
Policy Brief:

Recommendations for leveraging Artificial Intelligence (AI) in the fight against corruption

FALCON – GA101121281

1. Who is this for?

This brief seeks to inform EU policymakers and officials involved in preparing legislation and policy initiatives that leverage AI to detect, prevent and combat various forms of corruption, including border corruption, corruption in public procurement and conflicts of interest.

2. Context

FALCON (Fight Against Large-scale Corruption and Organised Crime Networks) is a three-year Horizon Europe research project in anti-corruption. FALCON develops new data-driven indicators and AI-based tools to strengthen the global fight against corruption by following an evidence-based interdisciplinary approach. This policy brief summarises the main results of the analysis of AI use and corruption under the FALCON Project.

Corruption constitutes a severe threat affecting nations around the world. The impact of corrupt practices is detrimental and wide-ranging, leading to economic losses, weakened governance structures and inequality. Traditional approaches to detect and combat corruption can struggle to keep pace with the growing scale and complexity in a rapidly evolving environment. As AI and technology advance, organised crime groups and criminal networks increasingly leverage digital tools for recruitment, encrypted

Executive Summary

- ▶ AI technologies show considerable potential to support in anti-corruption efforts by improving transparency, streamlining investigations, and detecting anomalies in real-time.
- ▶ The use of AI in the fight against corruption requires the development of strict ethical protocols, improving data accessibility and capacity building of law enforcement officers.
- ▶ Currently, resource and budget constraints, resistance to change and ethical concerns hinder the use of AI technologies in this space.



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communications, cryptocurrency transactions and fraud. Therefore, we need innovative methods to prevent, detect and tackle corruption and to make our anti-corruption strategies more efficient in coping with the risks of illicit exchange. As AI technologies become ubiquitous in modern society, they hold considerable potential to support anti-corruption efforts by improving transparency, streamlining investigations, and detecting anomalies in real-time. This proactive approach can significantly strengthen the efficiency of investigations and early detection efforts.

3. Policy Recommendations

3.1. Adopt strategies which promote the use of AI technologies in EU anti-corruption efforts.

EU Member State's governmental and national bodies should adopt comprehensive strategies that promote the use of AI and machine learning (ML) tools to combat all forms of corruption. Developing national strategies that focus specifically on the use of AI technologies in anti-corruption efforts can ensure that AI is deployed ethically and in compliance with existing AI, privacy and data protection laws. Collaboration across multiple domains (technical, ethical, legal, academic, and public) will ensure the development of a strategy that fosters innovation while safeguarding public safety. Strategies should address the challenges that hinder the development of AI technologies for anti-corruption efforts, for instance allocating resources and finances to initiatives, research and projects. It is also important to develop education and awareness programmes and promote the use of standardised formats when collecting data.

3.2. Develop AI governance frameworks promoting the responsible and ethical use of AI technologies in anti-corruption efforts.

The implementation of AI technologies demands strong ethical considerations and risk evaluations. Ethical challenges such as privacy, bias and human oversight must be managed proactively, dynamically and systemically. It is vital to ensure that AI technology used in anti-corruption efforts follows strict ethical protocols and is legally compliant to ensure long-term sustainability. A dedicated framework for AI technologies in anti-corruption is needed to ensure that they are designed, used and assessed in a manner that aligns with the unique context, risks and objectives of tackling corruption. Integrating internationally recognised approaches, such as those put forward by the Accountability Principles for AI (AP4AI) project, can serve as a basis to guide the design and implementation of AI in anti-corruption initiatives accountably.

3.3. Promote capacity building and provide specialised training for law enforcement officers on AI technologies.

It is essential to promote capacity building, cross-sectoral collaboration, and skills development regarding AI technologies used in anti-corruption efforts for law enforcement officers. Law enforcement officers require adequate and iterative training on how to use AI tools in an ethical and legally compliant manner. Building capacity in technological expertise, ethical AI use, and understanding the related legal and societal implications is critical for ensuring the success and

sustainability of AI technologies in anti-corruption efforts. Through training, law enforcement officers should be able to understand how these technologies work alongside any risks or limitations and ensure their use aligns with principles of transparency, fairness and accountability.

