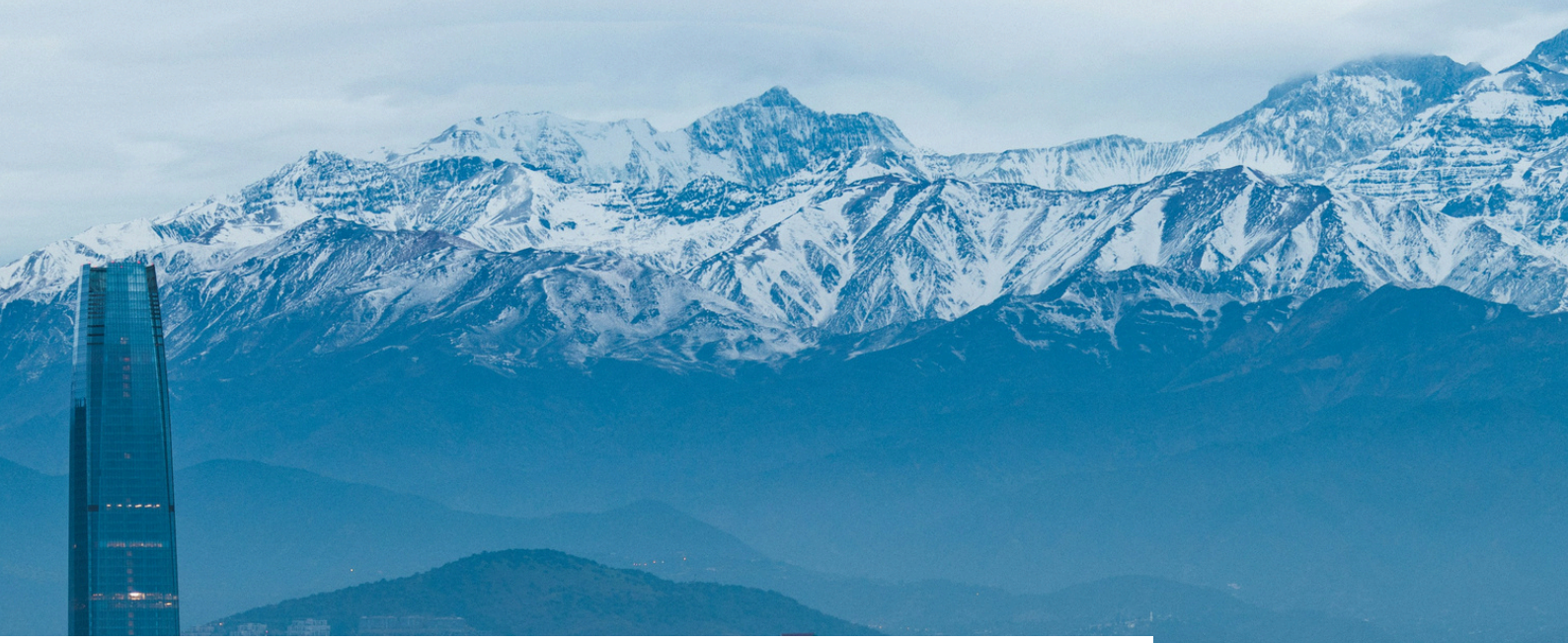
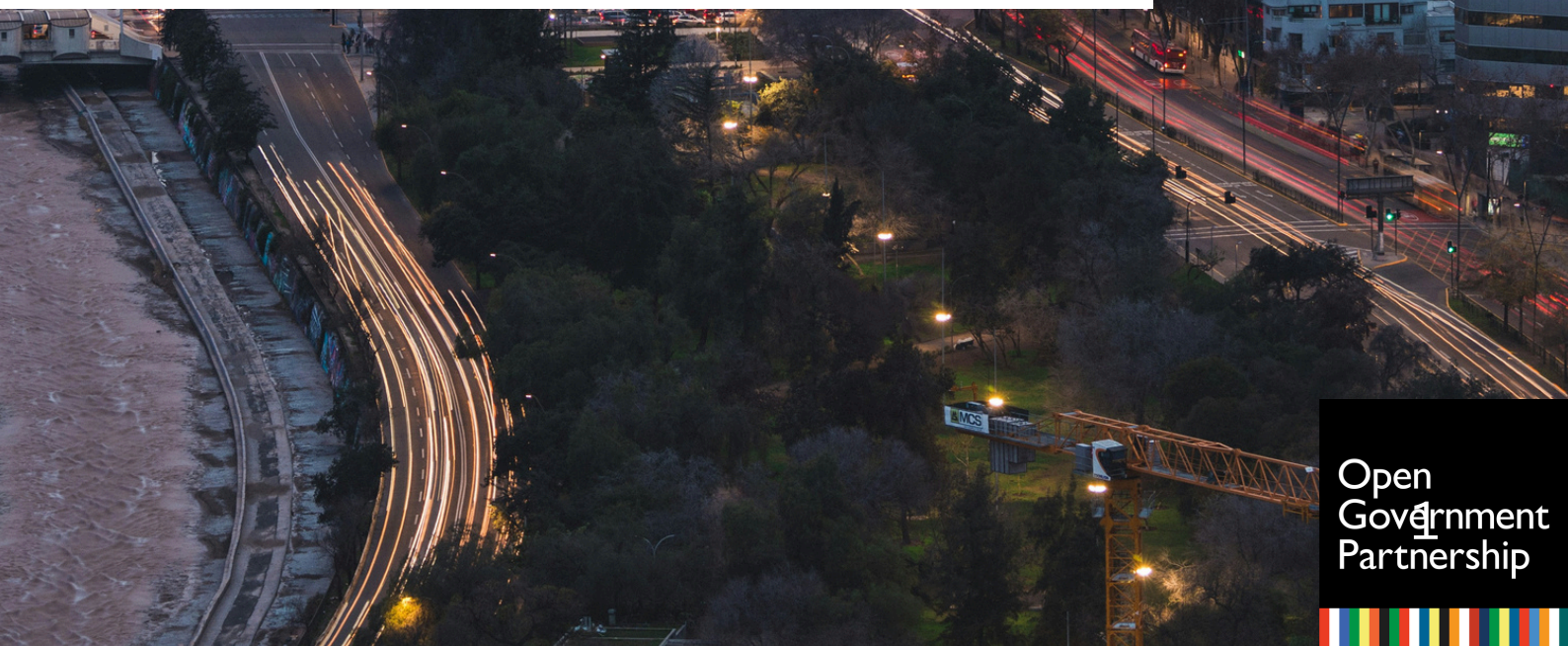


Building Transparent Infrastructure

Open Government Reforms to Guide Accountable Infrastructure Projects

June 2026



Open Government Partnership

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Author

Carey Kluttz

Editor

Joseph Foti

Copy Editor and Graphic Designer

Christina Socci

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Open Government Partnership

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Introduction

Infrastructure shapes access to markets, services, and opportunity, and is one of the largest areas of public spending. Yet decisions about what gets built, how it is financed, and who benefits are often opaque and weakly governed.

From transport and energy systems to digital and natural resource infrastructure, public investment decisions shape access to services, economic opportunity, and long-term development outcomes. These decisions are made by governments, but their consequences are borne by citizens. This guide shows how open government reforms can improve infrastructure outcomes by making decisions more transparent, participatory, and accountable.

The scale of global infrastructure need is substantial: an estimated USD 106 trillion in cumulative investment will be needed across infrastructure verticals by 2040, spanning transport, energy, digital, and the extraction and processing ecosystems that underpin the energy transition. These systems are increasingly interconnected, with infrastructure decisions in one sector shaping outcomes in others.

However, current spending trajectories are expected to fall short of needs by as much as USD 15 trillion globally. In Nigeria alone, for instance, the gap is currently estimated at USD 221 billion. But the financing gap is not the only one that matters. The IMF estimates that approximately 30 percent of public infrastructure investment is lost to inefficiency, poor project selection, and corruption. Closing this governance gap is as important as mobilizing additional finance, as more spending alone does not lead to better infrastructure outcomes.

The stakes are particularly high in the current geopolitical moment. Major infrastructure programs including China's Belt and Road Initiative, the G7's Partnership for Global Infrastructure and Investment, and the EU's Global Gateway are competing to finance infrastructure across the Global South. These initiatives reflect different approaches to how infrastructure is financed, delivered, and governed. In particular, the choices made now about how infrastructure is governed will shape development outcomes, democratic institutions, and strategic partnerships for decades. Strengthening governance is therefore essential to ensuring that infrastructure investments deliver sustainable and inclusive results.

Open government reforms offer practical tools to address these challenges. By improving transparency, strengthening public participation, and reinforcing accountability, governments can improve how infrastructure projects are selected, financed, and delivered. These approaches help reduce waste and corruption, strengthen oversight, and ensure that investments reflect public priorities.

This resource guide sets out what open government reform looks like across the infrastructure sector, drawing on concrete examples from Open Government Partnership (OGP) members and partners. It is designed for policy-makers, civil society organizations (CSOs), and international partners seeking practical approaches to strengthening infrastructure governance. It provides a high-level overview of key reforms and examples, with more detailed technical guidance and resources available in the final section of the guide.

Caption: Kiambu County (Kenya), the site of a large-scale corruption scandal involving road contracts (Credit: Dietmar Reigber via Flickr)

How OGP Works

OGP was formed in 2011 by governments and civil society organizations seeking new ways of working together to address difficult challenges, share innovations globally, and implement specific and measurable open government actions that benefit the public.

