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SCRUTINIZING ANTI-CORRUPTION INITIATIVES IN EUROPE: LESSONS TO LEARN FOR INDIA?

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Abstract: *Many studies have concluded that corruption hinders economic expansion by threatening the viability of the public budget and reducing the capital available for infrastructure development and social welfare. Thereby cultivating social inequality and eroding trust in the state and institutions. In recent decades, the European Union (EU) and India have experienced multiple corruption cases, including bribery, embezzlement, and abuse of power. Consequently, some EU nations and India have attempted to implement legislations and frameworks to curtail corrupt practices. The impact of adopted approaches can be witnessed in the contrasting scores and ranks of both regions on the Corruption Perception Index. Therefore, considering the distinctiveness in the efficacy of the approaches adopted by both of these regions, this paper intends to explore the efficacy and limitations of anti-corruption initiatives and frameworks implemented in the EU region and, subsequently, recommend the adoption of a similar approach which may prove to be beneficial in addressing the pressing issues of political and bureaucratic corruption in India.*

Keywords: *Corruption; Bribery; Anti-Corruption Framework; Vigil Mechanism; Transparency; Technology*

INTRODUCTION

Corruption is a deep-rooted societal concern that affects every nation worldwide by causing a detrimental impact on governance, economies, and societies. It erodes public trust, hampers infrastructure development, widens inequalities, and undermines the fundamental principles of justice, fairness, and integrity. In severe circumstances, corruption would lead to the state's delegitimization, which would cause political and economic instability. Consequently, because of the associated uncertainty, private businesses are less likely to commit to long-term development strategies, which makes sustainable development even more difficult to achieve (Kaplan and Akçoraoğlu 2017, 363). Hence, it is often contended that the impact of corruption on societies is pervasive and multifaceted, as it affects the economy, equality, and development.

Furthermore, it perpetuates a cycle of poverty, injustice, and social divisions by hindering progress and undermining the very fabric of societies (Gebeye 2012, 40). The issue of corruption is particularly prevalent in developing nations such as India, and its impact on these countries can be far-reaching and detrimental as the high level of corrupt practices leads to the diversion of funds and resources away from critical sectors such as education, healthcare, and infrastructure. Besides, the recurring instances of corruption exacerbate poverty and widen socioeconomic inequalities as it disproportionately affects the most vulnerable and marginalized populations who rely on public services and assistance. According to Nwankwo (2013), the

resources meant for poverty alleviation programs or public welfare are embezzled or misused, depriving those who need essential support and perpetuating cycles of poverty. Moreover, from the perspective of corporations and businesses, the level of corruption in the nation poses a compelling deterrent to FDI because Investors are often reluctant to commit capital to countries where corruption is rampant, as it increases the risk of unfair competition, arbitrary decision-making, and obscurity in enforcing commercial contracts or seeking legal remedies (Runnels et al. 2012, 295). To combat this pervasive problem, governments worldwide have implemented various anti-corruption measures, such as enacting preventive laws and regulations that criminalize corruption, bribery, embezzlement, and other corrupt practices. This legislation sets a deterrent effect and provides a legal basis for investigating, prosecuting, and punishing offenders. At the same time, few nations have undertaken a formidable step of establishing the institutions, such as anti-corruption commissions or Ombudsman offices, that are empowered to investigate corruption cases and set accountability of the alleged officials (Meagher 2004). Meanwhile, citizens are also encouraged to report instances of corruption through steady vigil mechanisms, as there are various examples wherein the nations have ensured the protection and anonymity of whistle-blowers. In addition, it has been realized that addressing the issue of corruption requires global collaboration.

Consequently, various nations have established international initiatives, such as the United Nations Convention against Corruption (UNCAC), to share best practices, exchange pertinent information, and strengthen anti-corruption efforts collectively. It has been noticed that these anti-corruption measures play an indispensable role in combating corruption. Nevertheless, they are not always effective due to various challenges and factors, as corruption often involves influential people or groups who tend to exert their political influence to protect themselves and undermine anti-corruption efforts. This political interference often hinders investigations, obstructs justice, and leads to selective enforcement by eroding the effectiveness of anti-corruption measures (Webb 2005, 191-229). Besides this, corruption is considered an adaptive and constantly evolving phenomenon. New forms of corrupt practices can emerge to counter existing legislation, making it challenging for anti-corruption measures to keep pace (Meagher 2004). On top of that, these measures require adequate resources such as appropriate funding, the appointment of trained personnel, and the inclusion of the latest technology to investigate and prosecute corrupt officials effectively. Therefore, the insufficient allocation of resources and limited capacity often impede the efficiency and effectiveness of these anti-corruption efforts, leading to delays, backlogs, and compromised outcomes (Meagher 2004).

Accordingly, this paper will explore the anti-corruption frameworks implemented in European nations while elaborating on the various initiatives and steps for continuous monitoring. After that, the paper will also take cognizance of Europe's cooperation with the international legal framework while discussing the limitations and efficacy of its anti-corruption measures. Subsequently, the paper will scrutinize the efficiency and infirmity of the anti-corruption framework adopted in India, followed by reviewing the indicators of measuring corruption through Transparency International's Corruption Perception Index (CPI) of a few European nations and India. Finally, the paper will attempt to recommend adopting such measures in India, which proved to be efficient in curbing corruption in European nations that fared better in the CPI.

EUROPE'S ANTI-CORRUPTION FRAMEWORK

Europe has proactively recognized that a robust economy is necessary for executing the growth plan of the Union. However, economic growth alone was insufficient to achieve the ambitious targets. The leaders of the EU have realized that institutional aspects like effective leadership, the rule of law, and the prevention of corruption are also important and will play an imperative role in its growth (Nwabuzor 2005, 121-138). Hence, by concentrating on legislative actions and improved scrutinizing of defiance with these initiatives, the EU has lately made constructive progress against corruption (Obradović et al. 2016). Some of these initiatives resulted from the practical implementation of international treaties and agreements that intend to combat corruption in the global economies (D'Souza 2012, 73-87). For instance, most members of the OECD Anti-Bribery Convention have been motivated to draft and legislate domestic legislation that adheres to the Convention's standards. Subsequently, the United Kingdom enacted UK Bribery Act (UKBA) in the year 2010, which took the inferences from the United States Foreign Corrupt Practices Act (FCPA), which entails antagonistic methods to uproot corrupt practices (Obradović et al. 2016).

Concerning the felicitous implementation of the anti-corruption framework, the citizen's perception and experience related to corruption plays a cardinal role. The European nations rely on Transparency International's Global Corruption Barometer (GCB), which has gathered information on people's experiences and perceptions of corruption worldwide since 2003. It supported a common belief about corruption in Europe, i.e., 62% of the 40000 respondents said that government corruption was a major issue in their nation (Figure 1) (Barometer 2019, 243). With more than 50 percent of the respondents feeling that personal connections and bribes are frequently used to gain official contracts and a comparable number believing that commercial interests govern their respective government, it also manifested that EU residents were concerned about the strong relationships between politics and business. According to the report, governments must take more action to combat the problem, as more than 106 million individuals in the EU are affected by minor corruption due to bribery or personal relationships. Additionally, nearly 50% of EU citizens believe their government is not doing enough to combat corruption. Hence, it is deduced that both national governments and the EU must collaborate constructively to cure this conjecture.

Considering the country-specific example, in Cyprus, as per the Transparency International Report 2021, most people (88%) believe corruption has worsened in recent months. These impressions have been fueled, among other things, by controversies surrounding Cyprus' "golden passports" program, also known as the Cyprus Citizenship by Investment Programme. This government initiative grants citizenship to foreign individuals who invest significantly in the country's economy. The program was launched in 2013 to stimulate foreign direct investment (FDI) in Cyprus, which was gravely affected by the global financial crisis.

