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**EL SALVADOR REPORT**  
**Follow-up on the Lima Agreement.**  
**Citizen Corruption Observatory.**



**Country:** El Salvador – **Local Partner:** FUNDE – **Partner Organization:** CECADE



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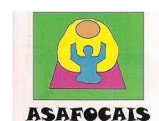
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## Contents

	4
Introduction	2
Participating Organizations	3
Context of El Salvador	6
Progress and challenges to fight corruption	6
Threats or difficulties to the work carried out by Civil Society Organizations	7
Election process	7
Situation of the COVID-19 pandemic	8
Results in El Salvador	9
1. Reinforcement of democratic governance	12
2. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression	14
3. Financing of political organizations and election campaigns	16
4. Prevention of corruption in public works and public procurement and contracting	17
5. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery	18
Conclusions	20
Calls for action and recommendations	21
Actions and recommendations to comply with the Lima Agreement in El Salvador	22
References	26
Appendixes	28
Appendix 1. Evaluation of the Lima Agreement in El Salvador	28
Reinforcement of democratic governance	28
Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression	29
Financing of political organizations and election campaigns	31
Prevention of corruption in public works and public procurement and contracting	31
International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery	32

## Table of contents of charts

Chart 1. Results by topic of the Lima Agreement	10
Chart 2. Results of the commitments regarding the reinforcement of democratic governance	13
Chart 3. Results of the commitments regarding the transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression.	15
Chart 4. Result of the commitment regarding the financing of political organizations and election campaigns.	16
Chart 5. Results of the commitments regarding the prevention of corruption in public works and public procurement and contracting	17
Chart 6. Result of the commitments regarding the international legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery.	19

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## Acronyms and initials

<b>AL:</b>	Asamblea Legislativa [Legislative Assembly, LA]
<b>OCC:</b>	Observatorio Ciudadano de Corrupción [Citizen Corruption Observatory, CCO]
<b>REDLAD:</b>	Red Latinoamericana y del Caribe para la Democracia [Latin American and Caribbean Network for Democracy, LACND]
<b>FCA:</b>	Foro Ciudadano de las Américas [Citizen Forum of the Americas, CFA]
<b>CSO:</b>	Civil Society Organizations
<b>OAS:</b>	Organization of the American States
<b>NGO:</b>	Non-Governmental Organization
<b>CSJ:</b>	Corte Suprema de Justicia [Supreme Court, SC]
<b>SCN:</b>	Sala de lo Constitucional [Room of the Constitutional, RC]
<b>ARENA:</b>	Alianza Republicana Nacionalista [Nationalist Republican Alliance, NRA]
<b>PDC:</b>	Partido Demócrata Cristiano [Christian Democrat Party, CDP]
<b>PCN:</b>	Partido de Conciliación Nacional [National Conciliation Party, NCP]
<b>FMLN:</b>	Frente Farabundo Martí para la Liberación Nacional [Martí Farabundo Front for National Liberation, MFFNL]
<b>GANAU:</b>	Gran Alianza por la Unidad Nacional [Great Alliance for National Unity, GANU]
<b>TEG:</b>	Tribunal de Ética Gubernamental [Court for Government Ethics, CGE]
<b>TSE:</b>	Tribunal Supremo Electoral [Electoral Supreme Court, ESC]
<b>IAIP:</b>	Instituto de Acceso a la Información Pública [Access to Public Information Institute, APII]
<b>CCR:</b>	Corte de Cuentas de la República [Accounting Court of the Republic, ACR]
<b>OAG:</b>	Office of the Attorney General
<b>CICIES:</b>	Comisión Internacional Contra la Impunidad en El Salvador [International Committee against Impunity in El Salvador, ICAIES]
<b>MH:</b>	Ministry of Health
<b>MT:</b>	Ministry of the Treasury
<b>MAL:</b>	Ministry of Agriculture and Livestock
<b>SPTA:</b>	Secretaría de Participación, Transparencia y Anticorrupción [Participation, Transparency and Anti-corruption Secretariat, PTACS]
<b>FNCA</b>	Foro Nacional Ciudadano de las Américas [National Citizen Forum of the Americas, NCFA]

## Introduction

At the VIII Summit of the Americas from the Organization of the American States (OAS), the civil society organizations proposed to create a permanent inter-American forum for the civil society and the social actors, so there is a permanent process of consultations, recommendations and proposals, as well as a permanent compliance of the agreements and commitments of the Summit. Thus, the Civil Society Participation in the Summit of the Americas (PASCA, by its Spanish initials) came up as an opportunity to constitute a permanent forum that promotes dialog and incidence of the different organizations and social actors in the Americas.

The project PASCA facilitates the coordination of civil society efforts in the Americas to achieve a more real action in the formal scenarios of OAS, by forming the Citizen Forum of the Americas (CFA), which is a civil society participation mechanism for the follow-up and recommendations to the commitments and recommendations from the Summit of the Americas, under the supervision and coordination of the Latin American and Caribbean Network for Democracy (REDLAD, by its Spanish initials).

Within the framework of the project PASCA, the Citizen Corruption Observatory (CCO) was created to follow up on the progress of the government actions of the Lima Agreement “Democratic Governance against Corruption”, at the VIII Summit of the Americas that took place in Lima, Peru, in 2018; the observatory will also investigate, document and analyze the effectiveness of the anti-corruption efforts in the region.

Thus, the CCO is made up of a coalition of civil society organizations and social actors of the continent, created to follow up on compliance with the agreements adopted by the governments. The resulting document from the Summit provided an opportunity to endorse and ratify previous international commitments on anti-corruption issues.

The national report has the main purpose of providing a summary of the results and conclusions of the follow-up to the progress and/or compliance of the 2018 Summit commitments in El Salvador, prepared from the follow-up to the Lima Agreement methodology document <sup>1</sup> and the information review done by 9 organizations of the civil society. The entire information gathered in the framework of the follow-up can be seen at the CCO website<sup>2</sup>.

The follow-up methodology to the Lima Agreement allows civil society to assess the progress and/or compliance with 19 commitments prioritized<sup>3</sup> by the CCO for monitoring in each of the countries participating in this observatory. The follow-up is based on the review of developments

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<sup>1</sup> The methodology can be seen at: <https://occ-america.com/metodologia/>

<sup>2</sup> Available at: <https://occ-america.com/>

<sup>3</sup> The 19 commitments were prioritized taking into account the possibility of making a comparative analysis in all of the CCO participating countries.

at both the normative<sup>4</sup> and practical levels made by national governments over the last two years in respect to commitments made in the fight against corruption.

At the normative level, the current law was reviewed, based on 74 guiding questions regarding constitutional, legislative and jurisprudential developments. The analysis of practice consists of the review of concrete measures taken by the government in response to the commitments made. For this purpose, 64 questions were constructed, which were answered through requests for information, interviews, reference to media reports, reports and research on the subject, among others. This information is the basis for evaluating each commitment in terms of effectiveness, efficiency and sustainability<sup>5</sup>.

## Participating Organizations

In El Salvador, the coordination process of CCO with civil society organizations and the National Citizen Forum of the Americas (NCFA) Chapter El Salvador started on November 2020 and was addressed by the National Foundation for Development (NFD), National Chapter of International Transparency. The basis to identify the organizations part of CCO was the previously prepared actors mapping in the context of the Observatory's actions, prioritizing those that are part of CFA Chapter El Salvador.

From such date, the organizations that decided to be part of this effort constantly met, collected information about practice indicators and assessed, from their experience, the compliance with the commitments by the Salvadorean government. The results in this report are product of the collective analysis and reflection the organizations had in this period, and they have been validated by each of them. The organizations part of the CCO are:



**Fundación Nacional para el Desarrollo (FUNDE) [National Foundation for Development, NFD]** is the National Coordinator of CCO El Salvador.

This is a non-profit organization engaged in research, socio-economic policy making, lobbying and promotion of development. The most disadvantaged sectors of the population are their main target. In 2012, it was credited as chapter of International Transparency in El Salvador; and since then, it has vigorously promoted the anti-corruption agenda in the country. Currently, it is part of different coalitions, national and international, that seek democratic strengthening, citizen participation and social auditing of public management.



