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From Fragmented Enforcement to Collaborative Prevention: Uzbekistan's Corruption Prevention Cluster as A Model of Networked Anti-Corruption Governance

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Abstract

Anti-corruption systems in many transition countries detect more offences every year without reducing corruption, because the bodies that hold relevant information work in isolation. This article examines why Uzbekistan introduced a Corruption Prevention Cluster, a networked arrangement that links the Anti-Corruption Agency, law enforcement and supervisory bodies, research institutions, internal compliance units and civil society institutions, and what benefits this innovation can deliver. The study combines doctrinal analysis of Presidential Decree No. UP-270 of 30 December 2025, a review of media reports and official statements for 2021–2026, a survey of 8,356 law enforcement officers and a comparison with the Hong Kong and Indonesian models, using the collaborative and network governance literature as an analytical lens. Three reasons for the proposal are identified: information silos, in which a risk detected by one body did not reach others; an enforcement-centred model that measured success by the number of criminal cases rather than by prevented harm; and compliance units that operated without links to the wider system. Cases from road construction illustrate these failures, including collusion and backdated laboratory reports in 200 road-material testing tenders that led only to administrative measures. The cluster, embedded in paragraphs 9–12 of the Decree, converts episodic contacts into a permanent cycle of data sharing, analysis, targeted policy and reporting. Its benefits depend on safeguards against duplication, excessive centralisation and the token participation of civil society.

Keywords: Anti-corruption agencies; collaborative governance; network governance; corruption prevention; compliance; road infrastructure; Uzbekistan.

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Highlights

- Only 9.9% of surveyed officers rated interagency anti-corruption cooperation as satisfactory.
- Risks detected by one body often failed to reach the bodies able to act on them.
- Decree UP-270 created a permanent cluster of state, academic and civic actors.
- Road-sector cases show why detection must be linked to prevention.
- The cluster's value depends on clear referral rules and genuine civic participation.

1. Introduction

Uzbekistan has invested heavily in anti-corruption institutions over the past decade. A framework law was adopted in 2017 [1], a specialised Anti-Corruption Agency was created, and internal anti-corruption control (compliance) units were established in ministries, agencies and state-owned companies. Detection figures have grown accordingly. According to the national report discussed in the Senate in August 2026, 7,517 persons were held criminally liable for corruption offences in 2025, damage to state interests exceeded 2.9 trillion soum, and violations worth 12.6 trillion soum were found in public procurement [2]. Yet perceived corruption has not declined in step: in the Corruption Perceptions Index 2025, Uzbekistan scored 31 points and ranked 124th [3].

This gap between rising detection and stagnant outcomes is particularly visible in road transport infrastructure, a sector that absorbs large public and donor funds and is known internationally for its vulnerability to collusion, inflated estimates and poor-quality works [4]. Prosecution data compiled in the author's doctoral research show that criminal cases concerning embezzlement of road funds and abuse of procurement were sent to court against 112 employees of organisations in the Ministry of Transport system in 2023, 168 in 2024, 123 in 2025 and 105 in the first half of 2026 alone [5]. The numbers do not fall, which suggests that punishment after the fact does not remove the conditions that produce the offences.

The author's doctoral research argued that the underlying problem is institutional fragmentation, and proposed a holistic corruption prevention system based on the permanent cooperation of the Anti-Corruption Agency, law enforcement and supervisory bodies, research institutions, internal compliance units and civil society institutions [5]. The proposal was used in drafting paragraph 9 of Presidential Decree No. UP-270 of 30 December 2025, which established the Corruption Prevention Cluster [6].

This article explains why the cluster was proposed and what benefits it can bring. It makes three contributions. First, it identifies the institutional, functional and practical reasons that made a networked arrangement necessary, supported by survey and media evidence. Second, it interprets the legal design of the cluster through the lens of collaborative and network governance theory, which has rarely been applied to anti-corruption systems in Central Asia. Third, it sets out the benefits and risks of the model and proposes legal steps to consolidate it, using road infrastructure as the illustrative sector.