OGP provides a structured platform to advance governance reform through several key elements:

- **Strategic, challenge-driven action:** Under the updated 2026 Action Framework, OGP members are encouraged to align action plans with priority open government challenges, focusing reforms on the most pressing governance issues. On a regular cycle (typically every two years), members submit action plans co-created with civil society. These plans center on commitments that are verifiable, relevant, and results-oriented, aligned with OGP values of transparency, participation, inclusion, and accountability. The updated framework places greater emphasis on ambition, policy relevance, and impact potential.
- **Co-creation:** Collaboration between government, civil society, and other stakeholders is at the center of the OGP process, referred to as co-creation. Participating governments must ensure that a diversity of voices can meaningfully participate and shape commitments. The updated framework reinforces minimum participation standards and continuous engagement throughout implementation, not only during design.
- **Visibility and accountability:** Being in OGP raises members' visibility by highlighting the stories of reformers within and beyond government to a broad audience and raising the profile of member countries working on open government reform. OGP provides an accountability platform for members through the Independent Reporting Mechanism (IRM), which provides independent, evidence-based, and objective reporting on members' progress. Additionally, a country's participation in OGP may be reviewed if it acts contrary to the OGP process or principles. The updated framework places stronger emphasis on implementation progress and results over time, alongside the quality of co-creation and the ambition and delivery of commitments.
- **Learning and community:** Members benefit from a global network of peer reformers to share knowledge about best practices and lessons learned from past reform efforts. OGP actively encourages exchanges through events, training sessions, research publications, and blog posts. The 2026 Action Framework further emphasizes peer learning tied to priority policy areas and cross-country collaboration on shared challenges.
- **Evidence for the OGP model:** Ten years' worth of data strongly suggest that the OGP model works. When governments substantively engage with civil society in the OGP process, commitments are more ambitious, implementation rates are higher, and reforms achieve stronger early results. Countries implementing IRM recommendations also tend to have more ambitious commitments. And most importantly, membership in OGP leads to real-world change, with OGP members outperforming non-members in areas such as beneficial ownership transparency, fiscal transparency, and open contracting. The updated Action Framework builds on this evidence by sharpening incentives for more ambitious, results-oriented reforms and clearer alignment with global priorities.

Caption: Students in a nickel mining area in the Philippines, including the children of indigenous community residents and company employees, in a school created by a mining company that regularly participates in EITI (Credit: Joylin A Saquing, PH-EITI via Flickr)

Open Government in the Infrastructure Sector

Infrastructure decisions are fundamentally governance decisions. Choices about what to build, how projects are financed, and who benefits from them shape development outcomes for decades. Where governance is weak, these decisions can lead to inefficiency, exclusion, or corruption.

Open government approaches provide practical tools to improve these outcomes. By strengthening transparency, participation, and accountability across the project lifecycle, governments can improve decision-making, reduce risks, and ensure that infrastructure investments better serve the public.

Three Dimensions of Open Government in Infrastructure

TRANSPARENCY

Making decisions visible

Transparency allows governments, oversight bodies, and citizens to understand how infrastructure decisions are made and implemented. This includes the disclosure of project pipelines, appraisal documents, financing terms, procurement processes, contracts, beneficial ownership, and implementation progress. Transparency means making decisions visible across the project lifecycle, from project selection and financing to procurement, implementation, and results. This allows governments, oversight bodies, and citizens to track whether projects are delivering as planned.

Common approaches including the Extractive Industries Transparency Initiative (EITI), CoST Infrastructure Transparency Initiative, and the Open Contracting Partnership (OCP) data standards provide practical frameworks for disclosure. When implemented effectively, these approaches help create a clear, accessible record of decisions across the project lifecycle.

PARTICIPATION

Giving affected people a voice

Public participation helps ensure that infrastructure investments reflect the needs and priorities of affected communities. Effective participation begins early, before key decisions are finalized, and includes deliberate efforts to reach underrepresented groups. It also requires that input is taken seriously and reflected in project design.

International standards such as Free, Prior and Informed Consent (FPIC) provide guidance for engaging communities, particularly in contexts involving indigenous peoples. The principles underlying FPIC provide a useful standard of good practice for all major infrastructure decisions: consent freely given, before decisions are made, and on the basis of full information. This helps reduce the risk of delays, conflict, and poorly designed projects.

Caption: A member of the Cuadrilla Rosa, Santiago de Cali (Colombia)'s first women-only road maintenance crew, painting a guardrail in the city (Credit: Infrastructure Secretariat)

ACCOUNTABILITY

Ensuring decisions can be challenged

Accountability ensures that transparency and participation translate into action. This includes effective audit institutions, parliamentary oversight, grievance mechanisms with functioning feedback loops, and enforcement of rules governing public officials and contractors.

Because infrastructure projects are complex, long, and high-value, accountability often depends on a combination of formal oversight and active civil society engagement. Without enforcement, transparency and participation alone do not change outcomes.

How This Guide Is Structured: The Infrastructure Lifecycle

This guide is structured around six core areas of reform.

1. **Transparency in project selection and financing:** Which projects are built, why, and how are they financed? This section covers independent appraisal, project pipelines, debt and financing transparency, and environmental and social impact assessment (ESIA) publication.

2. **Open contracting and procurement:** How are contracts awarded and implemented? This section covers competitive tendering, full contract publication, digital platforms, and open data standards.

3. **Beneficial ownership and integrity:** Who really owns and benefits from private companies, especially those winning public contracts? This section covers beneficial ownership registers, procurement-linked disclosure, conflicts of interest, asset declarations, and sanctions.

4. **Public participation and stakeholder engagement:** Who has a voice? This section covers early consultation, FPIC, gender-responsive engagement, civil society monitoring, and ESIA access.

5. **Parliamentary and audit oversight:** Who checks the checkers? This section covers Supreme Audit Institution (SAI) mandates and access rights, parliamentary scrutiny (including of public-private partnerships, or PPPs), ex-post evaluation, and stranded asset risk.

6. **Grievance mechanisms and remedy:** What happens when things go wrong? This section covers grievance redress mechanisms (GRM) design, contractor obligations, outcome reporting, and whistleblower protections.

These thematic areas cover the infrastructure project lifecycle from project selection and financing, through procurement and delivery to operation, oversight, and closure. Each section highlights practical reforms that address common governance risks at different stages of the process.

Lifecycle Stage	Sections	Key Governance Questions
Selection & Appraisal	1	Which projects? Why? Are appraisals independent and public before commitments are made?
Procurement & Contracting	1 to 3	Are contracts competitive and published? Are beneficial owners disclosed?
Construction & Delivery	2 to 4	Is delivery monitored? Are cost overruns reported? Are communities engaged?
Operation & Monitoring	4 to 6	Is service delivery equitable? Are oversight bodies active? Are grievances resolved?
Evaluation & Closure	5 to 6	Are ex-post evaluations published? Is stranded asset risk assessed?

While presented separately, these reforms are most effective when implemented together. Transparency without accountability, or participation without access to information, is unlikely to produce meaningful change.

Four reform areas recur across multiple sections. These transverse reforms are most powerful when implemented together, as they reinforce and enable each other.

Transverse Reform	Sections	Why it Matters across the Guide
Open Data Standards (OCDS/OC4IDS)	1, 2, 3, 5	Links project selection, procurement, contracts, and oversight in a single auditable trail.
Beneficial Ownership Disclosure	2, 3, 5	Transforms procurement transparency from a record into an anti-corruption tool.
Civil Society Monitoring	4 to 6	Complements formal institutional oversight, or substitutes for it in low-capacity environments
Multi-Stakeholder Oversight Committees	1, 4, 5, 6	Distributes accountability and creates channels for early problem identification.

The six thematic areas in this guide address distinct but interrelated challenges, such as:

- Transparency in project selection is limited without open and competitive procurement;
- Procurement transparency is strengthened by beneficial ownership disclosure;
- Participation helps ensure that technically sound projects are also socially and environmentally sustainable; and
- Oversight and grievance mechanisms ensure that problems are identified and addressed.

Taken together, these reforms are not a checklist, but form a system for improving infrastructure governance. Implementing them in combination can significantly strengthen outcomes, reduce risks, and build public trust.

Each section below provides additional context, with practical examples and recommendations that governments can adapt to their context.

Infrastructure Transparency Across the Lifecycle: Ukraine's DREAM System

The following case illustrates what the six governance themes look like in practice when applied together to a single country context.

END-TO-END TRANSPARENCY FOR RECONSTRUCTION

When Russia's full-scale invasion began in February 2022, Ukraine faced a reconstruction challenge of unprecedented scale, with damage and recovery needs estimated at hundreds of billions of dollars. At the same time, the risks of inefficient spending and corruption were high. Ukraine's response was to build, at speed, the most comprehensive open infrastructure management system yet attempted anywhere: the Digital Restoration Ecosystem for Accountable Management, or DREAM.

The system was developed by the RISE Ukraine coalition in partnership with government and civil society, including the Better Regulation Delivery Office and Transparency International Ukraine, and funded by the European Union, among other partners. DREAM builds on a decade of open government reforms, including the award-winning Prozorro electronic procurement system. The platform's development demonstrates how digital systems and regulatory reforms can be introduced in parallel: the regulatory framework was developed alongside the technology at an unprecedented pace, and multi- stakeholder collaboration produced a functioning pilot in under three weeks. As of March 2026, over 14,000 projects worth more than USD 14 billion were on the platform, with more than 1,300 communities, about two-thirds of all regional administrations, and all ministries actively using it.

