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Zdravko Veljanov^{1,2}, Mihály Fazekas^{1,2}, Marko Klašnja³, Bence Tóth²

Beyond Disclosure

The Global Usability Gap in Asset and Interest Declaration

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1 – Central European University

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3 – Georgetown University

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Executive summary

Asset and interest declarations require public officials to file reports about their financial holdings, income, and external interests. Such reports serve the dual purpose of preventing conflicts of interest and helping to detect unexplained or illicit enrichment. However, their value is not automatic; it depends on whether the disclosed information can be found, processed, and connected with other data. The brief maps the global landscape of declaration systems and, drawing on the team's direct research and policy experience with declaration data, focuses on a decisive but underexplored question: whether and how these data are used in practice.

The regulatory landscape: broad norms and uneven practices

No uniform global standard governs how declarations should be structured, published or enforced. Instead, there is a wide range of guidance and good-practice recommendations from international organizations, reflecting different institutional contexts. Despite this diversity, several core design choices recur, notably who should declare and what should be declared. Coverage of senior executive and legislative officeholders, such as cabinet members and members of parliament, is among the areas of broad consensus. However, there is less explicit guidance on the judiciary, subnational officials, and family members. Oversight arrangements likewise vary considerably across countries, ranging from independent bodies with clear mandates and referral powers to fragmented or politicized bodies with little or no investigative capacity.

Data Review

The core finding of the policy brief concerns the gap between publication and usability. High legal coverage does not automatically translate into usable data for research. Although many countries collect such declarations, many fail to publish the resulting datasets, and even fewer publish them in machine-readable, open, or reusable formats. The brief identifies three key weaknesses. The first weakness is the format. Declarations are mostly published as HTML pages or scanned and handwritten PDFs. Structured information is rarely available, creating a gap whereby much data is public but analytically unavailable. The second weakness is comparability. Even where the same categories of information are required or published, what is recorded and how it is recorded differ substantially. For instance, property may be reported at current market value in one system and at acquisition price in another. Such inconsistencies make comparisons over time and across countries largely impossible. The third weakness concerns linkage: the identifiers needed to connect declarations to company registries or procurement data. Only a handful of countries include company identification numbers.



Compounding these three weaknesses is the frequent practice of removing data once officials leave office, which ultimately prevents retrospective analysis.

Recommendations

What holds declaration systems back is no longer a lack of standards, prescribed guidelines or evidence, but the absence of implementation and structured data. The following recommendations would turn declarations from a compliance exercise into an analytical tool:

- Design structured data infrastructure. Move from document-based publications (scanned or handwritten pdfs) to structured and machine-readable formats with clearly defined fields and values. This requires oversight bodies to build in-house IT capacities.
- Mandate unique identifiers. Standardized identifiers for natural persons and legal entities are the most important prerequisite for cross-referencing declarations with other datasets.
- Widen coverage. Extend obligations beyond executive and legislative officeholders to include senior officials in public agencies, subnational decision-makers, and close family members.
- Tailored data for better communication. Provide various level of data access depending on the audience. For researchers and civil society, provide API access, clear identifiers, and bulk-download functionality. For the public, provide accessible dashboards and explanatory summaries, together with guidance on how to use them.
- Require asset valuation. Declarations should capture the location and current value of assets to allow year-on-year changes to be traced and unexplained wealth accumulation to be detected.
- Enable data verification systems. Equip and train an independent oversight body with the legal authority and financial backing to run automated and identifier-based cross-checks that can be complemented by targeted spot checks on higher-risk profiles.

Background

Goals

This brief examines the entire disclosure chain: from legal coverage, declarable content and publication to data structure, linkage and institutional oversight and verification. It draws on sources with different samples and purposes, including the World Bank's comparative work on legal requirements across 176 jurisdictions and the Global Civil Society Coalition for the UNCAC's European mapping of asset and declarations across 33 countries. The latter was developed in collaboration with the Global Data Barometer (GDB), which provided the indicators and technical platform.

The regulatory reviews reveal that while over 160 countries introduced some form of financial disclosure system, only a small number publish declaration data with (i) have sufficiently broad scope (i.e., include a wide array of public officials); (ii) provide sufficient depth (e.g., information on company ownership and financial assets); and (iii) are available in a format that permits systematic analysis across countries and over time. The global gap therefore lies not the lack of declarations as such, but in the distance between legal frameworks and their implementation and, ultimately, a functioning accountability data system.

This brief therefore focuses not on restating these mappings and frameworks, but on examining what is needed to analyse diverse declaration datasets and advance data-driven public accountability. Drawing on the team's experience in mapping and using publicly available disclosure data sources, the brief emphasizes the importance of the last piece of the puzzle, that of the need for unique identifiers, structural and institutional set up of the systems, and most importantly, interoperable registers.

Why asset and interest declarations matter

Asset and interest declarations of public officials are among the most widely adopted instruments for political accountability and public sector integrity. An asset and interest declaration represents a structured statement through which public officials report their financial holdings, income sources, and additional private interests that might be relevant for the exercise of their public function. Depending on the jurisdiction or the extensiveness of the form, a declaration might include bank accounts and savings, company shares or board memberships, real estate and securities, vehicles and property, gifts, and income from outside employment. Moreover, declarations may also extend to, or be linked with, the assets and activities of spouses, partners, or dependants. In recent years, the instrument has evolved from a narrow conflict of interest mechanism to an important component of anti-corruption structure.

The United Nations Convention against Corruption (UNCAC), through Articles 7(4), 8(2 and 5), and 52(5), calls on state parties and national authorities to establish systems that require public officials to report their assets, interests, investments, additional activities, and any substantial gifts and benefits that can potentially compromise the impartial exercise of their duties. The OECD, GRECO, the World Bank, and the EU's DG HOME complement the broad

norm with more operational guidance on scope, potential sanctions, public access, and institutional design (see OECD 2011, GRECO 2025, World Bank 2020, DG HOME 2024; United Nations 2004).

The provisions reflect both preventive and investigative objectives. A conflict of interest exists when a public official has a private interest that influences, or appears to influence, the performance of their public duties. It does not necessarily imply misconduct; rather, the objective is to identify and manage risk before a decision is compromised. By contrast, corruption concerns the abuse of power. As a result, declarations can support corruption detection by revealing unexplained wealth, concealed business activities or inconsistencies in income. The preventive function therefore lies in identifying situations in which an official's private interests may conflict with public responsibilities. The investigative function lies in enabling researchers, civil society or journalists, to use temporal patterns to identify unjustified wealth accumulation or illicit enrichment (Global Civil Society Coalition for the UNCAC 2025; Rossi, Pop, and Berger 2017, pp. 4-8).

Publication of asset and interest declarations functions at the intersection of several governance domains. It can strengthen accountability, but publication alone does not automatically produce it. Beyond preventing and managing conflicts of interest between public duty and private interests, it also serves to deter corruption through the credible prospect of scrutiny and to reduce the risk of integrity violations by creating a public record against which conduct can be assessed. The literature suggests that public access is most consequential when declarations are comprehensive and institutions can act on them. Systems in which declarations are filed but not verified, or verified but not published, show weaker effects (Transparency International 2015).

Box 1: Evidence and use of declarations as an investigative starting point

Research on India uses candidates' disclosures to examine wealth accumulation, political selection and voter reactions to identify an increase in exit of winning candidates (Fisman et al. 2016). Cross-country works also show that disclosure requirements matter most when information is publicly accessible and comprehensive (Djankov et al. 2010). Such findings indicate that the potential benefits are dependent on the extent of the policy implementation and the contextual factors (Chauchard, Harish and Klačnja 2019).

