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CORRUPTION AS A VIOLATION OF HUMAN RIGHTS

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ABOUT KLI

Kosovo Law Institute, is a non-profit organization of public policy, a think-tank specialized in the justice sector.

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Content

1. Executive summary	7
2. Understanding human rights, corruption and their interconnection	8
3. Impact of corruption on human rights	9
4. Role of human rights in anti-corruption policies	11
5. Human rights dimension in the fight against corruption	12
5.1. Whistleblower protection	12
5.2. Unlawful restriction of rights.....	13
5.3. Preserving democracy and the rule of law.....	13
6. European integration as a tool for human rights protection in anti-corruption efforts	14
7. Outlook for Kosovo based on the legal and institutional framework	14
8. Recommendations	17

1. Executive summary

In this report, KLI examines the relationship between corruption and human rights, beginning by clarifying that human rights are built upon the state–citizen relationship, in which the state has an obligation to respect, protect, and fulfil the rights of individuals. Corruption, on the other hand, is understood as a crime committed by public officials involving public resources, and is addressed primarily within the realm of criminal law. This division has long led to corruption and human rights being perceived as separate fields, each with its own institutional and legal mechanisms.

However, recent developments within the United Nations system, other international organizations, academic circles, and national human rights institutions are increasingly challenging this separation. While international judicial practice has not yet explicitly recognized a stand-alone “right to be free from corruption,” there are clear points of intersection, and a new legal approach is emerging in international discourse, one that views corruption as a violation of human rights.

In its analytical section, KLI explains how corruption directly affects the exercise of human rights and argues that integrating a human rights perspective into anti-corruption policies strengthens and enhances the effectiveness of anti-corruption efforts. Rather than understanding corruption solely as a criminal matter, it is approached as a governance problem, one concerning transparency, accountability, and institutional integrity, with direct consequences for citizens’ lives. UNCAC requires states to promote transparency, public participation, whistleblower protection, and remedies for harm, while instruments such as the ECHR and CEDAW set binding standards on equality before the law, non-discrimination, and access to justice.

KLI identifies three key dimensions of engagement in preventing and combating corruption that not only safeguard public funds but also protect human rights: protecting whistleblowers, preventing unlawful restrictions of rights, and preserving democracy and the rule of law. These illustrate in concrete terms how human rights standards can serve as tools for measuring and challenging corruption in practice.

European integration, meanwhile, is seen not only as a political process but also as a substantive mechanism for strengthening human rights protection within the broader framework of anti-corruption efforts.

Finally, KLI concludes that Kosovo, equipped with a relatively advanced constitutional framework and clear international obligations stemming from the European integration process, provides fertile ground for developing an approach in which the link between corruption and human rights becomes more clearly defined. The incorporation of international instruments into the Constitution, provisions of the Criminal Code that connect corruption with human rights, as well as the potential roles of the courts, the Ombudsperson Institution, and the Anti-Corruption Agency, all create real opportunities to advance this perspective. Such an approach compels the state to adhere to higher standards of transparency and integrity, ensuring effective protection for citizens whenever corruption infringes upon their fundamental rights.

2. Understanding human rights, corruption and their interconnection

Human rights constitute a universal normative system that guarantees individuals fundamental freedoms, equality, and protection against arbitrary state interference. They are codified in the core international instruments, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the European Convention on Human Rights. These rights belong to every person simply by virtue of being human.¹ At their core, human rights establish the limits of state power in its relationship with citizens. This approach is also reflected in the Constitution of Kosovo, where human rights form its central foundation.

Corruption, meanwhile, is most often defined as the abuse of public office for private gain. Under the United Nations Convention against Corruption (UNCAC), states are obliged to prevent, investigate, and sanction various forms of corruption, including bribery, embezzlement of public funds, conflicts of interest, and illicit enrichment.² Traditionally, within legal contexts, corruption has been treated as a criminal offence rather than as a matter with direct implications for individual rights.

As a result, corruption and human rights have, for many years, been perceived as separate domains, governed by different institutional and legal frameworks. Historically, this separation stems from the different types of relationships each field addresses: human rights are grounded in the state–citizen relationship, imposing obligations on the state to respect, protect, and fulfil individual rights; corruption, by contrast, is conceptualized as a crime committed by public officials with public resources.