Transparency in project selection and financing

Bolstered by an OGP commitment, the real-time system was designed to help the state allocate funding for public projects in a way that meets government priorities and the actual needs of Ukrainian citizens. DREAM introduces a single, digital project pipeline where all proposed public investment projects are registered, assessed, and prioritized. Each project is assigned a standardized profile, including costs, objectives, and funding sources.

DREAM's risk-flagging algorithms and public APIs enable early-stage transparency, allowing governments, oversight bodies, and the public to scrutinize which projects are selected and why before financing decisions are finalized. This means that transparency is deeply embedded at the prioritization stage, before a single contract is signed.

Open contracting and procurement

DREAM provides a single digital route for all reconstruction and public investment projects, collecting public project data online and ensuring open data publication in line with global open contracting standards. It builds on Ukraine's Prozorro system to ensure that contract information is accessible and linked directly to project data by coordinating with the Unified State Electronic System in the Construction Sector (which covers the entire infrastructure lifecycle), the Diia government services digital ecosystem app, and the State Treasury System, under a single "everyone sees everything" principle.

Every project has its own digital profile, allowing users to track procurement processes and contract implementation as part of a continuous project record, rather than as isolated disclosures, allowing users to follow the money from planning through award and implementation.

Beneficial ownership and integrity

DREAM's integrity architecture goes far beyond simple procurement disclosure, leveraging Ukraine's five dedicated anti-corruption bodies to ensure consistent data-driven monitoring and rapid identification of corruption risks in reconstruction projects.

In addition, DREAM connects procurement and project data with Ukraine's beneficial ownership and anti-corruption systems, leveraging the country's history as a leader on beneficial ownership transparency. This enables users to identify the entities behind companies receiving public funds and supports risk-based monitoring of reconstruction projects, which can strengthen the detection of conflicts of interest and corruption risks and shed light on who is actually benefitting from the billions invested in reconstruction.

Public participation and stakeholder engagement

DREAM incorporates multiple tools that allow citizens, civil society, and local stakeholders to monitor projects and provide feedback, with platforms such as DoZorro enabling users to review procurement processes and report concerns. Supported by multiple OGP commitments, any participant can monitor tenders, analyze procurement records, report wrongdoing, and appeal illegal practices. Dozens of civil society organizations engaged in monitoring the system, identifying issues,and submitting complaints on over 1,500 procurements each month.

Planned expansions, including the co-designed eDem public participation module, will further allow communities to propose and prioritize projects, helping ensure that reconstruction reflects local needs as a crucial component of the decision-making process.

Parliamentary and audit oversight

By consolidating project data into a single system, DREAM provides audit institutions, parliamentarians, and oversight bodies with real-time access to information on public investment. This digital system reduces reliance on fragmented or delayed reporting and strengthens the evidence base for financial oversight and performance audits.

Increased transparency is beneficial not only to civil society, as the audit and oversight authorities are primary users of data available through Prozorro's procurement dashboard. DREAM's open data tools allow anyone to view planned projects and track their progress at every stage, providing a real-time evidence base for parliamentary scrutiny that does not depend on government-produced reports.

Grievance mechanisms

The platform also enables users to flag inconsistencies, submit complaints, and track responses directly through the platform. This builds on DoZorro's feedback mechanism, which has processed complaints from hundreds of thousands users since its initial launch.

Risk-based monitoring tools such as the complementary Big Recovery Portal also help identify potential issues early, allowing authorities to respond before problems escalate. This links transparency and participation directly to corrective action.

WHY IT MATTERS FOR THE GUIDE

Ukraine's DREAM platform offers what may be the most advanced real-world demonstration yet of what the guide's suggested government reforms point toward, demonstrating how governments can move from fragmented reforms to an integrated, lifecycle approach to infrastructure governance. By connecting data and oversight across stages—from project identification and financing, through procurement and implementation, to monitoring and grievance resolution—it creates a continuous, publicly accessible record of infrastructure decisions.

This approach strengthens coordination across institutions, enables earlier detection of risks, and allows both authorities and citizens to track whether projects are delivered as planned.

Though DREAM was developed in an exceptional context, the core model based on a unified project pipeline, open data standards, and integrated oversight can be readily adapted in other settings. Ukraine built DREAM not *despite* an emergency, but *because* of one, showing that political will generated by crisis can be channeled into durable open government reforms.

Reform Recommendations & Case Studies

1 Transparency in Project Selection and Financing

The most consequential infrastructure decisions—what gets built, why, and at what fiscal risk—are made before procurement begins. Yet this is often where governance is weakest. Without transparency at the selection and financing stage, downstream reforms cannot correct poor upstream decisions.

WHY THIS MATTERS

Infrastructure outcomes are largely determined before a contract is signed. Decisions on project selection and financing often involve the largest financial commitments, yet receive the least scrutiny. Across contexts from the US and Zambia, to Kenya and Mexico and across Latin America, weak upstream governance without due process or external scrutiny has led to costly, poorly performing projects. This is especially acute in energy and extractive infrastructure, where financing structures and political salience combine to make upstream decisions the highest-risk governance moment in the entire project lifecycle.

The challenge is growing. Increasingly, infrastructure is financed off-budget or through state-owned enterprises and special-purpose vehicles, limiting public scrutiny even where disclosure laws exist. PPPs) can further obscure long-term fiscal commitments, increasing the risk of hidden liabilities.

Strengthening transparency at the selection stage is critical to preventing poorly chosen or politically motivated projects before resources are committed.

SUGGESTED GOVERNMENT REFORMS

1. Require independent appraisal of all major infrastructure projects and publish a comprehensive project pipeline before procurement begins

No project above a defined threshold should proceed without a completed, *independently* commissioned feasibility study and cost-benefit analysis, both publicly disclosed. These studies should be commissioned and funded by the government rather than the potential contractor or financier (as seen in the cautionary tale of Kenya's Standard Gauge Railway feasibility study.)

Governments should maintain a standardized, publicly accessible pipeline covering all projects under consideration, in preparation, or under implementation, including project rationale, costs, financing sources, and expected impacts, ideally using standardized data. This pipeline should cover all infrastructure projects, with no exceptions for "urgent" or "strategic" projects, including those championed by key government officials.

Caption: Road construction in Northern Region, Malawi (Credit: Japhet Khendlo via Unsplash)

2. Establish publicly accessible infrastructure project registries using open data standards

Registries should cover the full project lifecycle and include costs, contractors, financiers, and implementation status. These should be available for scrutiny by citizens, parliamentary oversight bodies, civil society organisations, and the media, as well as other parts of government.

Standards such as the CoST Infrastructure Data Standard and the Open Contracting for Infrastructure Data Standard (OC4IDS) enable governments to link project selection data with procurement and contract data into a single auditable record. After all, you can't manage what you can't measure.

Making Public Investment Visible and Trackable in Latin America

MapaInversiones is a digital platform developed by the Inter-American Development Bank and implemented by OGP countries across Latin Amaerica to enable governments and citizens to track public investment projects in a single, accessible interface.

The platform integrates data from budgeting, procurement, and project management systems to present it as interactive maps and dashboards, showing project location, cost, implementing agencies, and status. In some countries, it also enables citizens to provide feedback or flag implementation issues.

By bringing together data across the project lifecycle, MapaInversiones helps make infrastructure investments more visible and easier to monitor, even for non-experts. This is particularly important in infrastructure sectors where projects are large, complex, and geographically dispersed.

For governments, the platform supports better coordination and oversight by linking information that is often fragmented across agencies. For citizens and civil society, it provides a practical tool to track whether projects are delivered as planned.

By linking data across the project lifecycle, the platform improves coordination within government and enables citizens to track whether projects are delivered as planned.

3. Require full disclosure of infrastructure financing, including PPPs and contingent liabilities

Budget documentation should include a comprehensive fiscal risk statement covering guarantees, revenue commitments, and other contingent liabilities that are key to many infrastructure projects, especially involving PPP contracts, state-owned enterprise (SOE) borrowing, and government-guaranteed loans. Lack of information on these aspects can lead governments to ultimately choose high-cost projects based on low stated base costs, but with large hidden commitments. This can create fiscal risks that may not materialize until years later, often when a different government manages the fallout.

PPP contracts and associated fiscal commitments should be publicly disclosed, with limited use of commercial confidentiality. Importantly, unsolicited proposals must be subject to the same competitive scrutiny as government-initiated projects.

4. Require public disclosure of environmental and social impact assessments before project approval

Early ESIA disclosure enables scrutiny before key decisions are finalized and supports meaningful community engagement. The 2021 Resource Governance Index (the latest publication) found that while virtually all assessed countries required companies to commission ESIAs, fewer than two-thirds required these to be disclosed publicly and only one-third of these actually published them in practice. International agreements including the IFC Performance Standards and the Equator Principles establish this as a baseline expectation for privately financed projects, and the same should apply to publicly financed ones.

5. Establish and publish transparent project prioritization criteria and scoring frameworks

Governments must establish formal criteria for selecting projects based on economic, environmental, and social impact, aligned to international standards. They should disclose scoring methodologies and results, including justification where lower-ranked projects are selected. Ukraine's DREAM platform embeds automated priority scoring into the project submission process itself, assigning scores on financial, social, environmental, and other criteria before any funding decision is made. This principle is replicable elsewhere.

