

Forum: Practical Perspectives

Framework to understand and address the systemic corruption in local governments

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The diagnoses made to justify anticorruption measures tend to minimize the complexity of the phenomenon of corruption. In line with the garbage can model (Cohen, March, & Olsen, 1972), where solutions look for problems, the corruption problem is characterized as something “addressable” by the anticorruption policy, which brings serious consequences, such as the implementation of a fallible policy. The article reviews the phenomenon of the fallibility of anticorruption policies. We argue that anticorruption policies are likely to fail when they are designed without recognizing that the type of corruption faced is embedded in a wider scheme of systemic corruption. We trace our argument along a series of implications that emerge from the Corruption Consolidation Framework (CCF) (Meza & Pérez-Chiqués, 2021). Supported by the CCF, we derive a series of implications to reorient the discussion and future lines of research around understanding and addressing the phenomenon of systemic corruption.


Keywords: corruption; systemic corruption; local governments; anticorruption policies.

Estrutura para entender e abordar a corrupção sistêmica nos governos locais

A corrupção é um fenômeno complexo. Os diagnósticos usados para justificar medidas anticorrupção costumam descartá-la. Em consonância com o modelo da lata de lixo (Cohen, March, & Olsen, 1972), onde as soluções procuram os problemas, neste caso, o problema da corrupção é caracterizado de tal forma que é “endereçoável” com a política em questão. Esta situação tem consequências graves. Entre eles, que a política implementada é falível. O artigo revisa o fenômeno da falibilidade das políticas anticorrupção. Argumentamos que quando a política anticorrupção é desenhada sem levar em conta que o tipo de corrupção com a qual ela lida faz parte de um sistema mais amplo de corrupção sistêmica, ela tem uma alta probabilidade de falhar. Traçamos nosso argumento por meio de uma série de implicações que emergem do quadro de consolidação da corrupção (*Corruption Consolidation Framework* – CCF) (Meza & Pérez-Chiqués, 2021). Com o apoio do CCF, extraímos uma série de implicações com a intenção de reorientar a discussão e futuras linhas de pesquisa em torno da compreensão e abordagem do fenômeno da corrupção sistêmica.

Palavras-chave: corrupção; corrupção sistêmica; governos locais; políticas anticorrupção.


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Marco para entender y atender la corrupción sistémica en gobiernos locales

La corrupción es un fenómeno complejo. Los diagnósticos empleados para justificar medidas anticorrupción usualmente tienden a desestimarla. En línea con el modelo de bote de basura (Cohen, March, & Olsen, 1972), donde las soluciones buscan problemas, en este caso, el problema de corrupción se caracteriza de forma que sea “atendible” con la política en cuestión. Esta situación tiene graves consecuencias. Entre ellas, que la política implementada sea falible. El artículo revisa el fenómeno de la falibilidad de las políticas anticorrupción. Argumentamos que cuando la política anticorrupción se diseña sin tomar en cuenta que el tipo de corrupción que enfrenta es parte de un sistema más amplio de corrupción sistémica, esta tiene altas probabilidades de fracasar. Trazamos nuestro argumento a lo largo de una serie de implicaciones que se desprenden del marco de consolidación de la corrupción (*Corruption Consolidation Framework – CCF*) (Meza & Pérez-Chiqués, 2021). Apoyados en el CCF derivamos una serie de implicaciones con la intención de reorientar la discusión y futuras líneas de investigación en torno a entender y atender el fenómeno de la corrupción sistémica.

Palabras clave: corrupción; corrupción sistémica; gobiernos locales; políticas anticorrupción.

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1. INTRODUCTION

With notable exceptions, anti-corruption plans are typically developed based on information about corruption that focuses on the dyadic type (also known as market corruption), overlooking the more complex and harder-to-observe and analyze types of corruption (Arellano-Gault, 2016; Arellano-Gault & Rojas, 2021; Ashforth & Anand, 2003; Bozeman, Molina, & Kaufmann, 2018; Jancsics, 2019; Mungiu-Pippidi, 2006). While dyadic corruption is the most well-documented, it is not exempt from being merely a manifestation of an entire system (Graaf & Huberts, 2008; Plaček, Půček, & Ochrana, 2019). The above has policy implications, as it can lead to underreporting or underestimating the phenomenon.

