

INFORMATION AND DATA AVAILABILITY IN ASSET RECOVERY

BRIEFING PAPER

UNCAC COALITION ASSET
RECOVERY WORKING GROUP

SEPTEMBER 2025

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EXECUTIVE SUMMARY

Transparency is vital in the recovery and return of assets stolen through corruption. Proactive disclosure of data and documents are key elements of public accountability. This includes publication of amounts frozen, confiscated, and returned, case information, legal frameworks and return agreements. This briefing, based on a 2025 survey conducted through the UNCAC Coalition Asset Recovery Working Group,¹ assesses the availability and accessibility of asset recovery data across 15 jurisdictions, covering both major asset-returning states and countries involved in efforts to return stolen funds to their jurisdiction.

The survey focused on a) the regularity and accessibility of data on frozen and recovered assets and methodologies for calculating that data, b) the publication of cases and case details, and c) the availability of legislation, agreements, plans and strategies.

Results reveal significant inconsistencies across the jurisdictions looked at:

- Only a minority of countries regularly publish asset recovery data, and even fewer provide accompanying methodologies, making cross-jurisdictional comparison difficult.
- Accessing case-specific information remains highly fragmented and it is difficult across all surveyed countries to get a full picture of cases being prosecuted for corruption and of completed cases from national sources alone.
- While most countries have enacted legislation, fewer than half have published asset recovery strategies, and even fewer publish memorandums of understanding or agreements governing asset return.
- Cost apportionment and asset-sharing criteria are also rarely published, impeding public understanding of the differences between recovered and returned amounts.

1. <https://uncaccoalition.org/get-involved/working-groups/asset-recovery/>

EXECUTIVE SUMMARY

Recommendations

- To facilitate public access and make it easy for stakeholders to find relevant information on asset recovery, States should set up or designate a dedicated webpage that links to all relevant legislation, strategy documents, case information, memorandums of understanding and other agreements, as well as statistics and other relevant information.
- Where documents pertinent to cooperation in asset recovery cooperation do not exist, such as strategies and policies, including around cost-sharing, States should develop these as soon as possible, in an inclusive manner, and make them publicly available.
- States should, at least annually, publish annual asset recovery statistics, as well as the underlying methodology for their statistics to facilitate interpretation.
- Where statistics are not collected or not collated, States should institute policies to collect, collate and publish those statistics.
- To enhance international cooperation, States should exchange experiences and consider developing coordinated approaches to gathering asset recovery statistics and in developing plans, policies and strategies around asset return.
- States should continue regularly transmitting case information to the Stolen Asset Recovery Initiative's Asset Recovery Watch database and, where relevant, identify gaps in their reporting around cases.
- States should ensure that access to information provisions also cover in principle asset recovery related processes, so that information that is not published can be requested by stakeholders through access to information laws.

INTRODUCTION

Transparency is essential to the recovery and return of assets stolen through corruption. It allows for citizens to both track what is happening in specific cases and assess the efforts made broadly by the government and relevant authorities to recover stolen assets.

To do so, governments need to proactively disclose a range of information. This includes aggregate data on the actions they are taking around stolen asset recovery, such as amounts frozen, confiscated, returned and received, the number of cases begun and the results of those cases. It also includes information on how that data was generated and from which sources. Further, it is important for governments to also publish legislation, general policy and specific return agreements and memorandums of understanding, so that the public can also understand and engage with how their government carries out asset recovery.

An important development in 2023 was the re-launch of the Asset Recovery Watch Database of the World Bank/UNODC Stolen Asset Recovery Initiative. This public database collects and systematizes global information on completed and ongoing recovery cases related to the proceeds of corruption that have an international dimension. To date, it includes information on 567 cases and USD 17 billion in frozen, confiscated and returned assets.²

However, the transmission of data around cases to the StAR database does not obviate the responsibility to publish data and information nationally. The UNCAC and international human rights law, as well as international standards, require and encourage data and information transparency. This is important due to the focus of the StAR database, which does not include statistics, and especially for domestic audiences, who need to understand how their government is addressing cross-border corruption in formats and languages they can access.