6. Strengthen parliamentary and audit oversight at the project selection stage

Require parliamentary review of major projects before financing is committed, and mandate SAIs to conduct pre-implementation appraisal reviews. Effective oversight must begin at the selection stage, as downstream audits and post-implementation reviews are unable to recover resources already committed to unviable projects. Parliamentary infrastructure committees should receive mandatory disclosure of all projects above a defined threshold before financing is committed, with sufficient time and technical support for real scrutiny, rather than rubber-stamp approval. Where these mechanisms are absent or weak, presidential discretion fills the vacuum.

Infrastructure Planning Data in Colombia

OGP action plan (2021–2024)

Oversight of infrastructure in Colombia has historically occurred after contracts are awarded, limiting visibility into how projects are selected, designed, or prioritized.

To address this gap, the government, in collaboration with civil society through OGP, is developing a public platform to disclose upstream infrastructure planning data, including project pipelines, investment priorities, and technical documentation. The platform is designed to link with the national SECOP procurement system, enabling visibility across the full project lifecycle.

The reform has expanded access to planning data and strengthened integration between planning and procurement systems. Though there is not yet independent evidence of impact on project outcomes, these changes can help enable earlier-stage oversight. It also improves competition by making technical and planning information more widely accessible. This has the potential to be a strong example for other countries on improving transparency around how infrastructure projects are selected, designed, and prioritized.

Key Lessons

- Infrastructure transparency is most effective when it begins *before* procurement, not after.
- Linking planning and procurement data strengthens accountability across the full project lifecycle.
- Political and private sector resistance to greater transparency should be anticipated and managed.

Improving Project Selection in Sekondi-Takoradi, Ghana

OGP/CoST-linked reform (2019–2023)

Historically, limited public access to information on infrastructure project pipelines, project design, and cost estimates made it difficult to assess value for money and alignment with public priorities in Ghana.

To address this, Sekondi-Takoradi introduced a public infrastructure disclosure portal that publishes data across the project lifecycle, including project justification, cost estimates, and implementation progress, supported by multi-stakeholder oversight through CoST.

This increased public disclosure has enabled earlier scrutiny of infrastructure decisions, helping identify inefficiencies, design flaws, and cost overruns before they escalate. It has also improved coordination between government, civil society, and oversight actors, and resulted in some cases of resolved issues.

Key Lessons

- Transparency across the full lifecycle, especially at the early stages, improves value for money.
- Multi-stakeholder oversight strengthens accountability, particularly where formal institutions are constrained.
- Usable public data enables more effective civic engagement.

Strengthening Debt Transparency in Kenya

Multiple OGP action plans (2018–2023)

Kenya's public debt has recently risen to approximately USD 80 billion, with debt servicing consuming a significant share of government revenue. Against this background, large-scale infrastructure investments in Kenya, often financed through borrowing and influenced by political pressure, have raised concerns about rising public debt and limited public scrutiny of financing decisions.

To address this, Kenya introduced reforms to improve transparency in public debt and infrastructure financing, including through OGP action plans. These include publishing more accessible debt data, opening parliamentary hearings on borrowing decisions, and expanding public participation in budgeting processes.

While there is not yet comprehensive independent accounting of the impact on fiscal outcomes, these reforms have increased parliamentary scrutiny and public debate around infrastructure financing, particularly regarding large-scale borrowing decisions. Further, this is one of only a handful of commitments around debt transparency currently among OGP members, despite its increasing importance on the global stage.

Key Lessons

- Transparency must be paired with usability, meaning data must be accessible and understandable.
- Parliamentary oversight is essential before borrowing decisions are finalized.
- Linking debt transparency to specific projects can help improve accountability.

REFORM TO WATCH

2 Open Contracting and Procurement

Public procurement is the primary delivery mechanism for infrastructure investment and one of its highest-risk stages. Open, competitive contracting reduces costs, improves quality, and strengthens public trust. Transparency at contract award and throughout implementation is how governments ensure value for money.

WHY THIS MATTERS

Public procurement or public contracting is the main channel through which infrastructure investments are delivered. It is also one of the most corruption-prone stages of the project lifecycle, due to high contract values, technical complexity, and limited public visibility.

These conditions create opportunities for bid rigging, conflicts of interest, and cost inflation, particularly in opaque arrangements such as PPPs or SOE contracting. These risks apply across sectors, from energy and extractives to digital infrastructure procurement, where exemptions from competitive processes are common.

Without transparent procurement and effective oversight, governments cannot ensure fair competition, value for money, and public trust in infrastructure investments. Well-designed procurement systems, on the other hand, can promote local participation, strengthen market competition, and improve economic and social outcomes.

SUGGESTED GOVERNMENT REFORMS

1. Require open, competitive tendering as the default for all infrastructure contracts

Governments should mandate open, competitive tendering as the default for all public procurement, particularly for large-scale infrastructure projects. Where open competition is not feasible due to local or project contexts or market constraints, procuring entities should publish a clear justification. The use of direct awards and emergency procurement should be strictly limited.

Competitive procurement processes promote fair competition, improve value for money, and reduce opportunities for corruption. By embedding transparency throughout the process, open tendering also strengthens public oversight and trust, ensuring that infrastructure investments deliver maximum economic and social returns.

2. Publish infrastructure contracts and contract implementation data, including amendments, cost overruns, and delivery timelines

Making full infrastructure contracts and implementation data publicly available, including contract amendments, cost overruns, and delivery timelines, enables stakeholders to monitor whether projects are delivered as agreed and identify risks early. Encouraging use of this information by various stakeholder groups further helps ensure its continued effective disclosure.

While legitimate confidentiality concerns may arise, most infrastructure contracts can be disclosed, and commercial confidentiality should not be used as a default basis for withholding information. This includes key sectors like energy and the extractive industries.

3. Adopt digital procurement platforms to manage and publish infrastructure tenders and contracts

The use of digital or electronic public procurement systems, or at minimum online platforms for publication of infrastructure contracts and implementation information, helps increase competition, improve efficiency, and reduce opportunities for discretionary decision-making in infrastructure projects.

Digital systems can also enable better use of data to improve planning, expand opportunities for local firms, and strengthen transparency and accountability.

4. Publish infrastructure procurement and contract implementation data using open standards

Publishing and using procurement data across the full contracting cycle can help improve transparency as well as service delivery and efficiency. Ideally, this can be done by using open data standards such as the Open Contracting Data Standard (OCDS) and/or the Open Contracting for Infrastructure Data Standard Toolkit (OC4IDS, which combines contract-level disclosure with project-level disclosure specifically relevant for infrastructure projects). These standards enable the disclosure of tender information, bidders, evaluation results, contracts, and amendments.

Publishing standardized data and linking this data to other public datasets, including budgeting and spending information, allows governments and external stakeholders to identify risks such as single-bid tenders, cost overruns, and delays.

5. Disclose beneficial ownership of bidding companies

Governments should require the disclosure of beneficial ownership for all companies bidding on infrastructure contracts. Linking beneficial ownership registries with public procurement platforms helps identify conflicts of interest, reduce the use of shell companies, and detect corruption risks before contracts are awarded. This is especially important in the infrastructure sector, where public contracts tend to be extremely high value and with long timeframes.

Open Contracting across the National and Local Levels of Government in Colombia

OGP-linked reforms (2015–2023)

In Colombia, fragmented procurement systems limited transparency, competition, and oversight in infrastructure contracting.

To address this, the government expanded its SECOP II e-procurement platform to publish standardized open contracting data nationwide, including tender documents, bidder information, and contract awards using the OCDS.

The reforms contributed to an estimated USD 1 billion in efficiency savings and improved competition by reducing opportunities for opaque contracting practices. Subnational adoption has expanded access to procurement opportunities, inspiring an OGP Challenge commitment on transparent infrastructure contracts and civil society monitoring. Together, these reforms have improved competition, transparency, and savings.

Key Lessons

- National platforms and local implementation reinforce each other.
- Transparency is most effective when paired with citizen monitoring.
- Standardization enables large-scale efficiency gains.

Using Data Analytics to Reduce Procurement Risk in Indonesia

Multiple OGP action plans (2017–2023)

Corruption risks in procurement often appear as patterns across multiple contracts, making them difficult to detect through traditional project-level oversight.

Indonesia combined open contracting data disclosure with analytical tools, supported by government-civil society collaboration, to identify risk indicators such as single-bidder tenders, short bidding periods, and repeated awards to the same firms, especially in the infrastructure sector.

The approach has enabled systematic identification of high-risk contracts and informed improvements in oversight and competition, such as corruption convictions amounting to over USD 18 million, an increase in corruption cases, and an estimated 200 percent improvement in efficiency and coverage of audits. Indonesia has been building on these results to publish and use beneficial ownership information, especially in the extractives sector.

Key Lessons

- Publishing data is not enough: analysis is critical.
- Collaboration between government and civil society strengthens oversight and reform.
- Risk-based approaches improve oversight efficiency.

End-to-End Infrastructure Transparency and Accountability in Kaduna State, Nigeria

Multiple OGP action plans (2016–2024)

Procurement transparency often ends at the contract award stage, with limited visibility into whether infrastructure projects are delivered as planned.

Kaduna State implemented open contracting reforms across the full infrastructure lifecycle, publishing data on tenders, awards, and project implementation using the OCDS and OC4IDS standards, supported by multiple OGP commitments. These reforms are complemented by citizen monitoring initiatives and grievance mechanisms linked to open data.

The system enables real-time tracking of infrastructure performance and has supported civic monitoring of projects worth over USD 100 million. It has improved the detection of delays, cost overruns, and implementation challenges, while also strengthening citizen-government feedback loops.

