

Report Part Title: IMPLEMENTING SOCIAL AUDIT IN 20 STEPS

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IMPLEMENTING SOCIAL AUDIT IN 20 STEPS

This section outlines a 20-step guide to implement social audit, based on the learnings from social audits in Guatemala, Peru and Ghana, as well as emerging lessons from wider literature. Social audits in India, especially monitoring the implementation of the Mahatma Gandhi National Rural Employment Guarantee Act (MGNREGA) in Andhra Pradesh, stand out as a success story. India is one of the few countries to have made social audits a formal part of government structure, beginning in 2005.³⁰

Before initiating social audit, you should develop a theory of change. A theory of change describes how the change you want to bring will happen in reality. It forces you to establish explicit links between your activities and the high-level desired change, usually referred to as long-term outcomes or impact. It usually has four levels: outputs, short-term outcomes, mid-term outcomes and long-term outcomes. Of the reviewed social audits, only the Peruvian Anti-Corruption Brigades have a formalised theory of change. It was developed retrospectively based on the experience from the first Brigade.³¹

You could use this theory of change and adapt it to your own context, but beware of the assumptions behind it. Social audit is not a silver bullet to universally address corruption. For social audit to work, it needs to happen under the right conditions. In general, the success of social accountability initiatives, including social audits, depends on the capacity and willingness of both citizens and the state.³² Once you have clarified your theory of change, start implementing social audit. The 20 steps to implement social audit are divided into four stages, as illustrated in Figure 1.

