

## *Chapter 14*

### **Fostering accountability through transparency and civil society scrutiny**

*This chapter describes how the Mexican Institute of Social Security (IMSS) discloses procurement information proactively through a variety of web-based tools (including an innovative portal) as well as through citizens' requests for information. It also describes how civil society scrutiny of its procurement activities is facilitated through the use of "social witnesses".*

## Introduction

Transparency in the procurement process supports a level playing field for suppliers and plays a vital role in achieving value for money in government operations. There are various means of promoting transparency which include: *i)* increasing the level of competition; *ii)* providing adequate tools to enhance the effectiveness of review and remedy systems; *iii)* ensuring access to information on procurement processes and results; and *iv)* promoting the adequate participation of civil society. This chapter will concentrate on this last aspect of transparency: encouraging non-governmental organisations, the media and citizens to scrutinise public procurement as a means of complementing traditional accountability and control mechanisms.

The participation and consultation of civil society in policy making activities and public access to related information have become a high priority among governments and public entities. In fact, access to information in Mexico has been at the core of the government agenda for many years. Various laws have been created for that purpose, such as the Federal Law on Transparency and Access to Government Public Information, making Mexico one of the most advanced open governments in terms of transparency laws.

The ability of citizens, civil society and other non-state actors to demand better governance depends on their access to information and the degree to which they can effectively act on this information. For public administrations, openness has become an essential component in reducing waste, preventing corruption and restoring trust. However, openness is needed, not only in terms of laws and regulations, but also in terms of attitude and commitment from stakeholders. Governments could enable civil society organisations, media and the general public to scrutinise public procurement through the disclosure of public information.

Due to the position of the Mexican Institute for Social Security (Instituto Mexicano del Seguro Social – IMSS) in Mexico’s social and economic context, a transparent and streamlined public procurement is required. In 2009, IMSS provided health and social insurance for 45% of the Mexican population and was one of the biggest buyers of the Mexican Federal Government. It spends an average MXN 30.7 billion (USD 2.6 billion) per year. In order to improve transparency through access to information, IMSS has recently renovated its online transparency portal. Yet, there is still room for improvement. IMSS needs to establish clear guidelines in order to make information publicly available as well as to ensure consistency, impartiality, accessibility and easily understood information across the different portals. In addition, IMSS could develop further mechanisms to strengthen civil society participation throughout the procurement process.

This chapter examines IMSS’ efforts towards enhancing access to information as a means to achieve transparency and restore citizens’ trust. In addition, it assesses IMSS’ need to increase transparency through citizens’ participation and scrutiny.

## **The Mexican Open Government Framework: One of the most advanced among OECD countries**

Freedom of information laws (or “access to information legislation”) are key in enhancing transparency and accountability in the procurement process and in public entities’ activities. The 2002 Federal Law on Transparency and Access to Government Public Information created the Federal Institute of Access to Information and Data Protection (Instituto Federal De Acceso a La Información y Protección de Datos – IFAI) as an entity to promote access

to and dissemination of public information. This initiative was reinforced in 2007 when access to information became a constitutional right in Mexico. This legislation applies to the three central government branches (executive, legislative and judicial) and to all public entities using total or partial federal funding, including IMSS. The law makes the proactive disclosure of information mandatory in a wide range of areas (Table 14.1).

Mexican laws provide that information must be published through different online portals such as an organisation's or government's website, Compranet (e-procurement website) and the "Portal de Obligaciones de Transparencia". Recently, the Ministry of Public Administration (Secretaría de la Función Pública – SFP) has developed a new IT tool, the Portal ciudadano ([www.gob.mx](http://www.gob.mx)). With this portal, it is possible to search a particular topic and be redirected to different online portals which have the information.

Table 14.1. Proactive disclosure of information by the central government in selected countries, 2010

Country	Budget documents	Annual ministry reports, including accounts	Audit reports	All government policy reports	Commercial contracts over a stipulated threshold	List of public servants and their salaries	Administrative data sets	Information describing the types of records systems and their contents and uses	Information on internal procedures, manuals and guidelines	Description of the structure and function of government institutions	Annual report on freedom of information law	Freedom of information procedural information
Australia	●	●	●	○	●	○	●	●	●	●	●	●
Brazil	●	●	●	●	●	●	●	●	●	●	○	○
Canada	●	●	●	○	●	○	●	●	●	●	●	●
Chile	●	●	●	○	●	●	○	○	○	●	●	●
Denmark	●	●	●	●	○	○	●	●	●	●	○	○
France	●	●	○	●	○	○	○	○	○	●	●	●
Italy	●	●	●	●	●	●	●	●	●	●	●	●
Japan	●	○	●	○	●	○	○	●	○	●	●	●
Korea	●	●	●	●	●	○	●	●	●	●	●	●
Mexico	●	●	●	●	●	●	●	●	●	●	●	●
Russian Federation	●	○	○	●	○	●	●	●	●	○	●	●
Turkey	●	●	●	●	○	●	○	●	○	●	●	●
United Kingdom	●	●	●	○	●	●	●	●	○	●	●	●
United States	●	●	●	●	●	○	●	●	●	●	●	●