Key Lessons

- Transparency must extend beyond contract award to implementation and project delivery.
- Standardized, open data enables both government and citizen oversight.
- Integrating transparency with feedback mechanisms, supported by evidence, strengthens accountability.
- Sustained reform over multiple years is critical for impact.

3 Beneficial Ownership and Integrity

Across infrastructure corruption cases globally, one mechanism appears repeatedly: anonymously owned companies that conceal the true beneficiaries of public contracts. Identifying the real (beneficial) owners of companies is essential to detect conflicts of interest, prevent bid rigging, and enable enforcement.

WHY THIS MATTERS

Infrastructure is among the most corruption-prone sectors in any economy. High contract values, technical complexity, and long timelines create opportunities for rent extraction across the project lifecycle. The IMF's estimate that approximately 30 percent of public infrastructure investment is lost to inefficiency, poor selection, and corruption represents a concrete and recurring theft from public resources.

A common mechanism underpins many of these risks: the use of anonymously owned companies to conceal the true beneficiaries of public contracts. Beneficial ownership refers to the natural persons who ultimately own or control a company, while beneficial ownership transparency refers to requiring disclosure of this information. Shell companies and complex ownership structures allow politically exposed persons (PEPs) and their associates to benefit from public contracts without detection.

In the extractive sector in particular, ownership concealment at the licensing stage, before a single contract is awarded, is the primary mechanism by which politically connected actors capture resource rents. Beneficial ownership disclosure requirements must therefore begin at the concession application stage, not only at the procurement stage.

The core challenge is not only disclosure, but use. In many countries, systems for collecting, verifying, and cross-referencing beneficial ownership data are weak or fragmented. Even where BO legislation and registers exist, they are often incomplete, unverified, or disconnected from procurement systems. The laws may be improving, but implementation consistently lags behind.

Beneficial ownership transparency is most effective when it is integrated into decision-making, as in Chile (see box below). A standalone register has limited value. Connecting ownership data to procurement systems allows authorities and the public to identify conflicts of interest and hidden ownership structures in real time. Without these measures, procurement transparency cannot reveal who ultimately benefits from public spending, limiting the effectiveness of anti-corruption efforts across the infrastructure lifecycle.

The previous section addressed how beneficial ownership disclosure integrates into procurement, while this section focuses on how to establish and enforce effective systems.

SUGGESTED GOVERNMENT REFORMS

1. Establish public, structured beneficial ownership registers meeting international standards

Effective beneficial ownership transparency is centered on a centralized, publicly accessible register that identifies the natural persons who ultimately own or control companies. Registers should be public to enable scrutiny by oversight bodies, civil society, and the media.

Definitions should be clear, cover all relevant legal entities, and address nominee ownership. Registers should follow international standards, including the Open Ownership Principles and Beneficial Ownership Data Standard, to ensure interoperability and data quality. Verification is a baseline standard, not an optional enhancement, as registers that accept self-reported data without cross-checking against tax or company records provide only weak anti-corruption protection.

2. Make beneficial ownership disclosure a mandatory condition for infrastructure procurement

Governments should require all bidders for public contracts above a defined threshold to disclose their beneficial owners as a condition of participation and contract awards. Requirements should cover joint ventures, consortiums, special purpose vehicles, subcontractors, and PPP concessionaires (contract structures often used for large infrastructure projects). Each of these structures can be used to obscure the real identity of beneficiaries, and all should be explicitly covered by beneficial ownership disclosure requirements.

Further, this required disclosure should cover subcontractors, PPP concessionaires, and companies bidding on extractive sector licenses, among others. In particular, disclosure should begin at the highest-risk decision points, including extractive licensing, where the risk of political interference is elevated.

3. Link procurement databases with BO registers and politically exposed person (PEP) flags

Procurement systems should be interoperable with beneficial ownership registers and other relevant datasets, including PEP lists and asset declarations. Integration enables automatic flagging of potential conflicts of interest. However, this is not only a technical issue, as barriers are often rather legal and institutional. Governments should establish a clear legal and institutional mandate for data sharing across agencies.

Beneficial ownership data has the most impact when it can be combined with data on public procurement, land ownership, real estate, and tax records. This means that procurement contract notices and award data reference the same company identifiers used in the BO register (ideally those in the business registry), enabling cross-system searching and automated flag generation.

4. Require asset declarations and conflict-of-interest disclosures from officials with infrastructure and procurement responsibilities

Beneficial ownership transparency must be complemented by disclosure from public officials. Governments should require financial interest, asset, and conflict-of-interest declarations from officials involved in infrastructure decision-making, procurement, and oversight. To date, in many countries, actual disclosure lags far behind legislation.

Declarations should be public, machine-readable, and cross-checked against company and ownership data. This is the case for officials (not only senior executives) involved in infrastructure project selection, procurement evaluation, contract management, and oversight.

Verification mechanisms are essential to make the system function and to avoid asset declaration becoming an unaudited compliance exercise. Post-employment restrictions or "revolving door" rules should prevent officials from benefiting from decisions they oversaw.

5. Establish enforceable sanctions and whistleblower protections to close the enforcement gap

Disclosure requirements must be backed by enforcement. Governments should establish clear sanctions for non-disclosure or false reporting, including exclusion from contracts, financial penalties, and criminal liability where appropriate. Enforcement should extend to intermediaries that facilitate concealment, including lawyers, accountants, or financial institutions.

Whistleblower protections are a key complement to formal enforcement and sanctions, and are essential to detect violations. Legal protections should cover public officials, contractors, subcontractors, and community members, and include safeguards against retaliation and access to reporting channels. Effective protection requires not only legal frameworks but active institutional support for complainants, including legal assistance, case monitoring, and proactive investigation of reported retaliation.

Integrating Beneficial Ownership into Procurement in Chile

OGP-linked reform (2023–2026)

Opaque company ownership structures increase corruption risks in public procurement, especially in the infrastructure sector.

In 2023, Chile required companies participating in public procurement to disclose beneficial ownership information directly within the procurement platform. The reform integrated beneficial ownership reporting directly into core procurement processes, triggering disclosure whenever a company submitted a bid, issued a quote, or received a purchase order.

This requirement has helped enable authorities to detect conflicts of interest in real time and strengthen accountability in public contracting with real results, reflecting the ability to link ownership data with procurement activity and identify risks more effectively. Within three months:

- 59 percent of approximately 66,000 targeted firms had complied.
- Over 100,000 beneficial owners had been registered.
- 69 percent reduction in conflicts of interest had been detected.

Key Lessons

- Beneficial ownership transparency is most effective when integrated into operational systems.
- Linking ownership data to procurement improves risk detection and enforcement.
- Rapid impact is possible through well-designed systems with effective oversight.

Building a Comprehensive Beneficial Ownership Framework in Indonesia

Multiple OGP action plans (2016–2023)

Opaque ownership structures have enabled corruption in high-risk sectors such as construction and extractives. A 2020 study found that nearly all businesses in these sectors in the country reported being asked to pay bribes by public officials.

To combat this, Indonesia developed its beneficial ownership framework over multiple OGP reform cycles, combining legal requirements, public registries, and private sector engagement.

Though there is no single consolidated measure of impact, the reforms have significantly expanded ownership disclosure and strengthened the ability of authorities and civil society to identify corruption risks. Such multi-stakeholder engagement is especially important in the context of the energy transition, as beneficial ownership transparency is identified as one of the most viable pathways to fighting corruption in Indonesia.

Key Lessons

- Beneficial ownership reform requires sustained effort over time.
- Private sector engagement is essential to ensure compliance and effectiveness.
- Transparency must be usable to support enforcement.

REFORM TO WATCH

Linking Beneficial Ownership and Procurement Transparency in Malawi

OGP commitments (2020–2024)

Infrastructure procurement is vulnerable to corruption where company ownership is opaque. In Malawi, these reforms have increasingly been linked to broader concerns around fiscal sustainability and public debt, reflecting the high stakes of infrastructure investment in lower-income contexts.

Malawi is integrating beneficial ownership disclosure into procurement systems, enabling authorities and the public to identify who ultimately owns companies awarded public contracts. A complementary OGP commitment on natural resource governance extends beneficial ownership disclosure to the extractives sector, linking ownership data to licenses and revenues.

While there is not yet independent evidence of impact, these reforms together create a more coherent transparency framework across sectors where large-scale infrastructure and public investment are concentrated. Combining open contracting and beneficial ownership transparency can strengthen due diligence, reduce corruption risks, and improve accountability in infrastructure delivery, helping to strengthen public trust in government systems and in the management of infrastructure investments.

Key Lessons

- Integrating beneficial ownership with procurement systems increases effectiveness.
- Cross-sector transparency (including for extractives) strengthens overall governance.
- Early-stage reforms require sustained political support.

REFORM TO WATCH

4 Public Participation and Stakeholder Engagement

Infrastructure projects that exclude affected communities generate predictable consequences: conflict, delay, cost overruns, and lasting grievances. Meaningful participation that is early, inclusive, and consequential is not procedural, but essential to delivering infrastructure that works and is sustained over time.

WHY THIS MATTERS

Infrastructure decisions determine who benefits, whose land is used, and who bears environmental and social costs. They dictate who gets electricity, whose land is acquired for a new road, or which communities live next to a mine. These stakes increasingly apply to digital infrastructure as well, where systems such as digital ID or automated service delivery can exclude large populations without visible conflict. Yet participation requirements rarely extend to digital systems.

These decisions are often made without meaningful involvement of affected communities. The consequences are predictable, whether they take the form of conflict, delays, legal challenges, or infrastructure that fails to meet local needs. Participation is both a democratic right and a practical tool for improving outcomes. However, without formal feedback loops, consultation risks becoming tokenistic rather than shaping decisions.