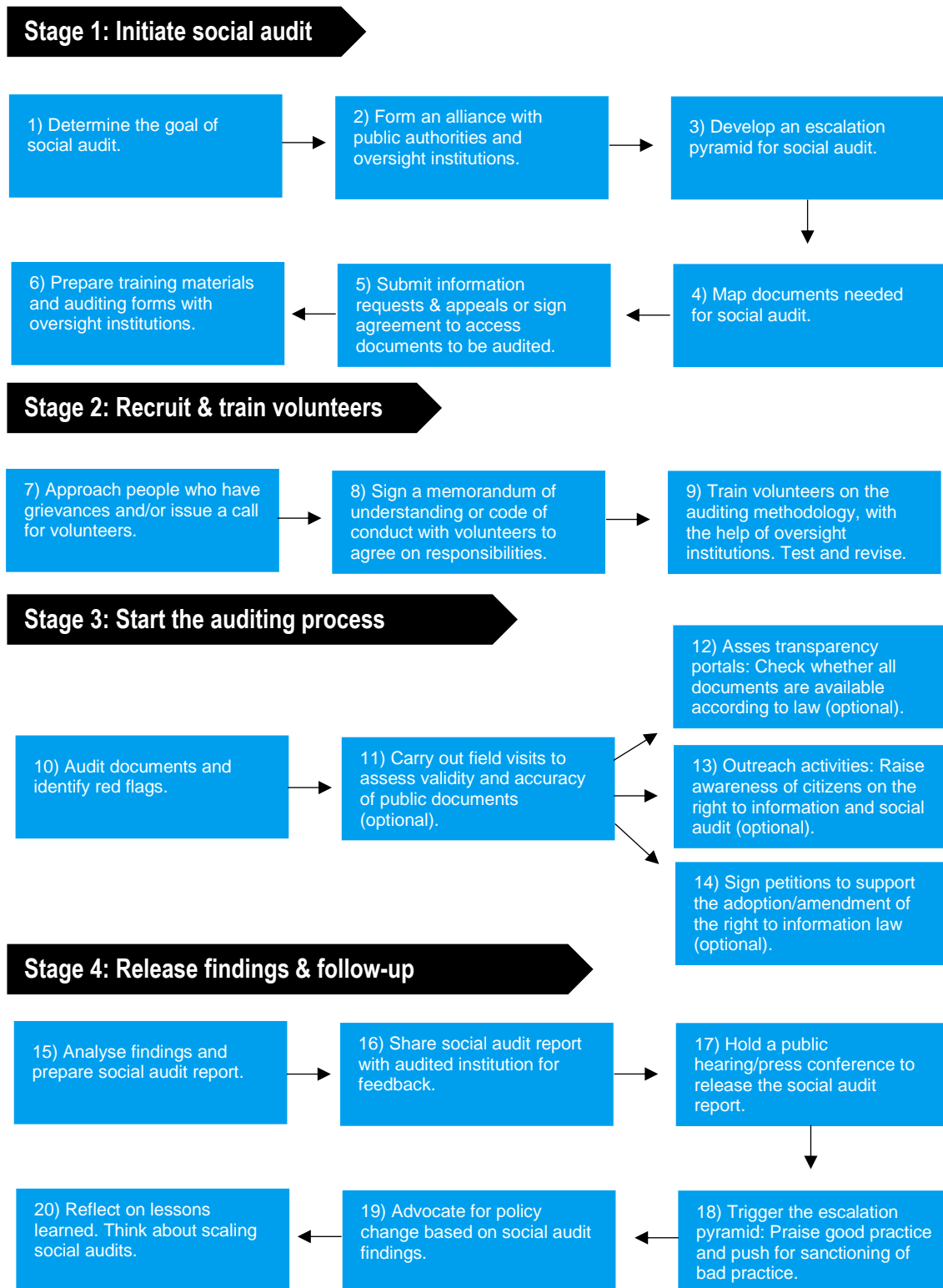
STAGE 1: INITIATE SOCIAL AUDIT

Step 1: Determine the goal of social audit

There are two ways to identify the goal of social audit. The first is to conduct a social audit on an issue that already concerns citizens, as demonstrated by corruption-related complaints. This way offers the greatest potential for citizen engagement in the audit. For citizens to have a stake in fighting corruption, they have to appreciate its negative impacts on their lives in terms of low quality education, health or financial losses via paying bribes.³³ This is why programmes that provide private goods, such as subsidised food, education or medical care, may be appropriate candidates for initiatives like social audits because individual citizens have a personal stake in ensuring the goods are delivered and theft is minimised. For public goods such as infrastructure projects, where incentives to monitor are much weaker, people might not be so motivated to audit.³⁴

Acción Ciudadana uses corruption complaints received by the ALAC to identify issues of concern to citizens and then approaches those citizens or groups to initiate social audits. Sometimes, Acción Ciudadana is approached directly by other NGOs or groups that seek their legal expertise to support initiating a social audit. In India, the Village Social Auditors, who play a role similar to the social audit commissions in Guatemala and volunteers in Peru, came from families who benefitted from the

Figure 1: Implementing social audit in 20 steps



project that was socially audited.³⁵ If you run a corruption complaints centre or if you have access to data on corruption complaints, you could use this data to identify the right public institution, municipality or sector to audit.

The second way to determine the goal of social audit is to use a set of objective criteria to decide where, when and on which issue to undertake social audit. This way offers the largest potential for buy-in from the public sector and for implementing the social audit recommendations. The criteria in the box below can help guide where and when to carry out social audits.³⁶ They build on the criticality index mentioned in the Peruvian Anti-Corruption Brigades' learning review, which has four criteria accompanied by a total of 10 indicators.³⁷ The first criterion is about targeting institutions, municipalities or sectors where corruption risks are higher. The second criterion is about the degree of openness of the public sector in terms of current anti-corruption reforms, the level of transparency or the receptivity of public officials to social audit. The third criterion is about the potential for citizen engagement. The last criterion refers to logistical and financial considerations. You could make an informal assessment by talking through these criteria when you decide which institution or sector you want to audit. Or you could systematically score each municipality, institution or sector against the criteria and choose the top one(s) to audit.

CRITERIA TO IDENTIFY THE GOAL OF SOCIAL AUDIT

You could use the four criteria below along with their indicators to decide on the goal of social audit.

