Gender, Inclusion and Corruption Working Group

Global Civil Society Coalition for the UNCAC

Advancing Resolution 10/10 by Addressing Sexual Corruption: Understanding and Enforcement

Submission by the UNCAC Coalition's Working Group on Gender, Inclusion, and Corruption[1]

19 November 2025

Why sexual corruption needs urgent action

Sexual corruption - the abuse of entrusted power for personal gain in the form of sex - is increasingly recognized in both academia and civil society spaces.[2] Comprehensive global data is still lacking, but findings over the years indicate that sexual corruption is widespread.[3] A wide range of case studies, documented in academic literature as well as in advocacy reports, demonstrate the occurrence of sexual corruption across diverse sectors and regions.[4] They range from abuse of authority[5] by immigration officers, police officers, and judges to that by teachers, professors, and humanitarian aid workers, among others.[6] The sexual acts are leveraged in exchange for the provision of goods and services, such as the approval of refugee or asylum applications, favorable court decisions, grades or admission to university, or the

[1] UNCAC Coalition. "Gender and Inclusion and Corruption Working Group." UNCAC Coalition, accessed 20 November 2025. https://uncaccoalition.org/get-involved/working-groups/gender-inclusion-corruption/.

[2] UNCAC Coalition Gender, Inclusion and Corruption Working Group. 2023. "Promoting a gender-responsive and inclusive approach to anti-corruption," UNODC, 2023. https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/NGO/CAC-COSP-2023-NGO31.pdf; Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf.

[3] Transparency International. "Global Corruption Barometer," Transparency International, 2023. https://www.transparency.org/en/gcb.

[4] Hazel Feigenblatt, "Breaking the silence around sextortion: The links between power, sex and corruption," Transparency International, 2020. https://images.transparencycdn.org/images/2020_Report_BreakingSilenceAroundSextortion_English.pdf; Marie Chêne, "Finding a Voice, Seeking Justice: The Barriers Women Face to Reporting Corruption in the European Union," Transparency International, 2021. https://images.transparencycdn.org/images/2021_FindingVoiceSeekingJustice_PositionPaper_Eng.pdf; Aksel Sundström and Lena Wängnerud, "Sexual forms of corruption and sextortion: How to expand research in a sensitive area," Quality of Government Institute University of Gothenburg, 2021. https://www.gu.se/sites/default/files/2021-12/2021_10_Sundstrom_Wangnerud.pdf.

[5] Guilherme France, "Criminalising sextortion: Challenges and alternatives," Transparency International Anti-Corruption Helpdesk, 2022. https://knowledgehub.transparency.org/assets/uploads/kproducts/Criminalising-sextortion_final_10.06.2022.pdf; Transparency International. "Petty Corruption," Transparency International. https://www.transparency.org/en/corruptionary/petty-corruption.

[6] Ann Towns, "Prestige, immunity and diplomats: Understanding sexual corruption," In *Elites, institutions and the quality of government*, edited by C. Dahlström and L. Wängerud (Palgrave Macmillan, London, 2015);
Ellie McDonald, Matthew Jenkins and Jim Fitzgerald, "Defying Exclusion. Stories and insights on the links between discrimination and corruption," Transparency International and Equal Rights Trust, 2021. https://files.transparencycdn.org/images/TI-ERT_Defying-Exclusion_web-accessible-v2.pdf; Ortrun Merkle, Julia Reinold and Melissa Siegel, "A gender perspective on corruption encountered during forced and irregular migration," Deutsche Gesellschaft für Internationale Zusammenarbeit, 2017. https://i.unu.edu/media/migration.unu.edu/attachment/4665/A-Gender-Perspective-on-Corruption-Encountered-during-Forced-and-Irregular-Migration.pdf; International Association of Women Judges. "Stopping the abuse of power through sexual exploitation: Naming, shaming and ending sextortion," International Association of Women Judges, 2012. https://www.unodc.org/res/ji/import/guide/naming_shaming_ending_sextortion/naming_shaming_ending_sextortion.pdf; Louise Morley, "Sex, grades and power in higher education in Ghana and Tanzania," Cambridge Journal of Education 41, no.1 (2011): 101–115. https://www.tandfonline.com/doi/full/10.1080/0305764X.2010.549453.

provision of food and medicine as aid.[7] These cases demonstrate how sex is leveraged as a "currency" of corruption, replacing the conventional notion of financial gain. The consequences of sexual corruption transcend the well-documented socio-economic consequences of corruption, as they strike directly at the dignity and bodily integrity of those affected, often compounded by victim blaming, shaming practices, and the lack of victim-sensitive reporting and redress mechanisms.[8]