To respond to this, members of the UNCAC Coalition Asset Recovery Working Group decided to undertake a study to ascertain the extent to which a range of governments are publishing data and information around asset recovery at the national level.

2. <https://star.worldbank.org/asset-recovery-watch-database>

INTRODUCTION

A survey was prepared by CiFAR and circulated to members of the Working Group in May 2025. The survey asked questions on availability of data relating to corruption-related asset recovery.

Questions for the survey covered:

- Availability and regularity of data published on the volume of frozen / confiscated, returned or received funds
- Existence of methodologies for calculating that data
- Availability of data on ongoing and concluded asset recovery cases
- Availability of asset recovery legislation, strategies and cost apportionment
- Publication of return agreements
- Ease of accessing the above data

Survey responses covered 15 jurisdictions from 12 CSOs and individuals in their personal capacity. This includes major asset returning jurisdictions and other jurisdictions often considered for the receipt of stolen funds. Contributors included:

Civil society organizations

- Amalna
- CiFAR
- Comision Ecuatoguineana de Juristas
- Dialogue and Research Institute
- Ethos Governance Partners
- INRAV
- Spotlight on Corruption
- Transparency International U.S

Individual contributors

- Jeffrey Simser
- Maria De Los Angeles De Seta Acosta
- Mathias Huter
- Sara Brimbeuf

INTRODUCTION

The jurisdictions covered by this assessment are:

- Argentina
- Austria
- Canada
- Equatorial Guinea
- France
- Germany
- Italy
- Kenya
- Portugal
- South Sudan
- Spain
- Switzerland
- United Kingdom
- United States of America
- Venezuela

TRANSPARENCY STANDARDS

Transparency in asset recovery has been identified as an essential part of the process across multiple international instruments and in best practice.

The United Nations Convention Against Corruption (UNCAC) itself includes several provisions that speak for transparency in asset recovery data. This includes Article 10 (c), encouraging State Parties to publish information to further transparency in public administration, and Article 13 (b) - (d), requiring that the public has effective access to information and that States Parties undertake public information activities that contribute to the non-tolerance of corruption. It also includes Article 61 (2), which encourages State Parties to develop and share with each other "...statistics, analytical expertise concerning corruption and information with a view to developing, insofar as possible, common definitions, standards and methodologies, as well as information on best practices to prevent and combat corruption."

International human rights law also requires transparency around asset recovery. The Office of the High Commissioner for Human Rights' Recommended Principles on Human Rights and Asset Recovery highlights transparency as "a precondition for the prevention of corruption and for the enjoyment of human rights more generally", which is grounded in article 19 of the International Covenant on Civil and Political Rights (ICCPR).³ It further highlights General Comment 24 of the Human Rights Committee, which states that States Parties to the ICCPR should proactively put information of public interest in the public domain.⁴ The Principles also highlight obligations under the right to participate in public affairs with respect to transparency around asset recovery, as laid out in article 25 of the ICCPR, highlighting that access to information and transparency is necessary for participation in public life.⁵

During the 2021 UN General Assembly Special Session against corruption (UNGASS), UN Member States further committed to 'consolidate and expand the global knowledge and data collection on asset recovery and return through gathering and sharing information on challenges and good practices, as well as on volumes of assets frozen, seized, confiscated and returned in relation to corruption offences, and the number and types of cases'.⁶

3. The Office of the High Commissioner for Human Rights, Recommended Principles on Human Rights and Asset Recovery, OHCHR 2022, [A/HRC/NONE/2022/2/iPub, para 22.

4. Ibid, citing Human Rights Committee, general comment No. 34 (2011), para. 19.

5. Ibid, para. 24.

6. UNGA, 'Our common commitment to effectively addressing challenges and implementing measures to prevent and combat corruption and strengthen international cooperation' A/RES/S-32/1, 7 June 2021, para. 52.