**Centro de Capacitación y Promoción de la Democracia (CECADE) [Democracy Promotion and Training Center, DPTC]** is the focal point of Latin American and Caribbean Network for Democracy (REDLAD) and coordinator of CFA Chapter El Salvador; it is a civil society organization engaged in

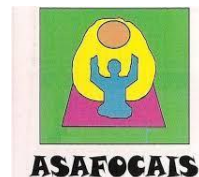
<sup>4</sup> The CCO made a first balance on the policy indicators at a regional level, the document is available at: <https://occ-america.com/2021/07/29/primer-informe-del-observatorio-ciudadano-de-corrupcion-revela-avances-y-retos-normativos-para-la-lucha-anticorrupcion-en-la-region/>

<sup>5</sup> The methodological aspects of this assessment will be presented in more detail further on in the report.

generating citizenship, promoting local actors in the territory towards a sustainable local development, within the framework of strengthening the democratic process. The institution promotes governance, development and decentralization under the premises of sustainability, democracy, citizen participation, gender equity, resilience and local competitiveness. The responsibility of DPTC within CCO is to provide technical support for the preparation, review and validation of the different products foreseen in the project; provide operating support to perform the different activities and give facilities for the organizations to get involved and actively participate.



**Asociación por un Futuro Abierto [Association for an Open Future]** is an organization that seeks to empower citizens in the exercise and defense of human rights, in the acquisition, development and implementation of open government and transparency mechanisms, to support a culture of intervention in public affairs aimed at the country's development. It is viewed as an example organization with respect to human rights, open and transparent government, which is committed to bringing these issues closer to citizens for the transformation of realities. Futuro Abierto is part of CFA Chapter El Salvador and CCO, and it has collaborated in the registration of progresses in the compliance with the Lima Agreement.



**Asociación Salvadoreña para la Formación y Capacitación Integral Sostenible (ASAFOCAIS) [Association for Sustainable Comprehensive Training and Education in El Salvador, ASCTEES]** is a public utility, social interest, apolitical, non-profit and non-religious entity made up by professionals of different areas. It works in different areas such as: sexual and reproductive rights (with advisory status in the OAS), advocacy of children, adolescents and women's human rights, social auditing of public administration, environment and climate change, among others. ASCTEES is member of CCO from the beginning, and it has collaborated in the collection and analysis of information to prepare the national report.



**Fundación Democracia Transparencia Justicia (FDTJ) [Democracy Transparency Justice Foundation, DTJF]** is an organization that focuses its work on three pillars: democracy, transparency and justice to achieve a peaceful coexistence consolidation and better living conditions for Salvadoreans by promoting democratic values, building a culture of legality, and strengthening the Rule of Law. Therefore, training opportunities are provided to strengthen technical capacities for citizen participation and social auditing, using access to information and demanding accountability. Moreover, it collaborates with making public policies proposals and draft laws to strengthen democratic institutional, and respect for human rights. DTJF is member of LACND and is part of CCO since its incorporation in the country, and it helped to collect and analyze information to assess the compliance with the Lima Agreement in the country.



**Jóvenes Iberoamericanos [Ibero-American youth]** is a network of young leaders who seek to promote and empower individual rights and democracy in the Ibero-American region. It responds



to a position that watches over the youth interests within the framework of freedom of expression. Jóvenes Iberoamericanos is part of CFA Chapter El Salvador and became member of CCO in the process, through the collaboration of one of its members in the country, who helped to collect information to prepare the national report.



**Mentees Jóvenes [Young minds]** is an organization formed by group of young people committed to promote social participation of young people; therefore, it develops different actions to share important knowledge, for example: leadership, politics, economics, among others. Mentees Jóvenes is part of CFA Chapter El Salvador and joined the work of CCO in the process, and it helped to collect information about practice indicators to prepare the national report.



**Asociación Transparencia, Contraloría Social y Datos Abiertos (TRACODA) [Transparency, Social Auditing and Open Data Association, TSAODA]** is an association made up by young people with different professions from different areas of the country; the association prepares and executes projects related to strengthening democracy and Rule of Law, respecting human rights, promoting transparency and the right to privacy. Likewise, it seeks citizen auditing through training on technology held by government institutions. It has also started strategic litigation actions intended to ensure that state entities make transparent computer systems and databases under their administration; so, they carry out actions aimed at strengthening oversight institutions. TSAODA is part of CCO since its incorporation in the country, and it collaborates in the assessment of the compliance with the Lima Agreement by the Salvadoran government.



**Verdad a Domicilio [Truth at home]** is an organization made up by young people from Central America, leaders in different areas of civil society. But above all, young people who deeply love their countries, who believe in a better future, in more democratic countries and where truth can be told without fear. The organization develops the program Verdad a Domicilio, an uncensored pod cast about Central American reality. They analyze and propose, they talk about all calamities in our region and about what is being done to progress. And since the reality is overwhelming, they open a space of hope in Central America. Verdad a Domicilio is part of CFA Chapter El Salvador and joined CCO during the incorporation process, and it has helped to collect and analyze information to prepare the national report.

## Context of El Salvador

The Lima Agreement “*Democratic Governance against Corruption*” was signed by the former President of El Salvador, Salvador Sánchez Cerén (2014 – 2019); however, its compliance mainly corresponds to President Nayib Bukele (2019-2024).

### Progress and challenges to fight corruption

Based on the assessment by the organizations of CCO – El Salvador, there are little progress or none regarding fight against corruption. During follow-up, important events have occurred that mark serious setbacks and they cannot be omitted. These are:

1. Termination of the cooperation agreement for the installation and operation of the Comisión Internacional Contra la Impunidad en El Salvador (CICIES) [International Committee against Impunity in El Salvador, ICAIES], signed between the Salvadoran government and the Organization of American States (OAS) (Americanos, 2021)<sup>6</sup>;
2. With majority of representatives in the Legislative Assembly, LA, the governing party along with its allied parties, in a questionable process, removed the Attorney General and the Magistrates of the Room of the Constitutional of the Supreme Court, SC on May 1, who were replaced by officials close to the government, thus affecting the checks and balances, as well as the separation of powers;
3. Harming the independence and autonomy of the Instituto de Acceso a la Información Pública (IAIP) [Access to Public Information Institute, APII], President Bukele appointed commissioners close to his party in this entity, removed from office a commissioner who make him uncomfortable, and modified the Reglamento de la Ley de Acceso a la Información Pública (LAIP) [Regulations of the Law on Access to Public Information, RLAPI] to give more powers to the president of such institution who, today, is pleasant with the government. Moreover, President Bukele promoted reforms to RLAPI in the AL to add more grounds for removal of APII commissioners;
4. To protect officials from possible investigations due to the COVID-19 pandemic, President Bukele, through his health minister, promoted a law in the LA that grants retroactive immunity to his officials;
5. The APII reverted the criteria that allowed revealing the names of all public administration officials, thus affecting nepotism investigations carried out by Civil Society Organizations;
6. Moreover, the Salvadoran government has abandoned international spaces that power citizen participation and transparency, such as Alianza para el Gobierno Abierto (AGA) [Open Government Partnership, OGP ] and Global Initiative for Fiscal Transparency (GIFT), among others.

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<sup>6</sup> With the agreement termination, by an announcement posted on social media on June 7, 2021, the OAS reported serious differences with the Salvadoran government, among them: the approval of a Law that benefits people who have committed possible acts of corruption during the COVID-19 pandemic; the Salvadoran government's decision not to make public the first descriptive report on quality, effectiveness, and legitimacy of the use of public funds in response to the COVID-19 pandemic, which specifies irregularities requiring investigation; the government's obstruction of corruption investigations of the current administration, among others (Organization of American States [OAS], 2021).

7. In general, in the past two years, citizens have had serious difficulties to access public information of their interest; and in the context of the COVID-19 pandemic, much of the information related to public procurement has been stated as discreet.

### Threats or difficulties to the work carried out by Civil Society Organizations

In general, the setback experienced in the country and the growing reports from Civil Society Organizations (CSO) about this have caused that the President of the Republic, officials of the Executive Branch, as well as representatives of the Nuevas Ideas party, and parties close to the government, with a contemptuous and threatening attitude, call these CSOs “front organizations”. In addition, a special commission in the LA was created to investigate if their financing comes from public funds, to discredit their work and reports. In this context, President Bukele qualified some CSO as “internal enemy”, which was enough to instrumentalize public institutions to prosecute organizations, in terms of tax, labor, and crimes, and some of their members. In addition to this, the President has encouraged his followers and some of his officials to harass them on social media to damage their image. In general, the CSOs, part of the CCO in the country, state their fear for the identified setback and some situations that could consider citizen participation a crime.

### Election process

President Bukele won the elections held in February 2019 under the political party Gran Alianza por la Unidad Nacional (GANU) [Great Alliance for National Unity, GANU]. Before being presidential candidate, President Bukele founded the Nuevas Ideas party in 2017. With this, he achieved the qualified majority<sup>7</sup> in the LA for the election of representatives and mayors on February 28, 2021. This allowed him to have the control of Room of the Constitutional of the Supreme Court and the Office of the Attorney General (OAG); although this was done without respecting the processes for removal and appointment of officials of this office. Although it is true that fight against corruption was part of President Bukele's speech, in practice, it has been the opposite. His administration has been characterized by nepotism, refusal to provide information, abuse of the public information discretion, disrespect for autonomy and independence of the oversight institutions, lack of dialogue spaces and citizen participation, and more recently, attack on OCS that fight corruption in the country.