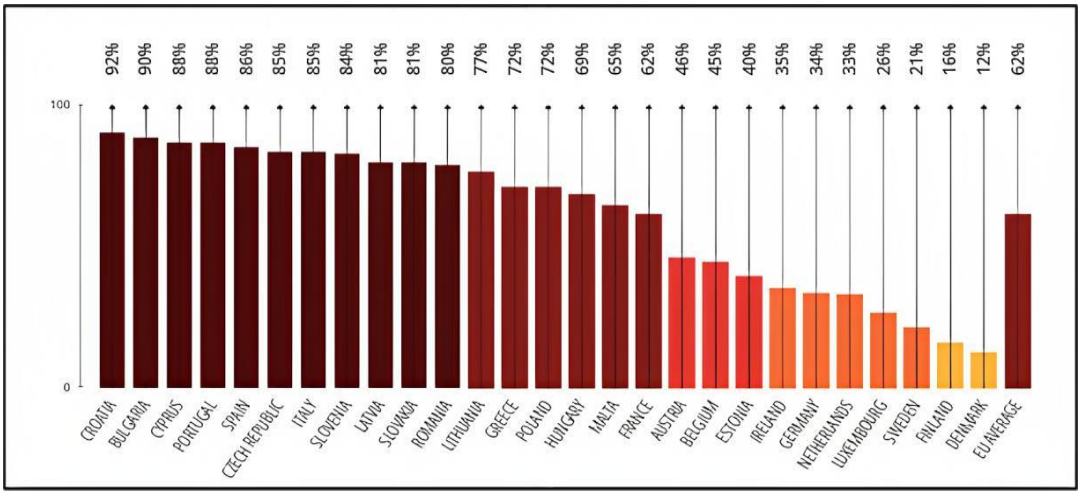

Figure 1: Percentage of People who Believes that Corruption is an Issue in their Respective Nation (Source: Global Corruption Barometer - European Union 2021)

Under the program, non-EU citizens could obtain Cypriot citizenship by investing at least €2 million in real estate, a Cypriot business, or government bonds. In addition to this requirement, applicants must meet certain criteria, including a clean criminal record and pass a due diligence check (Mavelli 2018, 482-493).

This program has been controversial, with critics arguing that it has the potential to be used for money laundering and allied forms of financial crime as there is always a possibility that a person commits a crime or financial fraud to generate funds in his home country and before it is detected in his home country or properly verified by the citizenship-granting state, the person attains the citizenship. Such a person can also take advantage of weak implementation procedures and bribe the officials of the citizenship-granting state to obtain a clean verification certificate. Meanwhile, a few investigative journalists found that several convicted criminals, wanted fugitives, and politically exposed people had procured citizenship from Cyprus in 2020. As a result, more than 85% of the native populace believes the government might be doing more to fuel corruption. In response to these concerns, the Cypriot government has tightened the rules surrounding this program, including increasing due diligence checks and imposing stricter investment requirements. After that, the concerned government announced that it would discontinue the Golden Passport Programme following allegations of corruption and abuses of the scheme. Thus, it was officially abolished in November 2020 (Sumption and Hooper 2014).

Similarly, at least two-thirds of the population share this opinion in Bulgaria, Croatia, and the Czech Republic. Whereas, irrespective of the fact that in countries like Denmark, Finland, Luxembourg, and the Netherlands, more than 60% of the population believes that their governments are doing phenomenally well in combating corruption and, in Austria, Ireland, Malta, Slovakia, and Sweden, more than 50% of respondents concur to this belief (Mensah 2014, 255). Furthermore, most EU citizens, i.e., almost 52%, have doubts about the competitiveness with which government contracts are awarded. Instead, they believe that bribery or personal ties are frequently used in their respective nations to influence how government tenders are procured (Bunciu and Dan 2022). Moreover, 32% of Germans believe that a few commercial

interests control the government (Bussmann et al. 2018, 255-277). Further, half of the German population believes businesses frequently use kickbacks or contacts to get government contracts. This can result from murky procedures and several controversies (Bovis 2012).

Anti-Corruption Initiatives

The majority of EU nations have put in place organizational and legal structures to combat the practice of corruption. In 2003, the EU published its framework for combating corruption in the private sector to make both active and passive bribery illegal (France 2019). The framework begins with separating the types of bribery into active and passive. According to Article 2(a) of the concerned framework, active bribery is defined as "promising, offering or giving, directly or through an intermediary, to a person who in any capacity directs or works for a private sector entity an undue advantage of any kind, for that person or a third party, so that that person should perform or refrain from performing any act, in breach of that person's duties" (Council Framework Decision 2003/568/JHA). Whereas, Article 2(b) defines passive bribery as "directly or through an intermediary, requesting or receiving an undue advantage of any kind, or accepting the promise of such an advantage, for oneself or a third party, while in any capacity directing or working for a private-sector entity, to perform or refrain from performing any act, in breach of one's duties" (Council Framework Decision 2003/568/JHA). The follow-up report in the year 2007 revealed that only the United Kingdom and Belgium have complied with the recommendations conveyed by the EU's framework (De Vel and Csonka 2000, 361-380). Although the number increased to 9 in 2011, these Member States have failed to provide adequate data and statistics about instances of active corruption and prosecution in the privatized sector of their own countries (Batory 2012, 66-82). Therefore, the European Commission eventually concluded that it could not conduct the impact analysis of the framework resolutions implemented by these concerned states. Taking note of the lacuna of data collection and reporting, later that year, the European Commission crafted a reporting mechanism for corrupt practices to systematically gauge the anti-corruption actions of EU countries (Eckes and Konstadinides 2011). This mechanism is an integral component of the Stockholm Programme, an initiative of the EU Council as it formed a cooperation with the Group of States against Corruption (GRECO) of the Council of Europe to create a comprehensive anti-corruption plan (Fard and Hassanpour 2016, 47). It was believed that the enduring ambition of this reporting mechanism is to give the EU's anti-corruption system and benchmark its international credibility by filing compliance reports every two years. Thereby, in 2014, the maiden EU corruption report was published, wherein the stature of every Member State was assessed, focusing on both their anti-corruption strengths and shortcomings (Hoxhaj 2019).

Furthermore, the report by OECD criticized the anti-bribery laws of Spain, the Netherlands, and Austria as being very weak in curbing corruption in their respective jurisdiction (Schmidt-Pfister and Moroff 2013). It further disclosed that none of these countries had convicted a single person since 1999. Thereon, in early 2012, France also came under fire for the same reasons because, despite the significant impact French companies have on the global economy, France had only initiated 30+ criminal investigations and imposed less than 20% of convictions since the ratification of the Convention in the year 2000 (Osrecki 2015).

Concerned with such a disparaging report, the Netherlands government intensified its efforts to formulate the integrity policies to be followed by government offices. Subsequently, the Office for the Promotion of Public Sector Integrity, a distinct entity, was established by the Dutch Ministry of the Interior and Kingdom Relations, to assist government institutions in enforcing the integrity policy standards (Osrecki 2015).

After that, it was also noted that Spain's anti-corruption prosecution office had succeeded in taking cognizance and convicting intricate systems for illegal party funding. Besides, the same OECD report has also applauded the United Kingdom, Switzerland, and Germany for their effective and specialized anti-corruption prosecution office while referring to UKBA be the most comprehensive set of anti-bribery laws legislated in the EU (Sampson 2012, 185). This Act specifies four distinct offenses, i.e., (i) offering, promising, and giving a bribe, (ii) requesting, agreeing to receive, or accepting a bribe, (iii) bribery of foreign public officials, (iv) failure of commercial organizations to prevent bribery. Besides, sections 1 to 6 of the Act define various corruption instances. At the same time, section 7 of the Act goes a step ahead in criminalizing the failure of corporate organizations to prevent corruption. This provision encourages businesses to take the initiative and establish their peculiar internal control measures to ensure a bribery-free working environment. Therefore, it is considered a more stringent regulation than the United States' FCPA.

Other EU nations, such as Germany, were recognized for achieving favorable outcomes in prosecuting corruption cases and implementing preventative measures regarding local procurement, particularly in the real estate sector. The effective measures include creating and implementing codes of conduct for bidding and awarding contracts, regular rotation of employees, explicatory rules against receiving gifts, organizing tender processes, snowballing the use of e-procurement, and others (Shehaj 2020, 250). Concurrently, Finland has made great strides toward implementing a transparent political party finance mechanism by implementing GRECO's suggestions. The system is designed to prevent corruption and fortify the accountability of the political parties to their constituents. Under this Finnish system, the political parties receive numerous public funding based on the number of votes they secure in elections. In addition to this, parties can also acquire general donations from individuals and legal entities, but these donations are subject to stringent regulations. All political donations must be reported to the National Board of Patents and Registration (NBPR), which maintains a public register of political donations. This register is a public document available online and can be accessed by any citizen. As per the concerned policy, the amount that can be donated to a political party by a person in Finland is confined to €30 k *per annum*. Whereas donations from foreign individuals or organizations are prohibited, donations from indigenous Finnish companies are subject to strict limitations. Thereon, after receiving the donations, political parties in Finland are expected to submit annual financial statements to the National Audit Office, which reviews these reports to ensure appropriate compliance with the applicable law. Hence, it has been observed that this mechanism is designed to ensure transparency in the funding of political parties and setting accountability for their constituents. By ensuring transparency and accountability in political funding, the system helps to prevent corruption and promote public trust in the political process (Nassmacher 2006, 455). Thereby, the technicalities of this mechanism might now become a

model law for other EU states in this regard. Besides this, other nations, such as Italy, have supported a coordinated anti-corruption campaign across Western Europe.