2. Theoretical Background

The dominant institutional answer to corruption in transition countries has been the specialised anti-corruption agency (ACA). Comparative research shows, however, that ACAs rarely succeed on their own. De Sousa describes them as oscillating "between empowerment and irrelevance": an agency that lacks access to information held by other bodies and has no partners able to act on its findings quickly loses relevance [7]. The OECD review of specialised institutions similarly stresses that prevention functions are spread across many bodies and require coordination rather than concentration [8], and the Jakarta Statement lists collaboration with state bodies, civil society and the private sector among the core principles for ACAs [9]. Article 5 of the United Nations Convention against Corruption requires States to develop coordinated preventive policies that promote the participation of society, Article 6 requires bodies responsible for prevention and coordination, and Article 13 calls for the active participation of civil society [10].

A second strand of research explains why isolated efforts fail. Persson, Rothstein and Teorell argue that systemic corruption is a collective action problem rather than a simple principal–agent problem: where actors expect others to be corrupt, even well-designed control bodies are unlikely to act as "principled principals" unless expectations change across the system [11]. Rose-Ackerman and Palifka accordingly treat prevention as a comprehensive policy that combines state institutions, private actors and civic oversight [12]. For infrastructure, the OECD recommends collective action among government, business and civil society across the entire project cycle [13].

The theory of collaborative governance provides tools to analyse such arrangements. Ansell and Gash define collaborative governance as a formal, consensus-oriented process in which public agencies engage non-state stakeholders in making or implementing public policy, and identify starting conditions, institutional design and facilitative leadership as determinants of success [14]. Emerson, Nabatchi and Balogh add that collaboration produces results only when principled engagement, shared motivation and a "capacity for joint action" are sustained over time [15]. Provan and Kenis

distinguish three modes of network governance: shared governance by participants, governance by a lead organisation, and governance by a separate network administrative organisation; lead-organisation networks are efficient but risk domination by the lead body [16]. Bardach shows that interagency collaboration requires deliberate "craftsmanship" in information systems, operating rules and trust [17], and the whole-of-government literature warns that horizontal coordination can be undermined by vertical accountability lines [18].

Two models illustrate these ideas. Hong Kong's Independent Commission Against Corruption combines investigation, corruption prevention and community relations within one body, and its effectiveness is attributed to the feedback between these three functions: investigation findings inform prevention studies of public bodies, while community relations sustain public support [19]. Indonesia's National Strategy for Corruption Prevention (Stranas PK), adopted in 2018, follows a networked rather than integrated approach: a national team of planning, home affairs, civil service and presidential staff bodies together with the Corruption Eradication Commission (KPK) coordinates prevention actions through a joint secretariat. An institutional study, however, found that the secretariat was dominated by the KPK, that procedures for involving civil society were never adopted and that civic access to the monitoring platform was later restricted [20]. Uzbekistan cannot replicate Hong Kong's single-body model, because investigative powers are distributed among several agencies; the question is whether a networked arrangement can recreate the same feedback loop without repeating the weaknesses observed in Indonesia. National scholarship has examined compliance control [21], but the design of a system linking all prevention actors has not been analysed.

3. Methods

The study uses four sources of evidence. First, a doctrinal analysis covered the Law "On Combating Corruption" [1] and Decree No. UP-270 [6], in particular paragraph 4 on compliance units, paragraphs 9–12 on the cluster and paragraphs 13–15 on the "Raqamli komplayens" (Digital Compliance) software complex, together with the departmental rules on compliance units registered in October 2026 [22].

Second, a qualitative review of media reports and official statements was carried out for 2021–2026. Reports were collected from Uzbek news outlets (Kun.uz, Gazeta.uz, Kursiv, Anhor.uz, Yuz.uz, Dunyo.info, Spot.uz) using search terms related to the Anti-Corruption Agency, compliance units, the cluster, public procurement and road construction. Reports were coded according to which body detected a violation, what follow-up was reported and whether information was transmitted to other bodies. The review identifies recurring patterns; it does not measure their frequency.

Third, an electronic questionnaire with eleven closed, single-answer questions was administered in 2026 to 8,356 law enforcement officers as part of the author's doctoral research [5]. This article uses the questions on the state of interagency cooperation, the integration of audit and the priority prevention measures. Because respondents belong to one professional group, the results are treated as expert assessments. Fourth, the Hong Kong and Indonesian cases described in Section 2 were compared using the Provan and Kenis typology [16] to identify the design choices and risks relevant to Uzbekistan.