The effects of poor participation mechanisms are uneven. Women, indigenous peoples, informal workers, people with disabilities, and marginalized communities are more likely to be excluded, despite often being most affected. Evidence shows that environmental and social impact governance is consistently among the weakest areas in infrastructure governance, with limited disclosure and engagement in practice despite its being a basic prerequisite.

Participation at the project design phase alone is also not sufficient, but engagement must extend across the infrastructure lifecycle. Engagement should evolve across planning, design, procurement, operation, and evaluation. Getting the sequencing right matters. Consultation that occurs after key decisions are made is ineffective and can increase frustration. Meaningful engagement must occur early, before design and financing decisions are locked in. Without meaningful participation, even technically sound infrastructure projects can fail, whether through conflict, delay, or lack of public trust.

SUGGESTED GOVERNMENT REFORMS

1. Require structured, early-stage public consultation before project approval, and publish the results

Governments should require structured stakeholder engagement for all major infrastructure projects during identification and design, with results published and reflected in decisions. Engagement should occur before feasibility studies are finalized and financing decisions are made. Engagement should be accessible, inclusive, and tailored to affected groups. This can help reduce the risk of project delays, disputes, and redesign costs.

Governments should also require consultation reports to clearly explain how stakeholder input influenced project design, mitigation measures, and compensation, as outlined in Peru's legal framework. Where input is not incorporated, reasons should be documented. This is the difference between consultation as process compliance and consultation as genuine accountability.

2. Embed FPIC into national infrastructure approval frameworks

Governments should embed FPIC into legal frameworks for projects affecting indigenous peoples. FPIC is recognized in international frameworks (such as the UN Declaration on the Rights of Indigenous Peoples, ILO Convention 169, and the IFC Performance Standards) and applies to projects affecting indigenous lands, resources, and livelihoods. FPIC requires consent to be given freely, prior to project approval, and based on full information. It depends on legal recognition of land and resource rights.

FPIC should be treated as an ongoing process. Consent at one stage does not apply to future project changes. Documentation of FPIC consultations and any agreements reached should be publicly disclosed, especially as the demand for critical minerals accelerates and FPIC may be bypassed when pressure to secure supply chains drives rushed licensing processes. Absent or insufficient FPIC processes are a common flashpoint for project-level conflict in extractive industries, transport infrastructure, and energy projects in indigenous territories across countries, contexts, and regions.

3. Institutionalize civil society monitoring of infrastructure projects through multi-stakeholder oversight

Governments should establish multi-stakeholder oversight mechanisms with civil society participation for major infrastructure projects. Civil society monitoring is a cost-effective tool for improving delivery and detecting risks, including through the CoST Infrastructure Data Standard and assurance process. Evidence shows trained community monitors, with access to project data and reporting channels, can detect implementation failures missed by formal oversight.

Multi-stakeholder oversight bodies must be independent, have access to information, and have clear escalation pathways. Without this, they risk becoming procedural rather than effective.

4. Require gender-responsive engagement and gender impact assessments as standard project requirements

Governments should require gender-responsive stakeholder engagement in all major infrastructure projects. This includes targeted outreach, inclusive consultation formats, and gender-disaggregated reporting.

Gender impact assessments should be integrated into project appraisal to identify differential impacts across the lifecycle, as infrastructure affects women and men differently. However, gender-neutral approaches often exclude women; effective engagement requires deliberate design to ensure women's effective participation.

5. Require publication of environmental and social impact assessments

Governments should require public disclosure of ESIAs for physical infrastructure projects before project approval, not after. While rarely practiced in reality, such disclosure enables communities to understand risks, engage meaningfully, and influence mitigation measures.

Independent, technical review of ESIAs for large or high-risk projects should be a standard requirement, and should be accessible to affected communities, not only government technical experts. Effective ESIA engagement requires plain-language summaries, community-accessible presentations of key risks and mitigation measures, and formal channels for community input to be recorded and addressed.

6. Extend participation, publication, and oversight requirements to digital infrastructure

Governments should require consultation on the design and governance of major digital systems, including assessment of exclusion risks, data protection, and access barriers. As governments continue to advance on digital public infrastructure (such as ID systems, automated welfare allocation, e-permitting platforms, procurement portals, or others), affected communities have little formal standing to participate in their design, challenge their operation, or seek remedy when they cause harm.

Mechanisms should allow affected users to raise concerns and seek redress from the design stage. Without these safeguards, digital systems risk entrenching exclusion without visibility or accountability.

Community Monitoring to Improve Infrastructure Quality in Afghanistan

Randomized control trial (RCT) conducted between 2015 and 2018, related to OGP commitments

Governments often lack the capacity to effectively monitor dispersed infrastructure projects, especially in fragile contexts. Implementation and project delivery thus depends heavily on contractor self-reporting, with predictable (negative) consequences for value for money and durability, which lead to poor quality and weak accountability.

Afghan community members were trained to monitor road construction and report contractor performance, linked to formal oversight systems. This combined community-level monitoring with centralized procurement data, allowing locally gathered information to be verified against official records, enabling communities to flag discrepancies to authorities with enforcement power. An RCT found significantly improved road quality and increased durability of infrastructure in monitored areas, as well as system-wide improvements beyond monitored areas. These results indicated systemic improvement in accountability across contractors' operations during the reform period.

While the reforms are no longer implemented, they remain an enduring example of the power of citizen oversight.

Key Lessons

- Community monitoring can measurably improve outcomes.
- Participation works when structured and supported, with access to information and clear reporting channels.
- Linking local monitoring with formal oversight is critical and creates accountability.

Building Capacity for Meaningful Participation in Infrastructure Oversight in Guatemala

OGP action plan (2021–2023)

Even where infrastructure and procurement data is available, public participation is often limited by the ability of civil society and government actors to access, understand, and use that information effectively.

Under its OGP commitments, Guatemala focused on strengthening the capacity of both public officials and CSOs to engage in infrastructure oversight. This included training on the use of open contracting and infrastructure data, the development of practical tools for monitoring projects, and alignment with CoST standards, as well as complementary reforms in extractive transparency and public procurement.

The reform has enabled more informed participation in infrastructure oversight processes, particularly by CSOs that are now better equipped to analyze procurement data and engage with government counterparts. While there is no consolidated quantitative assessment of impact on infrastructure outcomes, the initiative has strengthened the enabling environment for sustained, data-driven participation. Related initiatives, including participatory urban planning efforts such as Antigua's "Antigua me Mueve," show how these capacities can translate into more meaningful citizen engagement in infrastructure decision-making.

Key Lessons

- Transparency alone is insufficient without capacity to use the disclosed information.
- Training and tools can significantly expand effective participation.
- Strengthening both government and civil society capacity improves engagement quality.

REFORM TO WATCH

Community Monitoring and Local Accountability Systems in South Cotabato, the Philippines

OGP-linked (2016–2023)

Before this reform, public participation in infrastructure was historically limited to one-off consultations.

To fill this gap, South Cotabato established systems enabling citizens to monitor infrastructure projects and report issues through structured grievance mechanisms integrated with local governance systems. This muli-year reform effort helped to extend participation to the village level (the most local unit of government) actively engaging community members in monitoring project progress. Parallel reforms in extractive sector governance, public procurement, and grievance redress further strengthen this ecosystem, ensuring that community feedback can be raised, tracked, and acted upon.

The reforms have strengthened accountability by enabling continuous citizen oversight and improving responsiveness to infrastructure issues. While there is no consolidated quantitative impact assessment, there is now a continuous accountability chain from community to provincial authorities, allowing concerns about infrastructure delivery to be identified and addressed early.

Key Lessons

- Participation is most effective when embedded throughout the project lifecycle.
- Local-level engagement and grievance redress strengthen accountability where impacts are most directly felt.
- Linking monitoring with grievance systems improves outcomes.

REFORM TO WATCH

5 Parliamentary and Audit Oversight

Parliamentary scrutiny and independent audit are the accountability backstop for infrastructure investment, but are often weakest where risks are highest. Financing structures such as PPPs, SOE borrowing, and bilateral agreements frequently fall outside routine oversight, limiting scrutiny of the most consequential decisions.

WHY THIS MATTERS

Parliamentary and audit oversight determines whether infrastructure spending delivers value for money. Where oversight is weak, risks including cost overruns, opaque financing, and corruption often surface only after funds are committed. Oversight connects the full infrastructure lifecycle, from project selection to implementation and evaluation, by ensuring disclosed information leads to action. Strengthening parliamentary scrutiny and independent audits plays a critical role in improving transparency, fiscal accountability, and value for money in infrastructure investment.

Effective public investment systems combine independent project appraisal with legislative scrutiny of financing decisions across the full lifecycle of major projects.

The oversight gap is widening as infrastructure financing shifts outside of the budgeting process. PPPs, SOE borrowing, bilateral agreements, and special purpose vehicles are often structured in ways that limit parliamentary and audit access. SAIs vary significantly in whether they have the legal right to access information held by private PPP partners, a major gap in the audit coverage. Without explicit access rights, audit institutions can review only part of the transaction, making value-for-money assessments incomplete.

Oversight frameworks must also adapt to emerging risks that are often not captured in existing mandates, including stranded assets, environmental liabilities, and data governance. Across a variety of projects, decommissioning obligations, environmental liability accounting, stranded asset risk, and data sovereignty questions all require parliamentary frameworks and audit methodologies that many countries have not yet developed. Strengthening parliamentary scrutiny and independent audit capacity is therefore essential to ensure that the next generation of infrastructure investments remains transparent, accountable, and aligned with long-term public interests.