In this article, we argue that the lack of clarity regarding the type of corruption being addressed by anti-corruption programs and plans could explain the fallibility of policies attempting to address this issue, particularly within the realm of municipal government. As such, this article aims to make an analytical contribution with theoretical and practical implications that may alter the way anti-corruption policies are understood in the context of systemic corruption. The underlying question that drives us to answer is: Why do anti-corruption policies fail?

To address this question, we provide several examples where we observe policies systematically failing to effectively address the problem, even when they might be well-designed. This article has its defined limits, as it aims to argue, through analysis, the proposition that policies fail because

they attempt to solve the problem without accurately defining the type of corruption prevalent in a specific context. In other words, and more detail, what we observe is that anti-corruption policies are often designed with dyadic or ‘market’ corruption in mind. This is the type of corruption where ‘corrupt’ agents engage in isolated interactions with citizens and attempt to gain profits based on their primary advantage, which is the contact or intermediation with the client. However, we argue that these types of failures are more clearly evident in local governments, which face considerable limitations in addressing corruption issues and also tend to be subject to the whims of local elites that capture the local public administration.

This analytical exercise is based on the observations made from a research project that originated in Mexico, observing its municipalities, but which has been extended to other regions of the south-global world, such as Brazil, Chile, and Puerto Rico. From this discussion, we suggest opening a research agenda with a fresh orientation towards areas that had been neglected, such as the reasons why anti-corruption policies fail even when they have been, apparently, carefully designed.

Finally, we consider that this article provides very clear practical implications that could positively influence the way anti-corruption policies are designed and their outcomes.

The article is structured as follows. The first section addresses the applicability of dyadic anti-corruption policies and their failure in local governments. We draw upon research conducted by other authors who, like us, have identified the existence of this issue. Our main contribution is found in the second part. In this section, the theoretical contribution of the Analytical Framework for the Consolidation of Corruption Processes – Marco Analítico de la Consolidación de Procesos de Corrupción, in Spanish –, (MACC) is discussed.

It is a framework that originated in Mexico but expanded to other regions of the world. This framework has been used for the study of local governments (Bastidas-Vargas, 2023; Gofen, Meza, & Pérez-Chiqués, 2022; Lino, Azevedo, Aquino, & Steccolini, 2022; Mendoza-Figueroa, 2023; Moya-Díaz & Paillama-Raimán, 2022; Palacios-Garay, Rodríguez-Salazar, Fuerte-Montaña, & Pereyra-Zaldívar, 2022; Pérez-Chiqués & Bustos, 2021; Ramírez-Sánchez, 2021; Rentería, 2023; Santiago, 2023; Tirado-Teodocio, 2021; Zizumbo-Colunga & Meza, 2021) and it serves here to provide a different understanding of how anti-corruption policies are enacted and fail in the context of systemic corruption in local governments. Finally, the last section presents the main conclusions and practical takeaways for addressing the issue of corruption, considering a larger portion of its complexity.

2. ANTI-CORRUPTION POLICIES (AND THEIR FALLIBILITY)

Anti-corruption policies in subnational Latin America have shown a strong bias towards components that address the dyadic definition of corruption, thus focusing on the establishment or strengthening of anti-corruption agencies centered around interactions between government agents and citizens. Take the following as an example. Measures associated with training officials with moral or ethical responsibilities regarding corruption; public campaigns aimed at persuading citizens not to engage in ‘bribes’¹; the use of electronic media and information technologies to avoid contact and reduce the

¹ Within Latin American jargon, there are other words attributed to bribery among the most common: *jeitinho* or *pistolão*, *chanchullo*, *palanca*, *guiso*, *viveza criolla*, *malicia indígena*, *matraca*, *mochada*, *coima*, *tajada*, *chanchullo*, *shuco*, *mermelada*, among others (Arellano-Gault, Hernández, Álvarez, & Zamudio, 2019).

use of discretion in human interactions, as well as the implementation of anonymous whistleblower schemes within government organizations, all of these have been recurring inputs in anti-corruption policies. This dyadic perspective identified in the most recurrent measures of these policies positions the actors involved in corruption processes as individual agents disconnected from a context of systemic corruption (Fontaine, Milán, & Hernández-Luis, 2022; Mungiu-Pippidi & Dadašov, 2017; Zamudio-González, 2020). In this, we intend to argue that therein lies the fallibility of these policies.

