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SEXUAL CORRUPTION: EMERGING DIRECTIONS IN RESEARCH AND POLICY

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MAY 2024

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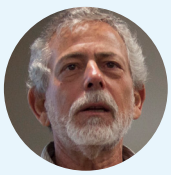

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SEXUAL CORRUPTION: EMERGING DIRECTIONS IN RESEARCH AND POLICY

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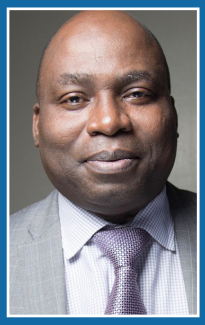

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SEXUAL CORRUPTION: EMERGING DIRECTIONS IN RESEARCH AND POLICY

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Failure to successfully implement anti-corruption reforms can sometimes be traced to a lack of understanding of the fundamentally different nature of different forms of corruption. This paper illustrates this problem by exploring a form of corruption that has been notoriously difficult to define and measure, and that thereby in many cases falls under the radar of anti-corruption policy and practice: sexual corruption. Our focus on sexual corruption allows us to categorise and explore not only why and how this form of corruption differs from other forms of corruption, but also investigate the specific challenges involved in addressing the problem under different jurisdictions and cultural settings. We conclude by summarising our insights on important aspects of this problem to bear in mind for any actor that seeks to implement effective measures to reduce the prevalence of sexual corruption in particular, but also implement anti-corruption reforms more broadly.

Introduction

Corruption comes in many different forms, and researchers, international organisations and government experts increasingly point to the fact that that different forms of corruption oftentimes have different causes and consequences and could thereby be affected in very different ways by anti-corruption reforms[1]. The failure of anti-corruption reforms could thereby partly be traced to a limited understanding of the particularities of different forms of corruption, that in turn limits the effectiveness of policy design, law making and implementation.

1 Monika Bauhr. 'Need or Greed? Conditions for Collective Action against Corruption', *Governance* 30 (4), 561–81 (2017).

In this paper, we suggest that paying closer attention to the specific challenges raised by specific forms of corruption will strengthen anti-corruption policy and practice. We illustrate this more general point by investigating what could arguably be seen as one of the most sensitive and hidden forms of corruption: sexual corruption. Sexual corruption (sometimes referred to as "sextortion") is an emerging area of interest in many countries. It is entering the public discourse, and even, in some cases, law making and associated public policies. Yet because cases of sexual corruption so often fall outside of both the de facto purviews of anti-corruption law and anti-sexual harassment law, the International Bar Association has called for "policymakers and legislators to consider bespoke legislation to identify and criminalise such conduct within their jurisdiction"[2]. Meanwhile, there is a thirst for knowledge about what constitutes solid, evidence-based policy in the field of gender and corruption in general. And, for academics trying to assist with this, there is especially little systematic information to work with in the area of sexual corruption.[3].

The paper discusses how sexual corruption can be defined and the specific challenges raised by this form of corruption, and also compares and contrasts how two different jurisdictions, Brazil and Nigeria, are currently seeking to address this problem. We thereby aim to contribute to a closer understanding of the concept of sexual corruption and the specific challenges raised by attempts to address this form of corruption. We also seek to draw more general implications for anti-corruption policy and practice.

The paper proceeds as follows. We begin with a brief discussion on the concept of sexual corruption, since the concept of sexual corruption — or sextortion — has only very recently made its way into corruption glossaries[4], and how and why sexual corruption is different from other forms of corruption. Next, we discuss how legal frameworks have sought to deal with this problem, with a special focus on contrasting the cases of policymaking in Brazil and Nigeria. Finally, we discuss how these cases may aid research and policy makers to better understand, and deal with issues of sexual corruption, and how such knowledge may inform anti-corruption policy and practice more broadly.

What is sexual corruption?

Scholars and practitioners have struggled to settle on a consensus terminology and definition for sexual corruption. The term "sextortion" emerged with the International Association of Women Judges (IAWJ), originally for the purposes of putting together a programme proposal[5] to denote any "form of corruption in which sex, rather than money, is the currency of the

2 Sara Carnegie, 'Sextortion: A crime of corruption and sexual exploitation', The International Bar Association, August 2019.

3 For example, only in 2019, did the Global Corruption Barometer start to include exchanges involving sexual favours in its survey questions about citizens' experiences with bribe paying: 'Women and Corruption in Latin America & the Caribbean Survey,' 23 September 2019, Transparency International, available at: https://www.transparency.org/news/feature/womenandcorruptionGCB

4 'Combating Sextortion: A Comparative Study of Laws to Prosecute Corruption Involving Sexual Exploitation', Thomson Reuters Foundation, IAWJ & Marval, O'Farrell and Mairal, 2015.

5 Nancy Hendry, Pers. Comm., 27 October 2019.

bribe"[6]. Since then, it has been picked up by organisations such as Transparency International[7]. Others have steered away from it, however, preferring "sexual corruption" for two reasons. One is practical, citing an unhelpful scope for confusion since the laws of some U.S. states refer to sextortion as enticing a minor into a sex act[8], and the United Kingdom's National Crime Agency differently defines it as "a form of webcam blackmail, where criminals befriend survivors online by using a fake identity and persuade them to perform sexual acts in front of their webcams"[9]. The term is also used popularly in the UK this way; the BBC news, for example, has a "sextortion" webpage collating many news articles and podcasts about online blackmail[10]. The second reason is etymological, straying into the conceptual. "Sextortion" is a portmanteau in which sex is combined with extortion, rather than combined with "bribery" or "corruption", and thus, implication of association risks encouraging the exclusion of cases of corrupt exchange that are corrupt but not extortive. In other words, the word may tempt interpretation that overlooks cases lacking any form of force or threat[11], even though it is well established that: a) gendered violence is not necessarily less abusive and tends to be poorly handled wherever establishing evidence of force or threat is understood to be a pre-requisite for survivors' claims of injustice to be taken seriously; and b), that corrupt practices are often deeply engrained within institutional logics in collusive forms, as well as coercive ones (that is, a bribe provider may receive better-than-fair-treatment just as a bribe withholder may receive worse-than-fair-treatment). Hence, even though scholars sometimes use sextortion to describe non-extortive cases of bribery[12][13], concerns around clarity and connotation remain.

Terminology aside, academic definitions of sexual corruption typically insert references to sexual benefits or sexual favours as an additional, necessary component within the most widely used definition of corruption — Transparency International's "abuse of entrusted power for private gain" — or minor variations on this, focusing on further specifying the currency of exchange (or content of the private gain)[14]. Eldén et al (2020), for example, refers to sexual corruption occurring when "a person with entrusted authority abuses this authority to obtain sexual favors in exchange for a service or benefit which is in their power to grant or withhold". Academics have called out the emphasis on sex and on the providers of sexual favours that popular, media-friendly phrases such as "sex for jobs" and "sex for grades" tend to promote, and argued for conscious emphasis on the abuse of entrusted power – on the unethical and

6 Sara Carnegie, 2019. Note that Nancy Hendry of IAWJ stated a more complete definition in an interview in 2020, "We now have a four-part definition that serves to differentiate sextortion from other kinds of abuses. First, you have to have someone in a position of entrusted authority; second, there has to be a quid pro quo element, which means the person has to exercise his authority in exchange for some personal benefit; third, that benefit has to have a sexual character; and finally, the person has to rely on the coercive power of authority rather than on physical force to obtain the sexual benefit." See: Noticing and Combating Sextortion: An Interview with Nancy Hendry, *EuropeNow* 2020, available at: https://www.europenowjournal.org/2020/03/09/noticing-and-combating-sextortion-an-interview-with-nancy-hendry/

7 Hazel Feigenblatt H. 'Breaking the Silence Around Sextortion; The Links Between Power, Sex and Corruption,' Transparency International 2020.

8 Helen Lindberg & Helena Stensöta, 'Corruption as Exploitation: Feminist Exchange Theories and the Link Between Gender and Corruption', in Stensöta, Helena, and Lena Wängnerud, Eds. *Gender and Corruption*. (Cham: Springer International Publishing, 2018).

9 Ibid.

10 BBC sextortion content; available at: https://www.bbc.co.uk/news/topics/cgdz91y340mt

11 Elin Bjarnegård, Dolores Calvo, Åsa Eldén, Sofia Jonsson & Silje Lundgren, 'Sex Instead of Money: Conceptualizing Sexual Corruption'. *Governance*, gove.12844 (2024)

12 Ortrun Merkle, Julia Reinold & Melissa Siegel, 'A Study on the Link between Corruption and the Causes of Migration and Forced Displacement', GI. (2017); available at: https://migration.unu.edu/publications/reports/a-study-on-the-link-between-corruption-and-the-causes-of-migration-and-forced-displacement.html

13 Aksel Sundström & Lena Wängnerud. 'Sexual Forms of Corruption and Sextortion: How to Expand Research in a Sensitive Area.' *QoG Working Paper Series* 2021:10 (2021)

14 See also: Ann Towns, 'Prestige, Immunity and Diplomats: Understanding Sexual Corruption', in Dahlström and Wängnerud (eds.) *Elites, Institutions and the Quality of Government* (Palgrave Macmillan, 2015)

unprofessional elements of the individual with typically much greater power. This exists in such cases whomever instigated an exchange, and whether or not its dynamics were collusive or extortive. Bjarnegård and colleagues have proposed a three-part definition of sexual corruption, deliberately starting with the existence of an abuse of entrusted power, to which they add quid-pro-quo conditionality (service or benefit is conditioned on a favour), and then currency (a sexual favour): "sexual corruption occurs when a person with entrusted authority abuses this authority to obtain a sexual favor. The quid pro quo (this for that) of sexual corruption involves conditioning a service or benefit, which is connected to the entrusted position, on a sexual favor."[15] They thus differentiate sexual corruption from sexual harassment (through the conditionality requirement) and from prostitution (wherein there is no abuse of entrusted power).