SUGGESTED GOVERNMENT REFORMS

1. Require parliamentary review and approval of major infrastructure financing agreements and PPPs above a defined threshold, before financing is committed

Governments should require parliamentary review and approval of all major infrastructure financing commitments, including PPPs and SOE investments, before they are finalized. This process must allocate sufficient time and technical support for parliamentary committees to conduct genuine review of project pipelines as well as procurement. This must happen *before* infrastructure financing decisions are made,

not after construction is underway and contracts are legally binding, to ensure that large financial commitments are subject to democratic scrutiny.

Project-level scrutiny should be complemented by oversight of the full investment pipeline, including aggregate fiscal exposure and contingent liabilities. Governments should submit regular reports on PPPs and contingent liabilities to parliament for committee review.

2. Strengthen SAIs' mandate and access rights to cover all forms of infrastructure financing, and throughout the lifecycle

Oversight institutions cannot effectively audit what they cannot access. Governments should ensure that SAIs have clear statutory access rights to information to all forms of infrastructure financing. For conventional budget-funded infrastructure, access to project documentation is typically established in law, but for PPPs, SOE-financed projects, and bilaterally financed infrastructure, access rights are frequently disputed or blocked by commercial confidentiality claims in financing agreements. SAIs should have statutory access to all project information, including data held by private partners. PPP contracts should also explicitly preserve these rights.

SAI mandates should cover both compliance audits and performance audits assessing value for money. Performance audits are especially important for infrastructure, where the gap between projected and actual outcomes is frequently large and rarely publicly examined. Audits should assess both individual projects and overall infrastructure programs, as in the UK. To enable effective oversight, governments should ensure not only legal independence but institutional capacity of SAIs, as well as facilitate civil society engagement with audit findings and feedback mechanisms, including through parliament.

3. Require public reporting of cost overruns, implementation deviations, and independent ex-post evaluations

Governments should require standardized public reporting comparing projected and actual costs, timelines, and outcomes throughout implementation. This reporting should ideally be standardized, machine-readable, and linked to the project registry data. CoST's infrastructure data standard provides a practical framework for project-level disclosure across the lifecycle, and open contracting data published in OCDS or OC4IDS formats should include implementation data as a standard requirement, not an optional disclosure. Standardized disclosure ensures data is comparable, usable, and actionable.

Governments should also require independent ex-post evaluations of major projects, published within a defined timeframe and linked to original appraisals. Ex-post evaluation is one of the weakest aspects of public investment management, but it is crucial to build the evidence base for improving future project selection decisions.

4. Institutionalize civil society engagement in the audit process

Structured civil society engagement can strengthen audit effectiveness, particularly in low-capacity environments. However, simply publishing audit reports is not participation. Effective engagement involves civil society in defining audit scope, contributing evidence, and reviewing findings before publication, as in the Philippines.

Civil society involvement in audits should be structured and formal, based on memoranda of understanding or published protocols, not ad hoc or based on personal relationships between civic leaders and individual auditors. When institutionalized, this approach expands evidence collection, strengthens public uptake of findings, and creates additional accountability channels.

5. Extend oversight mandates to cover the full infrastructure lifecycle, including decommissioning and stranded asset risk

Oversight mandates should require assessment of long-term risks, including stranded assets and environmental liabilities, at the project approval stage. Many oversight frameworks were designed for predictable infrastructure lifecycles, and do not account for emerging risks linked to energy transition and technological change, such as oil refineries and coal power plants in a decarbonising economy, mining infrastructure dependent on uncertain price assumptions, or AI data centers whose futures remain deeply uncertain.

Managing stranded asset risk requires early integration into project appraisal, financing agreements, and oversight processes by parliaments and SAIs. Governments should require clear decommissioning and repurposing plans to avoid future fiscal and environmental liabilities.

Strengthening Parliamentary Oversight of Infrastructure Financing in Kenya

OGP-linked (2018–2023)

Parliaments often lack the capacity to effectively scrutinize complex infrastructure financing decisions, especially when projects are negotiated by the executive, as in the SGR example mentioned above. Large infrastructure projects tend to be financed through complex borrowing decisions that receive limited scrutiny before commitments are made, further increasing the risk of unsustainable debt and poorly prioritized investments.

Kenya strengthened its Parliamentary Budget Office to support analysis of public debt and infrastructure spending, including through alternative budget analyses, impact assessment of debt on various population groups, and informed legislative review of borrowing agreements. This commitment also aims to open parliamentary processes to public participation.

The reforms have improved legislative scrutiny and informed debate on infrastructure financing, though there is not yet an independent quantitative impact assessment. Embedding oversight mechanisms *before* making financing commitments has helped improve legislative oversight of borrowing decisions and ensure infrastructure investments are economically justified, fiscally sustainable, and aligned with public priorities.

Key Lessons

- Independent analytical capacity is essential for effective parliamentary oversight.
- Oversight must occur *before* financing decisions are finalized.
- Transparency supports stronger legislative engagement.

REFORM TO WATCH

Participatory Audits for Infrastructure Accountability in the Philippines

OGP-linked (2012 to present)

Traditional audits often occur too late, after funds are spent and problems are difficult to correct. They also tend to focus narrowly on financial compliance rather than project outcomes.

In response, the government in the Philippines institutionalized citizen participation in audits, enabling civil society to support infrastructure monitoring and verification, even supporting audit teams during inspections.

Participatory audits have improved detection of implementation issues and strengthened accountability by incorporating citizen-generated evidence and local verification into formal audit processes, often detecting discrepancies that traditional audits may miss and ultimately improving service delivery and community welfare. This approach is especially critical in infrastructure sectors where implementation risks, cost overruns, and quality failures are most acute.

Key Lessons

- Citizen participation can enhance the effectiveness of formal audit systems.
- Real-time verification improves infrastructure outcomes.
- Combining technical and community data strengthens oversight.

6 Grievance Mechanisms and Remedy

Every infrastructure project, in spite of best laid plans, produces harms alongside benefits. The question is not whether grievances arise, but whether they are resolved quickly, fairly, and credibly. Grievance mechanisms that exist only on paper, or are introduced too late, tend to worsen outcomes, eroding trust and pushing communities toward more disruptive channels.

WHY THIS MATTERS

Infrastructure projects create both benefits and harms. Roads can displace communities, mines can affect water sources, energy projects can reshape land use, and digital systems can exclude users from essential services. Even well-designed projects generate grievances, but it is the effectiveness of response systems that determines whether those grievances escalate or are resolved. In digital infrastructure especially, this accountability gap is widening. As governments deploy digital public infrastructure at scale and at speed, systems that determine access to services often operate without clear redress or oversight mechanisms.

Grievance mechanisms that are introduced late or poorly implemented can exacerbate harm, raising expectations, leaving complaints unresolved, and increasing the likelihood of litigation, protest, or project disruption.

Failures in grievance systems disproportionately affect those most exposed to harm and least able to navigate formal processes. This includes displaced communities, indigenous peoples, informal workers, and users dependent on digital systems for access to services. These are the populations for whom GRMs are most critical, and for whom they most frequently fail. Moreover, fear of reprisal is a documented and realistic barrier.

Effective grievance mechanisms are a prerequisite for social licence to operate, a risk management tool, and a core accountability function. The IFC Performance Standards include project-level grievance mechanisms as a baseline requirement for companies. Governments should also apply these standards to public projects.

SUGGESTED GOVERNMENT REFORMS

1. Establish and fund accessible, project-level grievance mechanisms from the design stage, with clear timelines for response and public reporting of complaints and resolutions

Grievance mechanisms should be established at the design stage, before construction begins. This helps provide early warning of implementation problems and enables faster resolution. Evidence shows early-stage mechanisms are more effective, enabling issues to be resolved before they escalate.

In the mining and extractive sectors, grievance mechanisms should begin even earlier, at the exploration stage, when community relationships are first established. Mechanisms introduced after operations begin face serious challenges to establish trust, though those introduced early on should also extend to cover monitoring of service delivery and contract compliance at later phases.

Independence matters as much as timing. Mechanisms controlled solely by implementing agencies face inherent conflicts of interest. Effective systems include independent oversight, community input, and clear escalation pathways to a neutral third party when project-level resolution fails. Mechanisms must have authority and resources to act, as in Peru's mining sector. Otherwise, they undermine trust.

2. Require contractors and concessionaries to maintain accessible grievance systems for workers and affected communities

Contractors, subcontractors, and PPP concessionaires are often the direct source of grievances but fall outside formal accountability systems. IFC Performance Standards 2 and 4 require project-level mechanisms from private operators as a condition for financing. Governments should require contractors to maintain grievance systems for workers and communities, with compliance monitored through contracts. Performance data on grievance systems should be publicly disclosed and not treated as confidential.

Grievance mechanisms must be genuinely accessible, not just "available." For example, digital-only systems risk excluding affected populations. Effective systems provide multiple access points, including in-person, phone, and intermediary support.

3. Mandate proactive public reporting of grievances and outcomes

Mechanisms without public reporting reduce accountability and allow systemic issues to persist without a policy correction. Proactive transparency is a key element of effective mechanisms, as without it, complaints can be quietly closed and unresolved cases can accumulate. All grievance redress mechanisms should include binding response timelines with public reporting.