Nonetheless, the fruitful outcomes that the governments of EU nations have thus far attained have positively impacted the entire ecosystem of anti-corruption initiatives in Western Europe. Consequently, corrupt practices are sporadic events in Nordic Europe and EU nations. Eventually, the significance and impact of the problem, the possibility of cascading policy effects, and the ability to identify future actions that are both constructive and practical were all taken into consideration while choosing and analyzing the important concerns. The collective reports revealed that the plentiful corruption instances implicating the misuse of EU funding have shown that public procurement is still one of the most susceptible sectors of wrongdoing (Mendelski 2021, 237-258). Subsequently, toward the later part of 2014, the EU's public procurement legislation package was updated and released. The principal changes pertained to public works, service contracts, concessions, and supply governed at the EU level and procurement in electricity, public works, conveyance, water, and mailing services. Therefore, in a practical context, the newly implemented act established warnings and red-flagging mechanisms to discover fraud and corruption and scrutinize the application of public procurement standards.

Furthermore, the EU also recognized the need to implement enforcement measures at the national and organizational level, which requires the collaboration of the judiciary and law enforcement agencies. Consequently, the European contact-point Network against Corruption (EACN) was implemented; it primarily focuses on practical concerns important to those investigating corruption-related cases. The Commission recognizes a lack of reliable national data regarding cases investigated, prosecuted, and sanctioned due to incomplete or nonexistent statistics provided by the Member States.

Statutory Bodies and Continuous Monitoring

The European Anti-Fraud Office (OLAF) was established to continuously monitor anti-corruption initiatives in the late 1990s. It was given the responsibility of uncovering fraud and corruption that pose a threat to the financial interests of the EU. In 2021, OLAF issued over 3000 recommendations for implementing administrative, judicial, and disciplinary measures by national and EU competent authorities. These actions aim to recover approximately €8 billion from the EU budget. Figure 2, mentioned below, displays the number of settlements by OLAF in 2021. It can be concluded that OLAF's investigative work has gradually led to the return of improperly spent funds to the EU budget, the conviction of offenders in national courts, and the enhancement of anti-fraud measures throughout Europe.

The European Public Prosecutor Office (EPPO), developed through the EU enhanced cooperation mechanism, is poised to become one of the core components of the EU's anti-corruption system (Herrnfeld 2021, 655-673). The PIF Directive defines the EPPO as the first ever supranational EU public prosecution body with authority to investigate and bring cases against illegal activities against EU financial interests. Its purview extends to crimes "inextricably related" to the offenses listed above. The EPPO began doing business in June 2021 and opened its first investigation into a significant corruption case in July 2021. Furthermore, as a matter for

continuous monitoring, the European Union Commission of Communication on Fighting Corruption published a biannual EU Anti-Corruption Report (EU ACR) in the year 2011 as a response to the EU's absence of a comprehensive evaluation mechanism to track and evaluate Member States' anti-corruption activities (Melnyk et al. 2021).

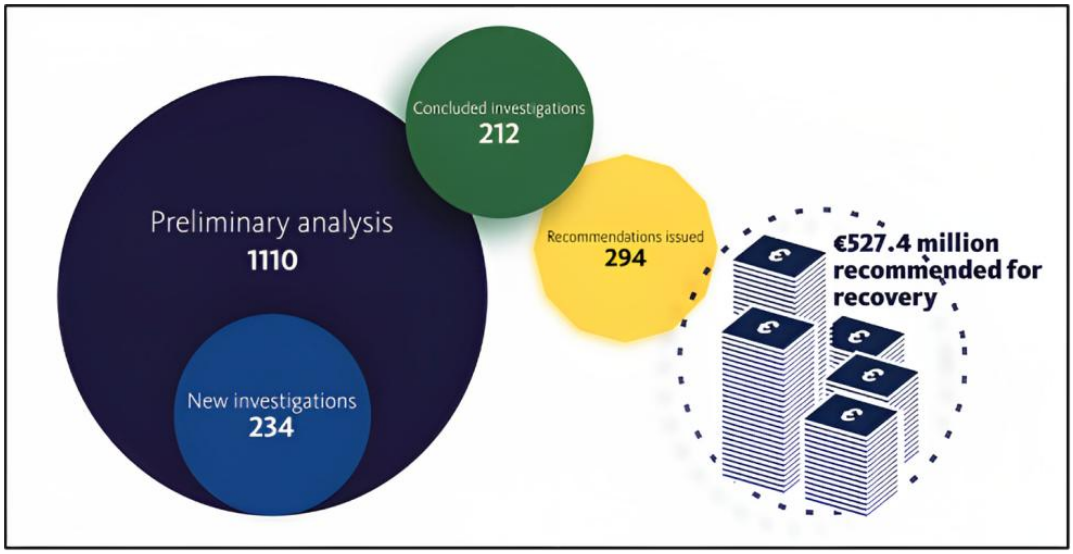

Figure 2: OALF Case Load in 2021 (Source: European Anti-Fraud Office Report 2023)

Group of States against Corruption (GRECO), the working group of OECD on bribery, the review mechanism of UNCAC, and the EU's systems were among the international datasets and assessment mechanisms to be expanded upon in the first report, issued in 2014 (Rose 2020, 55). Besides the report also used data from Eurobarometer surveys and various other sources from the academic community and civil society. The decision by the Commission to stop publishing the EU ACR in the year 2017 following the release of its second report was sharply criticized by the European Parliament, think tanks, academics, and civil society organizations.

As a consequence of this seizure, the assessment of Member States in placing anti-corruption efforts at the EU level has remained incoherent and limited in scope, with various systems evaluating just some components of the pertinent activities of certain Member States. One of these measures is the Cooperation and Verification Mechanism (CVM), which was placed for Bulgaria and Romania when they joined the EU and has since served as a de facto perpetual safeguard for these two Member States. It is considered a tool to keep the two nations' reform momentum going and prevent a rollback of the rule of law improvements implemented during the EU accession discussions. In the case of Bulgaria and the battle against organized crime, it offers particular yardsticks for the extent of judicial transformation and anti-corruption efforts. The Commission stated in a November 2022 progress report on Romania that it could now finish the CVM for this Member State and move forward with monitoring the legal system and anti-corruption initiatives under the rule of law toolbox. Another tool for evaluating the effectiveness, caliber, and independence of the Member States' judicial structures is the EU's Justice Scoreboard (Strelkov 2019, 15-27). Given its breadth, it only targets a few extremely specific concerns, such as combating corruption in the court and how prosecution services

handle corruption cases. The yearly rule of law report, a new mechanism launched in 2020, is constructed around four topic areas, with the anti-corruption frameworks being one of them. It now incorporates data from both the CVM and the EU Justice Scoreboard. Since its main objective is to enhance the synchronization of financial, budgetary, and employment policies throughout the EU, the European Semester of Economic Governance also sees corruption from a particular perspective. In this regard, just a few Member States have received recommendations from the European Semester reports about corruption (Zeitlin and Vanhercke 2020). Considering the summary of this report, a few researchers have acknowledged that controlling corruption is gradual and arduous. Romania and Bulgaria have been observed to make occasional progress, but at times they have also appeared to be stagnant or even declining (Mungiu-Pippidi 2019). Nonetheless, the CVM process has assisted both nations in advancing constructive reforms as the respective governments of Romania and Bulgaria have retaliated to the peculiar recommendations in the CVM reports, firmly implying that there would be less reform in the absence of the CVM. Additionally, they believed the thorough monitoring and evaluation documented in the reports, political pressure, and tangible consequences might produce significant positive outcomes (Toneva-Metodieva 2014, 551).

Adoption of International Legal Framework

In addition to their respective approaches, the EU's Member States' laws, rules, and policies have been significantly induced by international conventions, norms, and recommendations, particularly those issued by the Council of Europe, the OECD, and the United Nations. These tools are an outcome of what has evolved into world collaboration based on the general agreement regarding the fatalistic consequences of corruption. However, the first anti-corruption rules and agreements were not implemented until the end of 1990. Thereon, cooperation was promoted by first concentrating on global trade bribery (Greenleaf 2012, 68-92). The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, approved by twenty-three EU Member States thus far, was adopted. The OECD Working Group on Bribery in International Business Transactions was established to track the parties' progress.