Bjarnegård and colleagues also – although not stated in their three-part definition – consider sexual corruption to be distinct from monetary corruption because "the bribe and the body of the person paying the bribe are inseparable". In this sense, they have an exclusionary view of third-party sexual bribe provision with their conceptualisation of sexual corruption, unlike Eldén, and scholars such as Mark Philip[16] who have reimagined how power is brought into definitions of corruption, and who more straightforwardly incorporate bribes on behalf of (perhaps procured by) a briber for the bribee[17]. There are important stakes to this question, because it navigates the issue of whether full consent can exist in sexual corruption. Indeed, while a sex worker with other income (i.e. exit) options may be able to fully consent to providing a sexual favour as a third party within a bribery exchange, Bjarnegård et al argue that full consent cannot logically be given by a service seeker in a dyadic exchange in which their own body is the bribe currency, because of conditionality *within the exercise of entrusted power*.

Viewing the body of the briber as the currency of a bribe surfaces the violation of bodily integrity that occurs in such dyadic exchanges, and the absence of any simple parallel between the depth of psychological and physical impacts that are common to sexual corruption and those that are common to monetary corruption, even acknowledging that extreme power asymmetries and severe personal difficulties can emerge in cases of the latter. As Sarah Gitlin writes, sexual corruption "has a far greater adverse effect on victims than monetary corruption, not only because of the act itself – which can be extremely violent and is always a violation of personal dignity and human rights – but also because of the possibility of disease, pregnancy, and, all too frequently, social ostracization, victim blaming, and loss of prospects in the marriage market"[18]. The IAWJ has reported that the shame and fear that

15 Bjarnegård et al, 2024.

16 Mark Philip defines *political* corruption as occurring "where a public official (A) violates the rules and/or norms of office, to the detriment of the interests of the public (B) (or some subsection of) who is the designated beneficiary of that office, to the benefit of themselves and a third party (C) who rewards or otherwise incentivises A to gain access to goods or service they would not otherwise obtain." See: Mark Philip, The Definition of Political Corruption, in Paul Heywood (Ed) *Routledge Handbook of Political Corruption* (Routledge, London, 2014).

17 Lindberg and Stensöta (2018) propose several terms for different forms of sexual corruption. Among them, "sexual corruption" refers to bribery cases where the bribe payer directly provides the sexual favour. "Sexual petty corruption" would therefore occur when a frontline bureaucrat demands or is offered (explicitly or implicitly) a sexual favour in return for a license, visa, avoiding a fine etc. And "sexual grand corruption" would therefore involve sexual favours in exchange for information, or enhanced opportunity structures, or the avoidance of reduced opportunity. Sexual corruption could alternatively be broken down in terms of "need" and "greed" varieties, although the basic motivation for engaging in sexual corruption is notoriously difficult to study empirically. Lindberg and Stensöta suggest that a bribe involving sexual favours provided by third party—for example, a business deal with a kickback in the form of a prostitute's services—is a distinct kind of exchange, and propose the phrase "transmitted sexual corruption" to describe it. Leveraging sex secrets as blackmail—as the U.K. authorities define 'sextortion'—is, again, a different form of transaction. Although potentially extremely harmful to the person being blackmailed, whether this constitutes corruption is questionable; the blackmailer is seeking private gain yet may not have authority or power entrusted to them.

18 Sara Gitlin, 'Beyond Sextortion: How Corruption Uniquely Affects Women.' *The Global Anticorruption Blog.* 2 January, 2015, available at: http://goo.gl/pP5BNT

is often experienced by individuals exposed to sexual violence tends to be similarly present among people involved in the provision of sexual bribes[19]. These impacts may also be long-lasting, affecting people's lives for years after the act itself, eroding self-esteem and the ability to form healthy relationships, and therefore curtailing individuals' capacity to develop and maximise their own skills and to contribute fully to society. For these reasons, scholars have argued that sexual corruption has both elements of corruption and gender-based violence[20], and, as the section of this paper about Brazil notes, some practitioners drafting legislation that outlines penalties for sexual corruption have picked up on both aspects in their consideration of penalties.

What is known about sexual corruption's occurrence?

Studies that aim to assess the frequency of sexual corruption and the specific forms it tends to take are few and far between, though there are indications that it is widespread. Since 2019, Transparency International has sought to probe respondents to its Global Corruption Barometer (GCB) surveys about how common sexual corruption is in different societies using two questions. One is a straightforward perceptions question that asks whether respondents believe sexual corruption to be common in their country. In its 2019 survey in Latin America and the Caribbean, over 50% of men as well as women considered sexual corruption common (answering that it occurs either "very frequently" or "often"). The second question asks whether the respondent or someone they know has experienced it from a public official[21]. According to the GCB in 2019, approximately one in five people in Latin America and the Caribbean said that this was the case[22] — the same fraction as was found in another GCB survey conducted in Jordan, Lebanon and Palestine, and in GCB Asia 2020[23]. Curiously, a correlation analysis taking responses to these questions from the 2019 Latin America and the Caribbean GCBs, alongside a dozen other perception measures of corruption in the same surveys (e.g. perceived corruption among the police and perceived corruption among journalists), found no associations between the apparent frequency of sexual corruption and any of these other forms[24]. It may be, as Aksel Sundström and Lena Wängnerud write in their interpretation of this finding, that sexual corruption is a separate phenomenon to other forms of corruption; indeed, in some instances sex may become a currency because providers lack economic resources. Sex may also become the currency when money is not accepted as a substitute. Helpfully, the GCB's wording refers to both open and implicit requests. But

19 'Stopping the Abuse of Power through Sexual Exploitation: Naming, Shaming, and Ending Sextortion,' IAWJ, 2012.

20 Elin Bjarnegård, Dolores Calvo, Åsa Eldén, & Silje Lundgren. 'Chapter 13: Sextortion: Corruption Shaped by Gender Norms,' in Ina Kubbe & Ortrun Merkle (Eds), *Norms, Gender and Corruption.* (Elgar, 2022).

21 Specifically, question 1) states: "Sextortion is a form of corruption which occurs when a public official says that they will give a government benefit (such as quicker service, approval of documents, a job or promotion, or avoiding a fine or imprisonment) in exchange for sexual favours. How often, if at all, do you think that sextortion occurs in this country? Do you think it happens…?" Response alternatives were: 'Very frequently', 'Often', 'Occasionally', 'Rarely' and 'Never.' Question 2) states: "And thinking about your own experience or experiences had by people you know, how often, if at all, has a public official implied either openly or suggestively to either yourself or someone you know, that they will grant a government benefit in exchange for a sexual favour?" Response alternatives were: 'Never', 'Once or twice', 'A few times', 'Often', and 'Or have you had no contact with any public officials ever."

22 Pring C. & Vrushi J. 'Global Corruption Barometer Latin America & The Caribbean 2019,' Transparency International, (2019); available at: https://www.transparency.org/en/publications/ global-corruption-barometer-latin-america-and-the-caribbean-2019. Kukutschka R. M. B. & Vrushi J. 'Global Corruption Barometer Middle East & North Africa 2019,' Transparency International (2019); available at: https://www. transparency.org/en/publications/global-corruption-barometer-middle-east-and-north-africa-2019

23 Amalia Syauket & Dwi Seno Wijanarko. 'Sex + Corruption = Sextortion,' *International Journal of Environtmental, Sustainability, and Social Sciences*, 3(2), 307-312 (2022).

24 Aksel Sundström & Lena Wängnerud, 2021.

it is also possible that these data are problematic; the ways in which social desirability bias relating to questions about sexual corruption plays out is unknown, yet seems very likely to be a considerable problem. So far, surveys seeking information about sexual corruption have not really taken advantage of social-science survey techniques such as randomised vignettes, conjoints and list experiments that are all designed to overcome or to largely reduce sensitivity bias concerns[25]. List experiments have been deployed powerfully, and now with some regularity to measure the frequency of other forms of corruption, such as vote buying[26], as well as to assess the frequency of other forms of gender violence[27].

Qualitative research into sexual corruption's varieties and intricacies is also thin on the ground, though there are enough examples to confidently state that sexual corruption occurs in many different sectors. One of these is the water sector. Focus groups assembled in Bogotá, Colombia, and Johannesburg, South Africa reveal how sexual corruption manifests when water utility staff, often visiting homes in person, have the power to turn off the water supply and adjust meter readings[28]. Quotes from the study, conducted for the UN Development Programme and the Stockholm International Water Institute, are instructive. In a Johannesburg focus group, one woman explained the coercive nature of some interactions, "He [a water utility staffer] will sexually abuse me because that's the only valuable thing I can give him". Collusive dynamics also emerged, with another focus group member reportedly saying, "When they have come to cut the water or something like that, I dress up and flirt with them." Poverty, illiteracy, lesser de facto justice-system protections, and social norms that place responsibility for ensuring the supply of household necessities on women, all contributed to the bind that these women found themselves in.

In a careful examination of sexual corruption along migration routes, Ortrun Merkle has shown that sexual corruption can be a motivating factor for people to migrate away from a place of origin[29]. In a study based on interviews with African migrants into South Africa and with those who frequently interact with them (relevant representatives of civil society, government bodies etc), Merkle and colleagues note the existence of sexual corruption "hotspots" at border posts such as the Beitbridge border between Zimbabwe and South Africa and certain "bush routes". In these spaces, practiced smugglers who exchange healthcare, security and basic services for sexual activities are termed "the hyenas", and women who do not make the trip regularly are more exposed to sexual corruption than those who do[30]. Merkle has also documented instances of public servants (border control officers) both withholding rights unless sexual favours are provided, and allowing providers of sexual favours to cross a border that they have no legal right to cross. Again, these studies underscore that migrants rarely report sexual corruption; not only are they typically unregistered in the country of arrival, but the conditional aspect of sexual corruption is often associated with the belief that others will view the sexual activity as consensual, without physical duress

25 Graeme Blair, Alexander Coppock & Margaret Moor, 'When to Worry about Sensitivity Bias: A Social Reference Theory and Evidence from 30 Years of List Experiments,' *Am. Polit. Sci. Rev.* 114, 1297–1315 (2020).