Recent studies have provided a variety of evidence regarding the fallibility of these policies. Let's consider the example of an ethical or moral campaign aimed at reducing corruption. Crider and Milyo (2013) and recently Zinovyeva, Koptyakova, Kostina, and Skvortsova (2020) have indicated that they have been positioned as the privileged mechanism in anti-corruption policies; however, evidence demonstrates their limited effects in practice. This is because they focus on the individual behaviors of public servants and not on the mechanisms of an organizational and systemic framework within public administrations (Min, 2019).

At this juncture, organizational corruption has been described as a phenomenon involving multiple employees with sophisticated coordination tactics involving clients of the organization. Therefore, it constitutes a collective phenomenon of corruption (Palmer & Maher, 2006). This corruption implies the presence of actors united under collusion or coordination schemes for private gain. These elements within the organizational culture can expand opportunities for the commission of corrupt acts (Berkovich, 2016; Sancho, 2017) and have effects on individual actions in addition to the intrinsic or extrinsic motivations of individuals (Kwon, 2014).

Within this body of evidence, we highlight the example of electronic media or information technologies. These have garnered significant interest from policymakers, as the primary promise of these technologies is that they eliminate human interaction and provide administrative records. However, it has been shown that these means do not prevent the establishment of alternative interaction paths whose nature can be characterized as corruption (the use of WhatsApp to solicit illegal prebends, and social media, among other mechanisms). Recently, Kraha and Mertens (2020) have demonstrated that, while electronic devices in public administration have had an impact on reducing corruption, the effectiveness of these policies in systemic corruption contexts still needs to be verified. In this sense, despite the obligation of democratic governments to periodically publish information and the use of electronic means, what is often observed are a series of tactics to publish and comply without transparency; practices that generate opacity (Rentería, 2023). For example, the information is not available; the information is not up-to-date; or the information is irrelevant or incomplete, with excessive charges for access often being a barrier (Bisogno, Cuadrado-Ballesteros, & Santis, 2022). It also includes tactics to conceal information, such as non-compliance with public information requests, and tactics to undermine the quality of information, such as altering or mutilating documents (Rentería, 2023). These are new and more refined ways to maintain existing opacity, a factor that contributes to the consolidation of corruption (Meza & Pérez-Chiqués, 2021). Furthermore, according to Abu-Shanab, Harb, and Al-Zoubi (2013) as well as Lindstedt and Naurin (2010) even though public institutions maintain such mechanisms, it is not necessarily an effective method for combating corruption. This is due to the institutional framework related to other factors, such as accountability and, to a greater extent, the discretion of public servants (Merino, 2018).

One final example of the tendency of anti-corruption policies to fail lies in the rules that reduce discretion (e.g., police officers and filling out forms). In this regard, Mungiu-Pippidi and Dadašov (2017) provide evidence that the effectiveness of anti-corruption policies, including their regulatory mechanisms, depends on the context. Therefore, the discretion of the actors, as well as the under or overregulation of processes, depends on the existence of a rule of law capable of sanctioning such behaviors. The discretion enjoyed by public servants or privileged positions within public organizations, influenced by a framework of low transparency in the exercise of their responsibilities, encourages practices contrary to the public interest (Crispian, 2018; Sancino, Sicilia, & Grossi, 2018). This is discussed in their findings by Meza and Pérez-Chiqués (2021), – It is an environment of overregulation, with murky foundations and excessive costs in licenses, permits, procedures, and fines –, this combination results in what one interviewee described as a ‘breeding ground for corruption,’ leading to extortion and bribery.

We do not intend to be exhaustive; however, there is evidence that suggests the possibility of failures in existing anti-corruption policies. We share these and have decided to contribute to their explanation by proposing that they could fail because their designs might inaccurately characterize the phenomenon they aim to address. To delve into the analytical details that support this proposition, we use the case of local governments. This level of government offers valuable insights to redirect efforts and understand the biases currently encountered in anti-corruption policy. This is because the local context can aid in identifying key variables within corruption processes, especially their mechanisms, which are often overlooked in national policies. Local cases provide a necessary theoretical and practical perspective to understand the complexity of corruption, as well as the on-the-ground challenges that anti-corruption policies face (Graaf, 2007; Masters & Graycar, 2016). This is demonstrated by various research studies where the outcomes of anti-corruption policies failed at the local level, as seen in the English case (Doig, 2014, p. 683), the Spanish case (Jiménez, García-Quesada, & Villoria, 2014) or the Australian case (Masters & Graycar, 2016, p. 54), to mention a few examples in consolidated democracies.