Additionally, the OECD issued a new recommendation in 2021 to supplement the Anti-Bribery Convention and improve its implementation. The first worldwide anti-corruption statute, whose provisions went beyond criminal law, was proposed in the UNCAC. The quasi-global treaty addresses five key issues, including corruption prevention and criminalization. In terms of prevention, the convention outlines a plethora of steps that States parties are required to take, including encouraging the transparency, integrity, and accountability of public officials while guaranteeing appropriate public procurement systems and establishing a supervisory regime to spot and preclude the instances of money laundering. Over and above that, the UNCAC identifies factors that State parties must consider, such as maintaining openness in political party finance, avoiding conflicts of interest, establishing ethical conduct for officials, and making it easier to denounce public official wrongdoing (D'Souza 2012). The Council of Europe has acknowledged corruption's serious harm to political institutions and its clear danger to democracy.

Consequently, it has adopted several standards, including the 20 guiding philosophies for the brawl against corrupt practices and the direction on common guidelines against corrupt practices in the illicit funding of political parties and their polling campaigns, as well as the Civil and Criminal Law Convention, to take a comprehensive approach to the issue. Both the Conventions mentioned above have been endorsed by all Member States. GRECO, the most comprehensive mechanism in Europe for monitoring corruption, closely monitors the implementation of the two conventions. So far, it has undertaken five series of reviews and compliance monitoring. The EU has been given observer status in GRECO, although the 27 EU Member States participate individually (Plaček et al. 2019).

Limitation of the Initiatives

Several EU Member States are ranked among the least corrupt nations according to global corruption indices (Table 1). However, according to the reports on the Rule of Law, there are still many problems to be solved, as the concerned data from Eurobarometer indicates that corruption is still a major concern for people in the EU (Mungiu-Pippidi, 2019). In 2022, almost less than 70% of Europeans considered corruption pervasive in their nation, while just 30% of natives assumed that their government's attempts to prevent corruption were successful. Concurrently, the GCB report on the EU claims that almost half of the citizens of respective nation-states in Europe refrain from reporting corruption cases due to fear of retaliation from the government and institutions. The report's observations revealed that many whistle-blowers experience retribution, including dismissal, criminal charges, or even physical damage.

Consequently, the Whistle-blower Protection Directive, which includes several ground-breaking rules, was enacted by the EU in the year 2019. This directive offers multiple reporting options, prohibits retaliation against whistle-blowers, and safeguards their identities. However, it has significant flaws, including the limitation that, in certain cases, it only protects those reporting violations of EU law and not individuals reporting violations of national law. Further, it has been contended that the gender of a person frequently determines whether they feel corruption can be disclosed without fear in the EU. It also has an impact on whether they hold the opinion that ordinary people can stop corruption. According to the collected data, women are less likely than males to agree with these statements on how safe it is to expose and combat corruption. Concerning the pertinent reports, it is impossible to measure the precise level of corruption, yet even the most modest estimates indicate that it costs the EU economy approximately 120 billion euros annually (Everett et al. 2007, 542).

Efficacy of the EU's Initiatives

Anti-corruption measures in Europe have also had varying degrees of success. Some EU nations have made significant progress in combating corruption through reforms such as improving transparency, strengthening independent oversight, and increasing penalties for corrupt behavior. Nations such as Denmark, Sweden, and Finland consistently rank as some of the least corrupt in the world, conforming to CPI (Table 1). These countries have implemented various measures to promote transparency and accountability, including strict anti-bribery laws,

effective whistle-blower protections, and independent anti-corruption agencies. On the other hand, due to weak institutions, inadequate resources, and insufficient political will to tackle corruption effectively, corruption is deeply entrenched in certain sectors, such as law enforcement or the judiciary, in the cases of a few nations such as Romania. The implementation of the CVM by the European Union has resulted in some progress in addressing corruption in the EU region (Toneva-Metodieva, 2014). At the same time, the establishment of OLAF is answerable for investigating fraud and corruption affecting the EU's financial interests. It works closely with national authorities and law enforcement agencies to determine and prosecute fraud and corruption cases. Evidence shows that it has significantly contributed to the ongoing tussle against fraud and corruption in the EU. Thereon, the investigations persuaded by OLAF have resulted in significant recoveries of funds. For instance, in 2018, these investigations resulted in the recovery of over €370 millions of EU funds lost through fraud and corruption. The investigations have also led to criminal prosecutions and convictions in many high-profile cases across the EU. It has been imperative to encourage transparency and accountability in using EU funds. It has developed a range of guidelines and best practices for managing EU funds, and it provides training and support to national authorities to help them prevent and detect fraud and corruption (Tickner 2017).

Similarly, adopting the EU Anti-Corruption Report (EU ACR), which provides a comprehensive overview of corruption across the EU and identifies areas where more action is needed to combat corruption, was proved effective. The core strength of the EU ACR is its emphasis on providing a comprehensive overview of corruption across the EU, which allows policymakers to identify common trends and challenges and develop strategies to combat corruption effectively. It covers various topics, including corruption in the public sector, political corruption, and corruption in the private sector. It has recommended the development of comprehensive anti-corruption strategies, the strengthening of whistle-blower protection, and the improvement of public procurement processes. The effectiveness of the EU ACR has been evaluated through various means, such as reviews and assessments by the European Commission, surveys of EU Member States, and feedback from stakeholders and civil society organizations. In 2018, EU Justice Scoreboard observed advancements in the capacity of EU Member States to counter corruption, citing refinements in various spheres such as judicial independence, freedom of the press-media, and active participation of civil society in curbing corruption. While, ACR of 2017 divulged that the majority of EU Member States had taken precautionary measures to strengthen their legal and institutional frameworks for combating corruption, with some countries discharging measures such as exclusive laws for the protection of whistle-blower protection, ensuring transparency in public procurement, and enhancing enforcement of anti-corruption regulations. Over and above, there is innumerable evidence that the EU's Anti-Money Laundering Directive has been compelling in promoting transparency and combating money laundering and terrorist financing across the region. The effectiveness of these directives has been measured through a spectrum of diverse mechanisms, including investigation and evaluations by the European Commission, assessments by the Financial Action Task Force (FATF), and national assessments carried out by individual member nations (Levchenko et al. 2018). In 2019, the EU's Supranational Risk Assessment (SNRA) found that the

peril related to money laundering and terrorist financing in the EU is significant but that the EU AML framework has contributed to improving the detection and prevention of these activities.

The FATF's 2019 mutual evaluation report on the EU found that the EU's AML framework is comprehensive and has contributed to high compliance with international standards. Hitherto, it can be contended that the EU has taken a comprehensive approach to controlling corruption, combining legislative measures, monitoring and reporting mechanisms, and financial support to promote transparency and accountability. Even though the area still has to do more to combat corruption, these measures have played an important role in promoting good governance and certifying the effective and efficient utilization of EU funds (Pavlidis 2021, 765-773).

India's Anti-Corruption Framework

It has been observed that corruption is a pressing issue that plagues India's development and undermines its democratic fabric. To realize its full potential and ensure inclusive progress, the Indian government has attempted to confront corruption head-on with various initiatives, such as the Prevention of Corruption Act, which was legislated in 1998 to combat corruption in both the public and private sectors. The Act provides a legal framework to investigate and prosecute corrupt practices and establish stringent punishment for individuals involved in corrupt activities. This Act defines corruption broadly, covering offenses such as bribery, abuse of power, criminal misconduct, and possession of disproportionate assets. It also empowers law enforcement agencies, i.e., concerned police and the Central Bureau of Investigation (CBI), to investigate corruption cases while providing the provisions for the search and seizure of relevant documents, interception of communications, and recording of statements. Few stakeholders have criticized this Act for its lack of clarity and ambiguity in certain provisions, such as "criminal misconduct" and "possession of disproportionate assets", open to various interpretations, leading to inconsistent application and potential misuse.

Furthermore, few relevant provisions of this Act place a high burden of proof on the prosecution, making it challenging for a prosecutor to secure convictions in corruption cases (Solomon 2012, 901). The Act also contains a few provisions for the protection of whistle-blowers. However, the implementation and effectiveness of these protections have often been questioned (Solomon 2012, 901).