26 Ezequiel Gonzalez-Ocantos, de Jonge, C.K., Meléndez, C., Osorio, J. & Nickerson, D.W., 'Vote Buying and Social Desirability Bias: Experimental Evidence from Nicaragua,' *American Journal of Political Science*, 56, 202-217 (2012).

27 Carlo Koos & Richard Traunmüller, 'The Social and Political Legacy of Conflict-Related Sexual Violence: Evidence from List Experiments in Democratic Republic of Congo, Liberia and Sri Lanka.' *SSRN Electron. J.* (2021).

28 UNDP-SIWI Water Governance Facility, 'Women and corruption in the water sector: Theories and experiences from Johannesburg and Bogotá,' *WGF Report* No. 8. Stockholm: SIWI, (2017).

29 Merkle et al., 2017

30 Ashleigh Bicker Caarten, Loes van Heugten & Ortrun Merkle, 'The Intersection of Corruption and Gender-based Violence: Examining the Gendered Experiences of Sextortion During Migration to South Africa,' *Afr. J. Reprod. Health* 26, 45–54 (2022)

to obviously demonstrate coercive force. Thus, migrants often "blame themselves for not resisting, feel more ashamed, and fear greater social stigma when sex is obtained without physical force"[31].

Qualitative research such as Merkle's also illuminates the wider dynamics of sexual corruption, commonly noting the greater risk to those living in poverty where traditional gender norms are entrenched, and how sexual corruption often acts to further deepen poverty by invoking gender norms. One examination of sexual crimes committed by police officers shows how those with the least power tend to be targeted[32]. Although this study does not examine the conditionality of these crimes, many reported instances may have had a quid pro quo element. It found that more than a quarter of the perpetrators had previously been individually named in a civil rights deprivation civil action. According to another report examining cases in Tanzania and Colombia, sexual corruption "hinders victims' rights in other spheres as well as sustainable development at large"[33]. In Tanzania, sexual bribery has been given a name (the Kiswahili term "rushwa ya ngono"), partly driven by a deliberate effort by international and non-governmental organisations to raise salience and invoke outrage, and hence try to undo its normalisation. By contrast, the practice is more invisible yet simultaneously seemingly pervasive in Colombia. These examples are elaborated further in another publication by some of the same authors, where they reinforce the argument that informal, descriptive norms about masculinity "contribute to the perpetration of sextortion, by emphasizing ideas that men are entitled to sex, that the transactional aspect can be interpreted as reciprocity and consent rather than coercion, and that there is a probability of impunity". Meanwhile, informal descriptive norms about female sexual behaviour "are, to a much greater extent, injunctive, suggesting, in many contexts, that sexual activity is shameful, stigmatized, and best kept secret"[34].

Qualitative work has also, importantly, uncovered numerous examples when men and boys are in the position of providing sexual favours or having these demanded of them[35], and described carefully how discriminatory attitudes towards LGBTQ+ individuals place them in a position of heightened risk[36]. Together, although much more investigation is needed, the available empirical studies of sexual corruption paint an emerging picture of, on the one

31 Merkle et al., 2017

32 This study of sex crimes by police officers looked for statistically significant patterns in 548 police sex crimes in the United States that were committed during a three-year period (2005-2007). Survivors were those with least power in society: 92% were female; an incident of family violence was a strong predictor; 73% were under 18, with the modal age of 14-15 years. Most cases involving under-age survivors occurred when the officer was off-duty, whereas most of those involving adult survivors happened when the officer was on-duty. More than a quarter of the perpetrators had previously been individually named in a civil rights deprivation civil action. The consequences for the officers reflect gender and other forms of stereotypes and power dynamics in police agencies. For example, the odds of an officer's arrest relative to other kinds of police crime decreased by 97% where the survivor was male, and by 90% relative to other kinds of crime if the incident was alcohol related. Potential liabilities for bosses, the behaviour of the courts, the media and the type of police agency were also influential in the consequences that arrested police officers faced. Whether the arrested officer's chief faced scrutiny was a strong predictor of job loss. Arrested younger police officers were treated less harshly than older police by the courts. The odds of the officer losing their job rose 5.5 times when the media covered the arrest. And the odds of conviction were lower among those employed by municipal, special and tribal law enforcement agencies relative to state troopers and deputy sheriffs. See: Philip Matthew Stinson Sr., John Liederbach, Steve L. Brewer Jr. & Brooke E. Mathna, 'Police Sexual Misconduct: A National Scale Study of Arrested Officers,' *Criminal Justice Policy Review*, 26(7), 665-690 (2015).

33 Eldén, Å., D. Calvo, E. Bjarnegård, S. Lundgren & S. Jonsson. *Sextortion: Corruption and Gender-Based Violence*, EBA Report 2020:06, the Expert Group for Aid Studies (EBA), Sweden (2022).

34 Elin Bjarnegård, Dolores Calvo, Åsa Eldén, & Silje Lundgren, 2022.

35 For examples, see Merkle et al, 2017, and UNODC & Anna Petherick, 'The Time is Now: Addressing the Gender Dimensions of Corruption' (2020); available at: https://www.unodc.org/documents/corruption/Publications/2020/THE_TIME_IS_NOW_2020_12_08.pdf.

36 Victoria Abut, 'Bribe to Survive: Sextortion and LGBTQ Discrimination,' 13 June, 2022; available at: https://globalanticorruptionblog.com/2022/06/13/bribe-to-survive-sextortion-and-lgbtq-discrimination/

hand, its diversity across sectors and circumstances, but on the other hand, commonality in its reliance on power structures, both formal and informal, with gender norms as a prominent component of the latter. This is what is so far understood about the shape of the problem that policymakers are seeking to overcome, through new laws, new clarifications of existing laws, as well as new ways of working for those in the justice system and those with influence in sectors where sexual corruption is commonplace.

Legal frameworks

In this section we provide a brief overview of legal frameworks relating to sexual corruption that aid us in situating the international and comparative framework for our study on our two contrasting cases: Brazil and Nigeria. We describe some of the variation in relevant law across jurisdictions, as well as inconsistencies and contradictions in the interpretation of law. Awareness of sexual corruption is growing, and a few jurisdictions have introduced or are considering specific laws that criminalise sexual corruption, as per the International Bar Association's recommendation for bespoke sexual corruption legislation[37]. In some other jurisdictions, alternatively, policymakers have explicitly taken the view that existing statutes are fit for purpose, and that efforts to reduce sexual corruption would be better spent on improving the application of the law rather than on creating new law[38]. Overall, however, the general tendency is that most countries' legal systems do not appear to have been tested with cases of sexual corruption, or at least, if they have, those cases are not gathered together as such from legal records. This apparent lack of testing is almost certainly because sexual corruption cases are commonly viewed in many countries as hard to prosecute, rather than because such cases do not exist. How most countries' justice systems would handle sexual corruption cases thus remains not only unclear but also concerning.

The International Bar Association has called for the creation of bespoke legislation because sexual corruption often falls between the cracks of sexual harassment and anti-corruption laws, and because an eight-country study that it commissioned brought to light shortcomings in attempts to shoehorn cases under either of those options[39]. Commonly, prosecution under anti-sexual harassment law is unsuccessful because thresholds for demonstrating unwantedness of sexual pursuit are problematically high for quid pro quo arrangements; often, implicitly coercive let alone collusive dynamics, fall outside its application. On the other hand, sexual corruption fails to be prosecuted under anti-corruption laws when these are interpreted in such a way that extortion and bribery are defined or informally understood in merely monetary terms. Informal understandings of this interpretation can develop even when the wording of the law would seemingly cover a conditioned exchange involving sexual favours by an individual with entrusted power (for example, by employing language such as "any undue advantage" or "gratification" broadly). The UK Bribery Act provides an example: a U.K. High Court Judge, Lord Justice Bean, cast doubt over whether the Bribery Act could prosecute sexual corruption, even though this law defines bribery as "any financial or other advantage"[40]. In November 2018, he gave a lecture on the topic of misconduct in public office in which he stated that an offence of "abusing one's position to achieve a sexual benefit"

37 Sara Carnegie, 2019.

38 The IAWJ reports that Australia, Canada, Kenya, Taiwan and the UK have successfully prosecuted sexual corruption under existing corruption statutes. See also: Hazel Feigenblatt H. & Transparency International, 2020.

39 Sara Carnegie, 2019.

40 Research Note on the UK Bribery Act, 2010, Research Question: Are there any gender elements in this piece of legislation and related case law?

does not satisfy a requirement of legal certainty[41]. Yet the US Foreign Corrupt Practices Act (FCPA), a somewhat similar transnational law[42], has indeed been interpreted by the courts to include sexual favours[43]. The FCPA uses the terminology "anything of value"[44].

In some countries, precedents appear to have been set in the interpretation of the law, providing greater clarity. Existing laws in China have been interpreted as excluding sexual corruption cases[45]. Conversely, in Singapore, a case collusive sexual corruption has led to the prosecution of an immigration officer[46]. However, in other countries, the application of existing laws to sexual corruption has exposed inconsistencies, creating legal uncertainty. In the United States, for example, sexual corruption cases have met with a range of outcomes. Two cases involving police officers receiving sex as a bribe demonstrate this. In one of these examples, the woman involved was not charged when police officers demanded sex from her to avoid arrest[47]. However, in another case in 2019, two police officers received no jail time after admitting bribery and misconduct because a judge concluded that an 18-year-old woman involved in the bribery should be considered to have committed criminal activity for the part she played; the woman in the case had accused the police officers of rape while she was handcuffed[48]. An anecdote further illustrates the uncertainties that beget many jurisdictions, when not only investigators and attorneys but also judges do not consistently interpret the law. As detailed in a UNODC report, Nancy Hendry of IAWJ once ran a workshop for Tunisian judges and anti-corruption officials in which half of the judges in the room agreed that a broadly phrased Tunisian anti-corruption statute included cases of sexual corruption, while the other half disagreed or reasoned that it was an inappropriate application of the law[49]. A main point of contention among workshop attendees was the relevance of whether individuals accused of sexual corruption would have known their activities could be considered acts of corruption.