Despite these distinctions, the two concepts are deeply interconnected. The Office of the UN High Commissioner for Human Rights (OHCHR) addresses corruption and human rights through two complementary approaches

1. Ensuring that anti-corruption efforts and responses comply with human rights obligations and adopt a victim-centered approach; and
2. Examining the negative impact of corruption on human rights—particularly economic, social, and cultural rights—through prevention, effective administration of justice, and ensuring remedies for victims of human rights violations resulting from corruption-related acts and anti-corruption responses.³

¹ Office of the United Nations High Commissioner for Human Rights (OHCHR), “*What are human rights?*” (See link: <https://www.ohchr.org/en/what-are-human-rights>).

² United Nations Convention against Corruption (UNCAC), Articles 15–23, which address the classical forms of corruption.

³ Office of the United Nations High Commissioner for Human Rights (OHCHR), “*Approach to corruption and human rights*” (see link: <https://www.ohchr.org/en/good-governance/corruption-and-human-rights>)

In line with this, recent developments show that many international organizations, academics, and national human rights institutions have begun to explore the emerging view that corruption should be understood as a violation of human rights. This approach is not self-evident, nor has it traditionally been part of most states' legal frameworks. Rather, it is an evolving perspective gaining prominence, as it recognizes corruption as a phenomenon that not only undermines institutional functioning but also directly or indirectly infringes upon the rights and freedoms of citizens.

3. Impact of corruption on human rights

Corruption constitutes one of the most serious challenges to the rule of law and the protection of fundamental human rights. Although Kosovo's legal framework addresses corruption primarily through criminal law, its impact extends far beyond that, reaching into civil, political, economic, social, and cultural rights. In doing so, corruption contributes to structural inequality, discrimination, and declining trust in public institutions.

A new legal approach is developing in international discourse—one that views corruption as a human rights violation.

First, the United Nations Convention against Corruption acknowledges that corruption, among other consequences, contributes to the violation of human rights.⁴ In July 2025, the UN Human Rights Council adopted a landmark resolution on the negative impact of corruption on human rights.⁵ The resolution sets out a clear descriptive and normative framework for understanding how corruption infringes human rights and outlines the obligations this creates for states and other actors. It represents a significant step forward, reinforcing the recognition that corruption poses a systemic threat to fundamental rights and places the issue at the centre of the international human rights agenda. In doing so, it establishes a reference point within the UN system for further analytical, legal, and political work, paving the way for deeper integration of anti-corruption measures into human rights mechanisms and state practice.

This approach rests on the premise that corruption obstructs the fulfilment of the state's core obligations to respect, protect, and fulfil human rights. When the state fails to prevent, investigate, and sanction corruption, it fails to protect citizens from its harmful consequences. Thus, the state becomes responsible for human rights violations. In this sense, corruption affects the enjoyment of rights in multiple ways; it is not merely an abuse of power but a factor that restricts the effective enjoyment of human rights. This analytical approach helps identify and assess instances in which a corrupt act becomes a violation of fundamental rights, making visible, and measurable, the link between corrupt behaviour and concrete human rights impacts.

⁴ United Nations Convention against Corruption (UNCAC), Preamble – text by the Secretary-General, Mr. Kofi A. Annan.

⁵ Human Rights Council Resolution A/HRC/59/L.6 of the United Nations, on the negative impact of corruption on the enjoyment of human rights.

Specialized literature proposes conceptualizing corruption through a causal chain, assessing not only the corrupt act itself but also how it spreads through institutions, public services, or administrative processes until it affects a protected right. Under this approach, violations can be categorized into three forms: direct, indirect, and remote.⁶

Direct violations occur when the corrupt act and the human rights infringement are immediately linked. This is especially true when corruption is used as a tool to violate a right, or when the violation was foreseeable and the state failed to act with due diligence. A typical example is bribery within the justice system, when judges, prosecutors, or lawyers accept money to influence the outcome of a case, the right to a fair trial is directly and immediately violated. Here, corruption is not an indirect cause or contributing factor; it is the primary cause of the violation.⁷