In 2005, the ruling government legislated the Right to Information Act (RTI) which enables citizens to access information from public authorities, promoting transparency and accountability. Under this Act, citizens can obtain government records, documents, and information. Hence, by providing access to the information, citizens have been empowered to expose corrupt practices, irregularities, and misuse of public funds. The Act also contends to uphold the fundamental right to freedom of speech and expression guaranteed by the Constitution. It recognizes the imperativeness of information as a fundamental right and enables individuals to exercise their right to seek, receive, and impart information.

Consequently, this Act was instrumental in promoting transparency and accountability in India. However, challenges and concerns are associated with its implementation, such as the backlog of cases and delays in providing information as public authorities often fail to respond within the stipulated time, leading to frustration among information seekers and hindering

timely access to information (Roberts 2010, 925). Further, the lack of awareness among the citizens hampers the full potential of the Act. Besides, there have been various instances wherein the information provided by public authorities is incomplete or inaccurate, defeating the purpose of transparency and accountability (Roberts 2010, 925).

After that, during the initial decade of the 21st century, India experienced various political corruption cases, and the concerned civil society officials realized the importance of forming a robust anti-corruption institution. Thus, in 2011, social activist Anna Hazare launched a hunger strike demanding the formation of an anti-corruption institution called the Lokpal. This movement gained significant public support and outlined the issue of corruption at the forefront of public discourse. In response to the public demand, the ruling government constituted a Joint Drafting Committee consisting of government and civil society representatives. The committee was tasked with drafting a bill to establish a Lokpal institution (Goswami et al. 2012). The Act contains provisions for establishing a Lokpal and Lokayuktas at the central and state levels. Hitherto, the Lokpal has jurisdiction over the central government employees, including ministers, Members of Parliament, and other gazetted officers. The Lokayuktas have jurisdiction over state government employees, including ministers, Members of the Legislative Assembly, and other executive officers. These ombudsmen can receive complaints and initiate inquiries into the proclamation of corruption against public servants. They also have the authority to investigate cases, conduct searches and seizures, summon witnesses, and gather evidence. This legislation was an important step in the fight against corruption as it offers a framework for independent oversight, investigation, and prosecution of corruption cases, aiming to ensure transparency, accountability, and integrity in public administration.

Nevertheless, due to the lack of political will and apparent conflict of interest, establishing the *Lokpal* (Ombudsman) and *Lokayuktas* (Parliamentary Ombudsman) has faced significant delays. The process of appointing members, setting up infrastructure, and operationalizing these institutions has been very bovine, affecting their ability to address corruption cases promptly. In addition, there was ambiguity regarding the jurisdiction and powers of the Lokpal and Lokayuktas, particularly concerning cases involving state government employees. Accordingly, the coordination and harmonization between the central and state institutions have been challenging, leading to confusion and delays in handling corruption cases (Rao 2017). In the same year, the Whistle-blower Protection Act, also known as the Public Interest Disclosure and Protection of Informers Act, was legislated to protect whistle-blowers who expose corruption, wrongdoing, or malpractices in government and private sectors. The key objective of this Act was to encourage individuals to come forward and disclose information in the public interest without fear of retaliation or victimization. The provisions of this Act extend protection to whistle-blowers from victimization, harassment, or unfair treatment by their employers or colleagues. It also prohibits any adverse actions such as dismissal, demotion, suspension, or transfer that may be taken against a whistle-blower by ensuring the confidentiality of the individual's identity. However, despite the provisions for ensuring protection, there have been instances where whistle-blowers have faced retaliation, victimization, or even threats to their safety. Hence, the effectiveness of the protection measures outlined in the Act has been probed. Furthermore, whistle-blowers lack dedicated support

systems regarding their counseling, legal aid, and assistance in filing complaints. Subsequently, experts contend that this Act lacks certain crucial provisions, such as ensuring safeguards for anonymous disclosures, rewards for whistle-blowers, and mechanisms for independent oversight (Sharma et al. 2018).

Moreover, India has engaged itself in profuse international collaborations and initiatives such as BRICS Anti-Corruption Cooperation, including the collaboration of other countries like Brazil, Russia, China, and South Africa. Besides, in 2010, the country became a member of FATF. This intergovernmental organization sets standards and stimulates the effective implementation of legal, regulatory, and operational measures to combat money laundering, terrorist financing, and other threats to the integrity of the international financial system. Thereon, in May 2011, India became a signatory to United Nations Convention against Corruption (UNCAC). It joined the Stolen Asset Recovery (StAR) initiative, a collaboration between the World Bank and the United Nations Office on Drugs and Crime (UNODC), to facilitate the recovery of stolen assets and their return to their rightful owners. Lastly, India has signed Mutual Legal Assistance Treaties (MLATs) with countries like the USA, UK, Canada, and Australia to facilitate cooperation in legal matters, including the exchange of information, receiving assistance in investigations, and affirming prosecutions related to corruption (Verma et al. 2019).

Irrespective of the numerous anti-corruption initiatives, measures, and international collaborations, instances of corruption remain a persistent and complex challenge in India, impeding efforts to eradicate this societal menace. The eradication of corruption has proven elusive due to various underlying factors, such as traditional customs, patronage networks, nepotism, and favoritism, perpetuating a culture where corruption is sometimes viewed as a norm rather than an aberration. In addition, political interference often impedes investigations, prosecution, and the functioning of anti-corruption institutions. At the same time, India's vast bureaucracy and complex administrative policies and procedures create opportunities for corruption to thrive (Quah 2008, 240-259). The lengthy and convoluted legislative processes often provide sufficient room for corrupt practices, such as bribery and red tape.

Furthermore, the absence of comprehensive whistle-blower protection and witness protection mechanisms creates a hostile environment for those who come forward. The fear of retaliation and lack of trust in the justice system deter individuals from reporting corruption, which impedes the efforts to hold the corrupt accountable (Quah 2008, 240-259). Lastly, weak enforcement, lack of judicial coordination, and the absence of swift and stringent punishment for corrupt individuals contribute to a culture of impunity, diminishing the deterrent effect of anti-corruption measures.

Corruption Measuring Indicators

Assessing the level of corruption and identifying the efficacy of the initiatives of corruption in the concerned nation are both challenging. While most experts contest that corruption cannot be quantified because it is informal and concealed, they acknowledge its difficulties. The usefulness of accurate statistics is restricted. For instance, the number of investigations or convictions may be a good indicator of the level of corruption. However, the same quantity may also indicate how well the court or law enforcement handles corruption.

Additionally, there are few statistics or criminal records on corruption cases, which are of little significance, considering how frequently these crimes go undetected. Whereas, as pertinent as it seems, the corruption level is primarily measured through expert evaluation or public opinion surveys, which are sent to a random or representative sample of households or businesses, pertinent information is acquired. Such indicators have become increasingly common, making them the most important way to gather information on corruption. The two top composite indicators in the area currently are the World Bank's Worldwide Governance Indicators (WGI) and Transparency International's CPI. Numerous indicators based on ideas that are more general than corruption can be used to analyze corruption. The "quality of governance" (QoG) is one such idea, and it deals with topics like the prevalence of corruption, the efficiency of bureaucracies and the rule of law, and the sturdiness of electoral establishments. Likewise, many indicators built on more general ideas than corruption can be employed as a primary point for scrutiny of corruption. Accordingly, apropos of determining the efficacy of the anti-corruption initiatives in the European Union, the score and rank of a few nations according to the CPI through the period preceding five years can be considered.

Further, for effective data comparison, the base year has been taken as 2017 (Table 1). At the same time, the scores are computed out of 100. Further, the index retains a scale of 100 to Zero, wherein 100 is considered very clean, and zero (0) is cogitated to be relentlessly corrupt.

Table 1: Corruption Perception Index from 2017 to 2021 (Source: Transparency International - Corruption Perception Index 2021)

Corruption Perceptions Index of European Nations										
EU Member States	2017		2018		2019		2020		2021	
	Score	Rank	Score	Rank	Score	Rank	Score	Rank	Score	Rank
Denmark	88	2	88	1	87	1	88	1	88	1
Estonia	71	21	73	18	74	18	75	17	74	13
France	70	23	72	21	69	23	69	23	71	22
Finland	85	3	85	3	86	3	85	3	88	1
Germany	81	12	80	11	80	9	80	9	80	10
Ireland	74	19	73	18	74	18	72	20	74	13
Netherlands	82	8	82	8	82	8	82	8	82	8
Portugal	63	29	64	30	62	30	61	33	62	32
UK*	82	8	80	11	77	12	77	11	78	11
Corruption Perception Index of India										
India	40	81	41	78	41	80	40	86	40	85

*From 31 January 2020, the UK is no longer an EU Member State.