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<sup>7</sup> The qualified majority in the Legislative Assembly was 56 of 84 votes, so he can:

1. Approve loan agreements signed by the Executive Branch;
2. State physical or mental incapacity of the President, Vice president or officials elected by the Legislative Assembly for the exercise of their duties, after the unanimous decision of a commission of five doctors appointed by the Assembly;
3. Elect a President and Magistrates of the Supreme Court (SC), the Attorney General, National Attorney General, Human Rights Ombudsman and Superior Council for the Judiciary, (SCJ);
4. Suspend and restore constitutional rights;
5. Order war or public calamity in case of invasion and order related forced loans; and,
6. Ratify projects banned by the President of the Republic.

## Situation due to the COVID-19 pandemic

El Salvador, as the rest of the region countries, has been affected by the COVID-19 pandemic, and important resources have been allocated for its management. In this context, the pandemic has been the perfect excuse to damage the right to access to public information and control the institution protecting it, the APII. The scenario was similar in 2020. The Government clashed with the Room of the Constitutional (RC), which stated that it violated constitutional rights during the COVID-19 emergency; however, its resolutions were argued by the President and in some cases, he accused the magistrates of being “corrupt” and “taking away their powers” to deal with the pandemic. This situation was the justification of governing party representatives to remove the Magistrates of RC on May 1, 2021.

According to the digital newspaper El Faro, more than half of medical supplies purchases are under investigation for illegal negotiations and there are many irregularities in the purchases made by some government institutions, and several officials were reported in different bodies (Cáceres & Alvarado, 2020). For example, on November 2020, the OAG raided institutions such as the Ministry of Health (MH), Ministry of Finance (MF), and Ministry of Agriculture and Livestock (MAL) in search of information on purchases made for the pandemic management (Cáceres, Fiscalía arranca investigación contra el Gobierno Bukele por los contratos irregulares de la pandemia, 2020). In this context, regarding the funds used during the emergency, it was informed that ICAIEL filed twelve possible corruption cases before the OAG; however, due to the removal of the legitimately elected Attorney General and the appointment of one close to the government, it is expected the cases filed by the commission are not monitored, which cooperation agreement was terminated upon request of the Salvadoran government.

Moreover, the different institutions have stated discretion on information related to the COVID-19 pandemic management. For example, MH has stated information on plan and statistics of management, purchase of vaccines and vaccination plans, purchase of medication and medical supplies as discrete, and this affects citizen auditing. Not even the supervisory institutions such as the Accounting Court of the Republic (ACR) have had access to this information (Oliva, Olivares, Benítez, & Pacas, 2021). However, despite obstructions, the OCS and media have been in charge of auditing and filing reports during the pandemic, and they have constantly demanded more presence of the supervisory and auditing institutions.

## Results in El Salvador

As a result of the VIII Summit of the Americas, a process in which the CFA had an active participation, the countries of the region signed the *Lima Agreement*, entitled "*Democratic Governance against Corruption*", in which 57 commitments were made, in order for member states to implement concrete actions to build citizen's trust in institutions and reduce the negative impact of corruption on the effective enjoyment of human rights and sustainable development of the peoples of the American hemisphere.

For the follow-up, four criteria were taken into account to select the commitments: they should be representative, to analyze the anti-corruption actions in the region countries; they should be sustainable actions with the possibility of institutionalize them; they should include new approaches in the anti-corruption actions; and they should include the perspective of people in vulnerable condition. As a result, 19 commitments were selected, classified in 5 specific topics:

- A. Reinforcement of Democratic Governance,
- B. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression,
- C. Financing of political organizations and election campaigns,
- D. Prevention of corruption in public works and public procurement and contracting,
- E. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery.

These commitments were analyzed by identifying regulatory and practical developments which were rated on a scale<sup>8</sup> of 0 to 3, taking into account the following follow-up criteria:

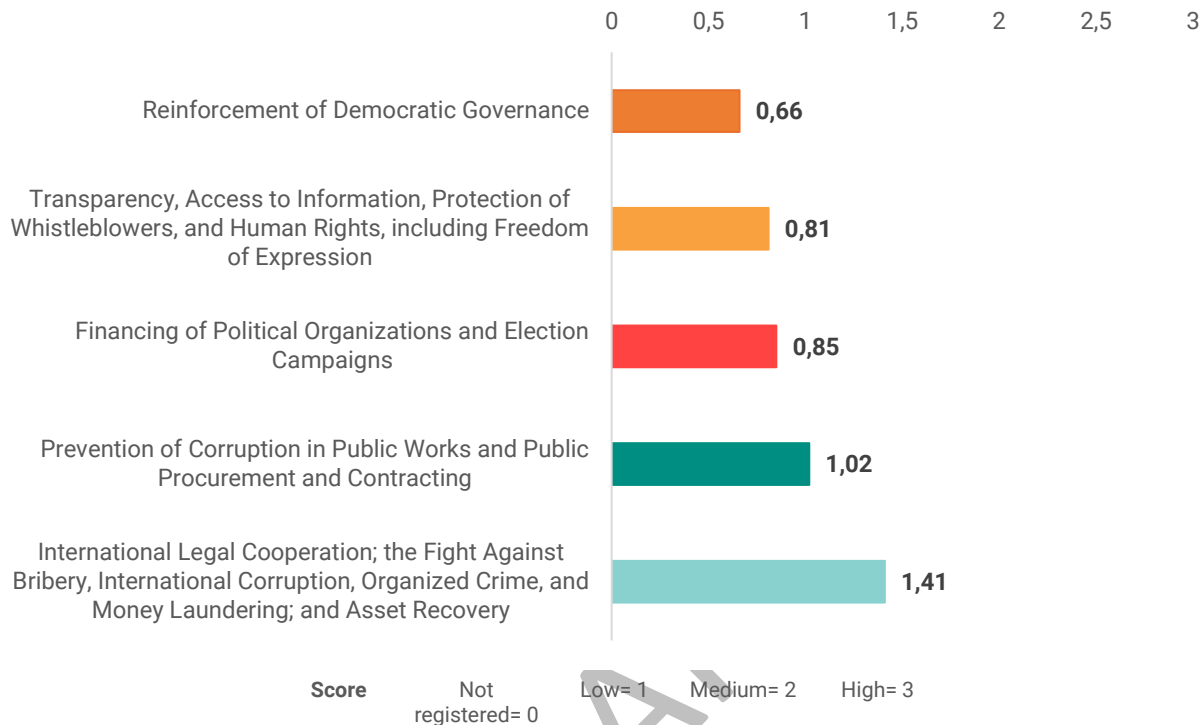
- **Effectiveness**, establishes to what extent the actions developed by the government as a result of the Lima Agreement contribute to the fight against corruption in the country.
- **Relevance**, establishes to what extent the actions developed by the government are timely, convenient and adequate according to the economic, institutional and/or social context of the country.
- **Sustainability**, determines to what extent the actions carried out to fulfill the commitment will have continuity over time.

Chart 1 presents the general results for El Salvador in the five topics the commitments are classified into.

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<sup>8</sup> Rated on a scale of 0 to 3: 0=no records, 1=low, 2=medium and 3=high

Chart 1<sup>9</sup>. Results by topic of the Lima Agreement



Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

## 1. Reinforcement of democratic governance

In topic 1 of the Lima Agreement, the CCO monitors 6 commitments. Supervision of aspects such as legal autonomy and independence, gender equity and equality in anti-corruption policies, inclusion of vulnerable groups in anti-corruption measures, transparency and equal opportunities in hiring public servants, prevention of conflict of interest, and promotion of codes of conduct for public servants. Compliance involves central government institutions, the Judiciary, LA and other high-level auditing institutions. In general, the OCS assesses compliance with these 6 commitments with a score of 0.66/3.0<sup>10</sup>, which indicates that the government and the rest of institutions have done little or nothing to comply with these in a 3-year period as from their subscription. Aspects like those occurred on May 1, like the removal of Magistrates of the RC and the Attorney General or the elimination of some inclusion policies from previous administrations contribute to this assessment.

<sup>9</sup> The colors of the charts herein account for the color designation given to each of the topics for the the CCO and do not have a correspondence to a numeric scale.

<sup>10</sup>A score close to 0 states no actions were identified to comply with the commitment, and a score close to 3 states that important and sustained efforts have been identified to comply with them.