Higher corruption risks

1. Municipalities, public institutions or sectors that are more corrupt than others (you can use data from national surveys on corruption or polls, as well as look at news on corruption scandals)
2. Higher level of public scrutiny exercised, for example via the media

Degree of openness of public sector

3. Efforts already underway to improve anti-corruption performance in the institution, municipality or sector
4. Level of transparency in the municipality or sector (comprehensive transparency portals, for example)
5. Officials' receptivity and openness to working with civil society (availability of influential reformers in the public sector, for example)³⁸

Potential for citizen engagement

6. Number of local NGOs or civil society groups with potential to become allies
7. Previous experience of local organisations in mobilising communities
8. Level of citizen involvement in public affairs and availability of volunteers

Logistical/financial considerations

9. Proximity to your location and to trusted/accountable local partner
10. Budget available to complete social audit

Step 2: Form an alliance with public authorities and oversight institutions

Building an alliance requires that government reformers and citizens work together to counter the powerful corrupt players within the system. Some, but not all, social audits in Guatemala and Peru have been met with resistance from some public authorities. Resistance was also obvious from the delays in responding to information requests and providing all required information.

In India, the social audit process owes its success to the presence of strong and committed leaders at the helm of government. This support was critical in securing administrative buy-in and responsiveness to the social audit process. At the same time, civil society advocates took steps to build political support for the audits through constant engagement with the then Chief Minister of the Indian state of Andhra Pradesh. Political support at the top served to quell any local opposition to the social audit process.³⁹

In countries where there is no right to information legislation, government buy-in is even more essential to guarantee access to requested documents and information. Increasing buy-in could also happen via induction and sensitisation workshops for public officials from the institution being audited. The workshop could target managerial positions and could cover transparency, accountability and citizen participation mechanisms, and the advantages they may offer for public management.⁴⁰

An alliance also works to give credibility to the findings of social audit. Government buy-in from above, when coupled with citizen engagement from below, triggers the sandwich strategy.⁴¹ In India, despite political buy-in, some public officials nevertheless discredited the audit process, arguing that the auditors were “illiterate” and lacked technical skills, and refusing to recognise and follow up their findings.⁴² Over time however, acceptance rates of social audit findings by the lower bureaucracy have risen from 55 per cent in round one to 85 per cent in round three.⁴³ This explains why the participation of the Ombudsman in the Proética Brigades and their training of volunteers set a good example, adding credibility to the findings of social audits. Following the Peruvian model, Acción Ciudadana also plans in the future to cooperate with the Ombudsman to train social audit commissions in Guatemala.

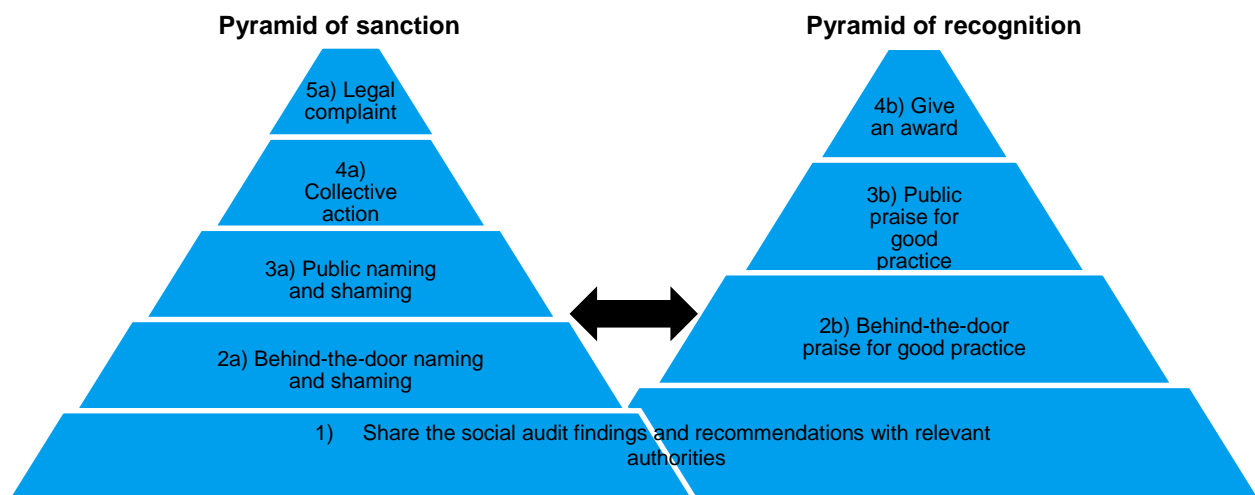
Step 3: Develop an escalation pyramid for social audit