Governments should establish public platforms to track complaints and responses and require regular publication of grievance data, including on volume, type, resolution rates, and escalation. Data should be disaggregated to identify systemic issues. Digital platforms such as Ukraine's DREAM system and DoZorro complaint portal demonstrate how real-time grievance data can support oversight and early intervention (see above for details).

4. Guarantee whistleblower protections and establish clear non-retaliation standards

There is a real and immediate fear of dismissal for raising safety or corruption concerns. In fact, fear of reprisal is a primary barrier to effective grievance reporting and redress. This is especially true for those employed by subcontractors under informal arrangements, a common occurrence in the infrastructure sector.

Governments should embed enforceable non-retaliation guarantees in all grievance systems. Collective complaint mechanisms can reduce individual risk and strengthen accountability. Protections should also extend beyond employees to contractors, subcontractors, and community members. Protections must be enforceable, with clear sanctions for retaliation and proactive communication to affected communities.

Grievance Redress for Water Services in Kenya

2013 to present

Users lacked effective mechanisms to report service delivery failures in infrastructure, including the water sector. Without effective complaint systems, service providers face little pressure to improve performance.

Kenya implemented a multi-channel grievance system allowing complaints via phone, SMS, in-person meetings, and online platforms, with real-time tracking and enforcement.

The system significantly reduced barriers, leading to increased reporting and improved resolution rates. Ultimately, the government strengthened accountability in water service delivery by combining user-friendly complaint channels with regulatory authority.

Key Lessons

- Accessible, multi-channel systems increase citizen engagement.
- Transparency in responses improves accountability.
- Linking grievances to enforcement drives results.

Integrating Citizen Feedback into Public Service and Infrastructure Evaluation in Mongolia

OGP action plan (2021–2024)

Grievance mechanisms are often treated as standalone tools, limiting their ability to influence broader infrastructure planning and public service delivery improvements.

Mongolia introduced reforms to strengthen the use of citizen feedback in evaluating public services and government programs, including those related to infrastructure and the extractive industries. These include citizen satisfaction surveys, structured feedback mechanisms, and multi-stakeholder engagement processes designed to incorporate user perspectives into policy evaluation and service improvement.

The reform represents a shift from reactive complaint handling toward systematic incorporation of citizen feedback into government decision-making processes. Though there is currently no independent, consolidated evidence of impact on infrastructure service delivery, the reform has the potential to help the government identify recurring issues and adjust programs accordingly.

Key Lessons

- Grievance data is most valuable when integrated into policy and evaluation systems.
- Systematic feedback loops can inform long-term improvements, not just individual fixes.
- Embedding citizen input in governance processes strengthens accountability over time.

REFORM TO WATCH

Strengthening Infrastructure Outcomes through OGP

The case for strengthening infrastructure governance through OGP has never been stronger. Infrastructure projects are among the largest and most complex forms of public spending, often involving significant financial risk, complex project design, long timelines, and multiple actors. These features also make them especially vulnerable to inefficiency, corruption, and public distrust when transparency and oversight are weak.

OGP provides a practical framework for addressing these challenges. Through national and local action plans, governments can: commit to specific, time-bound reforms, access independent, credible monitoring through the IRM, and learn from peer countries implementing similar reforms.

OGP commitments are public, time-bound, and internationally visible, helping to build momentum and sustain reforms over time, as demonstrated in several of the case studies. This visibility can strengthen reform resilience across political cycles, an important consideration for infrastructure projects that often span many years, while also increasing trust among citizens, investors, and development partners. This helps make infrastructure reforms more credible, visible, and resilient over time.

Caption: A harbor off the coast of Sekondi-Takoradi, Ghana (Credit: Joshua Dery via Unsplash)

Further Reading

Transparency in Project Selection and Financing

International Monetary Fund, *Making Public Debt Public* (2023): Practical guidance on improving transparency of public debt, including infrastructure-related borrowing.

International Monetary Fund, *Public Investment Management Assessment (PIMA)*: Diagnostic tool for evaluating infrastructure governance and decision-making systems.

OECD, *Recommendation on the Governance of Infrastructure* (2020): A comprehensive framework covering project selection, planning, and lifecycle governance.

OECD, *Getting Infrastructure Right* (2017): Practical guidance on improving infrastructure planning, prioritization, and delivery to ensure projects are efficient, sustainable, and aligned with public needs.

World Bank, *Public-Private Partnership (PPP) Reference Guide, Version 3.0* (2017): Key reference on structuring and assessing infrastructure investments, including fiscal risks.

Open Government Partnership, *Open Gov Guide: Energy Transition*: Includes practical guidance on transparency in infrastructure planning, financing, and investment decisions.

Oxfam, *Who Profits from the Global Gateway?* (2024): Critical analysis of transparency and accountability risks in major infrastructure investment initiatives.

Open Contracting and Procurement

Open Government Partnership, *Open Gov Guide: Open Contracting*: Practical steps for publishing and using procurement data.

Open Contracting Partnership, *Open Contracting Data Standard (OCDS)*: Technical standard for publishing standardized open data across the procurement process.

CoST Infrastructure Transparency Initiative and Open Contracting Partnership, *Open Contracting for Infrastructure Data Standard (OC4IDS)*: Technical standard for publishing infrastructure project data across the lifecycle.

Center for Global Development, *Transparency in Power Project Contracts* (2021): Guidance on disclosure of complex infrastructure contracts, especially in energy.

World Bank, *Framework for Disclosure in Public-Private Partnerships* (2017): Framework for proactively disclosing PPP contracts and related information.

Caption: A street scene in Bandung City, Indonesia (Credit: Fikri Rasyid via Unsplash)

Beneficial Ownership and Integrity

Open Government Partnership, *Open Gov Guide: Company Beneficial Ownership*: Practical guidance on establishing and using beneficial ownership registers.

Open Ownership, *Guide to Implementing Beneficial Ownership Transparency* (2021): Detailed implementation guidance, including legal, technical, and institutional considerations.

Open Ownership, *Beneficial Ownership Data Standard*: Structured format for collecting and publishing beneficial ownership data to improve transparency and enable effective use across government systems.

Transparency International Australia, *Infrastructure Corruption Risk Assessment Tool (ICRAT)* (2022): Tool for identifying corruption risks in infrastructure projects and procurement.

Extractive Industries Transparency Initiative, *From Resources to Revenues* (2026): Guidance on transparency across extractive sectors, closely linked to infrastructure investments.

International Council on Mining and Metals, *Social and Economic Reporting Framework* (2022): Guidance for disclosing the social and economic impacts of mining projects, supporting transparency and accountability in resource-linked infrastructure.

Public Participation and Stakeholder Engagement

World Bank PPP Resource Center, *Stakeholder Communication and Engagement*: Practical approaches to consultation and participation across project lifecycles.

World Bank, *Environmental and Social Framework (ESF)* (2016): Global standards for managing environmental and social risks in investment projects, including requirements for stakeholder engagement and transparency.

International Finance Corporation, *Performance Standards on Environmental and Social Sustainability* (2012): Widely used benchmarks for identifying and managing environmental and social risks in private sector infrastructure investments.

CoST Infrastructure Transparency Initiative, *Disclosure Manual* (2021): Guidance on multi-stakeholder approaches to infrastructure transparency and participation.

Securing Indigenous Peoples' Rights in the Green Economy (SIRGE) Coalition, *Free, Prior and Informed Consent (FPIC) Guide* (2023): Practical guidance for engaging communities, particularly in resource-linked infrastructure.

International Growth Centre and World Bank, *Community Monitors vs. Leakage: Experimental Evidence from Afghanistan* (2017): Evidence-based resource demonstrating the impact of citizen monitoring on infrastructure quality.

Parliamentary and Audit Oversight

International Organization of Supreme Audit Institutions, *Guidelines on Best Practice for the Audit of Public/Private Finance and Concessions (ISSAI 5220)* (2019): Guidance for audit institutions overseeing infrastructure and PPPs.

International Monetary Fund, *Public Investment Management Assessment (PIMA)*: Diagnostic tool for evaluating infrastructure governance and decision-making systems.

Transparency International, *Accountable Infrastructure Program*: Resources and tools for strengthening oversight and reducing corruption risks, among other issues.

Open Government Partnership, *Open Gov Guide: Parliamentary Oversight*: Practical approaches for strengthening legislative scrutiny of government decisions, including oversight of public spending and infrastructure investments.

Grievance Mechanisms and Remedy

World Bank Group Compliance Advisor Ombudsman, *Grievance Redress Mechanisms Toolkit*: Practical guidance on designing and implementing effective grievance systems.

Open Government Partnership, *Grievance Redress Mechanisms in the Public Sector* (2022): Literature review on for complaint handling and accountability.

Inter-American Development Bank, *The Importance of Project-Level Grievance Mechanisms* (2021): Explains how grievance systems improve project outcomes and community trust.

Cross-Cutting Standards and Initiatives

OECD, *Infrastructure Toolkit*: Practical toolkit provides overview, indicators, and good practice examples to strengthen policies and processes across the entire lifecycle of public infrastructure.

Extractive Industries Transparency Initiative, *EITI Standard*: Global standard promoting transparency and accountability in the management of oil, gas, and mining resources, including revenues that often fund infrastructure.

CoST Infrastructure Transparency Initiative, *Infrastructure Transparency Approach*: Multi-stakeholder framework for improving transparency and accountability across the infrastructure project lifecycle through disclosure and assurance.

Transparency International, *Accountable Infrastructure Program*: Provides tools and analysis to identify corruption risks and strengthen integrity in infrastructure planning, procurement, and delivery.

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