## **2. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression**

In topic 2 of the Lima Agreement, the CCO monitors 7 commitments. Supervision of aspects related to the open government, strengthening the autonomy and independence of the high-level oversight bodies, strengthening the APII, classification of corruption cases in accordance with international conventions signed by the country, and protection of whistle-blowers of corruption, among others. The organizations, part of the CCO in El Salvador, scored compliance with the commitments in this topic with a 0.81/3.0. In general, this score shows that the government and its institutions, as well as the high-level oversight bodies, have not made sufficient efforts to comply with the commitments of this topic, so there is a significant deficit in the fight against corruption. Loss of independence of APII and setbacks in the exercise of the right to access to public information contribute to this assessment.

## **3. Financing of political organizations and election campaigns**

Topic 3 of the Lima Agreement refers to the financing of political organizations and election campaigns, one commitment. Political parties, ACR, Electoral Supreme Court (ESC), private sectors, among others, intervene in its compliance. The OCS scored this topic with a 0.85/3.0. In general, the follow-up shows that political organizations, despite the existence of regulatory frameworks that oblige them to make their financing transparent, have a serious deficit, particularly with regard to disclosing their sources of financing and accountability; furthermore, that auditing institutions do not make sufficient actions to control the parties to guarantee compliance with commitment 25.

## **4. Prevention of corruption in public works and public procurement and contracting**

In topic 4 of the Lima Agreement, the CCO monitors 3 commitments related to electronic public procurement systems, inclusion of anti-corruption clauses in contracts with the State, and implementation of measures to reduce bureaucracy and administrative processes, among others. The OCS scored the Salvadoran government's compliance with this topic with a 1.02/3.0.

In general, there is little progress in the compliance with these 3 commitments. This is evidenced by important setbacks in some cases worsened by the COVID-19 pandemic in which information related to purchases of medical supplies has not been included into electronic procurement systems or has been eliminated from these. However, there are some improvements related to the reduction of administrative processes and the approval of some regulatory frameworks. Nevertheless, lack of information has been an obstacle for OCS to do an effective social auditing to public procurement process.

## **5. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery**

In topic 5 of the Lima Agreement, the CCO only monitors 2 commitments related to the promotion of cooperation between the authorities in investigations and procedures related to corruption offenses, money laundering, passive bribery and transnational active bribery; and the promotion or strengthening of measures to allow seizure, asset forfeiture and confiscation of proceeds of corruption. The police, OAG, APII, ACR and the Judiciary, among others, intervene in the compliance.

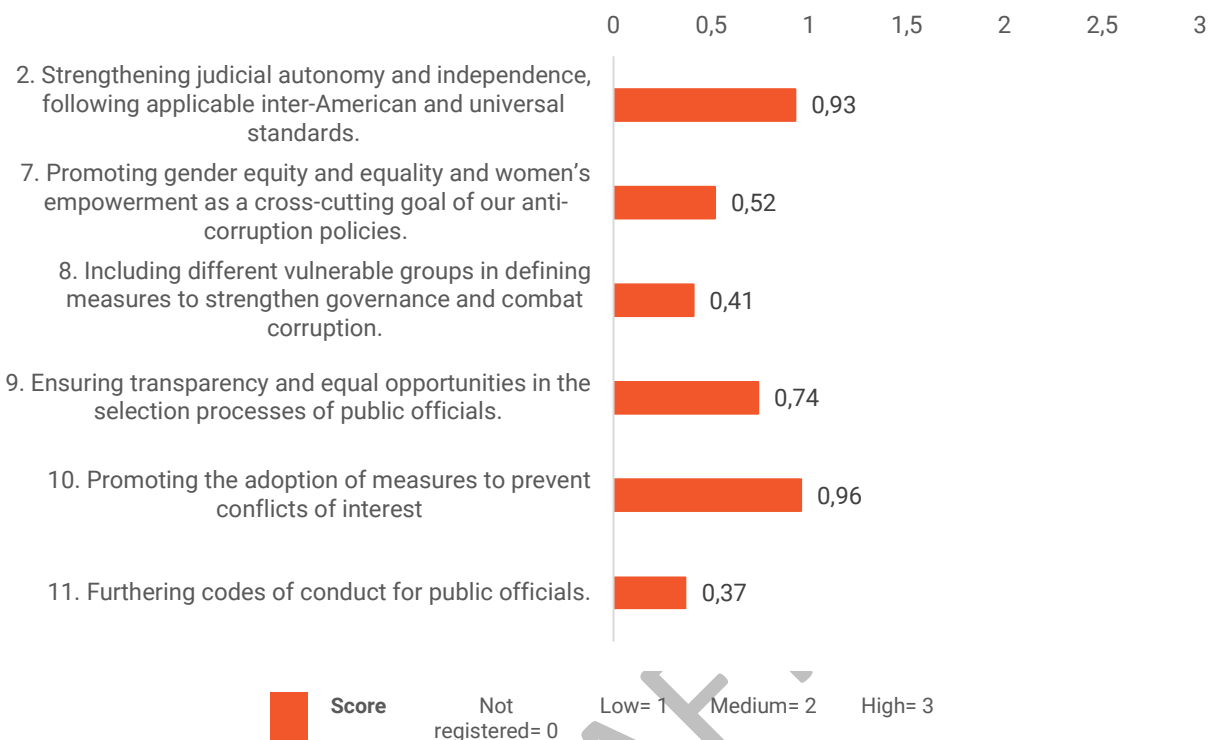
The OCS scored the compliance with this topic with a 1.41/3.0. Out of the 5 topics of the Lima Agreement, this was the best scored. The follow-up shows a progress in legal cooperation between authorities; however, despite the regulatory frameworks setting the competencies of each institution and the collaboration between them, there is still a long way to go to progress effectively in the investigations. In addition, there is some progress in the creation and application of measures for the seizure, asset forfeiture and confiscation of proceeds. Process for assets forfeiture against former Presidents of the Republic, representatives and mayors contribute to this assessment.

### **1. Reinforcement of democratic governance**

When reviewing compliance with the commitments of topic 1, the existence of some regulations stands out, many of them before signing the commitment. However, the existence of certain regulations does not guarantee the compliance with the Lima Agreement if not applied properly. For example, the Constitution of the Republic and other regulatory frameworks set the legal autonomy and independence, procedures for selection, appointment, and removal of judges and magistrates; however, an LA controlled by the governing party can ignore these regulations, as on May 1, 2021 when they removed Magistrates from the Supreme Court and the Attorney General from their positions. In chart 2, see scores for each of the 6 commitments of this topic.



**Chart 2. Results of the commitments regarding the reinforcement of democratic governance**



Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

The best scored commitment of this topic is No. 10 with 0.96/3.0. This is due to the existence of regulations for the statement of assets of officials and statement of income in general, despite it is clear that there are no major progress with its compliance. Currently, in the country, there is no specific regulation to prevent conflict of interest; and, despite having one that regulates the filing of statement of assets, it lacks enforceability, so many officials choose to ignore it. For example, a study of statements of assets of public officials sets forth that *"within the Executive Branch, from 2018 to 2024, 51 statements of assets for taking office have not been filed"* (Citizen Observatory to the Office of the Attorney General, 2019, p. 26)

On the other hand, the worst scored commitment is No. 11, with 0.37/3.0. With respect to this, it was identified that in the previous administration, some institutions created Codes of Ethics and/or Integrity on their own, but practice did not reach the public sector. However, the government is taking no actions to promote the use of this tool in the private sector, where some companies have it due to their own initiative and others due to international regulations such as the Foreign Corrupt Practices Act of the United States, and the UK Anti-Bribery Act.