Global anti-corruption efforts to address sexual corruption

Resolution 10/10 (hereinafter referred to as "the Resolution"), adopted at the Tenth Session of the Conference of the States Parties to the UNCAC (CoSP10) in 2023, was the first global anti-corruption measure toward recognizing sexual corruption as a distinct form of corruption. Entitled *'Addressing the societal impacts of corruption',* it calls for the incorporation of a gender perspective into global anti-corruption efforts. Within this framework, the Resolution explicitly calls on States Parties to take measures to address sexual corruption. Suggested actions include raising awareness of the existence of sexual corruption, closing legislative gaps, and implementing effective prevention and law enforcement measures. The Resolution further recognizes that sexual corruption predominantly affects women and girls, underscoring the gendered consequences and highlighting its psychological, social, and economic impacts.[9]

[7] Sara Carnegie, "Sextortion: a crime of corruption and sexual exploitation," International Bar Association, 2019. https://www.ibanet.org/MediaHandler?id=E5E451C2-A883-4518-B0ED-5AAAEBCDD5AA; Ortrun Merkle, Zobair Hasan, Debora Gonzalez, Alfredo Hernández Sánchez, Umrbek Allakulov and Sifat E. Rabbi, "When vulnerabilities are exploited—The role of sextortion in the WASH sector in Bangladesh," Frontiers in Water 5, (2023): 1048594. https://www.frontiersin.org/journals/water/articles/10.3389/frwa.2023.1048594/fulL; Ortrun Merkle, "66: Sextortion". In *Elgar Encyclopaedia of Corruption and Society,* (Edward Elgar Publishing, 2024); Centre for Equality and Justice, Sri Lanka, "Sexual Bribery of Military Widows in Sri Lanka: Anuradhapura, Kurunegala and Galle Districts," Centre for Equality and Justice, Sri Lanka, 2018. https://cejsrilanka.org/wp-content/uploads/Eng_Briefing-Paper_Sinhala_Sexual-Bribery-of-Military-Widows_Eng.pdf; Jamie Bergin, "Left Behind: Corruption in Education and Health Services in Africa," Transparency International, 2024. https://images.transparencycdn.org/images/Report-LeftBehind-Corruption-in-Africa.pdf; Åsa Eldén and Elin Bjarnegård, "Implementing Policy Against Sextortion in Tanzania: A follow-up study," The Expert Group for Aid Studies (EBA), 2022. https://eba.se/rapporter/implementing-policy-against-sextortion-in-tanzania-a-follow-up-study/20143/.

[8] Transparency International. "Gender and Corruption: Forms, Impact and Solutions." Paper presented at CoSP8, Abu Dhabi, UNODC, 2019. https://www.unodc.org/documents/treaties/UNCAC/COSP/session8/V1911814e.pdf; Marija Risteka and Ljupka Trajanovska "Sexual extortion as an act of corruption: Legal and institutional response," Organisation for Security and Co-operation in Europe (OSCE) Mission to Skopje, 2021. https://dksk.mk/wp-content/uploads/2022/03/Sextortion_EN_WEB_NEW-FINAL.pdf.

[9] Guilherme France, "Criminalising sextortion: Challenges and alternatives," Transparency International Anti-Corruption Helpdesk, 2022. https://knowledgehub.transparency.org/assets/uploads/kproducts/Criminalising-sextortion_final_10.06.2022.pdf; Jessie Bullock and Matthew Jenkins, "Corruption and marginalisation," Transparency International Anti-Corruption Helpdesk, 2020. https://knowledgehub.transparency.org/helpdesk/corruption-and-marginalisation; UNODC, "The time is now: Addressing the gender dimensions of corruption," United Nations, 2020. https://www.unodc.org/documents/corruption/Publications/2020/THE_TIME_IS_NOW_2020_12_08.pdf.

> Resolution 10/10 adopted at CoSP10, PP: Recognizing also that demanding sex or acts of a sexual nature within the context of the abuse of authority may be considered a particular form of corruption, which is primarily perpetrated against women and girls, and concerned about the serious negative impact of such situations on them,
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> Resolution 10/10 adopted at CoSP10, OP 6: Encourages States parties to raise awareness that demanding sex or acts of a sexual nature within the context of the abuse of authority may be considered a particular form of corruption, and to close potential legislative gaps, as necessary, and take further measures, as needed and appropriate, in order to prevent and prosecute such forms of corruption effectively;

Advancing Resolution 10/10 requires concrete measures to prevent and address sexual corruption, translating its commitments into actionable policies and practices.

