The data show that campaign legislation and lawmaking processes remain problematic areas. Peru also faces challenges regarding education.

Separately, the independence and efficiency of the judicial system is also an area of concern, with Peru trailing Colombia, Argentina, Brazil and Chile, and slightly above Guatemala. Recent high-profile corruption cases—such as the *Los Cuellos Blancos del Puerto* scandal, which exposed a high-level bribing scheme in a court in metropolitan Lima—illustrate the challenges facing Peru’s judicial system.

CRITICAL ISSUES TO MONITOR

President Martín Vizcarra’s focus on an anti-corruption agenda could improve Peru’s CCC Index score, but there are significant political roadblocks along the way. At the core of Vizcarra’s plan is a bold political reform, which includes much tighter restrictions on elected officials’ immunity from prosecution. But the president has a small base in Congress and the opposition is fighting the reform.

Changes to the judicial system approved in 2018 have yet to be implemented, particularly the formation of a new oversight body (*Junta Nacional de Justicia*). Corruption and inefficiency in the judicial system will remain a key topic.

The Odebrecht investigation has already implicated four ex-presidents and senior officials, and it will continue to move forward. Investigations into another Brazilian construction company, OAS, are also gaining traction.



6

RANKING

MEXICO

4.65

Overall Score

4.28 Legal Capacity

4.52 Democracy and Political Institutions

6.47 Civil Society, Media and the Private Sector

The CCC Index sheds light on Mexico's relative lack of progress in combating corruption. A key area of concern is judicial efficiency and independence: courts generally remain prone to political meddling and face a major backlog of cases. Also, the implementation of a new accusatory judicial system, designed to expedite judicial processes, remains patchy. As a result of these and other challenges, Mexico's score for judicial independence and efficiency is significantly behind all other countries, with the exception of Venezuela.

The appointment of an anti-corruption attorney general in February has not yet resulted in a intensified crackdown on corruption. Most public officials involved in major corruption scandals over the past five years, such as in the so-called "Estafa Maestra" scheme, remain uninvestigated despite documented evidence of wrongdoing. A reform to remove judicial immunity for public officials, including the president, was stalled in Congress, but is expected to be approved during the second half of 2019. Enforceability of anti-corruption legislation remains deficient compared to other countries, while corruption cases investigated by authorities are often seen as politicized.

The CCC Index shows that Mexico's strength in the anti-corruption space is outside of government: the Mexican score in the "Civil Society, Media and Private Sector" category is more than two points above the other two areas analyzed. Civil society has become increasingly active in promoting anti-corruption legislation, leading to the creation of the national anti-corruption system during the administration of Enrique Peña Nieto (2012-2018). The press has improved its investigative capabilities and over the past five years has unveiled some of the most notorious corruption schemes in Mexico's democratic history, but it still faces high levels of violence and intimidation.

CRITICAL ISSUES TO MONITOR

Congress is debating the removal of immunity for all government officials, including the president, in corruption-related cases. The bill is expected to pass in the second half of 2019.

In May, Attorney General Alejandro Gertz Manero promised to present his case against Odebrecht in Mexico within 60 days. Mexican authorities have also frozen assets of the former head of Pemex, who is facing accusations.

AMLO's commitment to combat corruption will be tested as members of his National Regeneration Movement (Morena) party face corruption allegations. A case in point involves the Morena federal delegate in the state of Jalisco who faces conflict of interests allegations in the awarding of contracts to provide medicines to state hospitals through pharmaceutical companies owned by him.



7

RANKING

GUATEMALA

4.55

Overall Score

4.88 Legal Capacity

3.29 Democracy and Political Institutions

5.35 Civil Society, Media and the Private Sector

The CCC Index presents a mixed picture of Guatemala's anti-corruption environment, reflecting the positive impact of the UN-backed International Commission against Impunity in Guatemala (CICIG), as well as the political reaction to recent anti-corruption gains and the country's deep governance challenges. Guatemalan scores are particularly low on variables related to the functioning of its democracy. Only Venezuela trails the Central American country on issues such as campaign finance legislation, lawmaking and ruling processes, and overall quality of democracy. Guatemala also falls behind on topics such as education improvements, where it has the lowest score among the eight countries.

In some aspects of the "Legal Capacity" sub-category, such as international cooperation and quality of collaboration instruments, Guatemala is among the leaders in the ranking. Based on the survey responses, the relative success in these areas can clearly be attributed to the changes brought by CICIG since the mid-2000s. In most variables under this sub-category, Guatemala is ahead of Mexico—in some cases by a significant margin.

Yet Guatemala faces substantial downside risk moving forward. Political volatility and the potential deterioration of democracy, particularly as a result of the presidential election (whose second round will take place in August), will exercise downward pressure on Guatemala's score on variables assessed by the CCC Index.

CRITICAL ISSUES TO MONITOR

The run-off of the presidential election, in August. President Jimmy Morales' efforts to curb anti-corruption investigations may continue or even expand under a new administration.