As with the creation of hate crimes – when it can also be argued that pre-existing laws, such as harassment or laws pertaining to bodily harm, already cover relevant instances – the creation of sexual corruption laws is likely to aid prosecution, by stating illegality even more straightforwardly. Yet, where this has happened so far, blind spots have often emerged. Sometimes it remains unclear whether they could be used to successfully prosecute sexual corruption cases where benefits (as opposed to withholding) are conditioned on sexual

41 Ibid. Note that, with, instead, reference to UK public officeholders, the UK Law Commission in 2020 published a report on Misconduct in Public Office, in which it states that "sexual misconduct is one of the most common categories of prosecution under the common law offence of misconduct in public office" and that sexual relationships can amount to corruption if the "*purpose* was to gain an advantage or to cause detriment to another"; see: https://assets.publishing.service.gov.uk/media/601bec27e90e0711cc85dd91/Misconduct-in-public-office-WEB11.pdf

42 The FCPA does not prohibit bribes paid to officers or employees of private, non-government entities, whereas the Bribery Act prohibits both public and commercial bribery. Under the FCPA, 'corrupt intent' is required, which is considered to be a higher bar than the Bribery Act's 'inducing of improper performance of a relevant function'. See: Sharifa Hunter, 'A Comparative Analysis of the Foreign Corrupt Practices Act and the U.K. Bribery Act, and the Practical Implications of Both on International Business,' *ILSA Journal of International and Comparative Law*, 18(1): 89-114 (2011).

43 Julia Lippman, 'Business Without Bribery: Analysing the Future of Enforcement for the UK Bribery Act', *Pub. Cont. L.J.*, 42: 649-668 (2013).

44 The FCPA applies to companies listed on US stock exchange, or that file reports with Securities and Exchange Commission, and to U.S. citizens. The U.K. Bribery Act covers any person or entity with a 'close connection' to the U.K., including British passport holders and firms that conduct any part of their business activities in the U.K.

45 Nancy Hendry, Pers. Comm., 27 October 2019.

46 Lydia Lam, 'ICA officer pleads guilty to obtaining sexual favours from immigration offenders,' *CNA*. 28 December, 2018; available at: https://www.channelnewsasia.com/singapore/ica-officer-pleads-guilty-obtaining-sexual-favours-immigration-offenders-916546

47 Sara Carnegie, 2019.

48 Hazel Feigenblatt, 2020.

49 Nancy Hendry, Pers. Comm., 27 October 2019. See: UNODC & Anna Petherick (2020).

favours, especially where sexual corruption has become so bound up in institutional logics that conditionality is more implicit than explicit. Sexual corruption laws sometimes apply only to public servants, even in jurisdictions where private sector corruption is criminalised, as the case study about Brazil shows. In Romania, the criminal code has a section (Art. 299) entitled 'Abuse of Power for Sexual Gain' that states that it is illegal for public servants, specifically, to take "advantage of a situation of authority or power… arising from the office held" to receive "sexual favours by a person who has a direct or indirect vested interest in that professional act"[50], applying a six-month to three-year prison sentence and a ban from future public officeholding. The example of legal text in the India state of Jammu and Kashmir presents a different problem of coverage. The state's high court has criminalised activities lying "at the intersection of sex and extortion under the overarching ambit of corruption"[51] and made it clear that a sexual favour being offered (rather than demanded) provides no defence for anyone accused. However, the text of this law refers to *women*[52] providing, offering, or having sexual bribes requested of them, rather than to people in general, suggesting that men in such a position may not be protected. This raises the wider concern that even sexual corruption laws that do not make the same error in their wording, may nonetheless be interpreted through the prism of traditional gender norms, which do not align with the idea of men being sexually victimised. Inconsistencies in application may arise there, although discussion of the issue is effectively mute.

Perhaps the most influential source of legal confusion can be traced back to the world's only legally binding, multilateral, anti-corruption treaty: the United Nations Convention Against Corruption (UNCAC). The treaty states that State Parties have a duty to criminalise the "promise, offering or giving… to a public official… of an undue advantage", as well as the "solicitation or acceptance… by a public official… of an undue advantage", in the exercise of his or her public duties (Article 15). Although UNCAC does not define corruption[53], and as such its use of "an undue advantage" should logically extend to sexual favours, this is then combined with a requirement for states to penalise service seekers, ignoring nuance such as situations where conditionality and entrusted power reduce or shut down exit options (perhaps relevant to various forms of "need" corruption generally). As Bjarnegård et al have argued[54], in cases of sexual corruption where the body of the service seeker is indistinguishable from the bribe itself, the restriction of exit options is a removal of the possibility of full consent to the provision of sexual favours. As well as Article 15, another provision — Article 33's proposal that State Parties "provide protection against any unjustified treatment" for anyone reporting to the authorities offenses against the provisions in the Convention — may provide an additional area for richer specification. Amendments to UNCAC would certainly be difficult to attain, but in their absence, clarification of how State Parties should interpret its articles in light of sexual corruption is clearly needed[55]. The Brazilian sexual corruption bill discussed later in the next section prohibits penalising a service seeker, in contravention of UNCAC, yet in alignment with academic interrogation of issues of consent.

50 Romania's Criminal Code is available in English here: https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-REF(2018)042-e

51 Sara Carnegie, 2019.

52 Ibid

53 A. Katarina Weilert, 'Chapter 7: United Nations Convention Against Corruption (UNCAC)—After Ten Years Being in Force,' *Max Planck Yearbook of United National Law Online*, 19(1), 216-240 (2016).

54 Bjarnegård et al, 2024

55 Note that prostitution laws may offer some insights. Some countries, including Sweden, crimimalise the *buying* of sex, providing some protection for sellers.

Even briefly surveying relevant, existing legal frameworks brings several issues into focus. First, doubts about interpretation of the law are entwined with lack of clarity around effective application, and, in turn, to a lack of incentives for investigators and prosecutors to pursue sexual corruption cases. Second, gendered expectations may interfere with interpretation and application in many ways, and in the case of Jammu and Kashmir, the very wording of sexual corruption law makes it likely that individuals who provide or have sexual favours demanded of them and who are not cisgender women may be unprotected. Third, some anti-corruption laws apply to public servants only, or corporate representatives of particular countries only (e.g. the FCPA), and so, to the extent that these laws are used to prosecute sexual corruption, they will be inapplicable to certain groups of individuals with entrusted power, with foreign aid workers being one possible category. And, finally, important justice concerns orientate around how providers of sexual favours are treated by individuals involved in countries' justice systems and by related processes, as an additional issue to the content of legal text. A 2022 report following sexual corruption policy implementation in Tanzania points to large gaps between policy and implementation, the importance of sustained engagement with civil society, and for a 360-degree approach — for example, working with professional bodies to update codes of conduct and emphasise the fault of the party with entrusted authority in all circumstances[56]. As the case of Nigeria suggests, resourcing and appropriate training for investigators, prosecutors and others who may handle such cases is valuable for survivors' fair treatment, to avoid disincentivising the reporting of sexual corruption, and, in turn, for addressing the problem at large.

The case of Brazil

In Brazil, in 2022, sexual corruption emerged as a topic of interest to legislators, even though it had not been widely discussed in the media to date, nor had it been an issue championed by Brazilian civil society groups. Rather, in late 2021, a technical team serving three legislators from the political left and right[57], took it upon themselves to draft a "Criminalisation of Sexual Corruption ("Sextortion")" amendment to the Brazilian penal code. They did this after reading several reports from international organisations such as the UNODC, and Transparency International. Their technical note to promote and explain the bill quotes TI's 2019 Latin America and the Caribbean survey results, which states that in line with the region's average, 20% of Brazilians have either encountered sexual corruption in accessing public services themselves, or know someone who has[58]. In the words of Carolina Martinelli, one of the researchers who drafted the bill from within the joint cabinet of the three legislators, "Brazilian civil society so far has played a minor role only. The information and data we got came from international studies and specialists, especially from Transparency International and the UN. However, since the bill was presented, members of Transparency International's Brazilian chapter have written a couple of articles in the media, where they explain the issue and argue in favour of the criminalisation of sextortion through our bill."

56 Åsa Eldén & Elin Bjarnegård, 'Implementing Policy Against Sextortion in Tanzania: A Follow-Up Study,' Stockholm, September 2022; available at: https://eba.se/wp-content/uploads/2023/01/Implementing-Policy-Against-Sextortion-in-TanzaniaWPSeptember2022.pdf

57 Members of the 2022 Federal Congress: lower chamber members Tabata Amaral and Filipe Rigoni, and Senator Alessandro Vieira.

58 'Gabinete Compartilhado. Criminalização da corrupção sexual ("sextorsão")," Technical Note 03/2022, available at: https://movimentoacredito.org/dados/notastecnicas/NTPL%20Corrup%C3%A7%C3%A3o%20Sexual.pdf

The draft amendment itself is very short. In essence, it establishes the penalty of a prison term of two to six years "for the mere conduct of making the provision of service or the practice of an official act conditional on sexual activity on the part of the victim"[59]. The penalty rises from six years to 10 if sexual activity actually occurs in this context, in line with the penalty for rape under Brazilian law. Sexual activity is defined as ranging "from sexual intercourse to the exposure of body parts". The bill's technical note presents three criteria that must be satisfied for sexual corruption to have occurred – abuse of authority (a perpetrator must have entrusted power), a dynamic of quid pro quo involving sexual activity, and psychological coercion (an imbalance of power and exertion of coercive pressure on the someone without the need for any physical force)[60]. While the first two of these are approximately aligned with Bjarnegård et al's definition (though the word choice of "activity" versus "favour" is distinct), the additional element of coercion in the Brazilian bill makes these criteria more restrictive, and may limit its eventual applicability to complicated cases where a certain degree of collusion operates within institutional logics.