Nonetheless, public availability alone does not guarantee the intended transparency benefits. Different audiences require different levels of transparency. The general public typically pays limited attention to published declarations, even when access is unrestricted (Djankov et al. 2010; Global Civil Society Coalition for the UNCAC 2025). Instead, intermediary actors, such as investigative journalists, oversight committees, researchers, or civil society organizations, are the ones realizing value from such publications. Such entities tend to cross-reference

declaration data with company registries, public procurement databases, and beneficial ownership records. On the one hand, published declarations intended to inform the public should be accompanied by explanations that are legible to non-specialists. On the other hand, for specialized intermediary actors, a decisive aspect is not publication per se, but the availability of key variables in a structured, machine-readable, and linkable format. The brief focuses primarily on the latter.

Global Regulatory Landscape

No uniform, globally accepted, and implemented standard exists on how asset and interest declarations ought to be designed, published, and enforced. International guidance exists on core design principles, while evidence on implementation and enforcement is documented mainly through regional mapping exercises.

International norms and guidelines

The relevant international instruments serve three complementary functions: establishing the legitimacy of financial disclosure, defining the core design choices that states need to consider and address, and creating cross-country pressure for implementation and enforcement. The founding international norm is the United Nations Convention against Corruption (United Nations 2004), whose articles 8(5) and 52(5) invite state parties to establish financial disclosure systems with appropriate sanctions for non-compliance. However, it leaves open to implementation who and what should disclose, and how the filing should operate. The OECD's 2003 Guidelines for Managing Conflict of Interest in the Public Service and its 2011 study, *Asset Declarations for Public Officials*, provide a more systematic comparative analysis of declaration systems, covering Eastern Europe, Central Asia, and OECD countries. Two GRECO evaluation rounds, first focusing on corruption prevention among parliamentarians, judges, and prosecutors from 2012, and second focusing on top executive functions and law enforcement from 2017, produced in-depth and operationally prescriptive country-level recommendations on the scope for declaration, verification, and transparency (GRECO 2024). At the EU level, a 2021 Notice on the avoidance and management of conflict of interest broadly addresses opportunities for member states to operationalize specific conflict of interest legislation and legal instruments, such as declarations of interest, asset disclosure, and company registers (European Commission 2021, Section 3.2). Moreover, a recent DG HOME technical report highlighted the need to focus on elements of effective asset declaration systems without specifying a single ideal model (DG HOME 2024, pp. 4-8).

The guidance arising from these studies and frameworks indicates who should file a declaration (scope), what declarations should include (content of assets and interests), how and when they should be filed (frequency), which body receives and investigates them (institutional structure), how they are published (access), and how non-compliance is addressed (enforcement/sanction). Yet, implementation is deliberately left to national discretion.

Institutional Oversight and Enforcement

This section considers the institutional design for overseeing declarations and enforcing compliance. The effectiveness of any system depends not only on what is declared, by whom, and how, but also on whether there is an independent body equipped with adequate legal authority, technical capacity, and political neutrality to conduct investigations into asset and interest declarations (Kotlyar and Pop 2021).

The responsibilities or duties of oversight institutions vary significantly. At a minimum, such a body should be mandated to receive declarations, ensure timely filing and completion, and make them available in accordance with the applicable rules. More robust systems empower oversight bodies to verify declarations against external sources, initiate or refer cases for proceedings, and, crucially, maintain sufficient analytical and IT capacity to conduct cross-checks at scale (Kotlyar and Pop 2021). The gap between these models helps explain why otherwise similar systems perform differently. For instance, France's Haute Autorité pour la transparence de la vie publique (HATVP) is independent, has access to other important databases, such as tax, banking, and real estate records, and can build cases for referral to criminal prosecution. Romania's National Integrity Agency (ANI) can cross-reference data and can similarly initiate administrative proceedings. Nonetheless, other countries assign such oversight roles to parliamentary committees or ethics commissions without real investigative powers, or to multiple fragmented bodies that lack a clear mandate. One such example is Bosnia and Herzegovina's Central Election Commission (Resimic 2023).

Sanctions for non-compliance range from criminal prosecution with imprisonment, e.g., in France or Ukraine, to minor administrative infractions, disciplinary reprimands, or monetary fines, e.g., in Montenegro, Kazakhstan, Lithuania, or Romania (OECD 2011). Without credible enforcement and well-equipped and well-financed oversight institutions, declaration systems function merely as bureaucratic, ritualistic tools rather than deterrents (OECD 2011).

Cross-border asset concealment poses an even greater challenge for enforcement. Analysing the "Panama Papers", Alstadsæter, Johannesen, and Zucman (2019) found an uneven presence in offshore jurisdictions, skewed toward wealthier countries and individuals. Limited access to such accounts, due to weak international coordination or data-sharing mechanisms, constrains domestic detection and enforcement.

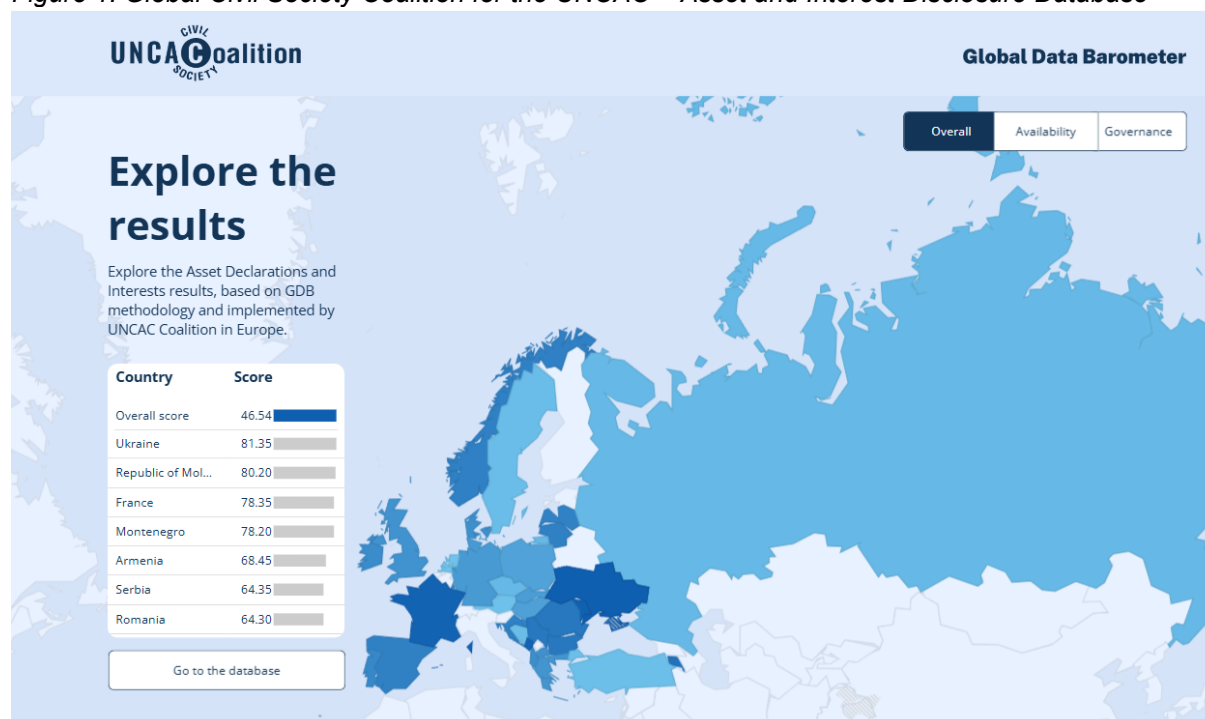
Existing mappings of declarations data

Several large-scale efforts have mapped how declaration systems work in practice. They fall into two analytically distinctive groups. The first group maps the rules on paper, i.e., whether a legal framework exists, whom it covers, and what it requires, a "de jure" mapping (see Figures 3 and 4 below). The second group focuses on what is actually published and how it can be used in practice, or "de facto" mapping (see Figure 5 below). It examines whether declarations can be found, the formats in which they are published, and whether the information can be linked to other data. The World Bank's Financial Disclosure Law Library, developed by the WB/StAR team (see Rossi, Pop, and Berger 2017), offers the widest coverage. It documents