TRANSPARENCY STANDARDS

The Global Forum on Asset Recovery (GFAR) principles also highlight the important role of transparency to asset recovery. Principle 4 on Transparency and Accountability states that 'transferring and receiving countries will guarantee transparency and accountability in the return and disposition of recovered assets. Information on the transfer and administration of returned assets should be made public and be available to the people in both the transferring and receiving country'.⁷

The specific collection of statistics is additionally a key part of the FATF Recommendations. Recommendation 33 highlights the importance of maintaining comprehensive statistics, including on frozen, seized and confiscated property.⁸

Civil society has called for extensive transparency provisions in asset recovery laws and policies. The Civil Society Principles for Accountable Asset Return⁹ have called for the publication, from the earliest legally possible opportunity, of the following information in an accessible manner and format to the public, including any identified victims of corruption:

- timely and accessible case information on the progress and status of asset recovery cases, including case names;
- the nature, type and estimated value of the assets under investigation;
- the legal framework through which the asset recovery process was initiated and is being undertaken;
- the nature, type and estimated value of assets seized and a timeline of planned steps for return;
- the negotiating framework, modalities for asset return and disbursement, and the foreseen role of civil society in the return;
- the disposition, administration and monitoring of returned assets.

The Principles also call for all recovered assets to be traceable at all stages of the process, and for the publication of multilateral, bilateral and case-specific agreements or arrangements should in a timely fashion and accessible manner.

7. GFAR Principles for Disposition and Transfer of Confiscated Stolen Assets in Corruption Cases, <https://star.worldbank.org/sites/star/files/the-gfar-principles.pdf>

8. Financial Action Task Force, International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation: The FATF Recommendations, FATF, updated February 2025, <https://www.fatf-gafi.org/content/dam/fatf-gafi/recommendations/FATF%20Recommendations%202012.pdf.coredownload.inline.pdf>, Recommendation 33.

9. Civil Society Principles for Accountable Asset Return, CiFAR, <https://cifareu.eu/what-is-asset-recovery/civil-society-principles-for-accountable-asset-return/>

RESULTS

The 15 jurisdictions covered by the survey included both asset returning states and countries more frequently the source of stolen asset recovery cases. The same questions were asked to CSOs and individual experts and for each jurisdiction.

The results of the survey demonstrate that asset recovery data can still be very difficult to access, depending on where you are in the world. With some jurisdictions clearly more proactive when it comes to data publication and the availability of information relating to cases, agreements and policies, in many countries this information is not accessible at all.

Regardless of the type of data looked at, it was also rarely easy to access the data. Meaning that even where data is available, it is not frequently available in a centralised location or in a form that would be accessible to the general public.

Clear also from the data is that there are large differences across the jurisdictions looked at. While this paper looks at the overall picture, clear to is that the differences in the way each jurisdiction is publishing data makes cross-country learning difficult. Overall then, the survey indicated that there is work to do to ensure that relevant asset recovery data and information is published and accessible and to make sure that this data and information operates cohesively across different jurisdictions.

Data availability

The area on availability of data around frozen, confiscated, returned or received funds, highlighted that this information is difficult to access, with responses from less than half of the jurisdictions indicating that it's possible to access this kind of data.

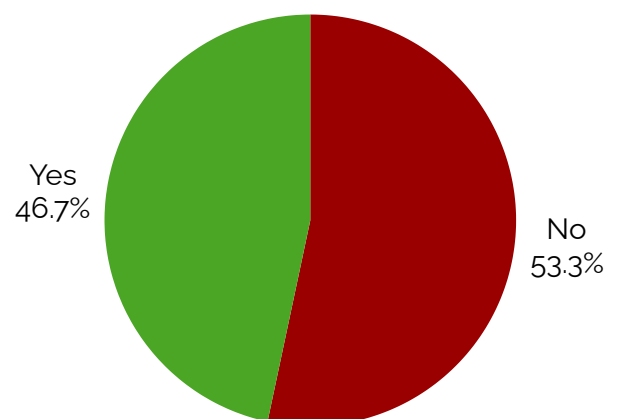


Figure 1. Publication of data on the volume of frozen / confiscated, returned or received funds through judicial processes on a regular basis.