Approaches and gaps in addressing sexual corruption

Robust legislation to address sexual corruption is largely absent, and most countries have no specific laws on the issue.[10] Existing legal avenues are found in anti-corruption, anti-gender-based violence (GBV), and anti-discrimination or harassment legislation,[11] but because cases of sexual corruption often do not fit neatly within these frameworks, they frequently fall between lines of responsibility.[12]

Many anti-corruption laws fail to recognize sex as a form of currency. This contributes to uncertainty and underreporting, as victims do not recognize it as corruption. It also perpetuates impunity as victims do not report the perpetrators.[13] Moreover, anti-corruption laws often criminalize both the giver and the receiver of a bribe. Applied to sexual corruption, this risks prosecuting the victims. Often, they comply under conditions of vulnerability and

[10] Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf; UNCAC Coalition. 2025. Sexual Corruption Database. https://uncaccoalition.org/sexual-corruption-database/.

[11] Sara Carnegie, "Sextortion: a crime of corruption and sexual exploitation," International Bar Association, 2019. https://www.ibanet.org/MediaHandler?id=E5E451C2-A883-4518-B0ED-5AAAEBCDD5AA.

[12] International Association of Women Judges. "Stopping the abuse of power through sexual exploitation: Naming, shaming and ending sextortion," International Association of Women Judges, 2012. https://www.unodc.org/res/ji/import/guide/naming_shaming_ending_sextortion/naming_shaming_ending_sextortion.pdf; Monika Bauhr, Bolaji Owasanoye, and Anna Petherick, "The Chandler Papers 9: Sexual Corruption: Emerging Directions in Research and Policy," Blavatnik School of Government, University of Oxford, 2024. https://www.bsg.ox.ac.uk/sites/default/files/2024-05/The%20Chandler%20Papers%20%E2%80%93%20Sexual%20corruption.pdf.

[13] UNODC, "The time is now: Addressing the gender dimensions of corruption," United Nations, 2020. https://www.unodc.org/documents/corruption/Publications/2020/THE_TIME_IS_NOW_2020_12_08.pdf.

necessity, given the power disparity between the two parties. For instance, when acts are in exchange for food or medicine in a refugee camp, refusal is not viable. Although limited, national efforts to introduce and amend provisions on sexual corruption in anti-corruption laws show both progress and ongoing challenges.[14]

Anti-GBV (gender-based violence) legislation, meanwhile, does not capture the corruption element in coerced sexual acts, allowing the abuse of power in such situations to go unpunished.[15] Anti-discrimination or harassment laws are often limited to workplace or domestic contexts, leaving broader situations of sexual corruption unaddressed. In addition, some States Parties adopt provisions solely focusing on women as victims, yet men, boys, and LGBTQI+ persons are also targets of sexual corruption, and this exclusion reinforces underreporting.[16] Beyond such legislative gaps, once reported, victims often face stigma, the fear of retaliation, and the absence of safe and accessible reporting pathways. Given the physical and socio-cultural dimensions attached to sexual corruption, reporting without victim-centered mechanisms risks revictimization.[17] These barriers undermine disclosure of such incidents and, consequently, the objectives of the Resolution.[18]

While appreciating the substantial step forward by Resolution 10/10, we submit that the efforts of States Parties to raise awareness and strengthen preventive and prosecutorial measures need to address these challenging domestic realities. The UNCAC Coalition's Working Group on *Gender, Inclusion and Corruption* is a global collective of civil society organisations and individuals, including academics, researchers, policy advisers, and grassroots mobilisers, who work together to promote a gender-responsive and inclusive approach to address sexual corruption. Therefore, building on Resolution 10/10 and based on

[14] Elin Bjarnegard, Asa Eldén, Janithirka Jayasundara, and Ave Maria Semakafu, "Getting the law on sexual corruption right: Why a 'do no harm' approach is essential," U4 Anti-Corruption Resource Centre, 2025. https://www.u4.no/blog/getting-the-law-on-sexual-corruption-right-why-a-do-no-harm-approach-is-essential.

[15] Silje Lundgren and Malin Wieslander, "Holding the harasser responsible: Implications of identifying sexual harassment that includes abuse of power and quid pro quo elements as sexual corruption," Gender, Work and Organization 32, no.1 (2024): 181-201. https://onlinelibrary.wiley.com/doi/10.1111/gwao.13142.