the legal frameworks of 176 countries, over 1000 laws in 33 languages, and for a subset of 52 countries, adds selected information on how these systems work in practice. It is therefore primarily a “de jure” mapping of whether disclosure laws exist, whom they cover, and what they require, rather than an assessment of how published data function in practice. Its primary purpose is to map the legal framework rather than to assess how published data function in practice. A key finding from the report is the high formal coverage at national-level, with 93 percent of countries prescribing coverage for cabinet members and 91 percent for parliamentarians. However, only 43 percent of countries make declarations publicly accessible (Rossi, Pop, and Berger 2017).

The two regional mapping initiatives, led respectively by the Global Civil Society Coalition for the UNCAC and the Global Data Barometer (GDB), also make their findings available through interactive dashboards. In Europe, the Coalition worked with its regional members and the GDB to develop a database on asset and interest declarations across 33 countries. It enables users to assess published declarations in terms of availability and governance. The underlying database further examines whether declarations are available online, the formats in which they are published, and whether they can be used for analytical purposes (Global Civil Society Coalition for the UNCAC 2025).

Figure 1: Global Civil Society Coalition for the UNCAC – Asset and Interest Disclosure Database¹



Note: Developed by the Global Civil Society Coalition for the UNCAC in collaboration with the Global Data Barometer

¹ <https://uncaccoalition.org/asset-and-interest-disclosure-database/>. The dashboard reports each country on a score of 0-100 across two areas. The governance area captures the strength of the underlying legal framework, by focusing on answer to the questions relating to the scope of declarants

The GDB's second edition extends the assessment to 43 countries in Latin America, the Caribbean, and Africa. It covers eight thematic clusters (company information, critical competences, equitable access, governance foundation, land management, political integrity, public finance, public procurement). Moreover, the interactive dashboard provides more granular information on specific indicators, e.g., beneficial ownership, asset declarations, or political finance data.

Figure 2: Global Data Barometer Database²



Finally, empirical research conducted for the FALCON, GI-ACE, and RESPOND projects has mapped declaration practices across 45 countries, with a particular focus on the actual content, format, and usability of published data. This “de facto” mapping underpins the practical findings in the remainder of the brief. Where data are available, the mapping also records whether declarations contain information that can be linked to company registries and procurement databases (Mineva, Fazekas, Poltoratskaia, and Tsabala 2023).

Substantive Scope and Coverage

Who should be declared?

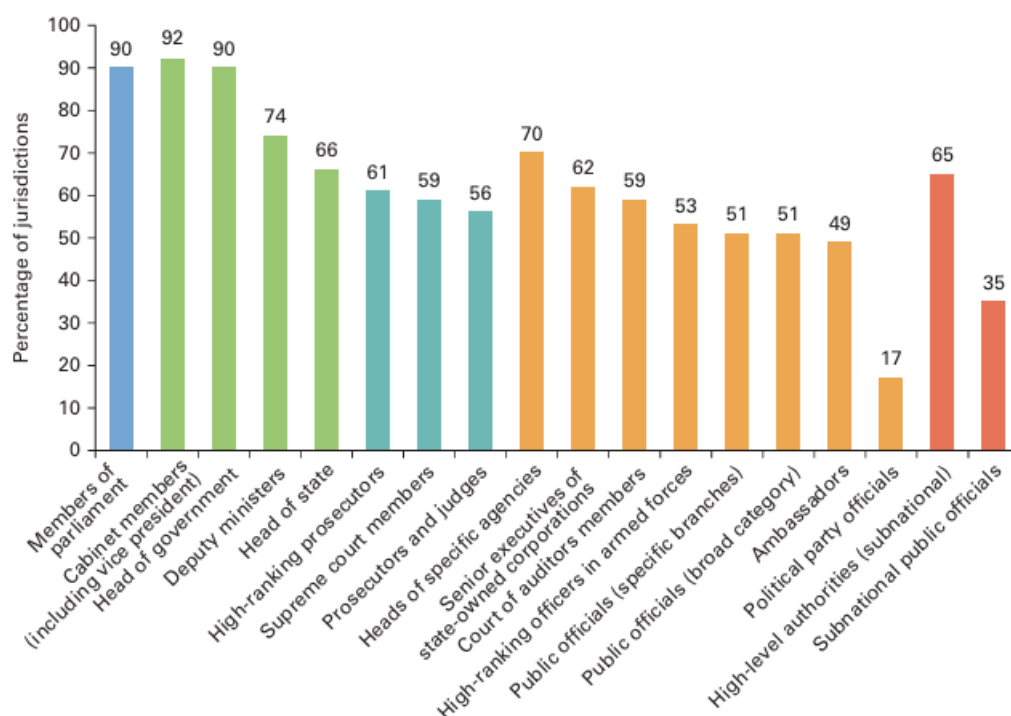
Given the differentiated spectrum of data availability and publication (see Global Civil Society Coalition for the UNCAC), there is also variation in who is required to file declarations. Rossi,

and declarable items, existence of independent oversight body, verification mechanisms, update frequency, publication (open-data) requirements. The availability area captures the openness of the published data, such as online access, completeness of fields, presence of identifiers, and availability in machine readable format. Scoring handbook for governance available here - <https://handbook.globaldatabarometer.org/2021/indicators/G.PI.IAD/>, and for availability here - <https://handbook.globaldatabarometer.org/2021/indicators/A.PI.IAD/>.

² <https://globaldatabarometer.org/explore-the-results/>. The dashboard is based on estimation from expert surveys, through country-level researchers, who draw on local sources, online sources and in-depth data assessments to provide evidence for governance, capability and availability (the three broader pillars). Methodology available here - <https://globaldatabarometer.org/methodology/>.

Pop, and Berger (2017, chapter 2) distinguish between five broader categories by which coverage varies. The first category covers the members of parliament. The second covers high-ranking executive representatives, such as the head of state and government, cabinet members, and deputy ministers. The third covers representatives of the judiciary - judges and prosecutors. The fourth covers heads of public bodies, agencies, and state-owned enterprises. The fifth concerns representatives of subnational institutions, including local elected politicians and senior subnational administrators. The WB data reveals a clear trend in coverage across national legislators and heads of government and their cabinet (Figure 3). Among the 176 surveyed countries, 92 percent require disclosure from cabinet members and 90 percent from members of parliament. Coverage of the judiciary is substantially more limited, with an average of approximately 59 percent requiring disclosure by prosecutors and judges. Political party officials are the least commonly covered category. At the subnational (local) level, almost two-thirds of the surveyed countries request information from elected local politicians, and one-third from subnational administrators.