4. Results

4.1. Why the Cluster Was Proposed (1): Information Silos

The first reason is institutional fragmentation. Before 2026, the Anti-Corruption Agency, law enforcement bodies, supervisory bodies and compliance units each collected information on corruption risks, but exchanged it mainly through paper documents and official correspondence; their information systems were not integrated and operated as "information islands" [5]. A risk detected by one body therefore did not reach others in time, inspections were duplicated, and violations at the stages of hidden works, audit and acceptance remained in interagency blind spots [5].

The road sector offers an early and striking illustration. At a Senate plenary session in 2021, senators criticised the practice whereby contractors themselves engaged the laboratories that tested the quality of their works, and noted that the road quality inspection had found more than 12,000 violations in two years but had sent only eight files to the prosecutor's office [23]. Thousands of findings thus remained within one body's administrative procedures and never became a source of criminal accountability or of system-wide prevention measures.

The survey confirms that fragmentation was perceived as the norm (Table 1). Only 9.9% of respondents described cooperation among prevention actors as satisfactory,

with regular information exchange. A plurality (42.1%) said that each body acts mainly within its own mandate and that information on detected risks does not reach others in time, and a further 30.1% said that cooperation exists only through one-off events and joint inspections without a permanent institutional basis. Similarly, 38.0% stated that internal, external and state audit operate without links, so that a deficiency found at one level does not reach another.

Table 1. Expert assessment of interagency cooperation in corruption prevention (N = 8,356).

Survey item and answer	n	%
State of cooperation among prevention actors		
Not systemic; each body acts alone; information on risks does not reach others in time	3,514	42.1
Exists, but only through one-off events and joint inspections; no permanent basis	2,517	30.1
Satisfactory; regular information exchange established	829	9.9
Cannot answer	1,496	17.9
Need for an integrated audit system		
Needed: the three types of audit are not linked; findings do not travel between them	3,176	38.0
Needed, with publication of results and liability for obstructing audit	1,837	22.0
Partly needed, only for large projects	1,044	12.5
Not needed; existing mechanisms are sufficient	431	5.2
Cannot answer	1,868	22.4

Source: author's survey of law enforcement officers, 2026 [5]. Percentages may not sum to 100 because of rounding.

4.2. Why the Cluster Was Proposed (2): An Enforcement-Centred Model

The second reason is functional. The system measured its success largely by detection and punishment. At the National Anti-Corruption Council meeting in March 2025, the Agency was criticised for having become a "dry statistician" that counted criminal cases instead of analysing sectors and proposing solutions; the President noted that about 3 trillion soum had been saved after oversight of investment programmes was strengthened, but asked why such work had to begin only after a presidential instruction [24]. The remark captures the core weakness of a reactive model: prevention depended on ad hoc political attention rather than on a permanent mechanism that turns findings into policy.

The same pattern appears in procurement data. In 2025, the Agency identified violations in 189 procurement procedures worth 666.6 billion soum; although the number of flawed procedures fell by 60% compared with 2024, their total value rose by 33.7%, and criminal proceedings were initiated in only two cases [25]. Detection was not lacking. What was missing was a link between what was detected and what was changed: investigation results were not systematically analysed to identify the factors that allowed offences, and no body was responsible for converting such factors into risk criteria applied across sectors. The steady number of prosecutions in the road sector [5] reflects this missing feedback loop.

4.3. Why the Cluster Was Proposed (3): Isolated Compliance Units and Missing Partners

The third reason concerns the actors closest to the risks. Compliance units were designed as the first line of prevention inside ministries and state companies, but they worked without links to the rest of the system. At the same March 2025 meeting, it was noted that 1,285 staff worked in such units in 117 ministries and agencies, yet their role and responsibility in eliminating corruption factors were not felt, and the Prime Minister was instructed to dismiss their heads [26]. Compliance oversight of five bodies, including the Ministry of Construction, was transferred to the Agency as a pilot [24].