Social audit is not about publishing a report. This should be considered a milestone, not the end product. In one of the Brigades initiatives in Peru, because there was no follow-up, the process faded out, showing a clear difference in intensity relative to the design, launch and training stages.⁴⁴ To avoid this, you should build a pyramid of escalation.⁴⁵ An escalation pyramid forces you to think proactively and prepare as early as possible in the process for the actions you will take based on the findings of social audit. If you wait until after the audit to develop your escalation pyramid, it might be too late or you might lose an important advocacy opportunity. Also, some of your follow-up might require building relationships with other civil society actors, which you could start doing from the very beginning. In case you were denied access to public information you require for the audit, you could also activate your escalation pyramid.

The escalation pyramid illustrated in Figure 2 contains two parts. The first part, on the left side, is the pyramid of sanction and the second part, on the right side, is the pyramid of recognition. Each part is composed of a series of escalated actions. Both parts of the pyramid start with sharing the social audit findings and recommendations with the relevant authorities. They diverge afterwards depending on whether you find irregularities or whether you identify good practice.

In case of irregularities, you will use the pyramid of sanction. The next step would be to use behind-the-door naming and shaming. You could do that in person in private meetings or in writing via letters condemning the lack of response or inaction by authorities. If you received no response or a negative response, you could resort to public naming and shaming. You could use the media, whether traditional or social, for this purpose. If public officials are elected, this might be damaging to them and could force them to react positively. If there is still no response or a negative response, you could resort to collective action by organising protests or signing petitions. This signals the public support you have for your cause. If there is still no response or a negative response, you could file a complaint to the relevant oversight institutions, higher governmental levels or to the courts, if possible. Legal action is your last resort and should be used very strategically.

Figure 2: Social audit escalation pyramid



Having a pyramid of recognition in place prevents public officials feeling that NGOs only care about bad practice and don't recognise governmental efforts. Praising good practice could be done informally, in meeting or in writing. It could also be done in public via media. Finally, it could be done using integrity awards such as [Accountability Lab's Integrity Idol](#), which uses a "naming and faming" approach. You can use both pyramids at the same time, if you uncovered both good and bad practice, or you can just use the pyramid of sanction if the social audit uncovered grave irregularities.

Steps 4 & 5: Map documents needed for social audit. Submit information requests and appeals or sign agreements to access documents to be audited.

Steps 4 and 5 are the corner stone of social audit. For a social audit to take place, you need to get hold of public documents. It is therefore not recommended to train people on social audit before accessing the documents required for the audit.⁴⁶ The documents you need depend on the nature of your social audit. Proética, for instance, focuses on auditing operational licences, building permits, public works and acquisitions, because of their high corruption risks. Acción Ciudadana audits documents such as workers' payrolls, collective agreements, inventories and protocols of liability. In any case, online transparency portals are the first go-to places. The comprehensiveness of such portals varies from one to another, but you might find some relevant documents.

What to do about documents that are not available online? If you have a right to information law, use it to request access to the remaining documents. In case your request is denied, you can submit an appeal. In some cases, public officials might be reluctant to share certain types of documents. Also, files are sometimes divided into several parts and dispersed across different departments, making access to all the documents difficult.

If you still cannot access the documents you need, you can file a case or submit a legal complaint against the public authority. Acción Ciudadana took this step in one case, which eventually resulted in the conviction of some municipal officials for violating the right to information law.⁴⁷

IS SOCIAL AUDIT POSSIBLE WITHOUT A RIGHT TO INFORMATION LAW?

If your country does not have a right to information law, you can approach the relevant authorities and request signing a memorandum of understanding to have access to relevant documents. The partnership you developed in step 2 with other public authorities or oversight institutions could support your request.

If all the above fail, you have three options.