In this context, considering the examples in the local reality, one might ask, how can we think more systematically about these things that happen day by day? How can we avoid falling into the trap brought by the false sense of security from anti-corruption measures? Addressing these questions within the Analytical Framework for the Consolidation of Corruption Processes (MACC) could be the solution. This will be explored in the next section through the analysis of the Mexican reality, resulting from the research conducted by Meza and Pérez-Chiqués (2021).

3. ANALYTICAL FRAMEWORK FOR THE CONSOLIDATION OF CORRUPTION PROCESSES (MACC)

The Analytical Framework for the Consolidation of Corruption Processes (MACC) allows us to understand petty corruption as a manifestation of a broader governance system, where corruption consolidates to a greater or lesser extent (Meza & Pérez-Chiqués, 2021). The MACC emerges as an alternative to corruption indices used in Mexico to measure perceptions or experiences of corruption. It aims to provide a concise and flexible tool that offers an approach to systemic corruption, without simplifying the high complexity of the phenomenon through instruments (Gofen et al., 2022; Meza & Pérez-Chiqués, 2021; Pérez-Chiqués & Meza, 2021). Through a sequential exploratory methodology – starting with exploratory interviews in the first phase,

followed by the administration of three surveys and semi-structured interviews in a second phase – the authors identified four dimensions that they propose as analytical dimensions useful for identifying probable consolidation of corruption in local governments (Meza & Pérez-Chiqués, 2021). Characterizing corruption using this analytical framework provides a detailed portrait of how corruption operates in a specific context. This analytical framework complements what other authors have already indicated about the complexity of the phenomenon (Berthin-Siles, 2008; Gorrochategui, 2000; Martínez-Cousinou & Andersson, 2009; Strach, Sullivan & Pérez-Chiqués, 2019; Zamudio-González, 2020), and, in turn, it allows us to transcend the dyadic meaning of corruption, replacing it with one that seeks to understand the consolidation of the phenomenon (Gofen et al., 2022; Lino et al., 2022; Moya-Díaz & Paillama-Raimán, 2022; Palacios-Garay et al., 2022; Pérez-Chiqués & Bustos, 2021; Zizumbo-Colunga & Meza, 2021). The MACC identifies four dimensions that are recurring to achieve the consolidation of corruption processes, with special emphasis on local governments (Meza & Pérez-Chiqués, 2021):

- 1) **Clandestine Networks:** these are woven between governmental and non-governmental actors and are of a proprietary nature. The actors in these networks are the driving forces behind a corruption process. They consolidate as these networks manage to secure the complicity or involvement of more actors within the governmental organization (Meza & Pérez-Chiqués, 2021; Pérez-Chiqués & Meza, 2021).
- 2) **Organizational Mechanisms:** These are defined as frameworks that promote or provoke modes of behavior among members of an organization. They establish parameters that *de facto* organize corruption processes by inducing behaviors in public officials (Meza & Pérez-Chiqués, 2021). These elements within the organizational culture can expand opportunities for the commission of corrupt acts (Berkovich, 2016; Sancho, 2017).
- 3) **Opacity:** This is defined as a lack of transparency, but also reflects the ambiguity and uncertainty present in governmental processes. Opacity serves as a lubricant for the machinery, enabling corruption processes to operate with impunity (Meza & Pérez-Chiqués, 2021; Rentería, 2023).
- 4) **Weakened checks & balances:** These are defined as institutions (both formal and informal) designed to limit, control, oversee, or supervise the power delegated to public officials. Weakened checks & balances, combined with power concentration in nodal actors of the public administration, facilitate the consolidation of corruption processes (Crispian, 2018; Jiménez et al., 2014; Meza & Pérez-Chiqués, 2021; Quesada, Jiménez-Sánchez, & Villoria, 2013).