The problem was not a lack of findings. Research on compliance control reports that compliance units carried out 1,293 control measures and identified financial violations worth more than 791.4 billion soum [21]. These results, however, were not systematically combined with the work of law enforcement bodies and the Agency, which limited their preventive effect [5]. Compliance units also depended on the heads of the bodies they monitored, including through performance indicators that could be used to discourage inconvenient findings.

Two other potential partners were missing altogether. Research institutions studied corruption but had no channel for receiving operational data or orders from practitioners, so their recommendations rarely reached policy. Civil society institutions conducted public control under separate legislation but were not connected to the bodies that could act on their findings. In terms of collaborative governance theory, the "starting conditions" for collaboration were weak: the actors had resources and information, but no shared forum, rules or incentives to combine them [14].

4.4. Practical Problems: Siloed Detection in Road Construction

Media reports show how fragmentation plays out in practice. The clearest recent case concerns quality testing in road construction. In September 2026, the Karakalpakstan office of the Competition Committee reported the results of its review of 200 tenders held in 2025 for laboratory testing of road construction materials and of the quality of completed works, each with an initial value above 1.6 billion soum. The review found signs of anticompetitive agreements between the customer and participants: bidders divided regions among themselves, some firms regularly bid together so that the same company won, and bid prices moved in a uniform pattern. In some cases, laboratory test reports had been drawn up before the tender was held and the contract was signed, and invoices showed works completed on the day the contract was registered with the Treasury or the next day [27].

The case is significant for two reasons. First, laboratory testing is itself a control mechanism: if quality reports are prepared before any testing contract exists, the quality of road works financed from the budget cannot be trusted. Second, the facts touch the mandates of several bodies at once: the Competition Committee (collusion), the Treasury (payment against implausible invoices), construction quality supervision (questionable test reports), law enforcement (possible forgery of documents) and the customer's compliance unit (conflict of interest). Yet the reported follow-up consisted of mandatory instructions and administrative protocols against officials sent to court [27]. The report does not mention any referral to law enforcement or the Agency, or any review of the roads accepted on the basis of the questionable reports. The case echoes the 2021 criticism of contractor-engaged laboratories [23], which shows that the same risk persisted for five years without a system-wide response.

Table 2 summarises this and related cases. They share a common feature: a body detected a problem within its own mandate, but the path from detection to systemic prevention was missing or narrow. Compliance units, for example, identified violations in 92 procurements worth 350 billion soum in the first half of 2026 and sent 43 files to law enforcement [28], but no mechanism existed to check whether the underlying risk factors were then addressed in other bodies exposed to the same schemes.

Table 2. Detection without systemic follow-up: selected cases relevant to road construction and procurement.

Case (year)	Detecting body and finding	Reported follow-up	Missing link
Road quality inspection (reported 2021)	Road quality inspection; more than 12,000 violations in two years	Eight files sent to the prosecutor's office	Findings not converted into criminal accountability or sector-wide prevention
Road-material testing tenders, Karakalpakstan (2025–2026)	Competition Committee; collusion in 200 tenders, reports dated before contracts	Instructions; administrative protocols sent to court	No reported referral to law enforcement or the Agency; accepted works not re-examined
Public procurement (2025)	Anti-Corruption Agency; violations in 189 procedures worth 666.6 bn soum	60 procedures cancelled; 2 criminal cases	Value of violations up 33.7%; causes not addressed systemically
Compliance units (H1 2026)	Compliance units; violations of 1.886 trn soum, incl. 92 procurements worth 350 bn soum	43 files to law enforcement; 46 submissions	No common mechanism to apply lessons across bodies

Source: compiled by the author on the basis of [23,25,27,28].

4.5. The Legal Design of the Cluster

Decree No. UP-270 responds to these problems by creating a single corruption prevention system based on the permanent cooperation of five groups of actors (paragraph 9) and by assigning each of them a defined contribution (paragraph 10) [6]. Law enforcement bodies provide the Agency with analytical and statistical data on corruption factors and risks identified in pre-investigation checks, inquiries and investigations. The Agency gains access, through an information system, to the analyses of the Chamber of Accounts and the State Financial Control Inspectorate on procurement, conflicts of interest and financial risks. Four research institutions listed in Annex 2 conduct scientific analysis, develop solutions on the Agency's order and run training programmes. Compliance units submit quarterly reports on the state and trends of corruption offences with recommendations. Civil society institutions carry out public control through public hearings, monitoring and opinion polls (Figure 1).