RESULTS

Where this data is available, updates were most commonly reported as only being published annually,¹⁰ with responses indicated however that in one jurisdiction this information is published on a monthly basis.¹¹ The methodology for how this data was generated was however only published in three jurisdictions.¹² Although it's positive that some jurisdictions are publishing data, the failure to publish the methodology for that data makes comparability particularly challenging across jurisdictions, while leaving domestic audiences in the dark about how figures were identified.

Year-on-year comparisons of asset recovery data were possible in four jurisdictions, indicating that those publishing data are doing so in a consistent manner and in a way that allows the public to understand how asset recovery processes are operating compared to previous years.

The survey results however also indicated that publishing jurisdictions vary widely with respect to the level of detail provided. For example, some jurisdictions publish only limited data points, for example the value of assets frozen and seized, the value of assets listed in indictments, and the value of assets declared forfeited to the state. For others, there are breakdowns according to the type of assets, for example, real estate, vehicles, cryptocurrency, and the legal stages of enforcement, but not for the value per predicate offence or geographical origin of the assets.

Overall, survey respondents indicated that it tends to be moderately difficult to impossible to obtain this kind of information in their jurisdictions.

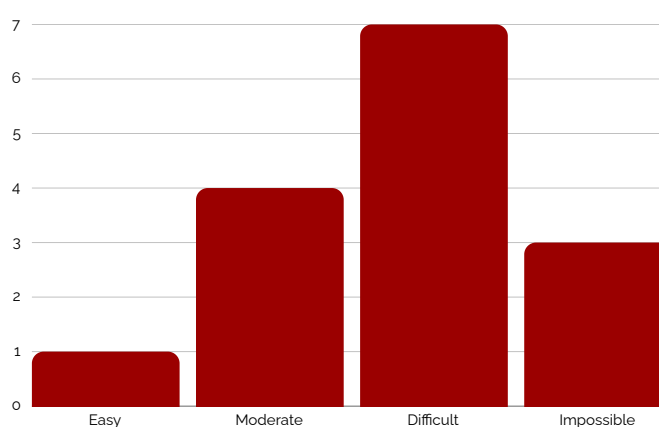


Figure 2. Responses to how easy access to data on volumes of returned or received funds is in each country.

10. This is reported as being the case in Argentina, France, Spain, Portugal, and the UK.

11. Italy.

12. Italy, Spain and the UK.

RESULTS

Case information

The second area surveyed looked at accessibility of information on ongoing proceedings and concluded asset recovery cases. The responses demonstrate that it is also difficult in many jurisdictions to access information on corruption cases that authorities are prosecuting and that have been concluded. Respondents also indicated that case information, when available, tends to be more diffusely distributed than aggregate data, making it potentially more challenging for the public to follow the work of authorities to prosecute corruption cases.

Only one jurisdiction reported on appears to have a single repository for information on corruption cases prosecuted,¹⁴ meaning that in other jurisdictions members of the public need to access several sources to fully understand what has taken place with respect to individual cases.

No respondents indicated that it was easy to find information on completed asset recovery cases in their country.

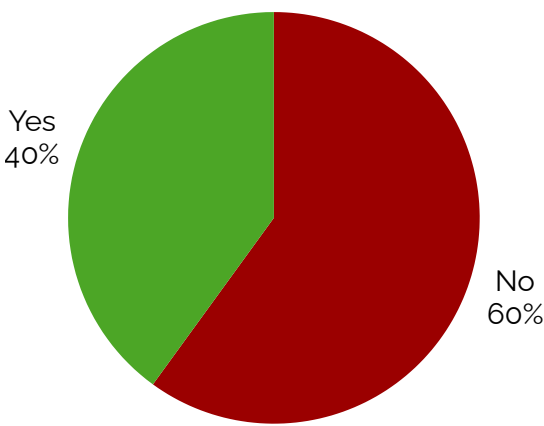


Figure 3. Responses indicating the number of countries surveyed that publish information on ongoing and concluded asset recovery cases.