4. ANTI-CORRUPTION POLICIES THROUGH THE LENS OF MACC

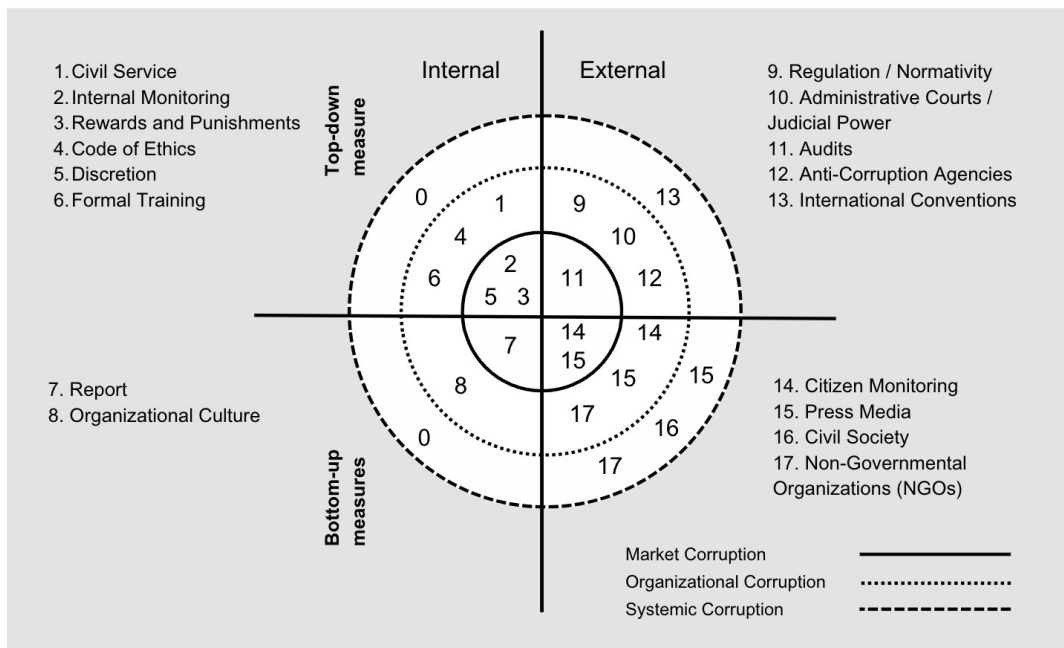
The bias in the creation of anti-corruption policies is overwhelming in the sense that, as we have already argued, they have tended to be designed as if the phenomenon of corruption were the exception rather than the rule. This policy design process is consistent with the garbage can model (Cohen et al., 1972) which suggests that solutions create their own problems, rather than the other way around, as proposed by the logical-instrumental model of policy design. In this specific case, it is anti-corruption policies themselves that end up characterizing the type of corruption they can effectively address and tackle. This occurrence, quite natural in the process of public policies, nevertheless has serious

consequences, as seen in other areas such as the issue of drugs (Meza & Corona-Ojeda, 2018), or forced disappearances (Naime, 2020). Ill-structured, complex issues end up creating even worse public consequences, or alternatively, the policies implemented achieve a limited margin of effectiveness or are outright flawed.

In light of the MACC, it is possible to analyze anti-corruption policies considering a more complex corruption phenomenon. The MACC is not exhaustive. Future research conducted under this framework should enrich the causal mechanisms and concepts integrated within each dimension. But even with these limitations, the MACC could provide insights into how anti-corruption policies could be modified to address the phenomenon in different ways and be more effective. To demonstrate this, we offer a hypothetical narrative that unveils what could happen when policy mechanisms are employed against a poorly characterized phenomenon.

Figure 1 provides an analysis of anti-corruption mechanisms linked to types of corruption. According to Jancsics (2019), studies on corruption categorize types into three main groups, and corresponding anti-corruption measures are identified from there. The three types are 1) market corruption, 2) organizational corruption, and 3) systemic or deep corruption (Bozeman et al., 2018; Jancsics, 2019). In the quadrant of Figure 1, anti-corruption actions are associated with four categories that we use to explain the implications and consequences of policies when starting from an erroneous assumption about the specific corruption phenomenon.

FIGURE 1 TYPES OF CORRUPTION, STRATEGIES, AND IMPLEMENTATION CLASSES



Source: Elaborated by the authors based on Jancsics (2019).