During the last five years, most European nations, such as Estonia, France, Finland, Germany, and Ireland, could improve their scores and lower their CPI rank. Denmark and the Netherlands have maintained their credentials. At the same time, Portugal and the United Kingdom could not maintain their perception score and rank in 2021 from the base year, i.e., 2017. On the other hand, India has maintained its score at 40 in the last five years, but due to relative ranking, its rank has been pushed down by five slots in the year 2021. As per the report, India's performance was impacted due to ongoing concerns over the democratic status and fundamental freedom of the citizens as the report alleged that the journalist, activists, and some civil society groups were targeted with charges of defamation, sedition, and hate speech.

Of the top 10 enlisted rankers, 8 are the European nations led by Denmark and Finland, followed by Norway, Sweden, the Netherlands, and Germany. Therefore, it can be concretely stated that the anti-corruption initiatives implemented by most of these nations have assisted them in faring better in this index.

KEY TAKEAWAYS FOR INDIA

As discussed earlier, corruption is a multifaceted phenomenon that has implications for the economy, society, politics, and culture. Therefore, combatting corruption with a set of universally applicable tactics is impossible. Nonetheless, there exists some commonality of reasons and forms of corruption between EU countries and India. As in any other European country, the sovereign government in India works based on the welfare state concept, implying that the state carries out a lot of public service activities through a license or tender system. From obtaining a driving license to permission to open a shop, a person in India must contact public servants. According to Raghunandan (2018), a probe conducted by Ernst and Young and the Federation of Indian Chambers of Commerce and Industry (FICCI) on bribery and corruption indicates numerous reasons for corruption in India. Among them, weak law enforcement is the top reason.

Further, the requirement of contacting public servants several times to acquire authorization for an activity is the second most important reason for corruption in the country. The survey also holds the public responsible while stating that people's "lack of will" to get things done correctly and acquire unfair advantages is also a reason for corruption in India. Thus, it is evidenced that some of the reasons for corruption in European countries, as discussed in the beginning, are the same as in India. Therefore, the authors believe that taking cognizance of the efforts of the EU in lowering or stagnating the occurrences of corruption in the Member States, some of the policies and actions can be useful for India in moving towards introducing an efficient preventative approach starting with an immediate and appropriate response to occurrences, which may include disciplinary action where necessary and sensitive management and communication through media. Meanwhile, India can assimilate from the EU's experience in developing comprehensive and effective legal frameworks and institutions, such as anti-corruption agencies and special courts, to investigate and prosecute corruption cases. The EU has also strongly emphasized promoting transparency and accountability in public and private sectors through public procurement transparency, disclosure of beneficial ownership information, and providing anti-corruption training to public officials. India can adopt similar measures to augment transparency and accountability in its establishments. The Union has lately recognized the importance of engaging civil society and mass media in anti-corruption efforts. India can also benefit from greater civil society participation in its anti-corruption initiatives, including monitoring and reporting corruption cases and advocacy for anti-corruption reforms. Besides, the Indian judicial bodies can benefit from greater international cooperation in sharing information and best practices and investigating and prosecuting transnational corruption cases as the EU has endeavored through participation in international conventions and agreements, such as the UNCAC. In addition to referring to the EU's initiatives, India may consider gathering insights from the initiatives pursued by the respective EU Member States.

The Netherlands and Finland: Integrity in Public Services Administration

Dutch's public services administration has fully promoted accountability, integrity, and transparency in every public interest transaction. Thereby, an independent organization, i.e., "Bureau Integriteitsbevordering Openbare Sector" (BIOS), emboldens and assists the public sector in developing and putting into practice integrity policies. Hence, Dutch Cities and Localities have implemented these integrity policies to improve the governance in local bodies. Likewise, to foster an entrepreneurial culture, reforms implemented in Finland during the early 1990s have led to a scenario where public employees are hired based on their competence and credentials. Lawfulness and integrity are seen as the top imperatives of public service values. In addition, dependability, eminence, expertise, and sincerity are perceived to be precarious for an effective public service. A similar stance has been adopted by the Union Public Service Commission (UPSC) in India, which plays a decisive role in promoting the integrity of Indian Civil Services by implementing a rigorous selection process of the bureaucrats. The Commission has also emphasized the significance of ethics by including an examination that tests aspiring civil servants' ethical and moral dimensions. This examination also assesses their understanding of integrity, honesty, accountability, and other ethical values essential for public service. In addition, the Commission also accentuates the training, orientation, and procedures for disciplinary actions on the appointed civil servants (Gupta et al. 2018, 98-120). Nonetheless, UPSC's role is limited to appointing bureaucrats and does not extend to appointing other public officials. Therefore, India can adopt the Dutch framework of extending these protocols of selection and training to the other officials appointed at cities or local levels.

Denmark: Penal Code

Most corruption charges outlined in international anti-corruption treaties are forbidden under the Danish Criminal Code. Furthermore, bribing foreign public authorities and conglomerates is considered illegal; thus, the concerned organization is held criminally responsible for any corrupt incidents perpetrated by the employees acting on their behalf. Furthermore, bribes and felicitation outflows are treated equally. At the same time, the appropriateness of gifts relies on the purpose and the advantage they provide. In addition, active and passive bribery, embezzlement, deception, breach of trust, and money laundering are all prohibited in the Danish Criminal Code. Besides, paying off foreign public officials, bribing other corporations, and engaging in corporate espionage is illegal. Along the same lines, corruption is considered a serious offense in India, and the Indian Penal Code (IPC) contains several provisions ranging from sections 161 to 165 that deal with different aspects of corruption. In addition, the Prevention of Corruption Act specifically deals with bribery and corruption offenses by public servants. However, few provisions related to corruption in the IPC are often criticized for being ambiguous or open to interpretation, leading to confusion and inconsistency in the application of the law. While the penalties prescribed for corruption offenses in these legislations are not stringent enough to serve as a deterrent (Khan and Ramaswamy 2020). On that account, Indian legislators may consider amending the stringent

penalizing provisions in existing legislation along the lines of a comprehensive penal act like the Danish Criminal Code.

United Kingdom: Whistle-Blowers Protection/Foreign Bribery

One of the primary purposes of Ireland and the United Kingdom's legislation to curb corrupt practices is to safeguard the public's interest by protecting employees or insiders who report workplace misconduct to the appropriate authorities. The applicable legislation in Ireland disregards the reasons behind whistle-blowing, in contrast to other nations where whistle-blowers must prove that their actions are "in good faith" or "in the public interest". Furthermore, according to the United Kingdom Bribery Act of 2010 (UKBA), corporate houses are now strictly liable if they do not stop affiliated individuals from bribing on their behalf. Thus, if employees or other connected parties engage in bribery, organizations are held guilty of failing to thwart bribery. Furthermore, the Serious Fraud Office of the United Kingdom (SFO) has a proven track record of looking into and prosecuting serious cases of international bribery, including those involving the operations of well-known UK-based companies (Bean and MacGuidwin 2011, 323). In India, Whistle-blowers Act 2014 is often criticized for not being exhaustive enough to provide safeguards and protection to the whistle-blowers. Thus, there is still scope for further strengthening and ensuring its effective implementation to provide comprehensive protection through the involvement of independent bodies like the UK's SFO.

Romania: Online Disclosures

In order to check for possible incompatibilities, conflicts of interest, and balance-sheet disclosures of individuals holding public office, the Romanian government formed the National Integrity Agency (ANI) in 2007. Moreover, ANI has created a public platform where all assets and respective statements of interest made by those holding public office are publicized, along with keeping an updated track record of investigations and convictions. In India, the central government has implemented an online platform called the Central Public Procurement Portal (CPPP) that provides information related to government procurements, such as contracts, tenders, and vendors (Hazarika and Jena 2017). Nonetheless, when it comes to checking the assets of public officers, there is not a centralized online platform specifically dedicated to this purpose. Accordingly, India can also institute online tracking systems for tracing the resources and corroborating disclosures from public officials and bureaucrats.