Figure 3: Share of Public Officials Requested to Disclose

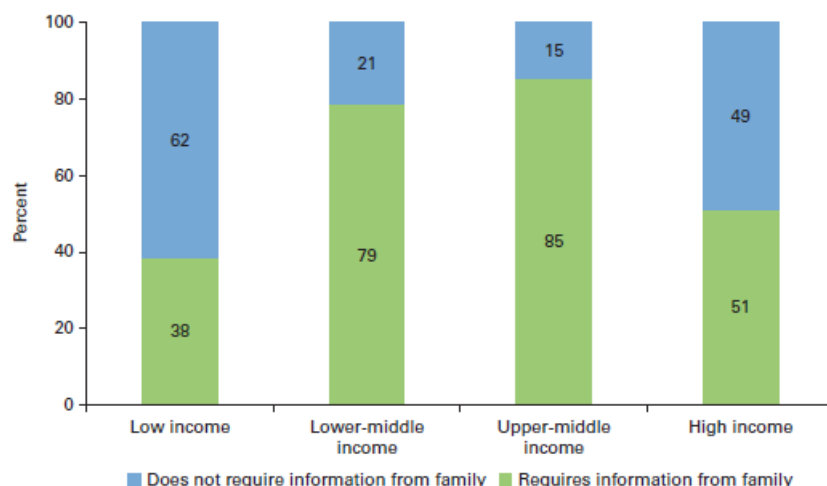


Source: Rosi, Pop, and Berger (2017, p.20).

An additional critical dimension is whether disclosure obligations extend to the family members and dependents of the declaring official. Existing research shows that the most common method for concealing illicit wealth is by transferring assets to spouses, children, or other close relatives (GRECO 2024; DG HOME 2024). However, coverage of family members varies significantly across the 176 WB surveyed countries. For example, Romania's National Integrity

Agency (ANI) has identified numerous cases in which officials transferred property to spouses or close relatives just before filing deadlines. Figure 4 shows that the share of countries not requiring family disclosure is highest among low-income (62 percent) and high-income (49 percent) countries. Lower-middle-income (79 percent) and upper-middle-income (85 percent) countries show stronger requirements for family disclosure.

Figure 4: Countries Requiring Disclosure of Family Members (share)



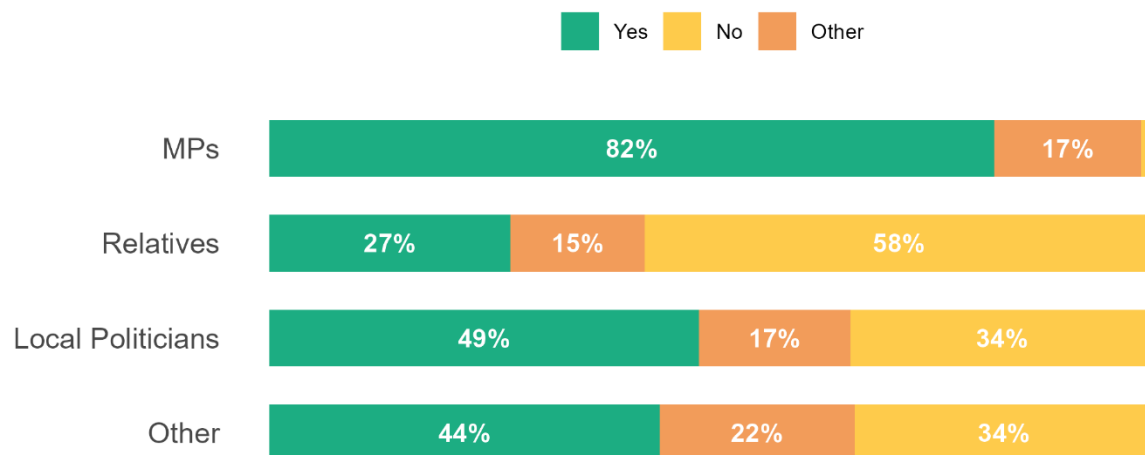
Note: Approximate percentages based on the analysis of 158 disclosure jurisdictions.

Source: Rosi, Pop, and Berger (2017, p.25).

Figures 3 and 4 describe the rules on paper, whereas Figure 5, drawn from the GTI-mapped countries, shows what is actually published; the figures should therefore be read as legal and practical mappings rather than as a single continuous framework. The 44 GTI-mapped countries span EU member states, the Western Balkans, selected post-Soviet countries, and a smaller number of developing countries, and confirm these patterns³ while adding detail on the relative coverage of officials who declare. The highest rate of required and published disclosure is among members of parliament, exceeding 80 percent. The coverage falls substantially for local elected politicians (merely 49 percent). Relatives and family members of declaring officials are the least-covered group for whom disclosure is required, with 58 percent of the countries examined not including them in the mandatory disclosure requirements (Figure 5).

³ Through GI-ACE, FALCON and RESPOND.

Figure 5: Coverage of Asset and Interests Declarations



Source: GTI research.

What should be declared?

In addition to the scope of public officeholders mandated to disclose, a second and equally important dimension, particularly for research and investigation, is the depth of required information. This dimension determines the analytical and enforcement potential of the asset and interest declaration system, a form that captures only income and real estate cannot reveal the full complexity of ownership chains through which conflicts of interest operate. A comprehensive and detailed declaration should distinguish between declared assets and interests. **Asset-related information** describes the economic position of the declaring official, including income, cash, accounts, securities, real estate, loans, company shares, and other liabilities. This part aims to support the tracking and analysis of wealth, changes in net worth and possible illicit enrichment. **Interest-related information** describes the relationships and roles that can affect the official's impartiality, including outside employment, board memberships, advisory roles or sponsored travels. This part aims to support conflict-of-interest prevention, even where no direct monetary value is apparent.

Financial accounts, securities, and property are the most frequently required categories. Figure 6 summarizes findings from 153 jurisdictions (of the full 176 WB-surveyed countries), revealing substantial overlap in the covered categories; however, there is significant variation in the level of detail. For instance, while most countries require disclosure of "assets", the definition varies widely. In some jurisdictions, it is only required for domestic property; in others, it includes foreign property.

Furthermore, in some jurisdictions, the declared price reflects the current market price, while in others it reflects the acquisition price. Rossi, Pop, and Berger (2017, 39) stress the importance of complete information to trace "monetary investments". As such, in addition to the acquisition price, effective disclosure therefore requires information on the current asset value, how the asset was financed, and any significant restoration or renovation costs. Such



detail matters because it can reveal substantial changes in an asset's value—for example, the transformation of a house into a mansion.

Figure 6: What is covered in disclosure forms

Category	Global	Asia	Europe and Central Asia	Latin America and the Caribbean	Middle East and North Africa	OECD high-income	Sub-Saharan Africa
Immovable assets	88	100	90	100	82	78	80
Sources of income	77	73	95	96	45	100	48
Stocks and securities	86	100	95	100	64	87	70
Bank accounts	80	86	86	100	64	72	70
Cash	29	45	38	37	36	16	20
Values of income	67	73	90	93	27	63	48
Movable assets	80	86	90	100	82	56	75
Liabilities	72	82	71	100	45	56	68
Pretenure activities	58	45	71	85	27	75	33
High-level positions	41	45	38	33	27	84	15
Gifts	39	59	57	33	9	53	18
Other positions	30	32	19	19	36	69	10
Unpaid activities	29	18	38	22	9	69	10
Expenditures	18	18	38	22	0	25	3
Sponsored travel	14	14	5	4	0	41	8
Posttenure activities	14	0	29	7	0	34	8

Note: OECD = Organisation for Economic Co-operation and Development. Approximate percentages based on the analysis of 153 jurisdictions.