The justification for the proposed changes to the penal code provided in a letter introducing parliamentarians to the bill, argues that a change to the law is necessary because existing legislation either fails to apply to sexual activity in its wording or interpretation, or is associated with insufficiently punitive penalties, or inappropriately punishes individuals who are obviously victimised. What exactly are these gaps in Brazilian law? For one, it defines extortion (Penal Code, Article 158) as requiring not only "violence or serious threat" but "the intention of obtaining an undue *economic* advantage", and so explicitly excludes extortive sexual favours. Brazilian sexual harassment law struggles to stretch to include quid pro quo dynamics, by defining sexual harassment as to "compel someone in order to obtain sexual advantage or sexual favour, with the agent taking advantage of their status as a hierarchical superior or of their ascendency due to the exercise of employment, position or function" (Penal Code, Article 216-A). The problem here being that "compelling" someone is a high bar, with the worrisome risk that it tempts an interpretation that an individual who is not obviously compelled is thus consenting. Corruption law in Brazil criminalises "active corruption" (the provision of, or the promise to provide an undue advantage) (Penal Code, Article 333) alongside "passive corruption" (the requesting or acceptance of an undue advantage) (Penal Code, Article 317), without nuance, and so in seeking to convict an individual with entrusted power for sexual corruption, prosecutors may find it hard to avoid convicting the party offering or providing sexual favours, who is typically far less powerful, and who may be deeply traumatised. The proposed amendments of the new bill prohibit prosecution of active corruption when the undue advantage is sexual.

At face value, the law covering abuse of authority does, however, appear to be phrased in a way to already encompass the prosecution of sexual corruption, even though its wording does not require the conditioning of a benefit or service. It applies to situations when "a public agent, whether or not a public servant, abuses the power assigned to him.... a crime of authority [occurs] when practised by the agent with the specific purpose of harming others or benefiting himself or a third party, or even on a mere whim or personal satisfaction" (Article 1, Law 13,869; 2019). The concern of drafters of Brazil's new bill has been that the abuse of authority law has not been sufficiently tested in relevant ways.

59 Article 1st Title VI of the Special Part of Decree-Law No. 2,848, of December 7, 1940 - Penal Code, Chapter I -B: Article 216-C.

60 See also: Camila Turtelli, 'Sextortion: Congresso avança na criminalização da corrupção sexual', UOL, 29 June, 2022; available at: https://noticias.uol.com.br/politica/ultimas-noticias/2022/06/29/congresso-avanca-em-criminalizacao-do-sextortion.htm

There are, however, a few documented examples of Brazilian courts attempting to prosecute sexual corruption using laws already on the books. One case from the state of Goiás is perhaps particularly telling of how the justice system has recently navigated such cases. It began in 2017, when prosecutors started to collect witness statements from women who had worked with Ricardo Paes Sandre, a doctor who served as director of the State Court's health centre. In 2020, the Goiás state prosecutor's office (the Ministério Público) eventually charged Sandre with four counts of passive corruption with the aggravating factor of abuse of authority, and in a statement explained that Sandre had been, "asking, directly and indirectly, sexual favours from the public servants who were with him subordinated, de facto and de jure, in exchange for favourable administrative conditions, related to working hours, taking vacations, obtaining bonuses and even abstaining from illegal acts of administrative persecution"[61]. In doing so, the state prosecutors office reinforced a prior decision by the National Council of Justice to formally remove Sandre from his post. It further banned him from working for the public administration for five years.

The Council had assessed the accusations against sexual harassment law[62], rather than the passive corruption and abuse of authority laws that were later relied on. (Unusually, it stepped in after state prosecutors had complained to it that the judge assessing the case in Goiás was the accused brother, and his father-in-law was the former president of the Goiás Court of Justice.) The switch to prosecution under anti-corruption law implied a potential jail term of two to 12 years imprisonment, instead of one to two years under sexual harassment legislation. There are no records of prosecutors also charging individuals with whom Sandre worked with active corruption. Despite many requests, no one in the prosecutors' office responded to requests for interview for this paper. However, the absence of any active corruption prosecution attempts may be because the prosecutors' report is carefully worded so that it only mentions Sandre *asking* for sexual favours, avoiding the issue of whether he *received* such favours (and thus whether anyone provided or offered them to him). It is also noteworthy, in this regard, that of the many testimonies (85 in total) that the prosecutors collected only a small number formed the basis of passive corruption charges. This may have been a strategy to circumvent potential demands to prosecute active corruption.

The new Brazilian sexual corruption bill passed a lower house vote on 8 March 2023[63], and has since been awaiting a spot in the agenda of the Senate. If it finds such a window, prospects for it becoming law are thought to be high due to the widespread support it has received from both the political left and right[64]. The bill's designated rapporteur in the lower house's Constitution, Justice and Citizenship Commission was Workers' Party politician Maria do Rosário, a former Minister of Human Rights (2011 to 2014). In the chamber, the bill was vocally supported by a prominent, centre-left federal deputy called Tabata Amaral, whose speeches drew praise, including from representatives of the right-wing Liberal Party (PL). At time of writing, the bill had been assigned to a new rapporteur in the Senate, Mara Gabrilli, and Amaral has recently held meetings about it with Senate president, Rodrigo Pacheco[65]. Those hoping to maintain the bill's momentum through the Senate are keenly aware that support

61 'MP denuncia médico do TJ de Goiás por exigir 'favores sexuais' de servidoras,' *Istoe*, 3 January 2020, available at: https://istoe.com.br/mp-denuncia-medico-do-tj-de-goias-por-exigir-favores-sexuais-de-servidoras/

62 Guilherme Rodrigues & Gustavo Martins, 'CNJ ordena a demissão de médico do TJ-GO suspeito de assédio sexual e moral contra servidoras,' *G1*, available at: https://g1.globo.com/go/goias/noticia/2021/09/28/medico-do-tj-go-suspeito-de-assedio-sexual-e-moral-contra-servidoras-e-demitido-pelo-cnj.ghtml

63 'Câmara aprova projeto que tipifica crime de abuso de poder em troca de benefício sexual,' *Agência Câmara de Notícias*, 8 March, 2023; available at: https://www.camara.leg.br/noticias/943480-camara-aprova-projeto-que-tipifica-crime-de-abuso-de-poder-em-troca-de-beneficio-sexual-acompanhe/

64 Pepe Tonin, pers. comm. (18 April 2024).

65 Caroline Martinelli, pers comm (25 April, 2024)

from across the political spectrum demands careful attention to framing during a period when the Senate majority — as well as the centre of gravity of Brazilian political opinion — lies to the right of its historic tendencies during the current period of democracy. Indeed, framing the bill as a means to close down open opportunities for corruption that current law fails to address, rather than as a response to feminist concerns about gender rights, is far more likely to sustain broad support.

In the pre-committee and committee-stage debates with other legislators in 2022, the legal necessity of the proposed amendment was queried. In this process, the amendment's wording has narrowed, so that it applied only to employees of the public administration. More persistent questions focused on why existing sexual harassment law is insufficient to cover cases of sexual corruption. The bill's proponents first argued that sexual corruption committed by agents of the state, involving exchanges for services that only the public sector provides, may lack, to a greater extent than sexual harassment (and to a greater extent than sexual corruption in the private sector) any credible exit option for survivors, and so stiffer penalties are appropriate. Second, they pointed to Brazil's generally high rates of gender violence, and recognised history of insufficiency in the prosecution of gender violence, which was famously laid bare in the 1990s by the Inter-American Commission of Human Rights with the case of Maria da Penha. On multiple occasions, and despite appeals to relevant Brazilian authorities, Maria da Penha was repeatedly violently abused by her husband and left paralyzed from the legs down[66]. The Commission published a report concluding that "the Brazilian state had violated the rights of Mrs. Maria da Penha Maia Fernandes to a fair trial and judicial protection" in its failure to consider domestic violence a crime. This led to a toughening of legislation in later years that pertained to forms of sexual harassment such as stalking[67], and broke new ground by clarifying in Brazilian law that the personal relationships to which it applied were independent of sexual orientation[68].

And yet, despite challenges in the pre-committee and committee stages, perhaps the most controversial element of the new sexual corruption bill received little comment. The bill's technical note explains that placing the amendment within the section of the penal code that details crimes against sexual dignity automatically places a duty on prosecutors to investigate and potentially prosecute *irrespective* of the survivor's wishes. While the intention here is presumably to give the law stronger teeth, it generates at least two concerns. First, it raises concerns about the psychological wellbeing of those who provided, offered, or had demanded of them some form of sexual activity. To be sure, the bill protects these individuals from prosecution for active corruption, but it sits starkly naked, without additional policies or resources planned for relevant bodies who could support those who may be traumatised by reliving their experiences through legal processes. These have proved valuable in dealing with other forms of gender violence in the country (indeed, specialist "women's police stations", created to prevent and investigate gender-based violence more sensitively than the general police units in Brazil, have been linked to higher trust in the police by women in the local area and with reduced gender gaps in perceptions of police effectiveness[69]). The second concern is, to the extent that the prosecuting authorities are seen to be politicised, that enabling

66 He is reported to have twice attempted to murder her, both by electrocution and by shooting her in her sleep.

67 The 'Maria da Penha Law' passed with President Lula's support on 7 August, 2006.

68 Aléxia Duarte Torres, 'Maria da Penha v. Brazil in the Inter-American Commission on Human Rights: An Analysis of the Impacts of the Convention of Belém do Pará in the Federal Legislation.,' *Ave Maria International Law Journal*, 30-41 (Spring 2017). Available at: https://docslib.org/doc/1782180/maria-da-penha-v-brazil-in-the-inter-american-commission-on-human-rights-an-analysis-of-the-impacts-of-the-convention-of-bel%C3%A9m-do-par%C3%A1-in-the-federal-legislation

69 Abby Córdova & Helen Kras, 'Addressing Violence Against Women: The Effect of Women's Police Stations on Police Legitimacy', *Comparative Political Studies*, 53(5), 775–808 (2020).

prosecutors to push ahead alone, may risk suggestions of sexual corruption law being deployed to achieve political ends, as is so often alleged for corruption cases in Brazil. That perception, if it were to emerge, would not serve the legitimacy of the public policy need. Nonetheless, in many ways the Brazilian bill is innovative, and these concerns may be softened with further discussion.