- First, limit the scope of social audit to the documents available online, if you think they are enough.
- Second, focus on monitoring the implementation of public projects, in accordance to local or national governmental plans, as Ghana Integrity Initiative does.
- Third, cancel social audit and trigger your escalation pyramid to advocate for access to information.

Step 6: Prepare training materials and auditing forms with oversight institutions

Once you gain access to documents, you can start developing your training materials and auditing forms. Training needs to be tailored to the nature of the social audit and the types of documents volunteers are going to review. If you have an oversight institution partner, the training materials and auditing forms can follow their auditing methodology. In Proética's Anti-Corruption Brigades, the Ombudsman's office develops forms and guidelines for the audit. If you don't have an oversight institution partner, you can develop your own training materials and auditing forms.

GUATEMALA: SOCIAL AUDIT TRAINING MANUAL

Acción Ciudadana developed a five-module training manual that covers the following topics. The manual is used in training social audit commissions and could be also used as a self-reference manual for citizens who want to implement social audit on their own:⁴⁸

- Module 1 explains the different concepts relevant to implementing social audit, such as transparency, corruption, social auditing and corruption. It also differentiates between types of corruption such as bribery, embezzlement, kick back, fraud and others.
- Module 2 guides people on how to identify the problem and its root causes. It also outlines the actions social audit commissions could take to tackle the identified problem.⁴⁹
- Module 3 includes forms and templates for access to information requests and appeals, strategic and work planning, and meeting minutes.
- Module 4 outlines the legal basis for the right to information in Guatemala, and the process and time frame for accessing information.
- Module 5 describes how to communicate the findings of social audit via a press conference and how to promote that on social media.

STAGE 2: RECRUIT & TRAIN VOLUNTEERS

Step 7: Approach people who have grievances and/or issue a call for volunteers

You can start by approaching the citizens or groups who have grievances and invite them to join the social audit. Alternatively, you can work with groups that are already well structured and mobilised, as communities sometimes do not have a ready stock of 'social capital' to mobilise.⁵⁰ If you have no previous experience with citizen engagement, consider partnering with an NGO that does – Proética partnered with AC Transparencia in the first Brigades initiative in Los Olivos for this reason. Proética was then able to capitalise on this expertise and successfully assume this role for the Miraflores Brigade.⁵¹

If you cannot identify already mobilised groups, you can issue a call for volunteers. Based on Proética's experience, university students are more likely to respond to such calls. Make sure to circulate your call in university students' circles and highlight the knowledge and practical skills people will get out of participating in social audit. Also, consider some material incentives such as providing meals during the social audit and branded clothes such as t-shirts, vests or caps.⁵²

SOCIAL AUDIT EMPOWERS CITIZENS!

Not only is citizen engagement important for the success of social audit, but it also empowers citizens. For example, citizens who do one social audit tend to continue to take part in other audits. In Guatemala, the education syndicate that conducted the social audit in Chiquimula moved on to do audits on other sectors. In Peru, participants in the Anti-Corruption Brigades in cities affected by coastal floods are participating in a new initiative auditing the management of reconstruction work carried out by the government.

Step 8: Sign a memorandum of understanding or code of conduct with volunteers to agree on responsibilities

You should clearly identify the roles and responsibilities of people taking part in the audit. This will help manage expectations on both sides. A memorandum of understanding is a good option if you work with a mobilised group with some kind of structure, whether formal or informal. It could be signed between you and one or more representatives from this group. A code of conduct works better if you are dealing with people who participate in the social audit in their individual capacity. In this case, it has to be signed by all participants. The box below includes a code of conduct template that you can adapt to your own context.⁵³

TEMPLATE: VOLUNTEER CODE OF CONDUCT

About the participant

- Name
- Contact details
- Any conflict of interest with audited institutions?