Source: Rossi, Pop, and Berger (2017), pp. 33-34. Based on an analysis of 153 jurisdictions (from the 176 WB countries surveyed).

Despite the detail shown in Figure 6, several caveats are necessary to avoid overstating comparability across systems. Even where the disclosure of the same nominal category is required, e.g., immovable property, the information reported may differ substantially. For example, while Chile requires officials to report the fiscal cadastral value (which typically lags the market value) for each property, not as an aggregate,⁴ Romania omits monetary value altogether and instead asks for descriptive information, such as property type, location, and

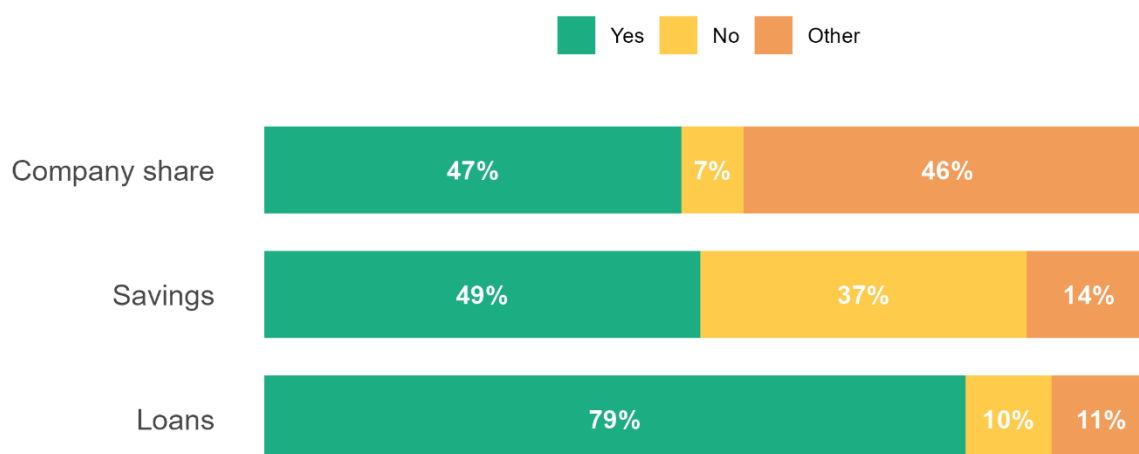
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https://documentos.minvu.cl/min_vivienda/GdeP/Documentos%20compartidos/INSTRUCTIVO%20PARA%20COMPLETAR%20DECLARACION%20DE%20INTERESES%20Y%20PATRIMONIO.pdf.

size.⁵ Bulgaria requires officials to report the acquisition cost. However, depending on when the asset was acquired and its subsequent price trajectory, reporting only that figure may produce a substantial divergence from the current market value. Croatia requires the current market value of each property. As specified by the Croatian Commission for the Resolution of Conflicts of Interest⁶, the declaring official must provide an approximation of the current market value, for which the Commission provides a table of median real estate prices. These methodological differences are major obstacles to cross-country comparisons. An official in Chile reporting a cadastral value for an individual property and an official in Romania providing descriptive information on the property without values cannot be compared, aggregated, or included in the same analytical framework. Moreover, systems that record only acquisition costs without accounting for appreciation or renovation, or that omit value altogether, cannot serve as a baseline for year-on-year or term-to-term comparisons.

GI-ACE and FALCON mapping identified three categories of financial assets with varying coverage. The mapping found that loans are declared in nearly 80 percent of the 44 surveyed countries, while coverage of company shares and savings is substantially lower, at almost 50 percent (Figure 7). With respect to company-related information, the mapping shows that company identifiers are rarely available. Only 13 percent of the 44 assessed countries contain company IDs, which are useful identifiers for matching records across databases, e.g., public procurement data. Company names are better represented, with almost 50 percent of the 44 mapped countries containing information on them. Although a name still enables some cross-referencing, matching on name strings alone is error-prone and lacks scalability. The same person or firm may appear under name variants, abbreviations, or different legal-form suffixes across registers (Figure 8).

Figure 7: What is declared (GI-ACE and FALCON)

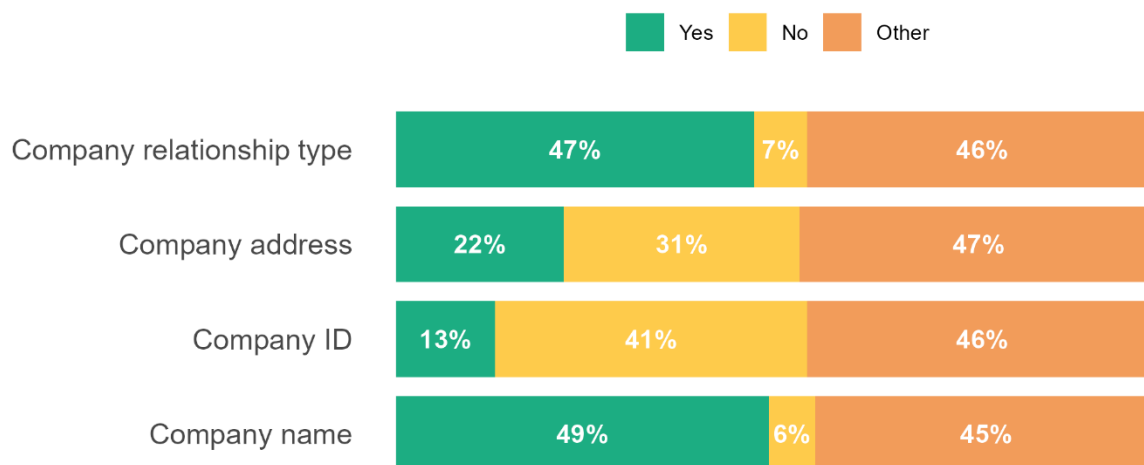


Source: GTI research.

⁵ https://integritate.eu/wp-content/uploads/2024/03/001_Brosura-A5-Ghid-de-completare-a-declaratiilor-de-avere-si-de-interese-IAN-2024-modificat-002.pdf.

⁶ Croatia Commission for the Resolution of Conflicts of Interest - <https://www.sukobinteresa.hr/hr/user>.

Figure 8: Declared company information



Source: GTI research.

Publication and Data Quality

This section moves from the legal content of declarations to their practical usability. It explores three interlinked dimensions. First, data availability or whether a declaration can be found and accessed. Second, data format, persistence, and quality: whether the record is complete, accurate, historically stable, and capable of being processed systematically. Third, data linkage: whether a declaration can be connected to other persons, entities, and administrative datasets. These dimensions determine whether publication remains merely a formal legal requirement or becomes operational infrastructure.