For, Giovanni Fuentes, National Coordinator of CCO, follow-up to compliance with the Lima Agreement has evidenced little interest and willingness by the government to progress with its compliance. He says *"the removal of Magistrates from the Supreme Court and the Office of the Attorney General is a blow to legal autonomy and independence, to the separation of powers and*

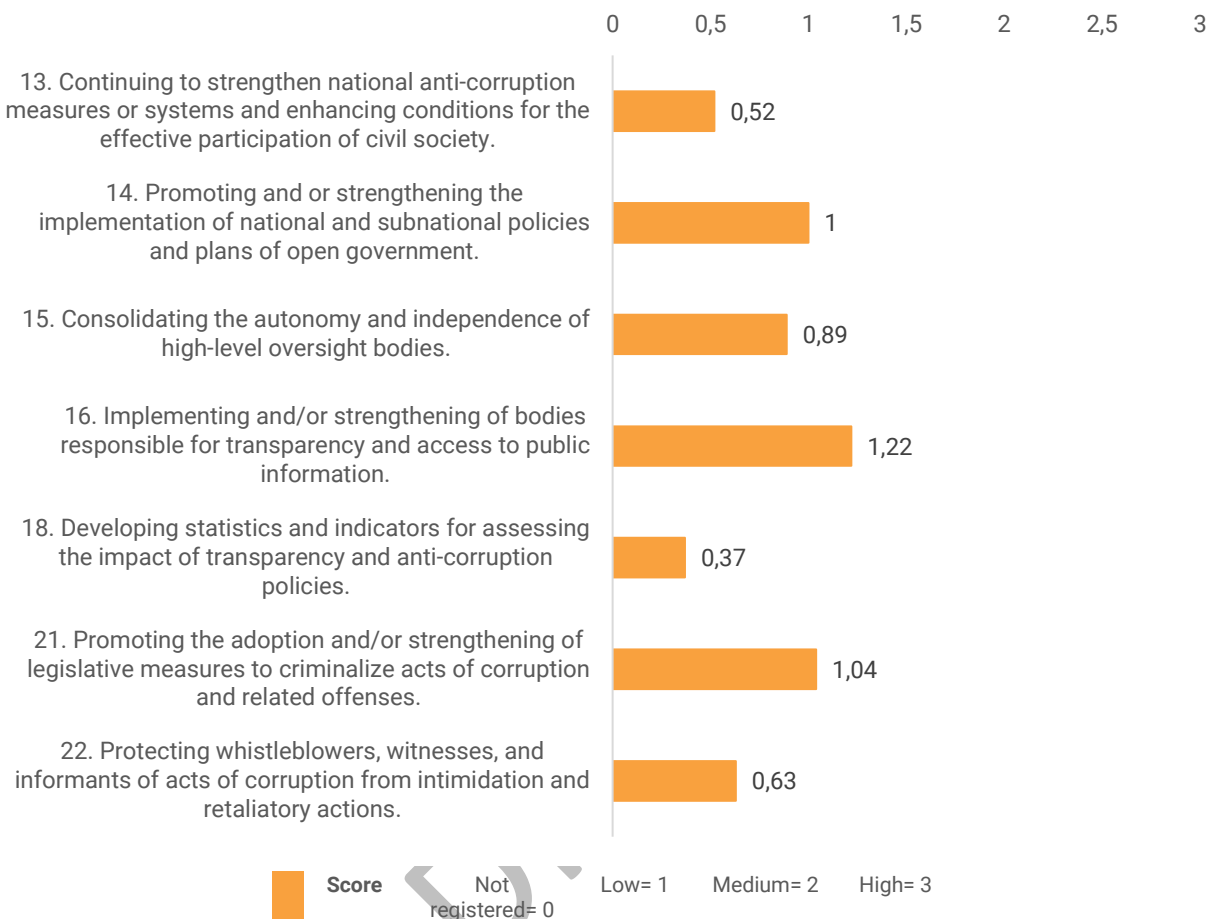
to the checks and balances. Moreover, recent reports state there is a significant number of officials who have not filed their statements of assets. These actions are unfavorable for the compliance with the commitments and, therefore, compliance is far away.”

Xenia Hernández Castro, CEO of Fundación DTJ, agrees with Giovanni Fuentes and she adds: *“The Coup d'état on May 1 contributes to El Salvador experiencing one of its worst moments in history related to democratic governance; strengthening this area not only means that popularly-elected officials have broad and democratic support, but, mainly, is that when they take office, they govern democratically. The concentration of power gathered by President Bukele is aimed at the destruction of democracy, Rule of Law and separation of powers, and, if the reforms to 215 articles of the Salvadoran Constitution are approved, it implies the establishment of a new Constitution of the Republic that favors the current government. As a result, there will be serious setbacks to the small progresses that had been difficult to achieve in decades. This causes serious setbacks to the State in good governance, making it impossible to adopt public policies to favor transparency and fight against corruption, which clearly affects even more the population's quality of life.”*

## 2. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression

When reviewing compliance with the commitments of topic 2, the existence of different regulations that could contribute to their compliance stands out. However, in practice, there is a significant setback related to transparency and access to public information, particularly in the context of the COVID-19 pandemic management. For example, a report of the Alianza Regional por la Libre Expresión e Información [Regional Alliance for the Freedom of Speech and Information], about the COVID-19 pandemic, on the right to access to public information in the region, sets forth that in the middle of a national emergency and exceptional regime in the country *“(...) all procedures of the Instituto de Acceso a la Información Pública (APII) were suspended, as well as the administrative processes of requests for information to the units of access to public information” (Alianza Regional por la Libre Expresión e Información [Regional Alliance for the Freedom of Speech and Information], 2020, p. 29)*

**Chart 3. Results of the commitments regarding the transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression**



Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

In Chart 3, it can be seen that, out of the 7 commitments, the one with the best scored was No. 16, with a 1.22/3.0. This states that there are regulations in the country on this matter, but measures implemented in the period show a halt and a setback in the exercise of this right. Thus, for the Report: *Is the Instituto de Acceso a la Información Pública in favor of the citizen? of Acción Ciudadana “2021 shows a drastic decrease of work by APII. This has caused a delay in cases to be solved and it also shows a halt in resolutions in favor of citizens (Observatorio para el Fortalecimiento Institucional, 2021, p. 16)*

Similarly, according to Gato Encerrado magazine, President Bukele appointed as commissioner of APII a former candidate to representative from his party. This affects the autonomy and independence of this entity (Benítez, 2020). These and other situations during the period caused that APII gradually loses public trust, and therefore this commitment is rated with such score.

On the other hand, the worst scored commitment was No. 18, with 0.37/3.0. This evidences that there is no progress in the country after three years of signing the Lima Agreement. To date, there is no statistics system that can measure and assess the anti-corruption measures implemented

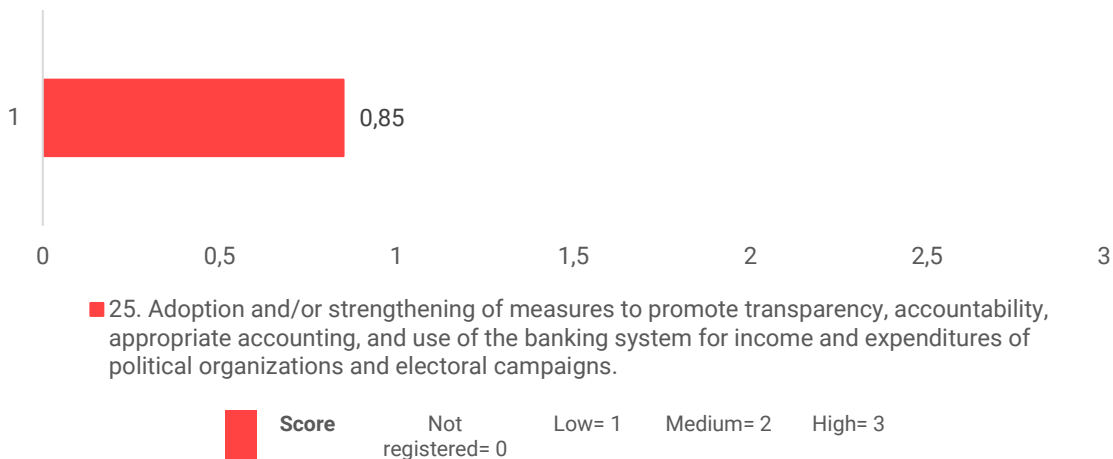
in the past years. In the previous administration, the Participation, Transparency and Anti-corruption Secretariat (PTAS) produced less information about the number of requests for information made to the Executive Branch and their response time coincided with accountability events, although incomplete, held by the institutions. Now, this is unknown data and there are no accountability events because the first decision of President Bukele when taking office was to eliminate PTAS.

On this matter, Nicolás E. Noyola, from the Democracy Promotion and Training Center (DPTC) states that *“in general, there is little progress in the compliance with the commitments of this matter that, for the most part, correspond to the government and its institutions. Unfortunately, there is no commitment to strengthen anti-corruption measures, oversight bodies, transparency and access to public information. It is worrying that in the past days the autonomy of APlI is being affected and there is an attempt to eliminate the Law on Access to Public Information with the reforms under study by the Legislative Assembly.”*

### 3. Financing of political organizations and election campaigns

In this topic, commitment 25 was scored with 0.85/3.0. Currently, this evidences that political parties and supervisory entities had not done enough to comply with it.