Slovenia and Portugal: Technologically Advanced Systems

Indicating the contracting parties, related legal entities, particulars, and purposes of transactions, the online real-time application incepted by the Slovenian Commission for Prevention of Corruption, referred to as "Supervizor", postulates data and info on the transactions of a wide range of public bodies. At the same time, Portugal has commenced a national website called BASE that serves as a clearinghouse for data on public procurement. The e-version of the Portuguese Official Journal and the recognized e-platforms provide data about

undefended and limited pre-award procedures to BASE. These technologically advanced systems and portals assist in detecting irregularities in transactions by refining transparency and setting accountability on concerned officials. At the same time, India has implemented a similar system, i.e., Central Public Procurement Portal (CPPP), which aims to provide transparency and efficiency in government procurement. Nevertheless, there are a few concerns related to its operations, such as the incompleteness of data, lack of standardization, delayed updates, usability, and technical issues (Hazarika and Jena 2017). Thus, the concerned departments should contemplate inculcating advanced technology to upgrade these existing mechanisms.

European Union: Funding of Political Parties

Regulation on the Ruling and Financing of European Political Parties and Foundations was enacted by the European Union's Parliament and the Council in 2014. It intends to bring visibility, accountability, and transparency to European political parties and their concomitants in political campaigns. Besides, these regulations also postulate the conception of an independent authority which plays a crucial role in registering and controlling the transactions related to the funding of political parties. While in India, political party funding is governed by several laws and regulations such as the Representation of the People Act of 1951, the Election and Political Party Fund Scheme, the Income Tax Act of 1961, the Foreign Contribution (Regulation) Act of 2010, and introduction of electoral bonds. However, considering the applicability of various provisions, the framework of political party funding is often debated for lack of transparency. Political parties often receive significant funds through anonymous donations, making it difficult to ascertain the true funding sources. Besides that, there are various loopholes in the scheme of electoral bonds and provisions of the Income Tax Act apart from the non-requisite provisions on public disclosures and foreign and corporate funding. On that account, India can consider taking the reference of the European Framework, which is believed to bestow positive results in the EU regions.

CONCLUSION

On a global, regional, and national scale, corrupt practices leading to corruption continues to be one of the most difficult obstacles to conquer. India has also struggled with corruption at various levels of government and society. As a result, corruption has been deduced as a major obstacle to India's economic growth, social development, and democratic governance. Meanwhile, along with the OECD, UN, Council of Europe, and other international organizations, the EU is continuously attempting to be the skipper in the anti-corruption movement while attaining cooperation from the Member States. Their anti-corruption legislative framework, which addresses issues such as money laundering, public procurement, corporate corruption, and other relevant corruption-related concerns, is always being adjusted, amended, and transformed towards betterment. These regular transformations in regulations and applicable laws set up the tone for developing nations such as India to introduce comprehensive anti-corruption mechanisms to circumvent the stagnancy in economic growth and ensure the appropriate usage of capital for the welfare of the public and inclusive development of the

country. On that account, it can be concluded that India can certainly benefit from the strategies adopted by the EU and its Member States, such as the Netherlands, Denmark, United Kingdom (former EU Member State), Romania, Slovenia, and Finland, adopting and endorsing these varied initiatives to their unique context. Nevertheless, it is predominant to recognize that tackling corruption is a tangled issue that requires a multifaceted approach. Hence, India will require a sustained effort from all sectors of society to address this mounting concern persuasively.

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REFERENCES

1. Arnaudovska, A. 2020. "Understanding and Combating Judicial Corruption". Journal of Liberty and International Affairs, 4(1), 115-124. Retrieved from https://ejlia.com/index.php/jlia/article/view/117
2. Batory, A. 2012. "Why do anti-corruption laws fail in Central Eastern Europe? A target compliance perspective". Regulation and Governance, 6(1), 66-82, DOI: https://doi.org/10.1111/j.1748-5991.2011.01125.x
3. Bean, B. W. and MacGuidwin, E. H. 2011. "Expansive Reach-Useless Guidance: An Introduction to the UK Bribery Act 2010". *ILSA J. Int'l and Comp*. L., 18, 323.Retrieved from https://nsuworks.nova.edu/ilsajournal/vol18/iss2/2
4. Bovis, C. 2012. "Public procurement in the EU: Jurisprudence and conceptual directions". Common market law review, 49(1). Retrieved from https://hull-repository.worktribe.com/output/465564
5. Bribery and Corruption: Ground Reality in India. Fraud Investigation Dispute Service available at https://ficci.in/SEDocument/20254/FICCI-EY-Report-Bribery-corruption.pdf (06 May 2023).
6. Bunciu, R. Ş., and Dan, A. M. 2022. "Developments In The European Union's Effort To Enact Good Governance Through Public Procurement Law". Europolity, 16(2).Retrieved from http://europolity.eu/2021-vol-15-no-1/
7. Bussmann, K. D., Niemeczek, A., and Vockrodt, M. 2018. "Company culture and prevention of corruption in Germany, China, and Russia". European Journal of Criminology, 15(3), 255-277. DOI:https//10.1177/1477370817731058
8. D'Souza, A. 2012. "The OECD anti-bribery convention: Changing the currents of trade". Journal of Development Economics, 97(1), 73-87. DOI: https://doi.org/10.1016/j.jdeveco.2011.01.002
9. Eckes, C., and Konstadinides, T. (Eds.). 2011. "Crime within the area of freedom, security, and justice: a European public order". Cambridge University Press, 1-312, available at SSRN: https://ssrn.com/abstract=2096117
10. Elbargathi, K., and Al-Assaf, G. 2019. "The impact of political instability on the economic growth: an empirical analysis for the case of selected Arab countries". International Journal of Business and Economics Research, 8(1), 14-22. DOI: https://10.11648/j.ijber.20190801.13
11. European Anti-Fraud Office Report 2023
12. Everett, Jeff, Dean Neu, and Abu S. R. 2007. "Accounting and the global fight against corruption." Accounting, Organizations, and Society 32, no. 6, 513-542. DOI: https://doi.org/10.1016/j.aos.2006.07.002
13. Fard, B. F., andHassanpour, H. 2016. "Reviewing the strategies of dealing with corruption in the Europe Union Countries with regulatory system of the group of states against corruption (GRECO)". *J. Pol. and*L., 9, 47. DOI: https://10.5539/jpl.v9n5p47
14. Foreign Corrupt Practices Act of 1977.

15. Gebeye, B. 2012. "Corruption and human rights: Exploring the relationships." In *Human rights and human welfare. A forum for works in progress. Working paper*, no. 70, pp. 1-44. 2012. DOI: http://dx.doi.org/10.2139/ssrn.2075766
16. Global Corruption Barometer - European Union 2021.
17. Goswami, Debika, and Kaustuv K. B. 2012. "The anti-corruption movement in India." *PRIA, New Delhi*.Retrieved from https://cetri.be/IMG/pdf/Anti-Corruption-Movement_India.pdf
18. Greenleaf, G. 2012. "The influence of European data privacy standards outside Europe: implications for the globalization of Convention 108". *International Data Privacy Law*, *2*(2), 68-92. Available at SSRN: https://ssrn.com/abstract=1960299
19. Gupta, Vi, Sanjeev C, and Ram K. K. 2018. "Leadership competencies for effective public administration: a study of Indian Administrative Service officers." Journal of Asian Public Policy 11, no. 1, 98-120. DOI: https://doi.org/10.1080/17516234.2017.1353942
20. Hazarika, B, and Pratap R. J. 2017. "Public procurement in India: Assessment of institutional mechanism, challenges, and reforms." National Institute of Public Finance and Policy 2, no. 1, 42-57. DOI: https://10.13140/RG.2.2.34990.61761
21. Herrnfeld, H. H., and Herrnfeld, J. 2021. "The European Public Prosecutor's Office–where do we stand?". In *ERA Forum* (Vol. 22, No. 4, pp. 655-673. Berlin/Heidelberg: Springer Berlin Heidelberg. DOI: https://10.1007/s12027-021-00688-0
22. Hoxhaj, A. 2019. *The EU anti-corruption report: a reflexive governance approach*. Routledge.
23. Kaplan, E. A., and Akçoraoğlu, A. 2017. "Political instability, corruption, and economic growth: Evidence from a panel of OECD countries". *Business and Economics Research Journal*, *8*(3), 363. DOI: https://10.20409/berj.2017.55
24. Khan, Firoz, and Ramswamy Sudarshan. 2020. "Enactment and enforcement of Anti-Corruption in India." In Understanding corruption, pp. 164-203. Routledge. DOI: https://doi.org/10.4324/9781003130086
25. Levchenko, Valentyna, Tetiana Anatoliivna Kobzieva, Anton Oleksandrovych Boiko, and Tetiana Viktorivna Shlapko. 2018. "Innovations in assessing the efficiency of the instruments for the national economy de-shadowing: the state management aspect". DOI: https//10.21272/mmi.2018.4-31
26. Mavelli, L. 2018. "Citizenship for sale and the neoliberal political economy of belonging". *International Studies Quarterly*, *62*(3), 482-493. DOI: https// 10.1093/isq/sqy004
27. Meagher, P. 2004. "*Anti-corruption agencies: A review of experience"*. College Park, MD: IRIS Center. Retrieved from http://www.anti-corruption.org/wp-content/uploads/2016/11/Overview-of-concepts-in-the-corruption-literature-IRIS-Feb-2004.pdf
28. Melnyk, D. S., Parfylo, O. A., Butenko, O. V., Tykhonova, O. V., and Zarosylo, V. O. 2021. "Practice of the Member States of the European Union in the field of anti-corruption regulation". *Journal of Financial Crime*, *29*(3), 853-863. DOI: https// 10.1108/JFC-03-2021-0050