3.4. Encourage data harmonisation and data accessibility practices.

Data harmonisation can serve as a powerful means for supporting the design and implementation of AI and ML solutions that can make the fight against corruption more efficient and sustainable. At the national level, many countries struggle to harmonise disparate data collected from different stakeholders involved. As per the European Commission's proposal (2023) for a directive on combatting corruption (COM/2023/234 final), the harmonisation of available data in a central database or the use of standardised formats and central registries, as encouraged in the 5th Anti Money Laundering Directive, ensures that data can be analysed in a consistent and uniform manner. Without data harmonisation, it can be increasingly complex, difficult and time-consuming for law enforcement officers to identify patterns or anomalies that suggest possible corruption.

Data-sharing protocols should ensure law enforcement agencies have access to datasets containing sensitive and personal data, with appropriate safeguards, from relevant stakeholders (e.g., real estate and company registries, beneficial ownership registers, and asset declarations). Disparities in national data-sharing protocols are a barrier to data exchange between countries and hinder international cooperation across the EU.

3.5. Create independent oversight mechanisms.

To ensure transparency and accountability in the use of AI technologies by law enforcement officers in anti-corruption efforts, independent oversight bodies should be established to monitor their application. Oversight bodies such as the European AI Office should develop tailored protocols and guidelines regarding the use of AI in anti-corruption efforts to ensure technologies are not misused, that their outcomes are regularly evaluated, and to identify areas of further improvement.

4. Policy Implications

In cases of border corruption, AI technologies can enhance existing border datasets, sensors, and video surveillance systems to provide valuable insights, anomaly detection and pattern recognition capabilities. For example, AI can identify vehicles that cross borders unusually frequently or for short durations and cross-reference these patterns with other red flags, such as border guard shifts, to develop a comprehensive understanding of the potential risks of corruption in border management.

In cases involving conflict of interest (COI), implementing AI technologies can help to make productive use of the large volumes of data generated by the COI infrastructure (e.g., legal ownership registries, tenders, contracts and vehicle registers) by identifying patterns and

trends faster than their human counterparts. AI can also analyse patterns and behavioural insights within cryptocurrency networks.

In cases of corruption in public procurement, predictive analytics can assist law enforcement officers in analysing public procurement processes and identifying patterns that may indicate irregularities. Moreover, web crawlers can help acquire publicly available online data related to corruption.

In cases concerning sanctions evasion, criminal networks may use shell companies in other countries to circumvent sanctions and launder money. As a result, law enforcement officers may need to collect evidence from multiple countries and different languages. AI technologies can help track the vast amounts of data related to shell companies.

Currently, resource and budget constraints, resistance to change, lack of training, data challenges, and ethical and privacy concerns hinder the development and deployment of AI technologies for anti-corruption efforts.

5. Further Reading

AP4AI., "Accountability Principles for AI project", <https://ap4ai.eu>, 2025.

Europol., "European Union Serious and Organised Crime Threat Assessment - The changing DNA of serious and organised crime", Publications Office of the European Union, Luxembourg, 2025.

FALCON., D2.5 Anti-corruption legislative measures and international policy landscape. [FALCON D2.5 Anti-corruption-legislative-measures-and-international-policy-landscape_Summary.pdf](#), 2024.

Ugale, G. & C. Hall., Generative AI for anti-corruption and integrity in government: Taking stock of promise, perils and practice, OECD Artificial Intelligence Papers, No.12, OECD Publishing, Paris, 2024. <https://doi.org/10.1787/657a185a-en>.

Glossary

AI	Artificial Intelligence
AP4AI	Accountability Principles for AI
COI	Conflict of Interest
LEA	Law Enforcement Agency
ML	Machine Learning

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Project Details

FALCON (Fight Against Large-scale Corruption and Organised Crime Networks) is a three-year Horizon Europe research project in the field of anti-corruption. It addresses the significant challenges of the global fight against corruption by developing new, data-driven indicators and tools following an evidence-based, multi-actor and interdisciplinary approach.

FALCON comprises 25 partners from 15 countries.

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