Dyadic corruption, which receives the most attention, also known as market corruption, is a phenomenon that can be 'addressed' in various ways. Within organizations, several policy actions are available to address this type. From a top-down approach alone, we can mention measures for internal monitoring, the application of rewards and punishments, and the modification of processes to reduce the discretion of officials. From 'bottom-up', we have the whistleblowing mechanism that implies the participation of individuals involved in or aware of corrupt acts, with the expectation that their report triggers a further investigation and a determined course of action to address the issue. There are also measures with external origins. The implementation of audits, for instance, is often carried out by external bodies, sometimes from other levels of government. Also, from an external 'bottom-up' perspective, there is citizen monitoring and the work of the press, which serves to uncover the phenomenon and call for action from the relevant authorities (Figure 1).

To combat dyadic corruption using mechanisms as previously mentioned assumes a significant premise: that the institutions and authorities responsible for making decisions and implementing anti-corruption measures, work within a framework adhering to legality and with a strong interest in safeguarding the public interest. However, in contexts of systemic corruption, this condition might not be met. According to studies stemming from the application of the MACC, dyadic corruption frequently supports a broader network of organized corruption. As such, dyadic corruption is merely a small link in a chain. In this scenario, the mentioned anti-corruption actions lose their effectiveness since the conditions for functionality won't be present (Mungiu-Pippidi & Dadašov, 2017; Mutahi, Micheni, & Lake, 2023) (Figure 1).

Given the above, what happens when the organization's governance premises hint at elements of capture or organizational corruption? For example, what happens to the whistleblowing mechanism (Figure 1)? In an environment of organizational corruption, those with the authority to make decisions and execute subsequent processes stemming from a report would have sufficient discretion to filter or select which records to pursue, or they might even possess information about the whistleblower, exposing them to retaliation. In an environment of organizational corruption, anti-corruption actions aimed at uncovering dyadic corruption become part of the network's toolkit to enhance their illicit activities. It's not surprising, and there are even cases known, of corrupt or captured governments or organizations that have been successful in implementing anti-corruption measures. This isn't just to manipulate public perception of these measures but also to refine their capture processes (Figure 1).

Organizational corruption can permeate different measures and capture a broad or specific range of administrative units, for example, within a local government. Depending on the extent of this corruption network, certain actions can be taken to address organizational corruption. Internally, it might be feasible to mitigate the issue by implementing professionalism systems for officials, and formal training alongside the establishment of ethical codes to guide personnel conduct. From the bottom, organizational culture exerts influence; it acts as an additional institution that guides actions and the 'ought to be' within an organization. Externally, organizational corruption can be tackled through the efforts of specialized anti-corruption agencies, improved regulation and norms, and the work of entities like administrative or specialized courts. Naturally, citizen monitoring, the

press, and civil society organizations that are vigilant and prepared to reclaim government units play a role (Figure 1).

Similar to the previous exercise, the successful implementation of the aforementioned anti-corruption measures relies on conditional premises; their absence leads to the fallibility of actions. Studies conducted using the MACC provide evidence of actors involved in corruption consolidation processes coordinating with others wielding political power, such as council members, individuals close to the president, officials from internal control bodies, or other high-ranking public officials. When this coordination is close, anti-corruption measures targeting organizational corruption lose their effectiveness, as the primary checks and balances designed to mitigate this issue might be employed for political purposes or deactivated according to electoral or private interests (Arellano-Gault, 2016).

In such a scenario, when the conditions for implementing these anti-corruption measures are lacking, fundamentally we are talking about a form of governance where corruption becomes the primary organizing instrument of the government. This is known as deep corruption. Deep corruption is defined as the distortion of public values through the moral actions of powerful individuals, caused or promoted by government structures, governance mechanisms, or public policy (Bozeman et al., 2018). Often, this type of corruption is hard to detect because it is legalized, and it is challenging to address because those who have the obligation and institutional power to tackle it are also the ones who conceal it.