On the basis of these inputs, the Agency develops targeted anti-corruption policy and programmes, sets the criteria for classifying corruption risk factors, monitors the corruption situation and coordinates the participants (paragraph 11); participating state bodies report to the National Anti-Corruption Council every six months (paragraph 12) [6]. Paragraph 4 strengthens the position of compliance units: they work in close cooperation with the Agency, which coordinates them; their structures are approved in agreement with the Agency; they may not be given unrelated tasks; and key performance indicators are not applied to their heads and staff [6]. These guarantees were detailed in departmental rules registered in October 2026, which also place compliance staff under state protection [22]. The technological backbone is the "Raqamli komplayens" software complex, which is to provide rapid information exchange among cluster participants and integrate the information systems of state bodies; it entered test mode on 1 July 2026 and is to be fully operational by the end of 2026 [6].

In Provan and Kenis's terms, the cluster is a lead-organisation network: the Agency acts as the hub, while participants retain their own mandates [16]. Unlike the Hong Kong model, it does not merge functions into one body; unlike the Indonesian model, its coordinating role is fixed in the decree together with specific information duties and a reporting line to a political body. The design

thus aims to recreate the investigation–prevention–community feedback loop [19] in a system where powers are distributed.

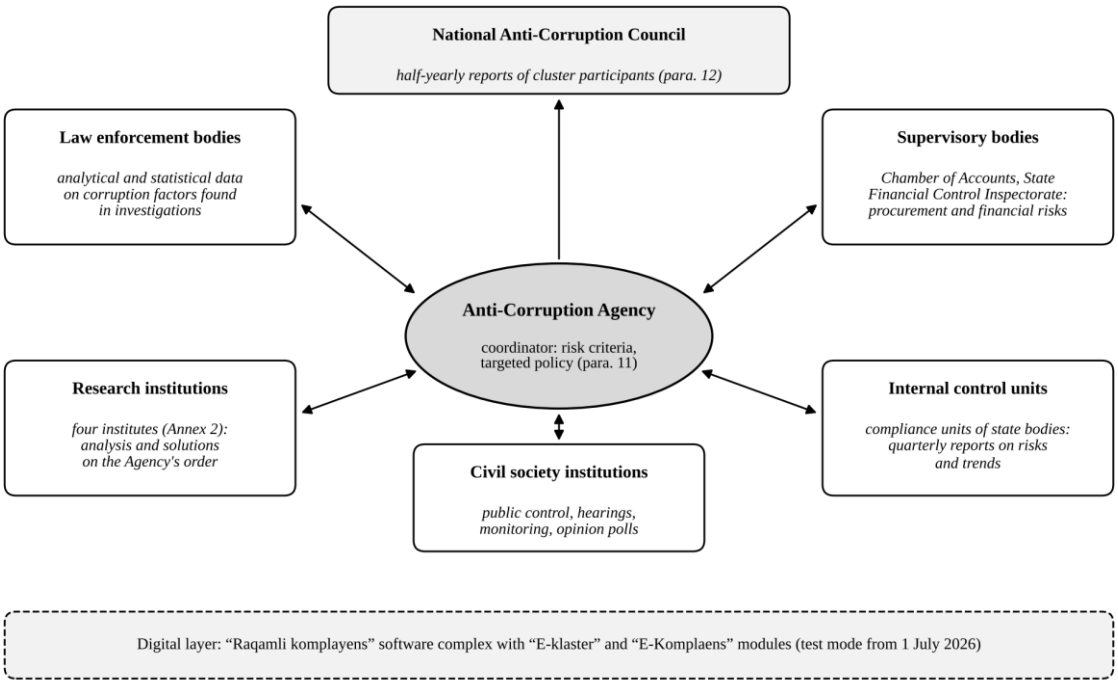


Figure 1. Structure and information flows of the Corruption Prevention Cluster under Decree No. UP-270. Source: author, based on paragraphs 9–13 of the Decree.