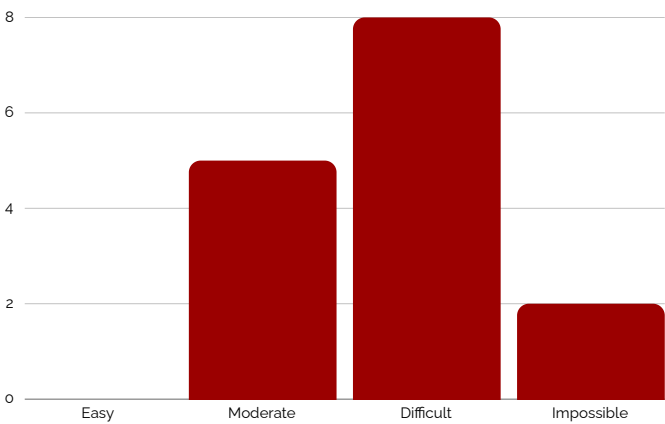


Figure 4. Responses indicating ease of accessing information on completed asset recovery cases in their country.

14. Kenya.

RESULTS

Publication of laws, strategies and individual agreements

When it comes to publication of documents setting out national rules and policies around asset return, while the surveyed countries often have laws in place, there is less in the way of published strategies and individual agreements.

A majority of the countries surveyed had published asset recovery legislation, according to respondents. Despite this, three surveyed jurisdictions do not have specific legislation in place that sets out the rules around returning the recovered proceeds of corruption.¹⁵

Fewer than half of the surveyed countries, however, have a published strategy or plan in place to address how they will carry out asset recovery, according to respondents. This may mean that there is no strategy or plan, making the practicalities of working on asset recovery much more challenging for involved authorities. Alternatively it may mean that these are not published, which may make it more difficult for authorities from other jurisdictions to know how to engage with their counterparts.

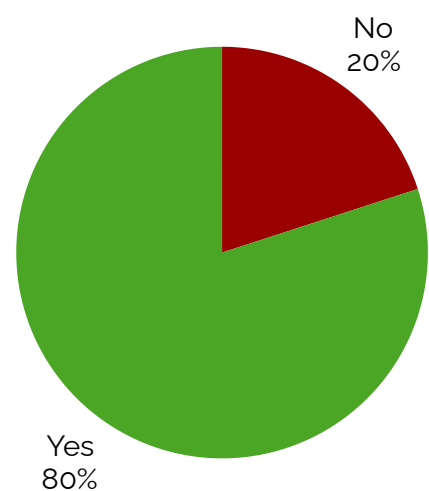


Figure 5. Asset recovery legislation across surveyed countries.

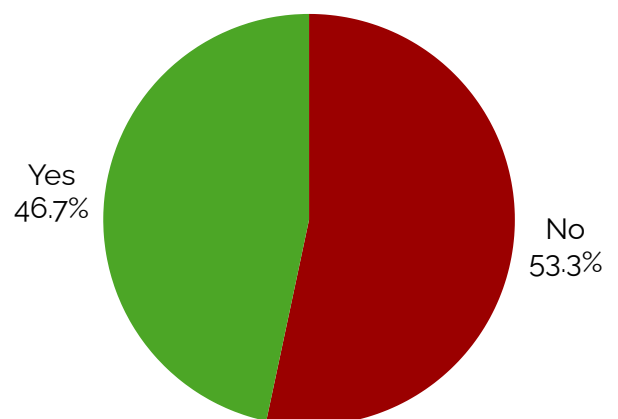


Figure 6. Availability of asset recovery plans or strategies across surveyed jurisdictions.

15. Austria, Equatorial Guinea and South Sudan.

RESULTS

Even less common, according to survey responses, is the publication of memorandums of understanding (MoU) or case-specific agreements between countries involved in asset return. While not all asset return cases may have an MoU or case-specific agreement, publishing these agreements allows the public to understand the values and conditions under which assets are being returned and engage in meaningful dialogue around these returns.

Still less common is the publication of policies and calculations for asset sharing and for apportioning costs in asset returns.¹⁶ These documents would typically set out percentages or amounts retained by returning jurisdictions for, e.g. prosecution costs. Without this information being publicly available, it is challenging for the public to understand any differences between confiscated and returned amounts.