Regulation of participation

- The participant takes part in the social audit in their personal capacity.
- The participant agrees that the objective of social audit is to enhance the transparency and accountability of the audited public institution, municipality or sector.
- The participant agrees that the findings of social audit are guided only by objective evidence found from reviewing public documents or any other sources.
- The participant respects the confidentiality requirements as communicated during the auditing process.
- The participant agrees not to disclose the findings of social audit before the official launch of the social audit report.
- The participant agrees not to use the premises, equipment or other material provided by the organisation managing the social audit in illegal, unethical or any other ways not related to the social audit.
- The participant understands that violation of these terms will lead to exclusion from the social audit and from potential future activities by the organisation and could be communicated to other organisations.
- The participant authorises the organisation to use their personal data in accordance with the law.

Step 9: Train volunteers on the auditing methodology, with the help of oversight institutions. Test and revise

Public documents are complicated in nature and getting volunteers to audit them requires time and effort. Thus, ensure the training is participatory and practical, with many exercises on how to use the auditing methodology. If you have an oversight institution partner, they could co-train volunteers and share their knowledge and experience in using the auditing methodology. They could also outline some potential challenges that volunteers might encounter during the audit and how they might overcome them.

If at the end of the training, volunteers needed more time to get used to the auditing methodology, extend the training duration. Also, don't forget to let your volunteers test the auditing forms and adapt them accordingly afterwards. It is always advisable to train more volunteers than you need, as usually not all those who are trained will end up participating in the social audit. For example, Proética trained 108 volunteers and only 69 took part in the actual Anti-Corruption Brigades.

STAGE 3: START THE AUDITING PROCESS

Step 10: Audit documents and identify red flags

If the public documents to be audited are online, volunteers can review them at your venue or at any office equipped with computers and internet connection. If the documents are offline or if an agreement with the audited institution requires it, you may need to review the documents at the audited institution's premises, like Proética.

Volunteers might end up reviewing several documents. For example, in the Los Olivos Anti-Corruption Brigade initiative, Proética volunteers reviewed 43 public documents including 17 operational licences, 10 building permits, 12 procurement documents and four public works documents. The review should aim to uncover red flags or irregularities. Lawyers and oversight institution representatives should accompany the auditing process to provide support to volunteers who have questions or face challenges.

INDIA: SOCIAL AUDIT UNCOVERING MANY RED FLAGS

In India, social audit has uncovered five types of red flags and corrupt practices that related mainly to the level of government implicated:⁵⁴

- Diverting money by faking workers' attendance sheets → local civil servants acting alone.
- Forging signatures/thumb impressions and adding fake names to muster rolls → local civil servants acting with their bosses.
- Committing larger frauds by inflating measurement of completed works → local civil servants and their bosses, joined by their directors at the district level.
- Ghost works coming into play → a wide corruption network across different levels, including local elites, able to fabricate muster rolls, verify work completion and sign-off on payments.
- Material fraud → local political elites convincing tractor owners to under-report the soil load they carry per trip or inflating the number of trips needed, extracting bribes from tractor owners in the process.

Step 11: Carry out field visits to assess the validity and accuracy of public documents (optional)

Field visits increase the level of scrutiny of social audits beyond reviewing documents. They aim to uncover any fake, exaggerated or inaccurate recording of information. This is an optional step because it requires more volunteers and a larger organisational capacity to train and supervise their field work. It also requires more money to cover transportation costs and other field related expenses. Volunteers can do field observations to assess whether recorded information is accurate. For example, if money was disbursed to build a road, volunteers could check whether the road was built. Ghana Integrity Initiative's SACs focus on site visits to ensure that projects are built as planned. Volunteers could also triangulate information with beneficiaries of public projects. For instance, volunteers could check whether a health clinic was renovated by asking patients or the medical personnel. If one document notes that a certain amount of money was disbursed to a private contractor, volunteers could confirm the accuracy of this amount directly with the contractor.

Step 12: Assess transparency portals. Check whether all documents required by law are available (optional)

Transparency is important for social audits. If transparency portals are complete, you probably won't need to submit information requests. This will save time and make the auditing process smoother. Volunteers could therefore assess the comprehensiveness of transparency portals. This is optional because it goes beyond the social audit process, but it contributes to the greater aim of a more transparent and accountable government.