Chart 4. Result of the commitment regarding the financing of political organizations and election campaigns



Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

In El Salvador, political parties had a deficit in regard to transparency about their financing, access to information and accountability. The little information known about the financing of political parties is due to the work of several OCSs that systematically perform social auditing on this matter. Thus, for example, the Report on Financing of Presidential Elections 2019 states that in 2019, financing of political parties was above \$24.6M; 51% is public financing and 49% is private financing. (Center for Monitoring Transparency and Democracy of Citizen Action, 2021, p. 43)

Likewise, the role played by control bodies such as ACR and SCE to supervise financing (public and private) has been weak. According to the above-mentioned report, when analyzing “control over financing of political parties performed by the SCE, the same weakness is observed in supervision, warned since 2016, since no financing auditing is performed” (Center for Monitoring Transparency and Democracy of Citizen Action, 2021, p. 31) With respect to role of ACR, the report states “(...) After several rescheduling, in 2019 it carried out the respective special assessments on political debt of 2014 to parties ARENA, PDC, PCN, FMLN, GANA. The ones from 2015, 2018, 2019 are still pending.”(Center for Monitoring Transparency and Democracy of Citizen Action, 2021, p. 33)

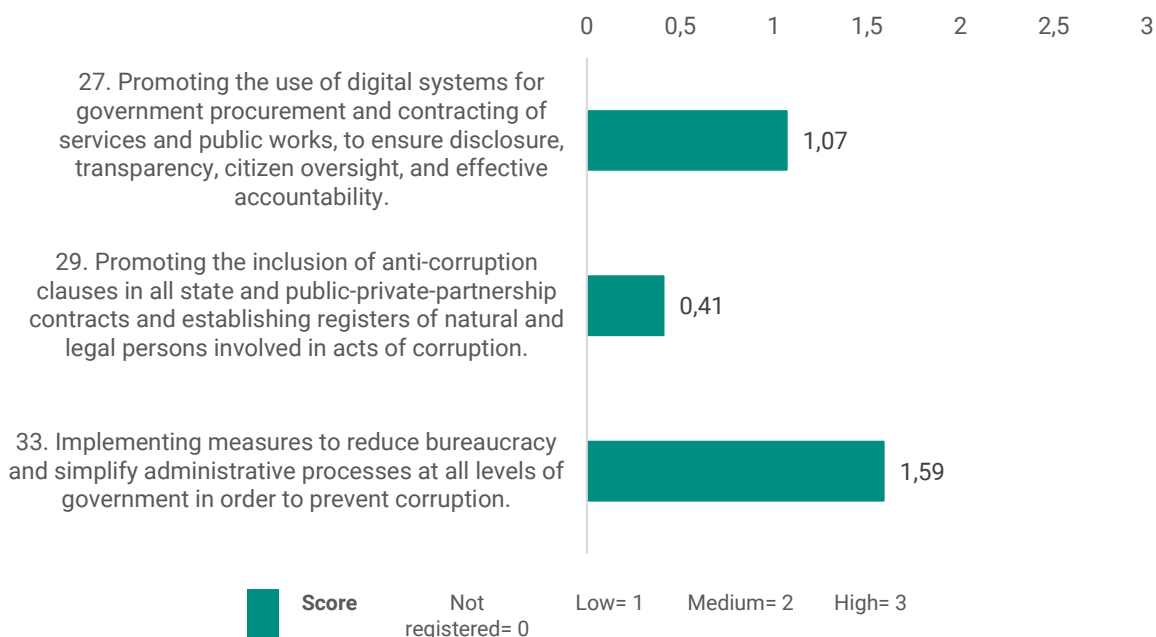
José Alexander Arévalo Carvajal, former Vice president of the organizations Jóvenes Iberoamericanos, says about financing of election campaigns “everything is still the same and there is no significant progress in the compliance with this commitment. In addition, there are no reforms on laws aimed at improving transparency and accountability of political parties.”

So, despite having different regulatory framework that regulate financing and promote transparency and accountability of political parties, as well as the supervision of financing, there is little progress on this matter, and therefore, the Lima Agreement has not been complied.

#### 4. Prevention of corruption in public works and public procurement and contracting

In topic 4, made up by 3 commitments, there is some progress, particularly related to reduce bureaucracy and simplify administrative processes. With respect to this, some regulation was identified, as well as other institutions recently created; however, these are not enough to state they are on the way to comply with them. In chart 5, see scores of these commitments.

**Chart 5. Results of the commitments regarding the prevention of corruption in public works and public procurement and contracting**



Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

Commitment 33 is the best scored, with 1.59/3.0. This is due to the approval of some regulatory framework in the past years to reduce some administrative processes to get a service. For example: Law on Regulatory Enhancement and Law on Administrative Proceedings, thus helping to prevent corruption. Another important element is the introduction of technology in administrative processes and follow-up of requests for services in the public administration. On this matter, there is a significant progress in this area, although it is not enough.

However, commitment 29 has the lowest score, 0.41/3.0. This states that there are little progresses in the country to comply with this. In general, contracts with the Government do not have anti-corruption clauses and, on the contrary, the approval of the recent law on use of products for medical treatments in extraordinary situations of public health caused by the Covid-19 pandemic, in section 4 grants immunity to official and suppliers, and in section 8, facilitates direct purchase, dismissing Law on Procurement and Contracting of Public Administration, making unnecessary the inclusion of these clauses, besides promoting the provision of goods and services of poor quality covered by this law (Official Gazette of the Republic of El Salvador in Central America, 2021, p 6-11).

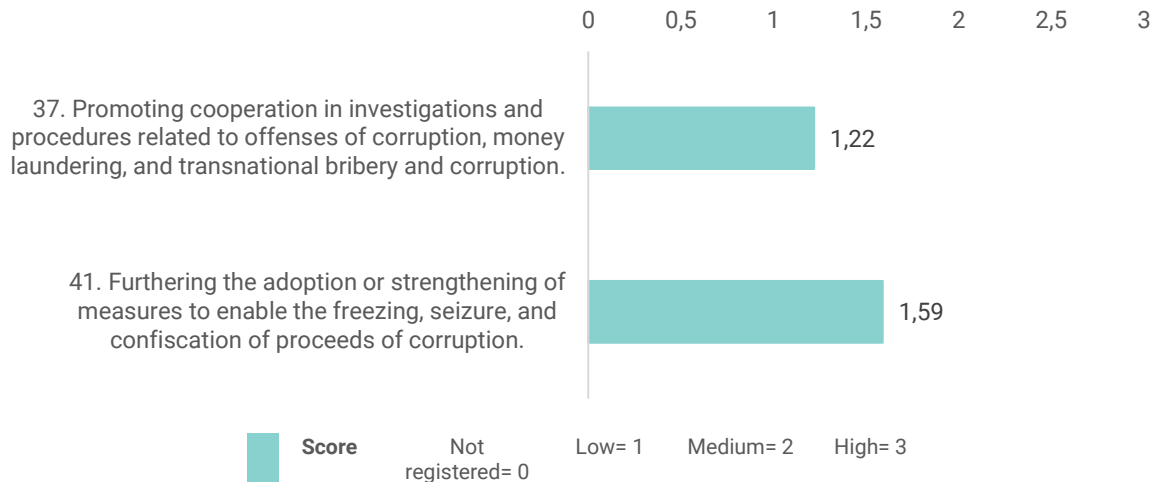
On this matter, Virna Alejandra Rivera Chacón, President of the organization Mentas Jóvenes, says that with respect to compliance with commitment No. 27 *“despite there is a Law on Procurement and Contracting of Public Administration, in the past years, the public procurement has not been transparent with the current government.” There is a halt caused by the current government and there are no progresses in the compliance with this commitment.*”

Moreover, Mirian G. Pineda Romero, member of Transparency, Social Auditing and Open Data Association, said about this commitment that *“there are no significant progresses on the compliance with this commitment. Also, during the Covid-19 pandemic, there is a setback in supervision and control on contracting and public procurement.”*

## 5. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery

Topic 5 of the Lima Agreement includes 2 commitments and, in general, there are significant progresses. Particularly, there are progresses related to asset forfeiture and confiscation of proceeds of corruption; however, these processes have taken a long time for its materialization, so, known cases in which both processes have been applied are not recent, but began some years ago. In chart 6, see scores for each commitment.

**Chart 6. Result of the commitments regarding the international legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery.**



Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

Commitment 41 is the best scored, with 1.59/3.0. This score states that there are progresses for its compliance, and this is largely due to existence of regulatory framework and bodies like special courts and Investigation Units in the OAG. Once process has started and with solid evidence, these kinds of measures can be applied. According to the working report of OAG 2019 - 2020, from May 2019 to June 2020, in asset forfeiture processes, a total of 290 properties were seized (money, real estate, productive assets, vehicles), for an amount above \$8.1M (Office of the Attorney General [OAG], 2020, p. 88) Although there are some progresses, there is a long way to go to fully comply with this commitment.