[16] See for example: Silje Lundgren, Asa Eldén, Dolores Calvo, and Elin Bjarnegård, "Sextortion: Linking sexual violence and corruption in a Nordic context", in *Re-imagining Sexual Harassment: Perspectives from the Nordic Region,* edited by M. Lundqvist, K. Widegren and A. Simonsson, (Bristol University Press (Policy Press), 2023). https://bristoluniversitypressdigital.com/display/book/9781447366546/ch010.xml.

[17] Hazel Feigenblatt, "Breaking the silence around sextortion: The links between power, sex and corruption," Transparency International, 2020. https://images.transparencycdn.org/images/2020_Report_BreakingSilenceAroundSextortion_English.pdf; Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf.

[18] Sara Carnegie, "Sextortion: a crime of corruption and sexual exploitation," International Bar Association, 2019. https://www.ibanet.org/MediaHandler?id=E5E451C2-A883-4518-B0ED-5AAAEBCDD5AA; Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf.

existing studies, experiences and consultations, the Working Group proposes the following recommendations to States Parties to prevent, address and respond to sexual corruption.

1. Understanding the concept: develop a common understanding with a precise and inclusive definition

1.1 Promote a clear and inclusive definition of sexual corruption that centers responsibility on the abuse of entrusted authority.[19] While the process may be challenging,[20] such a definition ensures legal clarity, prevents further victimization, and enables effective preventive and prosecutorial measures.

1.2 Complement the definition with systematic data collection, by gathering gender-, age-, sector-, and other demographic-disaggregated data, including origin, ethnic background, and nationality, on perceptions and experiences of sexual corruption, to capture dimensions such as migration status, human trafficking, and racism, and to assess the impact on different segments such as women, girls, women with disabilities and LGBTQI+ persons.[21] Such data should be shared among States Parties to inform national policies, refine common understanding and strengthen global cooperation in addressing sexual corruption.[22]

1.3 Request UNODC to convene an expert Working Group of legal practitioners, academics, civil society and UN partners to provide States Parties with technical assistance in formulating the definition and contextualized legal provisions.[23]

2. Preventive measures

2.1 Prioritise prevention as the foundation of addressing sexual corruption, recognizing that effective prevention reduces both incidence and harm. Emphasize that effective preventive

[19] A working definition that researchers and practitioners have worked with during the past decade is as follows: *"Sexual corruption occurs when a person abuses their entrusted authority to obtain a sexual favour in exchange for a service or benefit that is connected to the entrusted authority."* This definition identifies three key elements in sexual corruption: (i) the abuse of authority, where the individual exploits a position of power for personal benefit, (ii) quid pro quo nature, where a benefit or service is conditioned on giving a sexual favour and (iii) using sex as currency, as sex replaces money in the transaction. Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "Sexual corruption is abuse of power – and there's more to it than 'sextortion' alone," U4 Anti-Corruption Resource Centre, 2024. https://www.u4.no/blog/sexual-corruption-is-abuse-of-power-and-theres-more-to-it-than-sextortion-alone.

[20] Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf.

[21] Jenkins, M, "The impacts of corruption on women and their role in preventing corruption," U4 Helpdesk Answer, 2024. https://knowledgehub.transparency.org/assets/uploads/helpdesk/The-impact-of-corruption-on-women-and-their-role-in-preventing-corruption_Final.pdf.

[22] OP10 of UNODC, Resolution 10/10 on Addressing the societal impacts of corruption, CAC/COSP/2023/L.14/Rev.1, (December 15, 2023). https://www.unodc.org/documents/treaties/UNCAC/COSP/session10/resolutions/L-documents/2325384E_L.14_Rev.1.pdf.

[23] Transparency International. "Gender and Corruption: Forms, Impact and Solutions." Paper presented at CoSP8, Abu Dhabi, UNODC, 2019. https://www.unodc.org/documents/treaties/UNCAC/COSP/session8/V1911814e.pdf.

work against sexual corruption requires a broad commitment, including all groups of men, women and LGBTQI+ persons.

2.2 Conduct sector-specific risk assessments to identify sexual corruption risk vulnerabilities and design targeted preventive strategies.

2.3 Extend training and awareness initiatives to public officials and employees in high-risk sectors identified domestically (such as education, judiciary, and the police), emphasizing the ethical and legal consequences of sexual corruption. Such programs should not be limited to people at risk of being affected, but also target individuals in positions of entrusted authority and power - including those in supervisory or oversight roles - and others who can take action or serve as whistleblowers.

2.4 Strengthen institutional safeguards, including independent oversight bodies, transparent procedures, clear reporting channels and effective redress mechanisms.

2.5 Raising public awareness about sexual corruption to shift public perceptions, recognizing perpetrator behavior as predatory instead of acceptable, and understanding victims as victimized instead of opportunistic.