This step requires developing different forms than the ones used for auditing public documents. If you have enough volunteers, you could devote a team of volunteers to this activity and train them separately. Their duty would be to check whether transparency portals include all the documents that should proactively be made available online in accordance with the law. Results from this activity could later be included in the same social audit report or in a separate report.

Step 13: Outreach activities: Raise awareness of citizens on the right to information and social audit (optional)

Raising awareness of citizens about social audit and their right to information is a great way to increase your impact. Proética always builds a public outreach element in their Anti-Corruption Brigades. To increase visibility, Proética builds a booth on a central street that volunteers use to speak to citizens and raise awareness. The booth also provides fun activities to raise interest of citizens along with information materials and posters. In the Chiclayo Anti-Corruption Brigade, Proética volunteers reached out to more than 200 citizens. During their conversations, volunteers talk to citizens about social audit and the right to information. Using computers stationed at the booth, they show citizens where to find public information online and how to submit information requests.

Step 14: Sign petitions to support adoption/ amendment of right to information law (optional)

This step is particularly useful if your country has a weak or non-existent right to information law. Volunteers could go out and speak to people about the challenges faced when accessing public information. They could give examples of the range of information citizens could have access to, should a right to information law be amended/adopted. To support this cause, citizens could be asked to sign petitions. For more impact, try to coordinate such a campaign with other civil society organisations working on the issue. The more signatures you get, the more pressure you can put on the parliament to pass this law. Transparency International chapters offer a lot of lessons learned on this issue.⁵⁵

STAGE 4: RELEASE FINDINGS & FOLLOW-UP

Step 15: Analyse findings and prepare the social audit report

Now it is time to analyse the findings of the social audit. You could involve volunteers if they have the capacity and time, and if their involvement will not delay the process. In your analysis, you should focus on highlighting red flags and outlining recommendations to improve transparency and accountability. You could also identify good practices, to offer a balanced perspective. Think about the root causes for the red flags you have identified. Is it a problem of policy or practice? Would a new law or policy address those red flags? Is stricter oversight the solution? Brainstorm together with the oversight institution about the best ways to address the issues at hand.

Afterwards, it is time to prepare your social audit report. The report should include your main findings, red flags and recommendations. Limit the number of recommendations and prioritise them. Having 20 recommendations of equal importance could be overwhelming for public institutions. One tip: be selective and do not try to put all the information available in one document. For example, the Brazilian Supreme Audit Institution produces a synthesis sheet in which they only include some of the recommendations and interesting findings that appear in the full report. Their selection depends on what they think is relevant to their stakeholders.⁵⁶

Think also about the way you present social audit findings. Proética initially wrote lengthy, traditional reports. The findings were lost in the text. They then moved to reports with more visual elements such as graphs, pictures and numbers. Public institutions found this approach easier to follow and grasp. Also, don't forget to prepare a one-pager summarising your findings.

Step 16: Share the social audit report with audited institution for feedback

It is now time to share the social audit report and summary with the audited institution. Ask them to highlight any factual errors and to provide general feedback. Offer to hold a meeting to discuss the findings and recommendations. Give them a reasonable deadline to share their feedback. If they provide substantial feedback supported by evidence, do not shy away from revising your report.

There are a number of benefits from sharing the report with the audited institution. First, it shows your genuine interest in listening to them. Secondly, they cannot claim that your findings are factually wrong, once you publish them. Thirdly, it can help with your next step, namely organising a public hearing. Finally, it can help build long-term collaboration to improve their transparency and accountability performance.

Step 17: Hold a public hearing/press conference to release the social audit report

Social audits are much more impactful when they allow citizens to question government on their actions face-to-face. This can be done by organising [public hearings](#) at the end of a social audit. They could take place at the launch event for the audit's final report. In the long run, these interactions have the potential to significantly enhance people's civic capacity.⁵⁷ It's important however to encourage people's participation in these hearings as in some cases, like the District Neighbourhood Hearings in Bolivia, only 1.5 per cent of surveyed residents in La Paz City said they had participated.⁵⁸

In India, public hearings (called 'JanSunwai') are integrated into social audits and public authorities are required to attend them. Public hearings happen at the local and district levels as and when irregularities occur. At the village level, issues/complaints are read out loud and implicated officials

are given an opportunity to respond. The higher public officials present then take notes on what actions are needed to address the issue/complaint.⁵⁹ Many Indian civil servants agree that social audits make social programme management more accountable to citizens.⁶⁰

If you were unable to bring the audited institution on board for a public hearing, organise a press conference. Do your best to get media to cover the press conference. Share a media kit in advance and promote your findings on social media.