Indirect violations arise when corruption does not aim explicitly at violating human rights but creates the conditions for such violations to occur. The corrupt act is a crucial link in the chain of events but not the final cause. An example relates to the right to food. If a company obtains a food production license through bribery without meeting safety and quality standards, corruption enables unsafe products to circulate on the market, potentially harming public health. In such cases, corruption does not explicitly intend the violation but facilitates it, allowing risk to flourish while citizens become victims of a failed oversight system.⁸

Remote violations occur when corruption is just one among several contributing factors that together create a harmful situation. Here, corruption acts as a catalyst in a broader chain of social or political developments. A typical example involves corrupt practices in electoral processes. When electoral manipulation undermines citizens' trust in results and institutional legitimacy, it may trigger protests, tensions, or, in some contexts, violent interventions by security forces. In such cases, election-related corruption does not directly violate the right to peaceful assembly or the prohibition of excessive use of force, but it creates the context enabling such violations to occur.⁹

On the other hand, some legal doctrinal approaches challenge these categories, arguing that the logic of international human rights law focuses more on the obligations of the state than on the causal distance between corruption and its effects. From this perspective, the central question is not how “close” or “distant” the corrupt act is from the violation, but whether the state failed to protect citizens' rights from corruption. Consequently, if corruption results in situations where individuals are denied protected rights, then—according to this approach, a human rights violation has occurred, regardless of whether corruption was an immediate or remote cause of the harm.¹⁰

⁶ International Council on Human Rights Policy, *Corruption and Human Rights: Making the Connection*, 2009, pp. 26–28.

⁷ Ibid, pg. 27.

⁸ Ibid, pg. 27-28.

⁹ Ibid, pg. 28-29.

¹⁰ Martine Boersma, *Corruption: A Violation of Human Rights and a Crime Under International Law?*, 2012, pp. 196–200.

KLI considers this interpretive framework valuable in the context of Kosovo because it places responsibility where it legally belongs: on the state and its institutions. This approach is particularly important in systems where corruption is widespread and citizens have limited real influence over decision-making processes.

When combined with the causal-chain model, this perspective enables a more comprehensive understanding of how corruption harms fundamental rights and helps identify concrete areas for reform.

4. Role of human rights in anti-corruption policies

Integrating a human rights perspective into anti-corruption policies does not replace the classical approach of criminal prosecution, investigations, and administrative measures; rather, it deepens, expands, and strengthens it. This approach centres the individual and the state's obligation to protect the rights of its citizens—an obligation that naturally includes protection from corrupt actions.

The value of this approach becomes evident in the way international human rights instruments, the United Nations Convention against Corruption (UNCAC), and state constitutions intersect. When this framework is combined with the obligations arising from UNCAC, it creates a stronger legal basis for pursuing corruption cases. In this sense, human rights play a transformative role, seeing corruption not merely as an individual act but as a problem of governance, lack of transparency, and weak institutional integrity.

Instead of addressing corruption solely through the criminal justice sphere, the human rights approach builds resilience to corruption through functional democracy, access to justice, transparency, and equality. This approach broadens the understanding of who qualifies as a victim, expands state responsibility, and makes anti-corruption efforts more sensitive to the real-life impact corruption has on citizens.

The United National Convention against Corruption (UNCAC) requires states, among other things, to promote transparency and public participation¹¹, protect whistleblowers¹² and ensure compensation for damages suffered.¹³ In Kosovo, the implementation of UNCAC, its primary international anti-corruption instrument, must also be understood as a state obligation to protect citizens' rights against corruption. Corruption that restricts transparency mechanisms, hinders public participation, or discourages reporting constitutes a violation of citizens' procedural rights and a failure of the state to fulfil its protective role.

Beyond UNCAC, the application of standards under the European Convention on Human Rights (ECHR), the Convention on the Elimination of All Forms of Discrimination against Women

¹¹ United Nations Convention against Corruption (UNCAC), Article 13.

¹² Ibid, Article 33.

¹³ Ibid, Article 35.

(CEDAW), and other international instruments is not merely a matter of alignment with global standards, but a means of creating real conditions for justice and equality. This means that combating corruption does not depend solely on police and prosecutorial capacity; it must also rely on citizens, victims, civil society organizations, and the media. When applied consistently, this logic strengthens institutional pressure against corruption and increases the likelihood that cases will be documented, processed, and ultimately not remain unpunished.