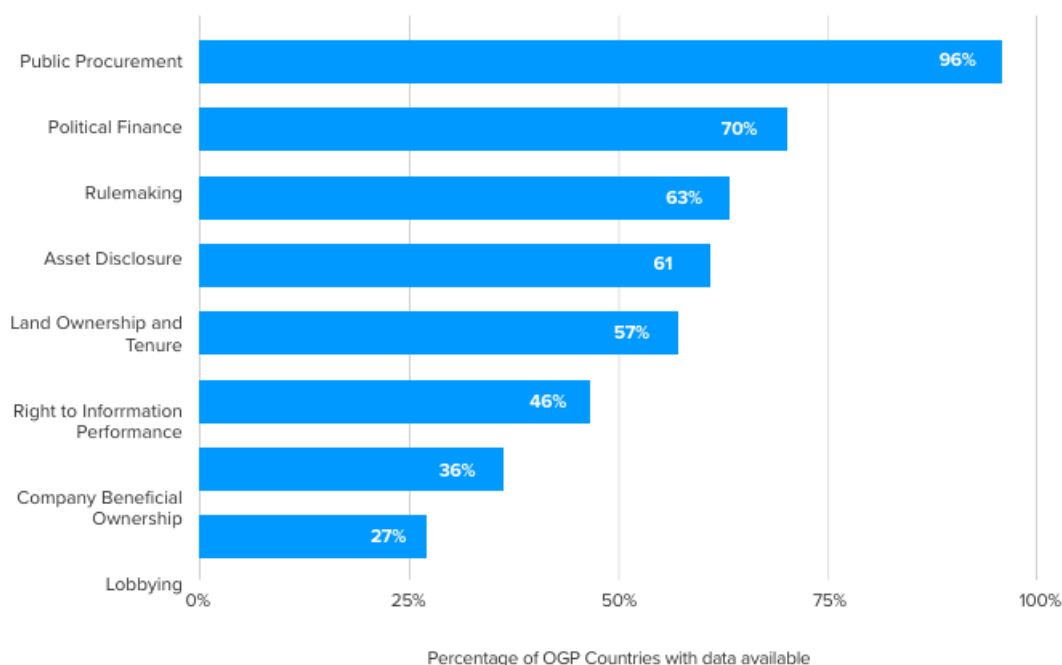
The system must also distinguish among different user needs. Citizens generally require searchable portals with explanations and comparative summaries of findings or descriptive information through dashboards. Journalists or civil society investigators rely on historical data tracking, batch access, field documentation and export functions to build linkages. Where the public engages, such as media reporting of declarations or CSO snapshots, it can generate political accountability pressure on representatives (Fisman, Schulz, and Vig 2016). Oversight authorities, academics and researchers require structured records with unique and well-defined identifiers and reliable interfaces for cross-checking and data linkage. A single dashboard cannot meet all these needs. Systems should therefore serve different audiences: structured, machine-readable, and downloadable data for intermediary users should be complemented by visualization tools and dashboards that present accessible information to the general public.

Data Availability

The preceding sections addressed what is required to be declared and by whom. This section turns to another important and equally consequential question: whether and how asset and interest declarations are published, and whether the published form allows for meaningful use or comparison (within a country or across cases). The exploration of this question helps determine whether a declaration system functions as an analytical tool or largely remains a bureaucratic formality.

Who actually uses declaration data matters because it frames everything that follows on publication format and linkage. The central logic of disclosure is transparency. However, systems should be designed to cater to both citizens, who tend to rely on accessible and digestible information, and researchers and authorities, who rely greater detail and the ability to link records and analyse changes over time. The OGP's 2022 report, *Broken Links: Open Data to Advance Accountability and Combat Corruption* (OGP 2022), provides the most systematic assessment across various policy areas, from asset disclosure to lobbying and public procurement, and across four broad regions in the world (Africa and the Middle East, Americas, Asia and the Pacific, and Europe). While 100 percent of the 67 assessed countries require the collection of asset declarations, only 61 percent actually publish them (Figure 9).

Figure 9: Data availability by policy area, 67 OGP-assessed countries

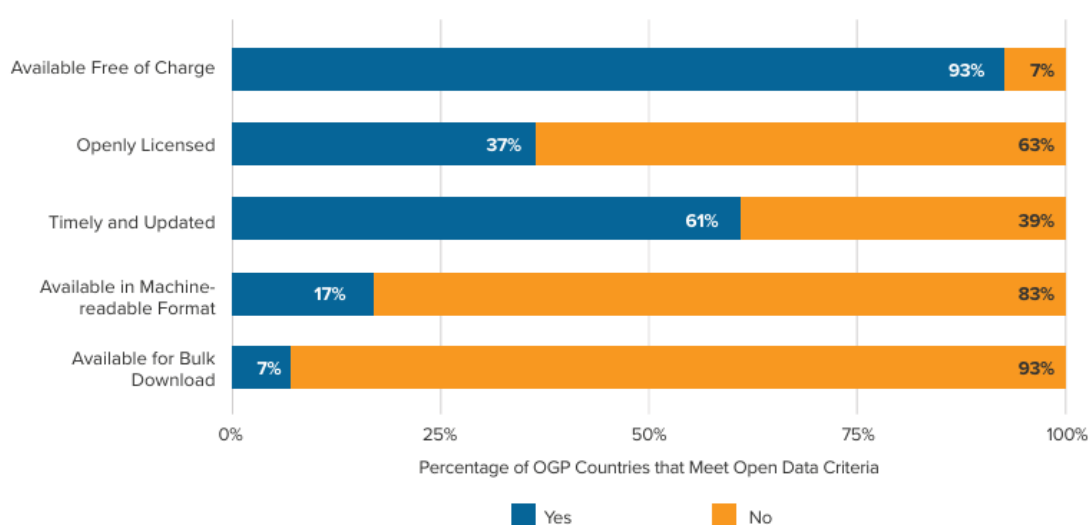


Source: OGP 2022, *Broken Links: Open Data to Advance Accountability and Combat Corruption*, p. 30

Among the 61 percent of the 67 OGP participating countries that publish asset-disclosure data, only 37 percent use open licenses, only 17 percent provide machine-readable data, and just 7

percent offer bulk downloads (see Figure 10; and OGP 2022, pp. 62-67). Nevertheless, it is also important to consider the scope of the OGP sample. Because OGP participation is voluntary and countries self-select into commitments, global data availability outside this sample may be even weaker. Even within the sample, as shown in Figure 10, countries fall short of the best-practice standards needed for meaningful research. Consequently, UNCAC's Coalition, in a recent report, stated that “...no country in Europe meets the highest standard of fully open, reusable, and comparable online asset and interest declarations” (Global Civil Society Coalition for the UNCAC 2025).

Figure 10: Data availability, 67 OGP-assessed countries



Source: OGP 2022, Broken Links: Open Data to Advance Accountability and Combat Corruption, p. 67

Data Format

The starting point is that asset and interest declarations, and their potential linkage to other data, are inherently complex. A comprehensive declaration must capture not a single snapshot but a network of related entities and relationships. Consider a hypothetical official, “Mayor A”, whose declaration omits information needed to trace links across databases. Effective analysis requires a stable identifier for Mayor A; information on a spouse or partner and any changes in status during the term; property held before taking office and property acquired during the term; financial information, such as loans and company shares; and interest-related information, such as board memberships and employment history. Each element may correspond to a distinct person, company, property, loan, or other record with its own identifier and value. Reconstructing the relationships among these elements, family ties, ownership, board memberships, and debt is precisely what conflict-of-interest and illicit-enrichment analysis requires.