The case of Nigeria

In Nigeria, differently from Brazil, sexual corruption is a commonly acknowledged phenomenon, having become part of the public consciousness through various scandals, many of which involved university professors abusing their entrusted power by withholding or granting grades in exchange for sex. Over the years, the Independent Corrupt Practices Commission (ICPC) has handled or been made aware of sexual corruption cases in sectors other than education, for example in the prison service[70], the police[71], and among the judiciary[72]. It is in the education sector, however, that the problem is understood to be most extensive. Media reports indicate this[73] but there is a paucity of academic studies[74].

Indeed, sexual corruption is such a widespread phenomenon in universities in Nigeria that slang terms have arisen. The diversity of these phrases is instructive. They draw language from other spheres to convey the euphemistic tone of an open secret. The phrase "praise and worship" calls to mind religious practice, and "fifty/fifty", business. Some of the slang terms, according to a focus-group study conducted by Olumuyiwa Ojo, Olusola Ayandele and Sunday Egbeleye, imply that sexual bribery was initiated by the student, rather than this point being left ambiguous. To "settle in kind" refers to a situation "where a female student offers her body to a lecturer as settlement to obtain marks"; "trade by barter" is understood as "the act of offering sex to a lecturer in exchange for marks"; and "farase" — a Yoruba verb otherwise meaning to manually engage in a task that one could have paid others to do — in euphemistic usage refers to "when a female student offers her body to a lecturer to obtain marks". The study does not examine whether the phrases are used loosely, with assumption about who initiated the sexual bribery, rather than with sensitivity to accuracy. Other slang terms pertain specifically to third-party sexual corruption. These include another Yoruba word, "gbomofun", otherwise translated as "to give the baby to someone" ("omo" meaning baby/girl/lady), but in the context of sexual bribery conveying the same situation as the phrase "control+shift+delete": "an operation originating from a student who arranges a female student for a willing lecturer, who in turn changes the poor examination mark of the organiser". Another term even more bluntly conveys patriarchal power dynamics. According

70 'Scandal: Assistant Comptroller of Correctional Service Impregnates Inmate's Wife', *The Source Magazine*, 10 July, 2021; available at: https://newsofnigeria.com/prison-warden-impregnates-and-marries-inmates-wife-pays-husband-n10000-as-bride/

71 'A'Ibom Policy Arrests Officer for Alleged Extortion Demanding Sex from Suspect,' *Ripples Nigeria*, 28 June, 2021; available at: https://www.ripplesnigeria.com/aibom-police-arrests-officer-for-alleged-extortion-demanding-sex-from-suspect/

72 Wale Odunsi, 'Lagos Sacks 'Judge Who Snatched Litigant's Wife', *Daily Post*, 6 July, 2022; available via: https://dailypost.ng/2022/07/06/lagos-sacks-judge-who-snatched-litigants-wife/

73 For example, 'Sexual Harassment Victims in Nigerian Universities Are Being Blamed – Cyberspace Study', *The Conversation*, 20 October, 2023; available at: https://www.premiumtimesng.com/news/top-news/635538-sexual-harassment-victims-in-nigerian-universities-are-being-blamed-cyberspace-study.html?tztc=1

74 A previous study on corruption within the university system by ICPC and the National Universities Commission, the national universities regulator, failed to look at the phenomenon of sexual corruption. See: *ICPC-NUC University System Study and Review Pilot Study Report 2012.*

to the study, "bait", means "a male student *releases* his girlfriend to a male lecturer for sexual intercourse in exchange for marks" (emphasis added)[75].

It is in this environment that the media and civil society have become engaged. In 2019, to much acclaim, BBC Africa Eye sent investigative reporters posing as students to the University of Lagos (as well as to the University of Ghana), and recorded professors grooming and demanding sex from students and underage girls seeking university admission[76]. Subsequently, students have since started recording private meetings with university professors on their phones, and providing this information to public investigators. Justice system reforms, in turn, are seeking to retrain investigators to improve the care with which such cases are handled. As part of these wider improvements, the Lagos State Ministry of Justice has created the Domestic and Sexual Violence Response Team to improve how it handles all forms of gender violence in the state. This Ministry has also created a Sexual Offenses and Child Justice Unit, aiming to effectively and in a timely manner send cases for prosecution to the state's specially designated Sexual Offences Court.

The ICPC has prosecuted sexual corruption involving university professors using existing laws, and for this reason does not consider new legislation necessary, although its leadership is keen to point out that legislation alone cannot sufficiently address the problem. The real game-changers, in the ICPC's view, are new practice directions and justice-system modifications (such as the aforementioned training and creation of the Sexual Offences Court). Lagos State also has new help desks to deal with gender-based violence in each of its 20 local governments, provided for only recently, in 2021, with the passing of the Domestic and Sexual Violence Agency Law. These aim to offer support and advice to citizens so that they better understand the options available to them.

A key case in the prosecution of sexual corruption in Nigeria was that of Professor Richard Akindele, a lecturer sacked by Obafemi Awolowo University, Ile-Ife. During a 27-day trial in November 2018[77], in the Federal High Court in Osogbo, the ICPC successfully demonstrated that he was guilty of three counts of abuse of office, contrary to sections 8(1)(a) (ii) and 18(d) of the ICPC Act, for corruptly asking for a sexual benefit from a female student while he was a lecturer at the university, as reward for altering her academic grades. WhatsApp conversations between him and student were part of the evidence, and the ICPC further showed that he had altered entries of this conversation by deleting several portions of it, contrary to section 15(a) and 15(c) of the ICPC Act. During the trial, Professor Akindele's lawyer argued that the offence bordered on sexual harassment in the workplace and could thus only be tried by the National Industrial Court by virtue of section 254 of the constitution[78]. However, he eventually changed his plea from "not guilty" to "guilty"[79], and the court then held that a non-custodial sentence would not serve the interest of justice. He was convicted and sentenced to 24 months in jail. His challenge was dismissed on appeal.

75 Olumuyiwa K. Ojo., Olusola Ayandele, and Sunday A. Egbeleye, 'Euphemisms of Corruption among Students of Higher Institutions in South West Nigeria', *National Research University Higher School of Economics Journal of Language & Education*, 6(1), 72-82 (2020)

76 Kiki Mordi, 'Sex for Grades: Undercover Inside Nigerian and Ghanaian Universities,' *BBC Africa Eye*, 7 October, 2019; available at: https://www.youtube.com/watch?v=we-F0Gi0Lqs&t=1260s

77 (Unreported) Appeal No. CA/AK/80C/2019, decided on 5 March, 2021.

78 Adejumo Kabir, 'Sex-For-Marks Scandal: Sacked OAU lecturer loses appeal challenging conviction,' *Premium Times*, 5 March, 2021,; available at: https://www.premiumtimesng.com/news/top-news/447030-sex-for-marks-scandal-sacked-oau-lecturer-loses-appeal-challenging-conviction.html?tztc=1

79 FRN vs Prof. Richard I. Akindele, Corruption Cases Database; available at: https://corruptioncases.ng/cases/frn-vs-prof-richard-i-akindele-former

At a federal level, Nigeria has various laws that, by their letter, could lend themselves to the prosecution of sexual corruption. Abuse of power is defined broadly for those in the public sector, applying to, "any public officer who uses his office to position to gratify or confer any corrupt or unfair advantage upon himself or any relation or associate of the public officer, or any other public officer", and come with a five-year prison term (section 19 of the ICPC Act). The terms "gratify" and "unfair advantage" logically cover the provision of sexual favours, and the ICPC is clear that the law should be interpreted as such. Professor Akindele was prosecuted under a different section of the ICPC Act, referring to bribery of a public officer, which uses essentially the same broad language to describe the content of an exchange, with the phrase "any gratification as an inducement or a reward". This section of the Act states (in line with UNCAC) that any person who offers a bribe to a public officer is liable also, however in the interpretation of section 18 of ICPC Act, and in the context of sexual corruption or sexual bribery, the ICPC takes into context the power relations between the parties. While there is the possibility of the provider of a sexual bribe being open to prosecution in the strict interpretation of this section, the section has so far not been used against the provider in the cases that have come before the ICPC from tertiary institutions**.**

Other federal laws have wording informed by the landscape of sexual corruption in Nigeria, with the Violence Against Persons (Prohibition) Act referring to aspects relevant to the education sector. It has a section about sexual intimidation (section 26), which is defined as "any action or circumstances which amount to demand for sexual intercourse with either a male or a female under any guise, as a condition for *passing examination*, securing employment, business, patronage, obtaining any favor in any form", or any "act of deprivation, withholding, replacing or short-changing of entitlement, privileges, rights benefits, *examination of test marks, or scores*, and any other form of disposition capable of coercing any person to submit to sexual intercourse for the purposes of receiving reprieve therefrom." Hence, this law covers both collusive and extortive sexual corruption, and, depending on interpretation, could encompass situations of face-value initiation by a provider in a context where sexual bribery has become an institutional logic. Its weakness may lie in the phrase "sexual intercourse", however, which sets a bar higher than "sexual favours" (or "sexual activity", as in the Brazilian bill). Abuse may occur in a form with a sexual tone, degrading to the provider, but also in a form that can be argued not to amount to a demand for intercourse, *per se*. In any case, Nigeria's National Assembly's plan to pass a bill to specifically legislate against sexual corruption in tertiary institutions, with the intention of enhancing the workability of the Violence Against Persons (Prohibition) Act, has not progressed so far.[80]. The bill contains guidelines as to the justice system's handling of sexual and gender-based violence cases, prompted by a rise in their frequency[81].