CICIG will officially end in September and the future of investigations triggered or associated with the international body remains very unclear. The best-case scenario is that international cooperation will go through different channels. A total break-up could lead to increased impunity and significant institutional setbacks.

The U.S. presidential elections. The Trump administration deviated from Washington's strong bipartisan support for CICIG, and a Democrat president may impose a new policy change.



RANKING

VENEZUELA

1.71

Overall Score

1.21 Legal Capacity

1.43 Democracy and Political Institutions

4.35 Civil Society, Media and the Private Sector

The index reflects Venezuela's status as a clear outlier in Latin America. Venezuela's score of 1.71 contrasts starkly with all the other seven countries—from Guatemala to Chile—which had scores ranging from 4.55 to 6.66. The reasons for this bleak picture are well-known. The worst collapse in Latin America's economic history, systemic state failure and the destruction of democracy have dramatically impaired Venezuela's capacity to combat corruption at a time when other countries in the region were achieving substantial gains. The index evaluates the *de facto* power in Caracas, headed by Nicolás Maduro, and not the *de jure* administration of Juan Guaidó.

Venezuela is at the bottom of the ranking in all variables except for education. In some cases—such as anti-corruption agencies' efficiency and independence or lawmaking and ruling processes—the score is either zero or close to zero. Venezuela had the lowest score in all three sub-categories, but its least problematic area is “Civil Society, Media and the Private Sector” where it scored 4.35—compared to 1.21 for “Legal Capacity” and 1.43 for “Democracy and Political Institutions”. This modest achievement was driven by education, as discussed, and the work of what's left of Venezuela's independent media.

The data for Venezuela also point to difficult times ahead. Venezuela has very low scores in several variables determined by long-term and gradual institutional improvements—such as the independence and efficiency of judicial and prosecutorial systems. The downfall of the Nicolás Maduro regime would open the country to significant gains if the new government implements major changes to foster a democratic environment—such as introducing free elections under strict campaign finance rules, functioning legislative chambers or removing restrictions on civil society. However, even in the most optimistic scenario of a peaceful and swift democratic transition, it is unlikely that Venezuela would substantially improve its position in the CCC Index rankings in the near future.

CRITICAL ISSUES TO MONITOR

The work of Venezuela's opposition-led National Assembly and the Guaidó administration to track down and seize assets abroad that originated from corruption. This process could lead to a more robust and institutionalized prosecutorial effort. Yet the opposition has not presented a concrete plan for rebuilding Venezuela's institutions to fight corruption.

The fate of Nicolás Maduro, as it remains a precondition for a political transition potentially improving Venezuela's anti-corruption environment. However, this process also carries significant risks for the fight against corruption, such as widespread political violence or new forms of authoritarianism.

The evolution of Venezuela's economic debacle. Even in the case of a peaceful political transition, the enormity of the crisis could overshadow efforts to improve the fight against corruption.

METHODOLOGY

The CCC Index encompasses different aspects of countries' anti-corruption environment—from the independence of the judiciary to the social media environment—relying on publicly available data and a survey of experts on the ground. The data feeding the index's model comes from two types of sources: publicly available data generated or gathered by renowned institutions and a proprietary survey data generated by Control Risks and anti-corruption experts selected by AS/COA.

The overall score is formed by three sub-categories—legal capacity (I); democracy and political institutions (II); and civil society, media and the private sector (III)—dividing the 14 variables analyzed which collectively are designed to measure a country's ability to uncover, punish and deter corruption.

LEGAL CAPACITY

Judicial independence and efficiency

Anti-corruption agencies' independence and efficiency

Access to public information and overall government transparency

Independence and resources for the Chief Prosecutor's Office and investigators

Level of expertise and resources available to combat white collar crime

Quality of leniency and plea bargain instruments

Level of international cooperation on law enforcement

DEMOCRACY AND POLITICAL INSTITUTIONS

Quality and enforceability of campaign finance legislation

Lawmaking and ruling processes

Overall quality of democracy

CIVIL SOCIETY, MEDIA AND THE PRIVATE SECTOR

Civil society mobilization against corruption

Education improvements

Quality of the press and investigative journalism

Digital communications and social media

Sub-categories

	Argentina	Brazil	Chile	Colombia	Guatemala	Mexico	Peru	Venezuela
Legal Capacity	4.89	6.53	6.07	5.37	4.88	4.28	5.10	1.21
Democracy and Political Institutions	5.56	4.71	7.59	5.40	3.29	4.52	4.79	1.43
Civil Society, Media and the Private Sector	6.78	6.97	7.54	5.24	5.35	6.47	6.16	4.35