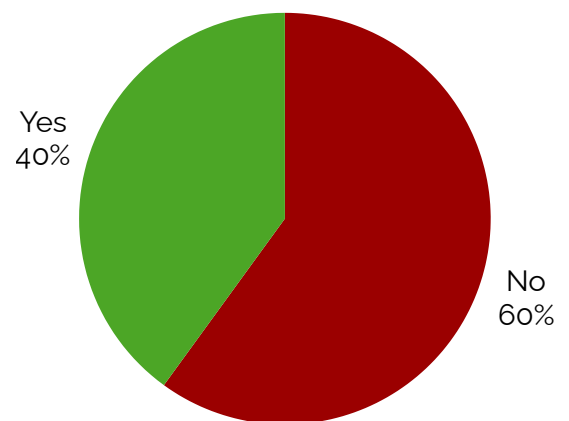


Figure 7. Publication of MoUs and other agreements across surveyed jurisdictions.

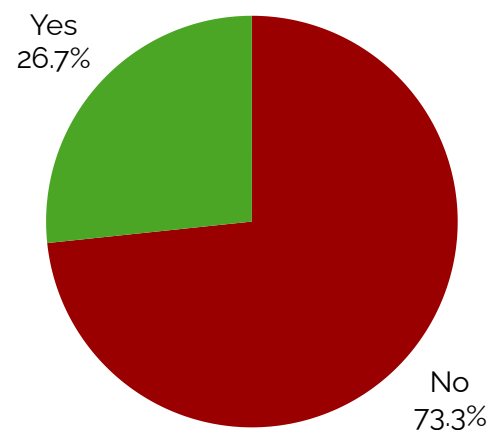


Figure 8. Publication of criteria for asset sharing or apportioning costs.

16. These were only reported as being available in Canada, Spain, Switzerland and the UK.

RESULTS

Overall, respondents indicated that it was largely challenging to find information on all of these elements within their national jurisdictions.

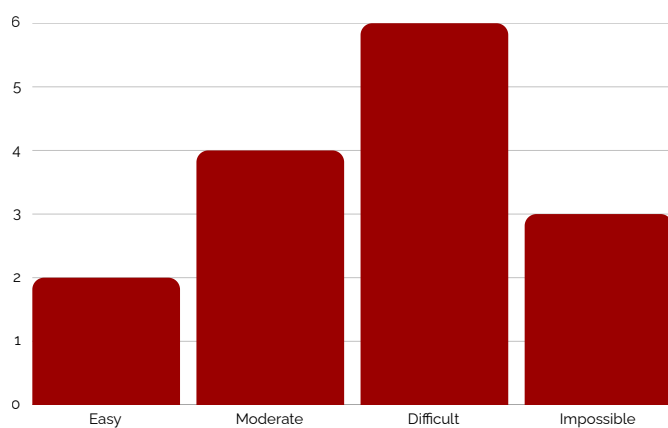


Figure 9. Overall ease of finding information on strategies and agreements.

16. These were only reported as being available in Canada, Spain, Switzerland and the UK.

CONCLUSIONS

The survey results show that despite international legal and normative frameworks encouraging transparency, actual practices in data and information transparency in asset recovery remain inconsistent and often opaque across jurisdictions. The lack of regular and comprehensive data publication on asset recovery processes, from frozen assets to concluded legal cases, limits the ability of parliamentarians, civil society, victims, affected communities, and international actors to monitor and engage with these processes meaningfully.

To bridge these gaps, governments must move beyond partial disclosure and commit to systematic transparency practices. This includes not only publishing summary and disaggregated data and case information on a regular basis, but also publishing return agreements, strategies, and cost-sharing policies alongside legislation.

Greater publication of asset recovery information and data will not only enhance public trust and participation but would also improve international cooperation between States and the overall effectiveness of asset recovery efforts globally. Data transparency is essential to enable meaningful comparisons of asset recovery processes, both across jurisdictions and within the same jurisdiction from one case to another. Without consistent data collection, comparative analysis becomes impossible, hindering the identification of both weak points and good practices. This, in turn, limits the development of data-driven solutions to improve asset recovery systems.

10. This is reported as being the case in Argentina, France, Spain, Portugal, and the UK.

11. Italy.

12. Italy, Spain and the UK.

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