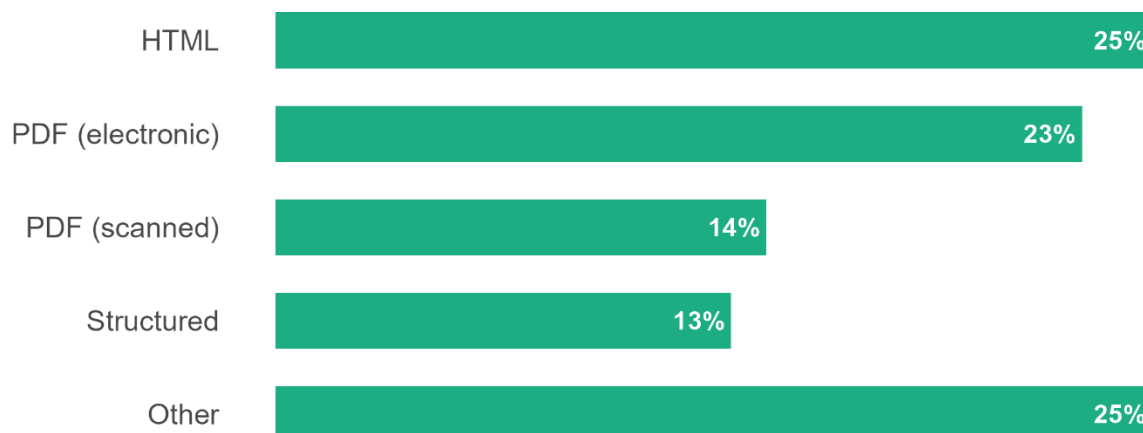
The main empirical finding is that, once this complexity is taken into account, most countries perform poorly. The publication format of asset and interest declarations determines their analytical potential. Structured and machine-readable formats, such as CSV, XML, JSON, and XLSX, enable automated extraction, structured comparison, and potential linkage to other datasets. Unstructured formats, such as scanned PDFs, handwritten forms, or non-downloadable HTML pages, may satisfy formal transparency requirements but offer limited potential for quantitative analysis (Open Ownership). The distinction between the two goes beyond a technicality because a declaration published in a scanned or handwritten format is formally public but analytically inert. By contrast, a declaration published in a structured format with unique identifiers for persons and legal entities can turn formal disclosure into a usable analytical tool.

Country practices vary greatly. Ukraine's Unified State Register of Declarations represents the most advanced model: a structured database with a public API that enables automated cross-checking with different national registries, and an analytical verification module that covers additional published documents (<https://nazk.gov.ua/it-tools/index/>). France's national system, HATVP, publishes interest declarations in CSV and XML formats under an open license, integrated into DataGouv (<https://www.data.gouv.fr/organizations/haute-autorite-pour-la-transparence-de-la-vie-publique>, and <https://www.hatvp.fr/open-data/>). Romania's ANI maintains one of the largest repositories, with more than 12 million published declarations.⁷ However, a limitation for analytical use is that, until 2022, most declarations were available only as scanned PDFs, many of them handwritten. Electronic PDF forms have been available only since 2022 (Official portal: <https://integritate.eu/>). Several Western Balkan countries, including Bulgaria, North Macedonia, and Serbia, publish data in machine-readable XML format but do not make the data available for bulk download, requiring scraping or manual extraction for analytical purposes (Mineva, Fazekas, Poltoratskaia, and Tsabala 2023).

Among the 44 countries mapped by GTI, the most common publication format is HTML, followed by PDF. Structured formats (CSV, XML, JSON, and XLSX) are the least-represented category in the survey. Cases in which information is unavailable or publications could not be identified are grouped under the category "Other", which, together with HTML, has the highest share (Figure 11). The suitability of publication formats is therefore directly linked to how declaration data can be used.

⁷ Official communication ANI - <https://integritate.eu/comunicat-privind-impactul-deciziei-ccr-ref-la-neconstitutionalitatea-unor-prevederi-ale-legii-ani/>.

Figure 11: Format in which declarations are handled



Source: GTI research.

User needs can provide important context for interpreting these findings. As discussed in the introduction, the central logic behind disclosure is the potential for transparency. However, evidence shows that formal transparency is not sufficient (Fox 2007), the intermediaries through which information reaches the public must also be trusted. The public is largely unfamiliar with the structure and content of disclosures, and to reach their full potential, citizens must understand how the information is presented and what it shows (Chauchard, Harish, and Klačnja 2019). Much of the anti-corruption value of transparent and usable data is realized by intermediary actors, such as researchers, civil society organizations (CSOs), oversight bodies, and investigative journalists. For these actors, the greatest value lies in the completeness of the information and in the ability to link and match it to other databases, placing it as a central design priorities.

Data Linkage

Against this background, three dimensions of data quality determine whether declaration data can fulfill its intended function. The first is the **availability of standardized identifiers**. Unique identifiers are a critical element enabling cross-database matching. Without unique identifiers for both natural persons and legal entities (such as company identification numbers), matching across datasets requires probabilistic algorithms and string-distance measures based on name similarity. Such methods are error-prone and resource-intensive when linking declarations related to the same person or company, or when linking companies that appear in other administrative datasets (e.g., public procurement or company registers). One structured approach is illustrated by the OpenSanctions website (<https://www.opensanctions.org/datasets/sources/>). The OpenSanctions project provides structured identifying information that some national systems fail to deliver consistently.

Standardized identifiers are closely connected to the broader issue of **data linkage**. The greatest unrealized anti-corruption value of declarations lies in their potential to be linked to

other datasets, such as company registries, public procurement data, or beneficial ownership registries. Where linkage is possible, several systems illustrate its practical value. Romania's PREVENT system, operational since 2017, cross-references asset and interest declarations with public procurement data by identifying potential conflicts of interest in the electronic public procurement system (SEAP) and resolving them without affecting procurement procedures (European Commission 2021). By 2021, the system had screened more than 50,000 declarations and 260,000 public procurement contracts (European Commission 2021). Ukraine's NACP analytical module cross-checks declarations against 16 registries at the time of submission (NACP 2025). However, these examples remain the exception. In most cases, barriers to linkage remain structural and difficult to overcome due to a lack of unique identifiers, non-machine-readable formats, and other access-related obstacles (OGP 2022, Mineva, Fazekas, Poltoratskaia, and Tsabala 2023, DG HOME 2024).

Box 2: Ukraine's good practice – publication as infrastructure

Ukraine's electronic declaration system shows the value of integrating data collection, publication, and verification with a common digital infrastructure system. Declarations are submitted electronically, kept as structured records and made searchable through a public register and accessible in a machine-readable format (e.g. JSON) through an API. The setup allows journalists, researchers, and authorities to analyze declarations on a scale, instead of inspecting them individually.

Moreover, the data format allows for integration and linking with other available data sources in state registers and databases. Based on assigned risk levels, authorized officials can conduct full verification. This design supports scale by using automated verification primarily as an information and screening tool, while full verification seeks to establish inaccuracies, unjustified assets, or other violations.

The second dimension is **completeness and accuracy**. Declarations are useful only if the information they contain reflects reality. When Georgia introduced compulsory monitoring in 2017, 224 of 280 randomly selected declarations (80 percent) contained violations, including undeclared assets, assets transferred to family members, or discrepancies between declared and market values (Transparency International Georgia, 2020, Table 1). The problems observed in Georgia are not unique; common issues across jurisdictions include systematic undervaluation of property (declaring houses or other property as storage units or omitting renovations and restorations from the updated valuation).