4.6. Early Implementation

Implementation began in 2026, which the President declared a year of "emergency" in the fight against corruption [29]. In May 2026, the Compliance Service of the Presidential Administration and the Agency held a meeting with law enforcement bodies, ministries, research institutions, civil society institutions and compliance units to launch the cluster's work. Participants agreed to define procedures for cooperation, coordination and analysis; to study at least one sector in depth each quarter, with compliance units analysing the factors that enable corruption; and to assign sectors and regions with a high share of corruption crimes to research institutions. An "E-klaster" electronic module was announced to digitise information exchange, and the "Public Procurement" and "Ethics" modules of the digital compliance software were presented to detect conflicts of interest and affiliation in procurement at an early stage [29].

Early figures point to the scale of information the cluster can draw on. In the first half of 2026, compliance units carried out 19,709 inspections and other control measures, identified financial violations with corruption risk worth 1.886 trillion soum, eliminated violations worth 264.7 billion soum and prevented the unjustified spending of 587.8 billion soum [28]. These results cannot yet be attributed to the cluster, which was still being set up, but they show the volume of data that previously remained within individual bodies. Expert opinion supports the approach: 25.2% of surveyed officers named an integrated system based on permanent cooperation of all prevention actors as the top-priority measure, and together with an interagency information platform (29.3%) and community initiative groups (24.7%), 79.2% chose one of the three networked measures proposed in the research [5].

5. Discussion

5.1. The Benefits of the Cluster

The analysis suggests six benefits, each corresponding to a documented weakness of the previous system. First, a unified risk picture. By requiring law enforcement, supervisory bodies and compliance units to feed their findings to one coordinator, the cluster turns scattered data into a common map of risks. A pattern such as contractor-controlled laboratory testing, visible in 2021 and again in 2026 [23,27], would become a recurring signal rather than a series of unconnected cases.

Second, a shift from detection to prevention. Paragraph 10 obliges law enforcement bodies to share not only statistics but the corruption factors identified in investigations, and paragraph 11 obliges the Agency to translate them into risk criteria and targeted programmes [6]. This creates the feedback loop that explains the success of the Hong Kong model [19] and directly answers the "statistician" criticism [24]. Third, evidence-based policy. Research institutions receive data and orders from practitioners, which links academic analysis to operational needs. Fourth, stronger compliance units. Coordination by the Agency, the ban on unrelated tasks and the exclusion of performance indicators reduce dependence on the heads of the bodies being monitored [6,22].

Fifth, legitimacy and an external check. The inclusion of civil society institutions gives the system a channel for public signals and an independent view of whether state bodies act on their findings, in line with Article 13 of the Convention [10]. Sixth, accountability. Half-yearly reporting to the National Anti-Corruption Council makes each participant answerable for its contribution, which addresses the whole-of-government risk that horizontal cooperation is neglected in favour of vertical priorities [18]. A further, indirect benefit is efficiency: shared information can reduce duplicated inspections, which burden both the state and contractors [17]. Table 3 links these benefits to the road sector.

Table 3. Problems, design features of the cluster and expected effects.

Problem before 2026	Feature of the cluster (UP-270)	Expected effect in the road sector
Risks detected by one body do not reach others (12,000 violations, 8 files)	Mandatory data sharing with the Agency; access to supervisory analyses (para. 10)	Quality and procurement findings reach the bodies able to prosecute or prevent
Success measured by criminal cases; prevention after instructions only	Corruption factors from investigations turned into risk criteria and targeted programmes (para. 11)	Recurring schemes, such as contractor-controlled laboratories, addressed at source
Compliance units dependent and isolated (117 heads dismissed)	Agency coordination; no KPIs; quarterly reporting (paras. 4, 10)	Compliance units of road agencies report risks without fear of internal pressure
Research disconnected from practice	Research institutions work on the Agency's order (para. 10, Annex 2)	Sector studies of road construction based on operational data
Civil society findings without follow-up	Public control, hearings and monitoring within the cluster (para. 10)	Residents' signals on road quality linked to state response
No accountability for cooperation	Half-yearly reports to the National Council (para. 12)	Road agencies answerable for acting on shared findings

Source: compiled by the author on the basis of [6] and Sections 4.1–4.4.