5. Human rights dimension in the fight against corruption

For institution to increase their focus on combating, this type of criminality, besides harming public funds, must also be treated as a direct human rights concern.

This approach elevated the social importance of institutional engagement, citizen participation and effective law enforcement in preventing and combating corruption. Aligned with this reasoning, KLI identified three key dimensions where anti-corruption efforts, in addition to protecting public funds, also safeguard human rights: (1) whistleblower protection, (2) unlawful restrictions of rights, and (3) preservation of democracy and the rule of law.

These dimensions concretely illustrate how human rights standards can serve as tools to measure and challenge corruption in practice.

5.1. Whistleblower protection

Whistleblower protection is a fundamental democratic safeguard that ensures transparency, accountability, and public participation in oversight of institutions. It is a key preventive mechanism against corruption. From a human rights perspective, whistleblower protection is closely linked to the rights to freedom of expression, liberty and security, and an effective remedy. If these rights are restricted, the system creates a hostile environment in which reporting corruption is perceived as a personal risk rather than a moral or legal duty to protect the public interest.

When whistleblowers lack effective protection, the system loses a vital tool for safeguarding rights. Corruption remains hidden, institutions remain uninformed about internal violations, and individuals exposing wrongdoing face retaliation, pressure, or dismissal. Failure of the state to provide effective protection constitutes a structural violation that allows corruption to develop and amplifies its human rights consequences.

In Kosovo, Law No. 06/L-085 on the Protection of Whistleblowers represents progress in establishing legal safeguards; however, its proper implementation remains a challenge.¹⁴ As a result, potential whistleblowers hesitate to come forward, leaving many corruption cases outside institutional scrutiny and weakening preventive mechanisms.

¹⁴ KLI, *“Fulfilling the Promise for Whistleblowers”*, 2024, p. 7.

5.2. Unlawful restriction of rights

A more concealed impact of corruption on human rights emerges through unlawful restrictions on fundamental freedoms. Often these limitations are justified under the guise of public security, maintaining order, or protecting state interests. While appearing formally legitimate, they effectively reduce democratic space and enable corruption to flourish behind closed doors.

In practice, these restrictions limit critical voices and obstruct democratic oversight of public power—restricting media freedom, hindering civil society activity, and undermining access to information. Such limitations are disproportionate in relation to their stated objectives and constitute violations of freedom of expression,¹⁵ peaceful assembly¹⁶ and association.¹⁷ These practices are often observed in the behaviour of public officials toward transparency, misuse of strategic lawsuits against public participation (SLAPPs) targeting journalists and civil society activists, political pressure, restricted access to official documents, or excessive classification of information.

Such restrictions not only violate rights but indirectly serve to conceal corruption. The narrower the space for criticism and accountability, the easier it becomes to normalize corruption and prevent its detection. Thus, corruption violates human rights, and human rights violations simultaneously reinforce corruption, creating a vicious circle. Protecting fundamental rights becomes not only a constitutional value but an essential preventive tool against corruption.

5.3. Preserving democracy and the rule of law

Corruption is the antithesis of the rule of law. In a democratic state, the rule of law requires authorities to act strictly in accordance with the law, laws to be applied impartially and predictably, and citizens to have equal access to justice. Corruption undermines all three pillars.

From a human rights perspective, democracy requires the exercise of public authority in accordance with the law and with equal respect for every citizen. Article 24 of the Constitution of the Republic of Kosovo, which guarantees equality before the law and prohibits all forms of discrimination¹⁸, is directly connected to this principle. Corruption, on the other hand, fundamentally undermines it by creating unequal treatment, favouring individuals connected to those in power, and producing economic and institutional discrimination. As a result, citizens not only suffer from unjust decisions but also lose trust in the very institutions that are supposed to protect them.

In this sense, preserving democracy and the rule of law becomes a prerequisite for safeguarding human rights and, at the same time, a powerful tool for preventing corruption. The jurisprudence

¹⁵ European Convention on Human Rights and Fundamental Freedoms (ECHR), Article 10.