The third dimension is **temporal persistence**. Some countries remove public officials' declarations after their terms end. Such restrictions impede longitudinal comparisons that could detect gradual enrichment over a political career or conflicts that emerge after an official's mandate ends. Consequently, they limit the possibility of retrospective investigations, which are often necessary to identify malpractice. For instance, Croatia and Hungary remove asset



and interest declarations after 1 year, while Serbia removes them after 3 years (SELDI; Mineva, Fazekas, Poltoratskaia, and Tsabala 2023).

Box 3: Temporal persistence – warning example in France

France illustrates how even otherwise advanced declaration systems can nevertheless impose significant limits on public data continuity. Access rules vary according to the officeholder and the type of declaration. For members of the National Assembly, declarations of interests and activities are published online. However, declarations of assets are only available through consultations at administrative offices at regional level, and for a legally defined period.

For members of the Government, assets and interest declarations are published online. Nevertheless, these are removed six months after the end of the officeholder's term. Such records may still remain available to institutions, but their removal from public access constrains independent longitudinal analysis.

Policy and Governance Outlook

Implications

Existing asset and interest declarations systems are often only partially effective at detecting domestic, visible conflicts of interest, such as secondary employment, business ownership stakes, or relationships between officials and procurement beneficiaries, and only when cross-referencing is permitted. In such cases, non-compliance patterns, such as late filing, acceptance of prohibited gifts, or an obvious lifestyle-income discrepancy, can be detected and investigated by robust verification systems. A risk-based verification system can calibrate scrutiny according to observable risk indicators (e.g., indications of offshore accounts, declared income above a threshold, ownership of foreign assets) can achieve meaningful detection rates. Nevertheless, the structural limitations identified in this brief point to three areas in which systems often fall short in detecting corruption and other forms of wrongdoing.

First, systems may fail to detect hidden assets held through nominees or proxies, including assets transferred to family members or trustees. Second, they may miss beneficial ownership concealed through shell companies or foundations. Without company identifiers, even declared ownership may be difficult to trace across databases. Third, and most consequentially, cross-border asset concealment remains difficult to detect. Unlike in areas such as tax administration, where mechanisms exist for cross-border information exchange, or in criminal investigations, no international legal instrument is currently in place to enable cross-border data exchange for the verification of asset and interest declarations (DG HOME 2024). In the absence of a larger, interoperable data infrastructure, such investigations tend to be case-specific and depend on cross-border cooperation and willingness to share information. Alstadsæter, Johannesen, and Zucman (2019) analysed a leaked subset matched to national microdata in Sweden, Norway, and Denmark from the “Panama Papers.” A more recent effort emerged in 2021, when the Regional Anti-Corruption Initiative (RAI) drafted an International Treaty on the Exchange of Data for the Verification of Asset Declarations, which was signed by Serbia, Montenegro, and North Macedonia, and later joined by Moldova.⁸

Recommendations for Better Data on Assets and Interests Declarations

Substantial efforts have been made in the past several years to encourage and strengthen asset declaration systems globally. The extensive publication record of Global Civil Society Coalition for the UNCAC, the OECD, GRECO, the World Bank, Transparency International, and regional and cross-regional initiatives such as SELDI or OGP demonstrates that there is no deficit of knowledge, empirical evidence, or examples of good practices. What continues to lag is implementation, together with the development of a common data standard.

⁸ Link to the webpage - <https://rai-see.org/what-we-do/regional-data-exchange-on-asset-disclosure-and-conflict-of-interest/>, and Treaty version - https://rai-see.org/php_sets/uploads/2019/12/Treaty-on-Exchange-of-Data-FINAL-ENG-VERSION.pdf.

Comprehensive and robust **data structure and infrastructure**. The most consequential reform relates to availability and publication. Declaration systems must move from document-based (including scanned or handwritten) to data-based approaches, which will be structured and in machine-readable formats (e.g. JSON), making it easier to access and process. Ukraine's experience illustrates the incremental steps through regular updates in order to build a genuinely usable database. An infrastructure based on constrained fields can reduce filing errors and produce cleaner, more consistent data. A common standard should specify not only which assets are covered, but how each field is defined, measured, and valued. A shared structure makes nominally identical categories genuinely comparable. Most importantly, rather than externalizing core functions, oversight institutions should develop sufficient in-house capacity, including dedicated IT staff responsible for maintaining the underlying data infrastructure.

The most impactful reform relates to **public data availability and publication**. Declaration systems must move from document-based (including scanned and hand-written declarations) to data-based approaches, such as structured formats (JSON, XML, CSV) that are machine-readable and easily accessible. Experience shared through OGP platforms has shown that it is the single most impactful reform available. The experiences of France and Ukraine underscore how regular updates and incremental improvements can create a usable database. For instance, e-declarations with multiple-choice questions can allow users to skip irrelevant fields (Transparency International 2023). Such an approach would further facilitate the collection, storage, and exchange of declarations data. Such open standards should also aim to harmonize which assets are covered and how they are defined, measured, and recorded. Critically, publication reform should also adopt a design that equally caters to the needs of the public, through interactive dashboards and contextualized presentation, and of intermediary users, who need to explore temporal trends through structured data, unique identifiers, and bulk downloads.

Underlying all the above, declarations must **incorporate unique identifiers** for legal entities and natural persons. In the absence of standardized personal and company identifiers, no improvements in data availability, publication, or verification will enhance analytical capacity for cross-referencing. This represents the single most important technical prerequisite for transforming asset and interest declarations from a tick-box compliance exercise into a functional analytical tool.

Wide scope of data coverage. Coverage should extend beyond sitting members of the parliament, heads of state or government, and cabinet members to the full range of decision-makers with the capacity to influence how public resources are used, such as senior executive officials, heads of agencies, and subnational decision-makers. Given the ease with which assets can be transferred to close family members, such as spouses and children, extending disclosure requirements to them can further strengthen transparency.

Asset valuation. Declarations should require precise valuation of assets rather than bare descriptions. Recording a property's location and current value (rather than simply describing it as a "flat" or "weekend villa") allows oversight authorities to detect unexplained wealth accumulation or restructuring. To support year-on-year comparison, each new submission should record relevant changes in the asset, including its size, current market or investment

value, and currency, rather than only the original acquisition date or price. More advanced systems could employ asset-valuation tools linked to declared asset information so that the actual market value is independently and more precisely estimated (e.g. relying on readily available real estate pricing tools).

Communicate data better, tailored to specific audiences. Audience-tailored communication should serve two audiences. Structured data with unique identifiers and API access helps researchers and technically equipped CSOs. Simplified dashboards with visualization and individual-record views helps the general audience. If public engagement is the goal, such visualization tools should be supplemented with explanatory information of what a declaration contains and how to interpret it.

Lastly, more robust and challenging steps concern **data verification**. Verification also needs to improve. Checking declarations against reality is what separates a system that deters wrongdoing from one that simply collects forms. Oversight bodies need sufficient legal authority and technical infrastructure to verify the content of declarations against other sources, such as tax records, income statements, company registries, and property data. This requires an independent mandate backed by sufficient and stable funding to avoid dependence on political goodwill or external projects. Additionally, manual verifications and spot checks complemented by semi-automated procedures that account for the public official's position and compare declared assets with observed income and spending, can create a sustainable cross-checking architecture across databases. This approach, however, requires more sophisticated data-integration systems, sufficient technical capacity, and appropriate legal authority, as implemented in Romania, Ukraine, and France.

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