5.2. Risks and Safeguards

The cluster also carries risks. Duplication and coordination costs are the first. Networks generate meetings, reports and data requests; without clear rules, participants may comply formally while continuing to work in silos [15,17]. Excessive centralisation is the second. Lead-organisation networks are efficient but can be dominated by the lead body, which may reduce other participants' ownership [16]; the Indonesian experience, where the secretariat was dominated by the KPK, illustrates this danger [20]. The Agency's role should therefore be one of coordination and analysis, not of replacing the mandates of law enforcement or

supervisory bodies.

Token participation of civil society is the third risk. In Indonesia, procedures for civic involvement were never adopted and access to the monitoring platform was later restricted [20]. If civil society institutions in Uzbekistan are invited only to formal events, the cluster will lose its external check. Data protection and the confidentiality of investigations are a fourth concern: sharing investigative data requires rules on access levels and on the protection of personal data. Finally, the cluster rests on a presidential decree rather than a statute, which makes it vulnerable to future reorganisations, and no indicators have yet been defined to measure whether it reduces corruption rather than merely increasing reporting.

5.3. Policy Implications

To consolidate the cluster, three steps are recommended. First, a regulation on cluster interaction should define the formats, deadlines and access levels for information exchange, and establish a referral rule under which a finding with signs of corruption made by any participant must be entered into the E-klaster module and forwarded to the bodies competent to act. Second, sectoral working groups should be formed for high-risk sectors, beginning with road transport infrastructure, bringing together the compliance units of the Ministry of Transport and road agencies, the Transport Inspection, the Competition Committee, the Chamber of Accounts, a research institution and civil society representatives. Third, the Law "On Combating Corruption" should give the cluster a statutory basis and define indicators of its effectiveness, such as the share of findings referred and acted upon, the time from detection to response, the number of risk criteria updated and the losses prevented.

As a starting point, the following provision is proposed for the regulation on cluster interaction: "A participant of the Corruption Prevention Cluster that identifies, within its competence, circumstances indicating corruption risks or offences shall, within five working days, enter information about them into the E-klaster module and notify the Anti-Corruption Agency and the bodies competent to take measures. The Agency shall analyse the information received, determine whether the identified risk factor is present in other bodies and organisations, and, where necessary, include it in the criteria for classifying corruption risk factors. Recipients shall inform the Agency of the measures taken within thirty days." The deadlines are indicative and should be calibrated with the participants.

5.4. Limitations

The study has limitations. The cluster is less than a year old, and systematic data on its outputs are not yet available, so its benefits are assessed analytically rather than empirically. The media review captures publicly reported cases and cannot establish how often findings remained within one body. The survey reflects the views of law enforcement officers and not those of compliance staff, researchers or civil society. Future research should evaluate the cluster after several reporting cycles, for example by comparing the time from detection to response and the recurrence of risk factors in sectors covered by sectoral working groups and in those not yet covered.

6. Conclusions

Uzbekistan's anti-corruption system had become effective at detecting offences but weak at preventing them. The Corruption Prevention Cluster was proposed for three reasons: information on risks remained within the body that found it, as the road quality inspection's 12,000 violations and eight referrals illustrate; the system measured success by criminal cases rather than by prevented harm, so that prevention depended on presidential instructions; and compliance units, research institutions and civil society worked without links to one another and to law enforcement. The case of 200 road-material testing tenders, in which collusion and backdated laboratory reports led only to administrative measures, shows that these problems persisted into 2026. By establishing permanent data sharing, a coordinating role for the Agency, risk criteria based on investigation findings, a scientific input and half-yearly accountability, Decree No. UP-270 converts episodic contacts into a cycle of prevention. Whether this cycle works will depend on clear referral rules, a balanced role for the Agency, genuine participation of civil society and a firmer statutory basis.

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Informed Consent Statement: Participation in the survey was voluntary, and respondents were informed of the research purpose.

Data Availability Statement: Aggregated survey data

are available from the author upon reasonable request.

Conflicts of Interest: The author declares no conflicts of interest. The proposal analysed in this article was developed in the author's doctoral research and used in drafting paragraph 9 of Decree No. UP-270 (implementation certificate of the Anti-Corruption Agency No. 3 of 20 January 2026).

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