¹⁶ Ibid, Article 11.

¹⁷ International Covenant on Civil and Political Rights (ICCPR), Article 22.

¹⁸ Constitution of the Republic of Kosovo, Article 24.

of the ECtHR, including cases such as *Kövesi v. Romania*,¹⁹ illustrates that institutional corruption and arbitrary interference in the judiciary violate not only the principles of the rule of law but also the fundamental procedural rights of the parties.

The more functional democratic mechanisms are, and the stronger the rule of law is, the more difficult it becomes for corruption to take root and become normalized.

6. European integration as a tool for human rights protection in anti-corruption efforts

European integration is not merely a political or diplomatic process; it functions as a significant protective mechanism for citizens' rights against corruption and abuse of power. In this sense, the EU's demands for reforms in the rule of law, judicial independence, and protection of fundamental rights serve as concrete instruments for strengthening accountability institutions.

The EU requires states to strengthen the link between human rights protection and institutional integrity. Through Progress Reports, the EU evaluates advancements in the fight against corruption, viewing failures not only as technical shortcomings but as indicators of misalignment with the Union's core values and standards.

Within the enlargement process, Chapter 23 (Judiciary and Fundamental Rights and Chapter 24 (Justice, Freedom and Security),²⁰ set and assess specific standards regarding the functioning of the judiciary, the fight against corruption, the protection of fundamental rights, freedom of expression, the combatting of organized crime, and the overall ensuring of accountability. These standards make the implementation of human rights both a direct tool in the fight against corruption and a measurable criterion within the accession process.

The EU accession process is built on the principle of meeting rule-of-law and human rights standards as a precondition for political and economic progress. This requires a state such as Kosovo to strengthen its justice institutions, protect whistleblowers and journalists, and guarantee access to public information. If these standards are implemented effectively and substantively, rather than merely in form, European integration can serve as a powerful driver for building a system more resilient to corruption and more responsive to the rights of its citizens

7. Outlook for Kosovo based on the legal and institutional framework

Although international judicial practice has not yet explicitly recognized a "right to be free from corruption" as a distinct human right, there are clear interlinkages, several of which have been addressed in the preceding sections of this analysis.

¹⁹ Case law No. 3594/19 *Kövesi v. Romania*, See link: <https://hudoc.echr.coe.int/eng#%7B%22appno%22%3A%223594/19%22%2C%22itemid%22%3A%22001-202415%22%7D>.

²⁰ Ibid

KLI considers that Kosovo, with its relatively advanced constitutional framework and its clearly defined international obligations within the European integration process, provides a suitable foundation for developing this perspective.

To begin with, the Constitution of the Republic of Kosovo guarantees fundamental rights and freedoms and aligns them with core international human rights instruments.²¹ The incorporation of the European Convention on Human Rights (ECHR), the International Covenant on Civil and Political Rights (ICCPR) and its Protocols, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and other international instruments makes the protection of many rights directly applicable. This creates a normative basis for addressing cases in which corruption obstructs access to justice, produces economic discrimination, or violates equality before the law, as such situations can also be interpreted as violations of constitutional and international human rights provisions.

The European Convention on Human Rights (ECHR), although not explicitly referring to corruption, guarantees, among other rights, the right to a fair trial,²² the right to an effective remedy²³ and the prohibition of discrimination.²⁴ In this respect, when judges or prosecutors are influenced by political or financial interests, the principles of judicial independence and impartiality are violated.

The International Covenant on Civil and Political Rights (ICCPR) guarantees equality before the law,²⁵ the right to fair access to courts,²⁶ and the right to participate in public affairs and state functions.²⁷ Corruption that unjustly favours individuals, companies, or political parties runs counter to these principles and makes the state responsible for discrimination and violations of equality before the law.

The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) prohibits all forms of discrimination against women and requires states to eliminate structural barriers that discriminate against women in employment,²⁸ education,²⁹ healthcare³⁰ and access to justice.³¹ When corruption is used to condition women's access to their rights, for instance, to property, employment, or public services, this also constitutes a breach of the state's obligations under the Convention. The absence of effective reporting and protection mechanisms for women victims makes corruption a tool of gender-based violence, further worsening their position in society.