Step 18: Trigger the escalation pyramid. Praise good practice and push for sanctioning of bad practice

It is time now to trigger the escalation pyramid that you developed during the first stage. Praise good practice and do it in an escalated manner. Also, push for sanctioning of bad practice. Without enforcement, social audits risk losing credibility if the corrupt feel they will not face any consequences.

In Guatemala, social audits have led to the prosecution of public officials for failing to comply with the right to information act.⁶¹ Furthermore, thanks to a cooperation agreement signed with the Faculty of Architecture, young university students in Guatemala have been trained in conducting social audits and fighting against corruption. As a result, a criminal complaint was filed against the high authorities of San Carlos University of Guatemala for the commercialisation of students' personal data.⁶²

In India, social audits have led to the dismissal of 5,220 public officials and suspension of 1,230 more.⁶³ Between December 2015 and November 2016, social audit facilitators in India recorded 45,448 grievances, of which 32 per cent were resolved.⁶⁴ As of March 2011, 23 per cent of the money illegally taken had been recovered across all social audit rounds in 22 districts of Andhra Pradesh.⁶⁵ Surveyed Indian civil servants reported that social audits were beginning to address one of their recurring grievances: late and incomplete payment of wages.⁶⁶ Furthermore, two-thirds of the surveyed staff felt that more than 50 per cent of the social audits they facilitated had helped deter corruption.⁶⁷

Step 19: Advocate for policy change based on social audit findings

Social audits should not be considered a one-time exercise. Rather, they should be part of a broader and longer process of engagement between collective actors and the state.⁶⁸ It is therefore not the impact of one social audit that matters, but how the practice of social audits across different municipalities and sectors over time can contribute to the accountability of public institutions.

Some of the irregularities uncovered by social audits are not illegal acts per se, but just administrative deficiencies. Social audits can uncover administrative non-criminal irregularities. This was the case with the study of social audits in Peru, which showed that public works subject to civil society monitoring by Proética, in partnership with oversight institutions, were around 50 per cent less expensive than non-monitored ones.⁶⁹ Social audits can therefore point to loopholes in the public system that could be gateways for corruption. Part of the success of social audits is not only to push for legal action but also to encourage closing these administrative loopholes. This requires advocacy and alliance with several actors at various levels.

In Guatemala, an agreement was signed with a parliamentarian to follow up on the denial of access to information, and build pressure within the parliament.⁷⁰ In India, Samarthan supports a network of some 2,000 elected representatives who aggregate the demands from local and district levels.

Because of these relationships, the NGO has successfully negotiated policy changes from the government and has even filed public interest litigation to advance its demands.⁷¹

Step 20: Reflect on lessons learned. Think about scaling social audits

Now, it is time to reflect on the progress you have made and the lessons you have learned. Do this jointly with your volunteers, partners and oversight institution.⁷² Think about the 19 steps you have implemented so far. Do they still make sense? Do you want to add or remove any steps? Did you leave out any important stakeholders? Are there better ways to include citizens and recruit volunteers? What can you do better to follow-up on social audit findings?

Also think ahead in terms of scaling social audit and its impact. This can be achieved in three ways: scaling-out, scaling-up and scaling deep.⁷³ Scaling-out involves replicating social audits in additional municipalities, institutions or sectors. Scaling-up means pushing for policy change based on the findings of social audits. Scaling deep means changing the behaviours that open the way to corruption by instituting values of integrity. The type of scaling to use depends on the context and resources available. To tackle the root causes of corruption, the three types of scaling should be carried out together. Acción Ciudadana is establishing a network of social audit commissions across the country to jointly explore how they could scale their impact.