Variables

Legal Capacity	Argentina	Brazil	Chile	Colombia	Guatemala	Mexico	Peru	Venezuela
Judicial independence and efficiency	4.55	5.77	7.06	5.31	4.22	2.99	4.33	1.00
Anti-corruption agencies' independence and efficiency	6.00	6.75	7.00	6.25	6.00	4.25	6.00	0.00
Access to public information and overall government transparency	5.85	6.95	7.23	7.08	4.30	7.25	5.98	2.00
Independence and resources for the Chief Prosecutor's Office and investigators	4.25	6.50	6.50	3.50	3.25	3.50	4.25	1.50
Level of expertise and resources available to combat white collar crime	4.00	5.50	5.50	5.50	4.00	4.50	4.00	2.50
Quality of leniency and plea bargain instruments	6.00	7.50	3.50	3.50	5.50	2.50	6.00	1.00
International cooperation	3.50	7.00	4.50	7.00	7.50	6.00	5.50	1.00

Democracy and Political Institutions	Argentina	Brazil	Chile	Colombia	Guatemala	Mexico	Peru	Venezuela
Quality and enforceability of campaign financing legislation	4.70	4.15	6.61	5.21	2.99	4.68	4.47	1.57
Lawmaking and ruling processes	4.00	2.75	7.25	4.50	1.75	2.50	2.75	0.75
Overall quality of democracy	8.40	7.50	9.40	6.60	5.30	6.30	7.30	1.90

Civil Society, Media and the Private Sector	Argentina	Brazil	Chile	Colombia	Guatemala	Mexico	Peru	Venezuela
Civil society mobilization against corruption	7.00	7.50	8.50	3.50	5.50	8.00	6.50	2.00
Education improvements	6.69	6.41	6.73	5.06	4.37	6.05	5.36	5.85
Quality of the press and investigative journalism	7.50	8.16	7.52	6.83	6.35	6.10	7.26	4.77
Digital communications and social media	5.95	5.81	7.41	5.55	5.16	5.74	5.53	4.77

The variables were weighted according to their relevance for fostering an anti-corruption environment, generating a final score for each of the eight countries. We understand that the 14 variables are not all equally important to the fight against corruption in the region. For example, a significant improvement in judicial independence and efficiency is more decisive for a country's capacity to enforce than the free flow of information on the web and social media. We gave variables different weightings in the scoring to reflect this reality.

THE PUBLIC SOURCES USED FOR THE INDEX WERE:

Electoral Integrity Project
Freedom House
International Budget Partnership
International IDEA
Pew Global Center
Reporters Without Borders
UNESCO
World Bank
World Economic Forum
World Justice Project

The index relies on the latest available data from these institutions. In some cases, specific data within the dataset were carved out—for instance, the index only uses the Open Government factor in the World Justice Project database and only the campaign financing variables in the Project for Electoral Integrity repository.

Together with the publicly available data, we implemented a survey system to generate exclusive data. An extensive questionnaire, composed of very specific and fact-based questions, was answered by respondents during the period of March-April 2019.

The use of a survey type questionnaire served two purposes. First, there is not enough high-quality data available in the public domain to comprehensively assess several of the selected variables. Also, a fact-based questionnaire allowed us to gather very specific information and calibrate the data to better assess some of these variables. The methodology is a hybrid of “hard” and survey data, which granted the necessary flexibility and accuracy to perform the analysis.

The survey was conducted among a network of leading experts in the field of anti-corruption working in the countries analyzed. They included academics, practitioners, civil society and journalists, as well as Control Risks analysts (in total, 14 experts). The survey respondents do not necessarily share the final conclusions presented in this report. We are grateful for the collaboration of Luis Barrauto (journalist and political analyst), Camilo Enciso (Enciso Vanegas Abogados & Consultores), María

Jaraquemada (Espacio Público), Eduardo Mello (Fundação Getulio Vargas), Gustavo Morales Oliver (Marval, O'Farrell & Mairal), Valeria Moy (México, ¿cómo vamos?), Simeon Tegel (journalist and risk analyst). The Control Risks analysts who participated include Eduardo Arcos, Antonia Eklund, Thomaz Favaro, Raúl Gallegos, Gavin Strong and Caio Torres.

All indices measuring human behavior are imperfect, as they can never capture all elements of a given phenomenon. The CCC Index is necessarily a partial representation based on the model discussed above, with 14 variables.

The index's model has some limitations, including subjectivity, overlapping and endogeneity (a causal relationship between some of the variables).

Questionnaires to AS/COA and CR experts were as factual as possible, but some degree of subjectivity inevitably remained. To reduce subjectivity, we imposed a filter: analysts centralizing the data oversaw the work of country experts, making sure that those answering the questions had a common understanding of the concepts and definitions involved. Overlapping relates to the fact that some variables include the same elements: for instance, the Freedom House score also includes measures of judicial independence. The same is true for issues of endogeneity between some of the 14 variables.

WHO WE ARE

AS/COA

Americas Society and the Council of the Americas bring together the public and private sector to discuss the most important issues affecting the Western Hemisphere and advance their common agenda of economic and social development, open markets, the rule of law, and democracy in the region.

Control Risks

Control Risks is a global specialist risk consulting firm that helps clients create organizations that are secure, compliant and resilient in an age of ever-changing risk and connectivity. Our experts across 36 offices help clients investigate wrongdoing and resolve crises, and provide the insight and intelligence companies need to realize opportunities and grow. Learn more at controlrisks.com