On the other hand, commitment is No. 37 is scored with 1.22/3.0. This indicates that there are progresses since the current regulation sets forth the cooperation between different institutions (ACR, OAG, Police, among others) to improve effectiveness of investigations in general. However, there is a long way to go to comply with this commitment. In some cases, there have been some situations in which institutions started the processes when cases were about to expire; this affects quality of investigation that allows to support the case the best way possible in courts.

Regarding this, Eva María López, President of Asociación Futuro Abierto, in relation to compliance with these commitments, says that *“there are some significant progresses for the compliance with these commitments.”* *There are cases in which preventive seizure, asset forfeiture and confiscation of proceeds have been applied. Likewise, there are intersectoral anti-corruption work efforts such as the Grupo de Trabajo Interinstitucional Anticorrupción (GTIAC) [Anti-corruption Inter-Institutional Working Group, AIWG].”*

## Conclusions

The Lima Agreement was a vital opportunity to affirm the international commitments previously taken by El Salvador, as well as to identify favorable scenarios for the discussion, preparation and implementation of anti-corruption measures in the country; it is worth mentioning that in the last 10 years, an important progress regarding the fight against corruption was made, which has led to the creation of an emerging and young institutional framework in the subject.

Most of this progress was done previous to the signing of the Lima Agreement by the government of El Salvador, meaning that certain regulations were already in place, for example: Law on Illicit Enrichment of Public Officers and Servants, Special Law on Asset Forfeiture and on Administration of assets from an illicit origin or destination, Anti-money and Asset Laundering Law, Law on Access to Public Information, and the classification of the corruption offenses in the Criminal Code; furthermore, control institutions had been created, such as the Court for Government Ethics (CGE) and the APII, as well as the creation of special courts for the asset forfeiture, and the creation of the Anti-corruption Inter-Institutional Working Group (ACI IWG), among others, to fight corruption.

However, after the signing of the Lima Agreement and with the change of government in 2019, **a setback has been perceived regarding fight against corruption**. Out of the 19 commitments the CCO analyzed, those whose compliance pertains the central government and its institutions are the ones that show less progress or are stuck. Thus, for example: the commitment 11 regarding the promotion of codes of conduct for public officials; the commitment 8 regarding the development of statistics and indicators for assessing the impact of transparency and anti-corruption policies; the commitment 8 regarding the inclusion of different vulnerable groups in defining measures to strengthen governance and fight corruption; and commitment 29 regarding the inclusion of anti-corruption clauses in all state contracts, are the the ones with the lowest levels of compliance according to research done by the organizations that make up the CCO. More recently, measures such as completion of the cooperation agreement for the operation of the International Committee against Impunity in El Salvador, removal of Magistrates of SC and the Attorney General, as well as interference in the operation of APII, are unfavorable to fight corruption and they affect compliance with the Lima Agreement.

However, **there is progress in some commitments**; their compliance is in charge of other institutions, or they involve the coordination among them for the investigation and punishment of corruption. For example, commitment 33, related to reduce bureaucracy and simplify administrative processes; and commitment 41, related to strengthening measures to allow seizure, asset forfeiture and confiscation of proceeds from corruption, are the best scored. Certainly, actions towards improving services provided to the population and simplifying administrative processes, as well as actions to apply asset forfeiture and asset recovery, deserve to be continued and thus improving level of compliance with these commitments.



## Calls for action and recommendations

Based on the follow-up of compliance with the Commitments of the Lima Summit by the Salvadoran government, CCO calls for actions and recommendations. See more details in Appendix No. 2.

- The government, through their respective institutions, is urged to work on generating a statistics system that allows measuring the impact of anti-corruption measures; promoting inclusion of vulnerable groups in anti-corruption policies; promoting the creation codes of conduct in all public institutions and coordinate with the public sector for their inclusion; including anti-corruption clauses in contracts with the State, generating actions to empower women in anti-corruption policies; promoting the coordination between the civil society, academy and observatories for public administration follow-up; and progressing in the installation of an open and electronic government. Thus, progress will be made in compliance with the commitments of their competence; and to date, little or no progress have been made.
- The Legislative Assembly is urged to pass a law regulating conflicts of interest of public officials to fight corruption, and the compliance with the commitment.
- Auditing institutions (ACR, OAG, IAIO and CGE) are recommended to promote actions for prevention, investigation and punishment of corruption, focusing on topics within their competence. This will contribute to improve levels of compliance with the Lima Agreement. However, it is necessary that those in charge of these institutions act with independence and autonomy so fight against corruption is effective.
- The full session of commissioners of APII is urged to work on promoting and strengthening independence and autonomy of the institution; promoting active transparency in public administration; and working for information discretion in institutions is the exception.
- ACR and SCE are urged to promote, supervise and punish lack of transparency and accountability on financing of election campaigns.

CCO - El Salvador will continue monitoring compliance with these commitments in the coming years. The results herein must be considered a baseline for future revisions.

## Actions and recommendations to comply with the Lima Agreement in El Salvador

Topic 1. Reinforcement of democratic governance	
Action	Recommendations
Strengthening autonomy and legal independence	To strengthen transparency and citizen auditing in the election processes of second grade officials, guaranteeing suitability, capacity and independence of those elected.
	To respect the procedures set forth for the separation and removal of officials from the Judiciary, guaranteeing due diligence, right to inputs and advocacy of people involved.
	To strengthen the Rule of Law and separation of powers by complying with orders from the Courts of Justice, including those issued by the Room of the Constitutional and other regional bodies.
	To promote statement and publication of conflict of interest of judges and magistrates within the Judiciary, as a measure to strengthen transparency in this sector.
To promote gender equity and equality in anti-corruption policies.	To make, with the participation of organizations of civil society with experience on this field, a policy that promotes gender equity and equality in the making and implementation of anti-corruption policies. An action that could be delegated to the Salvadoran Institute for the Development of Women and the Legal Secretariat of the Presidency of the Republic.
	When making a policy or regulation to fight against corruption, gender equity and equality must be included and must be validated in consultation with organizations with expertise on this matter.
To include vulnerable groups in measures to fight corruption	To promote, on national, department and local scale, the participation of vulnerable groups in anti-corruption measures made by the central government. In this action, regional Governments and department offices of the different public institutions could play an important leading role.
To strengthen transparency and meritocracy when hiring public servants.	To harmonize the different regulations governing entry into the public administration, approving a public service law that guarantees the acquired rights of workers and promotes meritocracy in hiring, as well as constant training and evaluation of workers.

To promote regulation of conflict of interest in public administration	To draft and approve a law regulating conflict of interest of officials, such a measure that along with statement of assets and income contribute to prevent corruption.
	To give the necessary resources to Probity Section of the Supreme Court to expedite procedures for reception and audit of statements of assets of officials and former officials.
	To create a portal allowing to know, per institution, what employees have complied with filing their respective statements.
Adoption of codes of conduct in public administration.	To prepare framework codes so all institutions of the Executive Branch prepare and apply the code of conduct regulation the performance of public servants.
	To coordinate actions with the private sector and chambers of commerce for the adoption of codes of conduct for private employees, that contribute to prevent corruption related to public administration.

Source: Prepared by the authors based on follow-up of compliance with the Lima Agreement in El Salvador.

Topic 2. Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression	
Action	Recommendations
To strengthen national anti-corruption measures and improve conditions for the effective participation of civil society, academy and other actors.	To encourage participation of civil society, universities, citizen observatories and other structures to follow-up government management, strengthening the exercise of citizen auditing.
	To create, in all institutions of the Executive Branch, effective channels to report cases of corruption. Initiatives that can be replicated in municipalities.
To strengthen government participation in regional initiatives that promote an open and electronic government.	To resume government participation in initiatives such as the Open Government Partnership and the Global Initiative for Fiscal Transparency that promote transparency and citizen participation in public administration; in this, the Open Government Observatory, created during the previous administration, could be reactivated.

To strengthen autonomy of oversight bodies.	To strengthen transparency and due diligence in election processes of officials for oversight institutions (Accounting Court of the Republic, Access to Public Information Institute, Office of the Attorney General and Court for Government Ethics), choosing the best qualified candidates to exercise duties and guaranteeing they are not related to existing political parties.
To strengthen transparency bodies and access to public information.	To strengthen independence and autonomy of the Access to Public Information Institute, by guaranteeing that its commissioners are elected in transparent and participative processes, and that they do not respond to the interests of political parties.
	To strengthen the implementation of the Law on Access to Public Information, by avoiding reforms that obstruct exercise of this right and that encourage opacity in public administration.  To encourage the use of web site to post official information in all public institutions and guarantee that discretion of information is made complying with provisions set forth in the Law on Access to Public Information.
To promote the preparation of national statistics about the impact of anti-corruption policies.	To create a statistics system that allows knowing and assessing the impact of the application of anti-corruption policies being implemented. Different oversight institutions (Accounting Court of the Republic, Access to Public Information Institute, Office of the Attorney General and Court for Government Ethics) can participate in the creation and feeding of this system.
To guarantee protection of whistle-blowers of corruption.	To encourage the approval of a special law that protects victims, witnesses and whistle-blowers of corruption.