²¹ Constitution of the Republic of Kosovo, Article 22.

²² European Convention on Human Rights and Fundamental Freedoms (ECHR), Article 6.

²³ Ibid, Article 13.

²⁴ Ibid, Article 14.

²⁵ International Covenant on Civil and Political Rights (ICCPR), Article 2.

²⁶ Ibid, Article 14.

²⁷ Ibid, Article 25.

²⁸ Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), Article 11.

²⁹ Ibid, Article 10

³⁰ Ibid, Article 12.

³¹ Ibid, Article 15.

Additionally, the Criminal Code of the Republic of Kosovo (No. 06/L-074), when analysed through the lens of its criminal offences, acknowledges the intersection between corruption and human rights. Chapter XVII lists offences against human rights and freedoms. In many of these offences, criminal liability is aggravated when the offence is committed through the abuse of official duty.³² Conversely, the core corruption offence, abuse of official position or authority, explicitly includes the violation of another person's rights as an element of the offence.³³

Within this architecture, courts play a crucial role. They must therefore develop a more consolidated practice of interpreting human rights in corruption-related cases. Such an approach allows courts to assess not only the formal elements of corrupt conduct but also the substantive impact that such conduct has on the exercise of citizens' rights. Through this interpretative approach, the violation of human rights becomes part of the legal weight of the case, clarifying state responsibility whenever corruption produces real effects on daily life, access to services, equality, and justice. This issue must also be considered in assessing the purpose of punishment, one of which is "to compensate victims or the community for the losses or damage caused by the criminal offence."³⁴

Recognizing and treating corruption as a human rights violation would strengthen national mechanisms, including the Ombudsperson Institution (OIK), enabling it to extend its analysis into the anti-corruption field, as well as the Anti-Corruption Agency (ACA), enabling it to integrate a human rights perspective into its mandate. Through thematic investigations, the Ombudsperson could examine how corruption affects human rights violations, including access to justice, equality before the law, socio-economic rights, and discriminatory practices. Meanwhile, the ACA, in close cooperation with the OIK, could develop a specialized framework for analysing and documenting cases in which corruption manifests as a human rights violation, particularly in high-risk sectors such as the judiciary, healthcare, public procurement, property rights, and local governance. This would produce a stronger, more integrated inter-institutional approach, creating a new model of state accountability and protection of citizens' rights.

At the same time, the National Anti-Corruption Strategy and its Action Plan should reflect this approach, treating corruption not only as a criminal phenomenon but also as one that directly violates individual rights and freedoms. Integrating this perspective into strategic documents would create a more robust and sustainable inter-institutional architecture, shifting the focus toward state responsibility and the protection of citizens' rights.

KLI assesses that adopting this perspective in institutional practice and strategic documents would significantly strengthen the coherence between anti-corruption policies and human rights protection mechanisms. Such an approach would orient the state towards higher standards of

³² Criminal Code of the Republic of Kosovo, No. 06/L-074, Chapter XVII – Criminal Offenses Against Human Rights and Freedoms.

³³ Ibid, Article 414.

³⁴ Ibid, Article 38.

transparency and integrity, while requiring institutions to provide effective protection for individuals whenever corruption infringes upon their fundamental rights.

8. Recommendations

1. During the drafting of legislation, state institutions should integrate a human rights-based approach into anti-corruption policies.
2. In the context of European integration, Kosovo's state institutions should use Chapters 23 and 24 to advance human rights standards as a tool for strengthening the fight against corruption.
3. Courts should develop a more consolidated practice of interpreting human rights in corruption-related cases, ensuring that the violation of rights is treated as a substantive element in case assessment.
4. The Ombudsperson Institution should conduct thematic investigations linking corruption to human rights violations, including access to justice, equality before the law, socio-economic rights, and discrimination.
5. The Anti-Corruption Agency, in cooperation with the Ombudsperson Institution, should establish a specialized analytical framework through which corruption is identified and documented as a human rights violation, particularly in high-risk sectors such as the justice system, healthcare, public procurement, property rights, and local governance.
6. The National Anti-Corruption Strategy and its Action Plan should address corruption also through the lens of human rights protection.