3. Policy and legislation: expedite closing gaps in domestic legislation

3.1 Promote immediate recognition of sexual corruption in institutional practice by integrating it into professional codes of conduct, ethical guidelines and conflict of interest regulations in both public and private sectors.[24] This ensures early deterrence and awareness even before legislation is in place.

[24] Åsa Eldén and Elin Bjarnegård, "Implementing Policy Against Sextortion in Tanzania: A follow-up study," The Expert Group for Aid Studies (EBA), 2022. https://eba.se/rapporter/implementing-policy-against-sextortion-in-tanzania-a-follow-up-study/20143/.

3.2 Explicitly recognize sexual corruption as a specific form of corruption in legislation.[25] Such criminalization creates deterrence and provides a legal basis to detect and punish sexual corruption.[26]

3.3 Ensure that victims are not criminalized as "givers" under the new or existing legal framework on sexual corruption. Notably, the practice of distinguishing between the bribe-giver and the bribe-taker in mitigating sanctions or even granting an exemption, already applied in domestic anti-bribery law, provides a precedent for such decriminalization.[27]

3.4 Engage diverse stakeholders, including women, girls, LGBTIQ+ advocacy groups, community-based and women's organisations, in line with Resolution 10/10, in the design of legislation to reflect lived realities and needs.

4. Reporting: establish victim-centered mechanisms

4.1 Establish safe, trauma-informed, accessible and gender-sensitive reporting mechanisms to redress against corruption for women and girls.[28] Such reporting mechanisms should be grounded in clear legal definitions, as discussed above, to avoid criminal victimization, retaliation or victim blaming.[29] While providing the opportunity to report cases anonymously,[30] these mechanisms should keep identified victims regularly informed of the progress of their case, to protect witnesses and whistleblowers, and include strong and gender responsive protections against retaliation, stigmatization and victim-blaming[31].

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[25] The Prevention and Combatting of Corruption Act (Section 25) in Tanzania explicitly criminalises sexual corruption, focusing liability on perpetrators. Sara Carnegie, "Sextortion: a crime of corruption and sexual exploitation," International Bar Association, 2019. https://www.ibanet.org/MediaHandler?id=E5E451C2-A883-4518-B0ED-5AAAEBCDD5AA; Marie Chêne, "Finding a Voice, Seeking Justice: The Barriers Women Face to Reporting Corruption in the European Union," Transparency International, 2021. https://images.transparencycdn.org/images/2021_FindingVoiceSeekingJustice_PositionPaper_Eng.pdf; Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf.

[26] Susan Rose-Ackerman, "Corruption and The Criminal Law. Forum on Crime and Society," Forum on Crime and Society 2, no.1 (2002): 3-21. https://www.unodc.org/pdf/crime/publications/corruption_criminal_law.pdf.

[27] UNODC, "Effective action against bribery: criminalization and enforcement of national and transnational bribery offences under the United Nations Convention against Corruption - Note by the Secretariat", Implementation Review Group of the Second resumed eleventh session on the State of implementation of the United Nations Convention against Corruption, CAC/COSP/IRG/2020/CRP.16, 2020. https://www.unodc.org/documents/treaties/UNCAC/WorkingGroups/ImplementationReviewGroup/16-18November2020/V2006560e.pdf.

[28] UNODC. "United Nations Convention Against Corruption," United Nations, 2004. https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf.

[29] Elin Bjarnegård, Dolores Calvo, Åsa Eldén, and Silje Lundgren, "What is sexual corruption? The challenges of raising awareness and legislating in the absence of recognition," Forum on Crime and Society 11, no.1 (2025): 1-17. https://www.unodc.org/documents/data-and-analysis/Forum/Forum_2025/ForumCrimeSociety_Vol11_Chapter1.pdf.

[30] Timby. "Using Timby to Fight Sextortion in Nigerian Universities," Timby, 2023. https://timby.org/2023/04/24/Using-Timby-to-Fight-Sextortion-in-Nigerian-Universities.html#:~:text=The%20Timby%20App%20can%20be%20downloaded%20for%20free,guidance%20before%20or%20after%20an%20incident%20has%20occurred.

[31] Dr Caryn Peiffer, "Corruption Through a Gendered Lens: Asia and the Pacific," Transparency International, 2023. https://files.transparencycdn.org/images/Report-Corruption-through-a-gendered-lens-November-23.pdf.

4.2 Ensure access to comprehensive support services, including legal aid, counselling and medical care, so victims can safely report incidents and pursue justice.