● Required to be proactively published by FOI law     
 ● Not required by FOI law, but routinely published     
 ○ Neither required nor routinely published

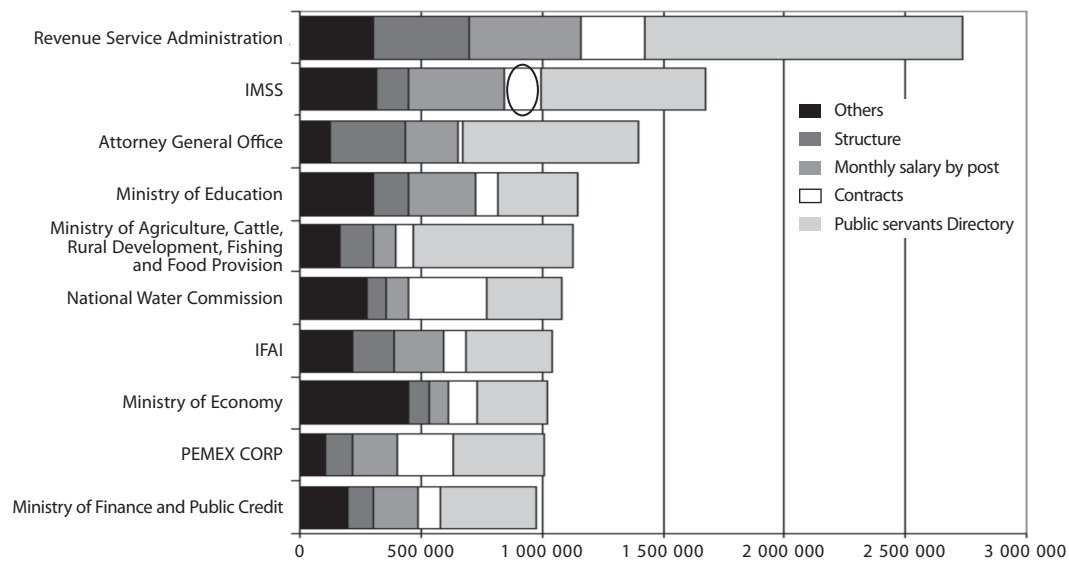
Notes: FOI = Freedom of information. Brazil is currently drafting laws on access to information. Some categories of information are required to be disclosed by laws other than FOI. Italy, Mexico, Turkey and the United Kingdom publish salary information for some public servants, such as managers who earn at the top of salary scales.

Source: Adapted from OECD (2011), *Government at a Glance 2011*, OECD Publishing, Paris, [http://dx.doi.org/10.1787/gov\\_glance-2011-en](http://dx.doi.org/10.1787/gov_glance-2011-en).

### *IMSS is one of the Federal entities with the most visitors to the Portal de Obligaciones de Transparencia*

The Portal de Obligaciones de Transparencia publishes information such as the structure of the Federal entity, the number and value of contracts and the monthly salary of public servants. According to the IFAI, IMSS is the federal entity with the second highest number of visits to its online portal. However, information on contracts is not the main area of interest to the portal's visitors, but rather monthly salary by post (Figure 14.1).

Figure 14.1. **Federal entities with the highest number of visitors to the Transparency Obligations Portal, from 15 February 2010 to 4 August 2011**



Source: IFAI website, [www.ifai.org.mx/](http://www.ifai.org.mx/).

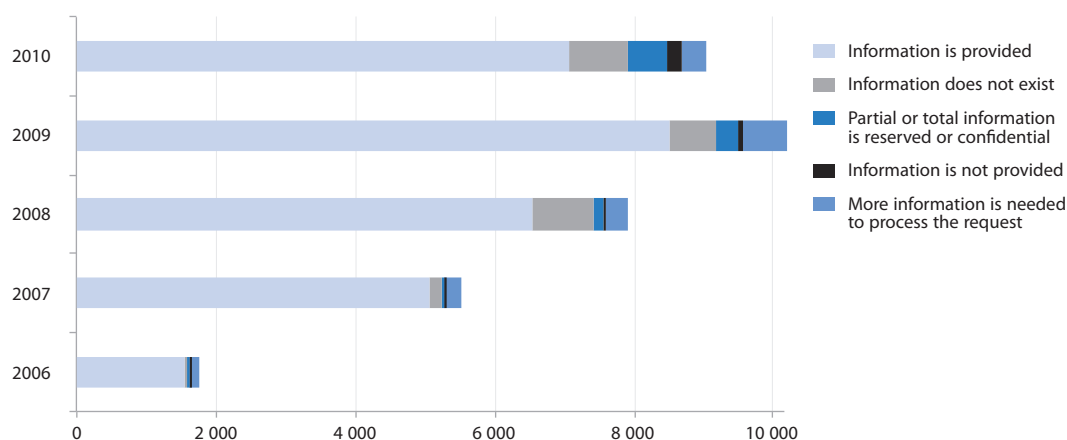
The Transparency Law empowers citizens to request specific information that has not been proactively disclosed. Data across the Mexican Public Administration has shown that the number of requests for information has increased substantially in the past four years. This can imply that the higher the level of awareness among civil society of its right to access information, the higher the willingness to use it.