29. Mendelski, M. 2021. "15 years of anti-corruption in Romania: augmentation, aberration, and acceleration". *European Politics and Society*, *22*(2), 237-258. DOI: http://dx.doi.org/10.2139/ssrn.3338075
30. Mensah, Y. M. 2014. "An analysis of the effect of culture and religion on perceived corruption in a global context". *Journal of Business Ethics*, *121*, 255-282. Retrieved from https://www.jstor.org/stable/42921380
31. Mungiu-Pippidi, A. 2019. "*Europe's burden: Promoting good governance across borders"*. Cambridge University Press. DOI: https://doi.org/10.1017/9781108665537
32. Nassmacher, K. H. 2006. "Regulation of party finance". *Handbook of party politics*, 446-455.
33. Nwabuzor, A. 2005. "Corruption and development: new initiatives in economic openness and the strengthened rule of law". *Journal of business ethics*, *59*, 121-138. DOI: https://doi.org/10.1007/s10551-005-3402-3
34. Nwankwo, Rose N. 2013. "Official corruption and poverty reduction in Nigeria: A critical assessment (2003-2010)". International Journal of Arts and Sciences 6, no. 2 (2013): 305. Retrieved from http://universitypublications.net/ijas/0602/pdf/H3V287.pdf
35. Obradović, S., Lojanica, N., andJanković, O. 2016. "The influence of economic growth on regional disparities: Empirical evidence from OECD countries". *Zbornik radova Ekonomskog fakulteta u Rijeci, časopis za ekonomsku teoriju i praksu-Proceedings of Rijeka Faculty of Economics, Journal of Economics and Business*, *34*(1), 161-186. DOI: https// 10.18045/zbefri.2016.1.161
36. OECD Global Anti-Corruption and Integrity Forum. 2019. Available at https://www.oecd.org/corruption/integrity-forum/2019/ (06 May 2023)
37. *OLAF's Results 2010-2021,* available at https://anti-fraud.ec.europa.eu/investigations/olaf-figures_en (23 February 2023)
38. Osrecki, F. 2015. "Fighting corruption with transparent organizations: Anti-corruption and functional deviance in organizational behavior". *Ephemera: Theory and Politics in Organization*, *15*(2). Retrieved from https://ephemerajournal.org/sites/default/files/2022-01/15-2osrecki_0.pdf
39. Pavlidis, G. 2021. "Financial action task force and the fight against money laundering and the financing of terrorism: Quo vadimus?". *Journal of Financial Crime* 28, no. 3: 765-773. DOI: https// 10.1108/JFC-09-2019-0124
40. Plaček, M., Půček, M., andOchrana, F. 2019. Identifying corruption risk: A comparison of Bulgaria and the Czech Republic. *Journal of Comparative Policy Analysis: Research and Practice*, *21*(4), 366-384. DOI: https// 10.1080/13876988.2018.1472473
41. Prevention of Corruption Act, 1988
42. Quah, Jon ST. 2008. "Curbing corruption in India: an impossible dream?." *Asian Journal of Political Science* 16, no. 3: 240-259. DOI: https://doi.org/10.1080/02185370802504266
43. Raghunandan, T. R. 2018. "Measuring Corruption in India: Work in Slow Progress." The Palgrave Handbook of Indicators in Global Governance. 389-405. DOI: https// 10.1007/978-3-319-62707-6_17
44. Rao, CN Shankar. 2017. *Indian Social Problems*. S. Chand Publishing.

45. Regulation (EU, Euratom) No 1141/2014 of the European Parliament and of the Council available at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R1141 (18 January 2023)
46. Right to Information Act, 2005
47. Roberts, A. 2010. "A great and revolutionary law? The first four years of India's Right to Information Act." *Public Administration Review* 70, no. 6, 925-933. DOI: https// 10.1111/j.1540-6210.2010.02224.x
48. Rose, C. 2020. "The creation of a review mechanism for the UN Convention Against Transnational Organized Crime and its protocols". American Journal of International Law, 114(1), 51-67. DOI: https://doi.org/10.1017/ajil.2019.71
49. Runnels, Michael B., and Adam M. Burton. 2012. "The Foreign Corrupt Practices Act and New Governance: Incentivizing Ethical Foreign Direct Investments in China and Other Emerging Economies". *Cardozo L. Rev.* 34: 295. Retrieved from https://heinonline.org/HOL/LandingPage?handle=hein.journals/cdozo34&div=10&id=&page=
50. Sampson, S. 2012. Corruption and anti-corruption in Southeast Europe: Landscapes and sites. In *Governments, NGOs and Anti-Corruption* (pp. 168-185). Routledge.
51. Schmidt-Pfister, D., andMoroff, H. (Eds.). 2013. *Fighting corruption in Eastern Europe: A multilevel perspective*. Routledge.
52. Sharma, J. P., Sunaina Kanojia, and Shikha Sachdeva. 2018. "Comparison of whistle-blower protection mechanism of select countries." *Indian Journal of Corporate Governance* 11, no. 1: 45-68. DOI: https// 10.1177/0974686218769198
53. Shehaj, A. 2020. "The perils of succor: The European Union's financial role in the Western Balkans during Covid-19". *European Policy Analysis*, *6*(2), 264-276. DOI: https://doi.org/10.1002/epa2.1102
54. Solomon, E. 2012. "Targeting corruption in India: how India can bolster its domestic anti-corruption efforts using principles of the FCPA and the UK Bribery Act". *U. Pa. J. Int'l L.* 34: 901. Retrieved from https://scholarship.law.upenn.edu/cgi/viewcontent.cgi?article=1783&context=jil
55. Strelkov, A. 2019. "EU Justice Scoreboard: A New Policy Tool for "Deepening" European Integration?". *Journal of Contemporary European Studies*, *27*(1), 15-27. DOI: https://doi.org/10.1080/14782804.2018.1534729
56. Sumption, M., and Hooper, K. 2014. Selling visas and citizenship. *Washington, DC: Migration Policy Institute*. Retrieved from https://www.migrationpolicy.org/sites/default/files/publications/Investor-Visas-Report.pdf
57. Tickner, P. 2017. *Fraud and Corruption in Public Services*. Routledge.
58. Transparency International - Corruption Perception Index 2021
59. Toneva-Metodieva, L. 2014. "Beyond the carrots and sticks paradigm: Rethinking the Cooperation and Verification Mechanism experience of Bulgaria and Romania". *Perspectives on European Politics and Society*, *15*(4), 534-551. DOI: https// 10.1080/15705854.2014.936108
60. United Kingdom Bribery Act, 2010

61. Verma, Arvind, and Ramesh S. 2019. Combating corruption in India. Cambridge University Press.
62. Webb, P. 2005. "The United Nations Convention Against Corruption: Global Achievement Or Missed Opportunity?". *Journal of International Economic Law* 8, no. 1: 191-229. DOI: https://doi.org/10.1093/jielaw/jgi009
63. Whistle Blowers Protection Act, 2014
64. Zeitlin, J., and Vanhercke, B. 2020. "Socializing the European Semester? Economic Governance and Social Policy Coordination in Europe 2020". *Economic Governance and Social Policy Coordination in Europe*, 2014-17. Retrieved from https://www.sieps.se/en/publications/2014/socializing-the-european-semester-economic-governance-and-social-policy-coordination-in-europe-2020-20147/sieps2014_7.pdf