Deep or systemic corruption, due to its consequences, is identified as a super-wicked problem (Peters, 2015). Problems of this nature lack clear instruments for addressing within the realm of public organizations, as illustrated in Figure 1. Addressing this type of corruption requires more systematic implications and demands effective information and communication to society through investigative work conducted by the press and specialized civil society organizations. However, even with this communication effort, it will be necessary for the general society to be aware of the damage that corruption inflicts on the system as a whole. Studies on social innovation in anti-corruption reveal the significance of social and cognitive change in how the population relates to the phenomenon of corruption. Aguirre-Arias (2023) points out that in Mexico, the turning point that motivated the creation of a National anti-corruption System, beyond the high levels of corruption, was explained by the cognitive-social shift in the interpretation of corruption. Previously seen by people as a necessary evil, it later came to be viewed as harm to the public, as a crime in itself.

In this sense, it will be necessary for the population to be willing to see the phenomenon as something that needs to be changed and addressed, rather than viewing it as something necessary or indispensable. This observation is consistent with broader insights from studies on corruption that emerge from the collective action perspective (Persson, Rothstein, & Teorell, 2019).

The studies conducted based on the MACC demonstrate the association between spaces of systemic corruption, as observed by Meza and Pérez-Chiqués (2021) in their cases, and a weakened press and civil society when it comes to addressing the issue of corruption. Two of the most important spaces where structural changes could be provoked are often seriously weakened. This aspect does not favor the sustainable addressing of the corruption problem at any possible level. Deep-seated corruption, as depicted by the MACC, could be motivating and concealing organizational corruption, which in turn supports dyadic corruption.

5. CONCLUSION

This article argues that the most visible and palpable forms of corruption have often shaped anti-corruption policies. This trajectory makes sense, as when designing policies, we must consider how we verify progress. The type of dyadic corruption, or market corruption, has had the greatest prevalence due to its visible characteristics and implicit manifestations. However, the problem of corruption can become much more complex. We propose with utmost clarity that crafting anti-corruption policies based on the dyadic phenomenon could lead to policy designs that are easily fallible when confronted with a context of systemic corruption.

The article aims to demonstrate the aforementioned argument with the support of the Analytical Framework of Corruption Process Consolidation, better known as the MACC. This framework has been used in several previous studies to understand systemic corruption by employing a set of four dimensions that unfold the complexity of the phenomenon. This framework can, in turn, function as a diagnostic tool to understand corruption in a contextualized and delimited manner, allowing monitoring of how practices of interest evolve in response to anti-corruption measures. We present a logical test of our main argument using what we know about systemic corruption and its interaction with anti-corruption policies. While this line of research is just beginning, through this article, we aim to leave the door open for organizing better subsequent studies that can help decode with greater precision and evidence how anti-corruption policies manage to be evaded when the governance context is one where corruption has become the norm.

The design of an anti-corruption policy that successfully addresses a context of systemic corruption must start with a conception of an organization that self-protects. From there, policies can be designed for a target population that will be fully inclined to bend the rules in their favor and hide their strategies in the shadow of the rule of law. This concealment will take many forms, and a particularly insidious one is cognitive invisibility. For instance, asserting that “this is not corruption, I’m just following the rules,” which might inherently be corrupt when viewed from the perspective of the harm they cause to public values like democracy, justice, and equality. The analysis based on the MACC shows that different forms of corruption, ranging from market corruption to organizational and then deep corruption, are intimately linked. One supports the other, and so on. This leads us to propose some ideas to keep the discussion going:

- 1) In the context of systemic corruption, improving institutional capacities through a technocratic approach might not serve to address the corruption problem; on the contrary, it could potentially exacerbate it.
- 2) In the context of systemic corruption, there is very little that can be done solely from within the organization. Instead, it will be necessary to rely on an external system of checks and balances, involving diverse actors including civil society, and particularly other formal checks and balances embedded in the division of powers according to the political regime. In this sense, the actors within the relevant political party system will have an unavoidable responsibility.

3) In the context of systemic corruption, the generalizable trust that is commonly associated with the role of the government will be diminished. The public tends to have little trust in a corrupt government. However, particularistic trust, which links citizens to specific individuals in positions of power and authority, could be seen as desirable, increased, and even indispensable (Pérez-Chiqués & Meza, 2021). This situation could hinder the reversal of the necessary vicious cycle to break free from systemic corruption. Certain segments of society may continue to support the corrupt system because they benefit not only from monetary gains but also from the assurance of trust.

These implications are empirically grounded and, therefore until policies are adopted that address the issue in all its complexity, the State will have no way to diminish the problem.

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