80 The bill did not become law because the President did not sign it after being passed by the lower house of the National Assembly. It is not clear why it was vetoed.

81 Unini Chioma, '22/23 New Legal Year: FCT CJ , Justice Husseini Baba Signs Guidelines For Trial Of Sexual, Gender-Based Violence Cases,' *The Nigerian Lawyer*, 17 October, 2022; available at: https://thenigerialawyer.com/22-23-new-legal-year-fct-cj-justice-husseini-baba-signs-guidelines-for-trial-of-sexual-gender-based-violence-cases/

Discussion

This paper investigates how countries and organisations in different jurisdictions have sought to tackle the issue of sexual corruption. The paper aims to define what makes sexual corruption different from other forms of corruption and the implications that this has for the opportunities and challenges involved in addressing this particular form of corruption. Our work thereby resonates with the broader call to better tailor anti-corruption reforms to the specific problems that they seek to address, an issue that is particularly challenging for forms of corruption that involve complex power hierarchies as well as practices laden with stigma, shame and fear, both of which makes sexual corruption hidden from the public eye.

The cases of Nigeria and Brazil provide a valuable comparison because as well as displaying numerous similarities, they eke out several important aspects of the approaches available to policymakers. Both jurisdictions already have laws that on paper are worded in a way that they are logically sufficient to make sexual corruption illegal and prosecutable, yet both countries are aiming to strengthen them through new legislation. For example, Nigeria's use of the word "gratification" in its ICPC Act is broad enough to encompass sexual activity, as is the Brazilian anti-corruption law's reference to "undue advantage". In both countries, a federal abuse of power / authority law is also phrased in a way that would seemingly make it an available strategy to prosecutors seeking to prosecute public sector employees. Nonetheless, accusations of abuse of authority have not so far been a common approach among prosecutors.

In both countries there also appears to be a consensus among policymakers that punishment of those who provide or offer sexual activity as part of a dynamic of corrupt exchange is not in the public interest. Brazilian prosecutors in the state of Goiás seem to have carefully worded formal accusations of passive corruption. They may have judiciously selected cases to prosecute also to avoid the question of prosecuting active corruption. This presents a potential concern - the absence of the prospect of justice - for victimised individuals who did provide sex acts as part of a quid pro quo dynamic to someone with entrusted power under coercive pressure. Meanwhile, Nigeria, in its attempts to treat survivors sensitively, has placed a much greater emphasis on involving the third sector, drawing on the expertise of civil society. It has also emphasised specialist training for investigators and prosecutors. Brazil, on the other hand, has hardly involved local civil society at all, nor has anyone yet instigated a discussion about specialist training that might support the implementation of its possible new law. It may admittedly be too early for that, yet, Brazil, like Nigeria, already has specialist institutions in its justice system to deal with survivors of gender violence.

Local legacies in past failures of the authorities to tackle gender violence and sexual corruption are evident. The bill that may soon pass in Brazil treats the issue of coercion differently. It also makes exceptionally clear the point that prosecutors may investigate and prosecute sexual corruption against a survivor's wishes. How collusive cases are handled in Nigeria is less straightforwardly obvious than this, yet the legal tone is one in which survivors are advantaged by providing recordings that demonstrate that consent was not given. Nigeria's relevant laws highlight the education sector, reflecting the specific history and tendencies of where sexual corruption has emerged in the country.

Attempts to define and contain sexual corruption raise a number of important issues for anti-corruption policy and practice. These include how to deal with the victimisation of bribe givers, how to understand exit options in contexts of important power hierarchies, and the role of publicity in containing the impact of shame and stigma. Some of these are unique to sexual corruption, while some provide pause for thought for other forms of corruption.

Building broader coalitions of support and interest in the issue of sexual corruption may be aided by framing sexual corruption as an attempt to close down open opportunities for corruption, and not only as a response to feminist concerns about gender rights. Sexual corruption is affecting both men and women across all social strata, with implications for both high-level grand corruption and street-level petty corruption.

A key challenge is the limited amount of data available in this field of research. Another, in the arena of encouraging appropriate law-making and interpretation, is UNCAC's text, stating that State Parties should criminalise the "promise, offering or giving" of bribes, lacking consideration of situations where sexual favours are the currency of a bribe. The United Nations Member States have, nonetheless, pledged to improve their understanding of linkages between gender and corruption and to "promote gender equality and the empowerment of women, including by mainstreaming it in relevant legislation, policy development, research, projects and programmes," following the first and only UN General Assembly Special Session against Corruption (UNGASS) in 2021[82]. We encourage further discussion between policymakers grappling with how to reduce sexual corruption, and academics who are working to improve its conceptualisation and evidence base.

82 At which one of the authors gave a presentation on gender and corruption. UNGA, A/S-32/L.1. Available at: https://baselgovernance.org/sites/default/files/2021-06/UNGASS%20Corruption%202021%20Political%20Declaration.pdf

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Kamel Ayadi is an international consultant and civil society activist in the fields of anti-corruption, ethics, governance, corporate social responsibility, and social accountability. He has served in a number of high-level positions, including Minister of Public Service, Governance, and Anti-corruption; Chair of the Authority on Financial and Administrative Control; Secretary of State; Senator; and Chair of the Regulatory Authority of Telecommunication. After having served in leadership positions in numerous NGOs, including President of the Tunisian Order of Engineers, he was elected in October 2003 as the president of the World Federation of Engineering Organisations (WFEO, 100 member countries). He also served for six years as the Founding Chair of its standing Committee on Anti-corruption. He is the Founding Chair of the World Leadership and Ethics Institute, Founding Chair of the Tunisian Centre for Strategic Thinking on Economic Development. He is also the Founding Chair of the Global Infrastructure Anti-corruption Centre's for the MENA region.

SHAMILA BATOHI

National Director of Public Prosecutions, South Africa

Career Advocate Shamila Batohi has served as South Africa's National Director of Public Prosecutions (NDPP) since February 2019. Advocate Batohi began her career as a junior prosecutor in the Chatsworth Magistrate's Court in 1986 and steadily advanced to become the Director of Public Prosecutions in KwaZulu-Natal. She was seconded to the Investigation Task Unit established by President Nelson Mandela in 1995, investigating and prosecuting apartheid-era atrocities, and later served as the first regional head of the Directorate of Special Operations in KwaZulu-Natal, investigating and prosecuting serious organised crime and political violence. Immediately before her appointment as NDPP, she served as a Senior Legal Advisor to the Prosecutor of the International Criminal Court in the Hague.

MONIKA BAUHR

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Monika Bauhr is a Professor at the department of Political science, University of Gothenburg and a research fellow at the Quality of Government Institute. Bauhr investigates the causes and consequences of corruption and quality of government. She studies the link between democracy and corruption, the role of transparency and access to information, women representation and the nature of different forms of corruption and clientelism. She also investigates how corruption influences public support for foreign aid, international redistribution and the provision of public goods more broadly. She has previously been a visiting scholar at Harvard University, Stanford University and the University of Florida in the US and the University of Dar es Salaam in Tanzania. She has also served as a consultant and participated in public events relating to climate change, corruption and development policies. Between 2014 and 2017 she has been the Scientific Coordinator and Principal Investigator of the ANTICORRP (Anticorruption Policies Revisited: Global Trends and European Responses to the Challenge of Corruption), a large-scale multidisciplinary research program, involving 20 institutions in 15 European countries, funded by the European Commission. She is also a co-editor of the recently publishedOxford Handbook of the Quality of Government.

MARTHA CHIZUMA

Director-General of the Anti-Corruption Bureau (ACB), Malawi

Martha Chizuma is the Director General of the Anti-Corruption Bureau effective from 1 June 2021, the first-ever female to hold the position in the country. The Bureau is mandated to fight corruption through prevention, public education and law enforcement. She holds a master's in law from the UK and bachelor's in law (Hon) degree from Malawi. Before joining the Bureau, she was Ombudsman of Malawi from December 2015 to May 2021. However, she has also held various positions in the judiciary and private sector. With fighting corruption being on top of the Government agenda, Martha is responsible for providing strategic leadership to operational and administrative processes at the Bureau in a manner that ensures that positive and substantive inroads are being made against corruption in Malawi and also that a correct moral tone is set for the country in as far as issues of integrity are concerned.

IZABELA CORRÊA

Secretary for Public Integrity at the Brazilian Office of the Comptroller General and editor of the Chandler Papers (2021-2024)

Izabela has been dedicated to the themes of integrity and anti-corruption academically and as a practitioner for over fifteen years. She is currently serving as the Secretary for Public Integrity at the Brazilian Office of the Comptroller General. Prior to that, she was the Postdoctoral Research Associate for the Chandler Sessions on Integrity and Corruption (2021-2023). She has also served in the Brazilian Central Bank (2017–2021), and in the Brazilian Office of the Comptroller General (2007–2012), where she led a team of public officials that oversaw the development and implementation of high-impact transparency and integrity policies. Izabela holds a PhD in Government from the London School of Economics and Political Science (2017) and a master's degree in political science from the Federal University of Minas Gerais (UFMG) in Brazil. She is a member of the Chandler Sessions and the managing editor of its paper series (2021-2024).

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Javier Cruz Tamburrino is the Compliance Officer of the Chilean Central Bank. His main responsibilities include, among others, designing and implementing an Annual Compliance Plan, coordinating and articulating the compliance activities with the Prosecutor's Office, the Comptroller's Office, the Division Management Corporate Risk and the other areas of the Bank. Prior to joining the Central Bank, Javier Tamburrino served for nine years as Director of the Financial Analysis Unit (UAF), a public service whose mission is to prevent Money Laundering (ML) and the Financing of Terrorism (FT) in the Chilean economy, also acting as National Coordinator of the ML/TF Preventive System of Chile.