Source: Prepared by the authors based on follow-up of compliance with the Lima Agreement in El Salvador.

<b>Topic 3. Financing of political organizations and election campaigns</b>	
<b>Action</b>	<b>Recommendations</b>
To strengthen the accountability system of campaigns and political parties.	The Accounting Court of the Republic and the Electoral Supreme Court must permanently supervise the operation of political parties to avoid that money from drug trafficking and organized crime is used in elections campaigns.
	Political parties must encourage transparency and accountability on the financing of their campaigns. Likewise, they must allow that citizens oversight their administration.
	Political parties can use websites to provide information about their management and thus contribute to transparency in financing election campaigns.

Source: Prepared by the authors based on follow-up of compliance with the Lima Agreement in El Salvador.

<b>Topic 4. Prevention of corruption in public works and public procurement and contracting</b>	
<b>Action</b>	<b>Recommendations</b>
Encourage the use of the electronic system for procurement in all public institutions, including municipalities.	<p>To promote use of the electronic system for procurement in all public institutions, and this is properly updated, so citizens can do a social auditing through this mechanism, and reduce areas for corruption.</p> <p>To keep updated the registry of suppliers that have been punished for not complying with agreements. This information allows communicating to the citizens that the institutions are committed to make a good use of resources.</p>
Inclusion of anti-corruption clauses in all agreements with the State.	To promote inclusion of anti-corruption clauses in all agreements with the State. These agreements can be signed in public events, so citizens can be informed about their general statements and the companies are encouraged to not commit illegal actions.

Source: Prepared by the authors based on follow-up of compliance with the Lima Agreement in El Salvador.

<b>Topic 5. International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery</b>	
<b>Action</b>	<b>Recommendations</b>
To promote cooperation between legal authorities, police, prosecutors' offices, financial intelligence units and administrative authorities.	To continue with measures that allow the cooperation between institutions to prevent, investigate and punish corruption offenses. If necessary, promote reforms to current legislation for institutions to have a better cooperation and coordination.
To promote measures that enable seizure, asset forfeiture and confiscation of proceeds of corruption.	To continue the actions that allow the State to apply forfeiture of assets from illegal activities, particularly from corruption.
	<p>To facilitate information to citizens about an extinguished property and their use.</p> <p>To promote that the Consejo Nacional de Administración de Bienes [National Council for Property Administration] has a website that provides information to citizens about properties under its administration and custody.</p>

Source: Prepared by the authors based on follow-up of compliance with the Lima Agreement in El Salvador.

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## Appendixes

### Appendix 1. Evaluation of the Lima Agreement in El Salvador

#### Reinforcement of democratic governance

**Table 1. Follow-up criteria of commitments regarding the reinforcement of democratic governance**

Commitment	Relevance	Effectiveness	Sustainability	Country average
Commitment 2. Strengthening judicial autonomy and independence, following applicable inter-American and universal standards on this matter, to promote respect for the rule of law and access to justice as well as to promote and encourage policies of integrity and transparency in the judicial system.	1.00	0.89	0.89	0.93
Commitment 7. Promoting gender equity and equality and women's empowerment as a cross-cutting goal of our anti-corruption policies, through a task force on women's leadership and empowerment that will actively promote cooperation among inter-American institutions and synergies with other international agencies.	0.67	0.56	0.33	0.52
Commitment 8. Including different vulnerable groups in defining measures to strengthen governance and combat corruption, recognizing the serious impact it has on these populations.	0.44	0.44	0.33	0.41
Commitment 9. Ensuring transparency and equal opportunities in the selection processes of public officials based on objective criteria such as merit, fairness, and aptitude.	0.89	0.67	0.67	0.74
Commitment 10. Promoting the adoption of measures to prevent conflicts of interest, as well as the public filing of financial disclosure statements by public officials, as appropriate.	1.33	0.89	0.67	0.96



Commitment 11. Furthering codes of conduct for public officials that contain high standards of ethics, honesty, integrity, and transparency, using as a point of reference the “Guidelines for the Management of Policies for Probity in the Public Administrations of the Americas” and urging the private sector to develop similar codes of conduct.	0.56	0.44	0.11	0.37
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Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

## Transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression

**Table 2. Follow-up criteria of commitments regarding the transparency, access to information, protection of whistle-blowers, and human rights, including freedom of expression**

Commitment	Relevance	Effectiveness	Sustainability	Country average
Commitment 13. Continuing to strengthen national anti-corruption measures or systems and enhancing conditions for the effective participation of civil society, social organizations, academia, the private sector, citizens, and other social actors in monitoring government performance, including the development of prevention mechanisms, channels for reporting possible acts of corruption and facilitating the work of watchdogs including other citizen oversight mechanisms, and incentivizing the adoption of digital means of participation.	0.44	0.78	0.33	0.52
Commitment 14. Promoting and/or strengthening the implementation of national policies and plans, and, as appropriate, subnational plans, in the areas of open government, digital government, open data, fiscal transparency, open budgeting, digital procurement systems, public contracting and a public registry of state suppliers, considering towards	1.00	0.89	1.11	1.00

that end the participation of civil society and other social actors.				
Commitment 15. Consolidating the autonomy and independence of high-level oversight bodies.	1.00	0.89	0.78	0.89
Commitment 16. Implementing and/or strengthening of bodies responsible for transparency and access to public information, based on applicable international best practices.	1.33	1.33	1.00	1.22
Commitment 18. Developing statistics and indicators in our States for assessing the impact of transparency and anti-corruption policies and advancing government capacity in this field.	0.44	0.44	0.22	0.37
Commitment 21. Promoting the adoption and/or strengthening of such legislative measures as are necessary to criminalize acts of corruption and related offenses consistent with the United Nations Convention against Corruption (UNCAC), the United Nations Convention on Transnational Organized Crime, and the Inter-American Convention against Corruption (IACAC).	1.11	1.00	1.00	1.04
Commitment 22. Protecting whistleblowers, witnesses, and informants of acts of corruption from intimidation and retaliatory actions.	0.67	0.89	0.33	0.63

Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

## Financing of political organizations and election campaigns

**Table 3. Follow-up criteria of commitments regarding the financing of political organizations and election campaigns**

Commitment	Relevance	Effectiveness	Sustainability	Country average
Commitment 25. Encouraging the adoption and/or strengthening of measures that promote transparency, accountability, appropriate accounting, and use of the banking system for income and expenditures of political organizations and parties, especially those related to their electoral campaigns, in order to guarantee the licit origin of the contributions and penalizing anyone involved in accepting illicit contributions.	0.78	0.78	1.00	0.85

Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

## Prevention of corruption in public works and public procurement and contracting

**Table 4. Follow-up criteria of commitments regarding the prevention of corruption in public works and public procurement and contracting**

Commitment	Relevance	Effectiveness	Sustainability	Country average
Commitment 27. Promoting the use of digital systems for government procurement and contracting of services and public works, to ensure disclosure, transparency, citizen oversight, and effective accountability.	1.22	1.22	0.78	1.07
Commitment 29. Promoting the inclusion of anti-corruption clauses in all state and public-private-partnership contracts and establishing registers of natural and legal persons involved in acts of corruption and money laundering with a view to ensure that they are not contracted.	0.44	0.44	0.33	0.41
Commitment 33. Implementing measures to reduce bureaucracy and simplify administrative processes at	1.67	1.56	1.56	1.59

all levels of government in order to prevent corruption.				
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Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.

International legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery

**Table 5. Follow-up criteria of commitments regarding the international legal cooperation; the fight against bribery, international corruption, organized crime, and money laundering; and asset recovery.**

Commitment	Relevance	Effectiveness	Sustainability	Country average
Commitment 37. Promoting the broadest possible cooperation among judicial, police, and prosecutorial authorities, financial intelligence units, and administrative authorities in investigations and procedures related to offenses of corruption, money laundering, and transnational bribery and corruption.	1.44	1.33	0.89	1.22
Commitment 41. Furthering the adoption or strengthening of measures through relevant institutions to enable the freezing, seizure, and confiscation of proceeds of corruption.	1.89	1.78	1.11	1.59

Source: Prepared by the authors based on information provided by the CSO who participated in the CCO.