TODD FOGLESONG

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Todd Foglesong joined the Munk School of Global Affairs & Public Policy at the University of Toronto in 2014. He teaches courses on the governance of criminal justice and the response to crime and violence in global context. In cooperation with the Open Society Foundations, he is developing a peer-based system of support for government officials that seek to solve persistent problems in criminal justice. Between 2007 and 2014, Todd was a senior research fellow and adjunct lecturer in Public Policy at Harvard Kennedy School (HKS). Between 2000 and 2005 Todd worked at the Vera Institute of Justice, creating a center for the reform of criminal justice in Moscow and founding Risk Monitor, a non-governmental research center in Sofia, Bulgaria that supports better public policies on organized crime and institutional corruption. Before that, Todd taught political science at the Universities of Kansas and Utah.

GUSTAVO GORRITI

Founder and Editor of IDL-Reporteros, Peru

Gustavo Gorriti leads the investigative center at the *IDL-Reporteros*, in Lima, Peru. He was Peru's leading investigative journalist before having to leave the country, largely because of his reporting. During the April 5, 1992, coup, he was arrested by Peruvian intelligence squads and "disappeared" for two days until international protests forced President Alberto Fujimori first to acknowledge his detention and then to release him. Gorriti had earlier investigated, among other things, the drug ties of the man who became Fujimori's de facto intelligence chief. After several months of mounting threats and harassment, Gorriti left Peru for the United States, where he was a senior associate at the Carnegie Endowment for International Peace and the North-South Center. In 1996, he settled in Panama and went to work for La Prensa. Gorriti's investigative reporting there, however, had a similar effect, and the government attempted unsuccessfully to deport him. After Fujimori lost power, Gorriti returned to Peru in 2001. Gorriti was a Nieman fellow in 1986. He received the Committee to Protect Journalists' International Press Freedom Award in 1998.

JIN WOOK KIM

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JOHN-ALLAN NAMU

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John-Allan Namu is an investigative journalist and the CEO of Africa Uncensored, an investigative and in-depth journalism production house in Nairobi, Kenya. Africa Uncensored's ambition is to be the premier source of unique, important and incisive journalism. Prior to co-founding Africa Uncensored, he was the special projects editor at the Kenya Television Network, heading a team of the country's best television investigative journalists. He has received numerous awards for his work including the CNN African Journalist of the Year and joint journalist of the year at the Annual Journalism Excellence Awards by the Media Council of Kenya.

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Owasanoye started his career as an assistant lecturer at the Lagos State University. He moved to the Nigerian Institute of Advanced Legal Studies (NIALS) in 1991 and became a Professor of law 10 years later. In August 2015, he was appointed as the Executive Secretary of the Presidential Advisory Committee Against Corruption (PACAC) before being appointed to the ICPC in 2017. He was involved in advocacy for passage of major anti corruption bills in Nigeria including Nigeria Financial Intelligence Agency Act , Proceeds of Crime Act, and reenactment of the Money Laundering Prevention and Prohibition Act and the Terrorism Prevention Act, amongst others. At the continental level he participated in drafting and advocating adoption of the Common African Position on Asset Recovery by the African Union in 2020 and served as member of the UNGA/ECOSOC established FACTI Panel in 2020-2021. His portfolio of consultancies include Nigerian federal and state agencies, as well as international development agencies such as the World Bank and USAID, DFID and UNITAR. In 1997, he co-founded the Human Development Initiative (HDI), a non-profit organisation. In 2020, He was awarded the rank of Senior Advocate of Nigeria (SAN) and national honour of Officer of the Federal Republic (OFR) in 2022.

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Anna Petherick is Associate Professor in Public Policy and Director of the Lemann Foundation Programme. Since her DPhil on the topic, Anna has researched corruption, gender and trust, and advised policymakers on the topic. She wrote the UNODC "The Time is Now: Addressing the Gender Dimensions of Corruption" report, published in 2020, and has presented on the topic of gender and corruption at the United Nations General Assembly. Anna is also co-Principal Investigator of the Oxford COVID-19 Government Response Tracker (OxCGRT) project. Prior to becoming an academic, Anna wrote a column for The Guardian that fused longevity and wellbeing research (how to die as late as possible, and until then stay as happy and as physically young as possible), and another column about the social dimensions of climate change for the journal, Nature Climate Change. She was a science and then foreign correspondent at The Economist, and a section editor at the journal, Nature. Anna holds a BA (MA) in Natural Sciences (Evolutionary Genetics, Population Modelling) from Cambridge University.

KATHLEEN ROUSSEL

Director of the Public Prosecutions, Canada

Kathleen Roussel is the Director of Public Prosecutions. She was appointed June 21, 2017. Kathleen was Deputy Director of Public Prosecutions from 2013 to 2017. She was responsible for the Regulatory and Economic Prosecutions and Management Branch. Previously, Kathleen served as Senior General Counsel and Executive Director of the Environment Legal Services Unit at the Department of Justice (Canada), from 2008 to 2013. From 2001 to 2005, she was the Senior Counsel and Director of the Canadian Firearms Centre Legal Services, before joining the Department of Environment's legal services later that year. Before joining the public service, Ms. Roussel worked as a criminal defence lawyer. She has been a member of the Law Society of Upper Canada since 1994 and graduated from the University of Ottawa Law School in 1992, having previously obtained an Honours Religion degree from Queen's University.

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Former Chairman of the Audit Board of the Republic and Lecturer at the University of Indonesia, Indonesia

Dr Agung Firman Sampurna was the Chairman of the Supreme Audit Agency for the period 2019 – 2022. Previously, he served as Member I of BPK-RI for the period 2014 – 2019, Member III for the period 2012 - 2013, and Member V for the period 2013 - 2014. Agung Firman Sampurna once led the Main Auditorate of Finance State (AKN) III (2012 – 2013), AKN V (2013 – 2014), and AKN I (2014 – 2019). Recipient of the Mahaputra Naraya Star, Agung Firman Sampurna is heavily involved in training activities, research, seminars and various other forums, both domestically and abroad. Agung holds a Bachelor of Economics from Sriwijaya University, a Master of Public Policy and Administration from the University of Indonesia and a PhD in Public Administration also from the University of Indonesia.

TANKA MANI SHARMA

Former Auditor General, Nepal

Tanka Mani Sharma Dangal is a Nepalese Bureaucrat. He has long experience in Public Financial Management and fiscal administration. He has experience in Public Procurement Management and development administration, Civil Service Administration and Training, Cooperative Societies Regulation and Management, Health Sector Financing, Public Enterprises Management, and other different areas of public sector management. He served as an Auditor General of Nepal from 2017 to 2023 for 6 years. His prior positions include Secretary at the Office of the Prime Minister and Council of Ministers, Ministry of General Administration, and Public Procurement Monitoring Office. He had also served as a Director General of the Inland Revenue Department, Department of Customs, Department of Revenue Investigation, and the Registrar of the Department of Cooperative. likewise, he had served as Finance Chief in different Ministries and Departments of the Government of Nepal.

Mr. Sharma holds a Master's degree in Business Administration (MBA). He has attended various national and international training and seminars and acquired knowledge and skills in different fields of the public sector management and governance system. He has rewarded with the "Best Civil Service Award" in 2001 by the government of Nepal. He has awarded the medal "Prasidda Prabal Janasewa Shree" by the president of Nepal in the year 2021. He was also awarded the "Prabal Gorkha Dakshin Bahu" medal in 2000.Mr. Sharma hopes to build a more efficient and effective public administration, promoting good governance through transparent and accountable public sector management. Moreover, he emphasizes maintaining professional integrity and controlling mismanagement and corruption in the governance system.

CHRIS STONE

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Chris Stone is Professor of Practice of Public Integrity. Chris has blended theory and practice throughout a career dedicated to justice sector reform, good governance and innovation in the public interest, working with governments and civil society organisations in dozens of countries worldwide. He has served as president of the Open Society Foundations (2012–2017), as Guggenheim Professor of the Practice of Criminal Justice at Harvard's Kennedy School of Government (2004–2012), as faculty director of the Hauser Center for Nonprofit Organizations at Harvard University (2007–2012), and as president and director of the Vera Institute of Justice (1994–2004). He is a graduate of Harvard College, the Institute of Criminology at the University of Cambridge, and the Yale Law School. At the Blavatnik School, Chris's work focuses on public corruption turnarounds: the leadership challenge of transforming cultures of corruption into cultures of integrity in government organisations, large and small. As an affiliate of the Bonavero Institute of Human Rights within the University's Faculty of Law, Chris serves as the principal moderator for the Symposium on Strength and Solidarity for Human Rights.

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Auditor General, Sierra Leone

Lara Taylor-Pearce is Auditor General of Sierra Leone and has more than 27 years of experience in public- and private-sector financial and administrative management and oversight. As the government's chief external auditor since 2011, she has won praise for helping change Sierra Leone's public-sector accountability landscape, including her work in developing its 2016 Public Financial Management Act and other public-sector oversight acts. Among other honors, she received the 2015 National Integrity Award from the Sierra Leone Anti-Corruption Commission. She has also served as principal finance manager and head of administration for the Institutional Reform and Capacity Building Project, finance and administrative manager for the Public Sector Management Support Project, technical assistant in the Accountant General's Department of the Ministry of Finance, and supervisory senior for KPMG Peat Marwick. An honours graduate in economics of the University of Sierra Leone, she is a fellow of the Association of Chartered Certified Accountants (FCCA), U.K, and of the Institute of Chartered Accountants of Sierra Leone (FCASL). She is vice chair of the INTOSAI Development Initiative (IDI) board, chair of the governing board of the African Region of Supreme Audit Institutions-English Speaking (AFROSAI-E), and a Grand Officer of the Order of the Rokel (GOOR) President's National Award.

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