The response to a citizen's request can be either positive (e.g. information is disclosed and provided to the requester) or negative (e.g. information is undisclosed). When disclosed, the information can be provided by electronic means or on paper. Between 2006 and 2010, the number of responses increased by 411%, being significantly higher in 2009. Between 2008 and 2010, in 81% of the cases, IMSS provided the information that was requested. In 29% of the cases, information was not provided because it was reserved, confidential, did not exist or because, in some cases, the request was incomplete. Evidence shows that, while the percentage of information provided decreased, the percentage of undeliverable, confidential information increased (Figure 14.2).

The federal law requires maximum disclosure of information from all Mexican entities. However, in some cases, information can be classified as reserved or confidential i.e. not subject to disclosure. There are specific conditions under which information cannot be made publicly available, such as commercial, industrial or banking secrets, previous enquiries and judicial or administrative files that are still in process. Nevertheless, it is impossible

to determine the scope of the exception or the criteria used by the person responsible for making the final decision on the disclosure of the information. In some cases, concerns have been raised about the potential unlawful use of withholding information. The criteria used to determine whether information can or cannot be published needs to be clearly identified and its scope of interpretation as narrow as possible.

Figure 14.2. Request of information by type of response. total for 2006-10



Source: INFOMEX, [www.infomex.org.mx](http://www.infomex.org.mx), accessed 31 August 2011.

### Mexico's procurement legal framework provides high levels of availability of procurement information for all public organisations, including IMSS

The interface between the public and the private sectors, where governments and state-owned enterprises buy a large number of goods, services and public works, is considered to be one of the government activities most vulnerable to fraud and corruption. In order to prevent this, civil society is demanding more openness from government and its entities.

#### *Public procurement information for all public organisations is made available on Compranet*

Compranet provides free information, including tender procedures, contracts awards history, and objections filed with the procuring entity's Internal Control body. In addition to Compranet, information can also be found on the website of a tendering authority. Supplying accurate information and access to civil society may prove to be a challenge despite the government's intent to promote the proactive disclosure of information and to provide the necessary technology and tools (websites). This is due to the manner in which public information is collected and its consistency. The quality of the information disclosed could be improved in order to better allow stakeholders to monitor and evaluate the procurement process. Information made publicly available is not always easily comprehensible, up-to-date or complete (for example, information on bid objections (*inconformidades*) is available only until 2003 and does not provide access to the complete file), and some information differs between different federal websites.

Furthermore, information on the procurement process (e.g. annual procurement programmes on acquisitions leases and services, calls for tender and its amendments, transcripts of the clarification meetings, testimony of social witnesses) could always be put on Compranet. This is particularly the case for all documents relating to contract award. It

is possible to find a contractor's name and the contract amount. However, no information is disclosed that allows understanding the reasoning behind the procurement agent's decisions, such as the basis on which the contract was awarded to that particular contractor. Amounts of subsequent modifications to the contract are also not available. In order to be as transparent as possible, IMSS could enable access to more procurement information, making sure that it is consistent, impartial, readily accessible and easily understood.

Table 14.2. **Overview of IMSS platforms to publish procurement information**  
(as of September 2011)

	IMSS NEW WEBSITE	<i>Transparencia en Adquisiciones del IMSS</i>	COMPRANET	<i>Portal de Obligaciones de Transparencia</i>
Website	<a href="http://www.imss.gob.mx/comprasimss">www.imss.gob.mx/comprasimss</a>	<a href="http://compras.imss.gob.mx/">http://compras.imss.gob.mx/</a>	<a href="https://compranet.funcionpublica.gob.mx">https://compranet.funcionpublica.gob.mx</a>	<a href="http://portaltransparencia.gob.mx/pot/">http://portaltransparencia.gob.mx/pot/</a>
Entity responsible to publish the information	IMSS	IMSS	IMSS	IMSS
Entity responsible to oversight the publication of information	IMSS	IMSS	SFP	IFAI
Information published				
Information on the entity's structure				✓
Procurement Legal framework		✓	✓	
Manuals and guidelines for suppliers	✓	Not yet online		
Procurement annual plans	✓	✓	✓	✓
Pre-solicitation documents	✓		✓	
Solicitation documents		✓ (Notice)	✓	
Minutes resulting from the clarification meetings	Not possible to access		✓	
Electronic submission of bids			✓	
Justification for awarding a contract			✓	
Contract modifications				✓ (sometimes and little detail)
Statistics and database related to past procurement	✓ (From 2006)	✓ (From 2009) Only amounts	✓	✓
Payment information	✓			
Blacklisted suppliers registry			✓	
Social witness testimony		✓ (From 2008)		
Possibility to file an objection			✓	
Objection's documents				

***IMSS has developed an innovative portal to ensure transparency and citizens' oversight on its procurement***

In 2011, IMSS created a new online portal (<http://compras.imss.gob.mx>) which replaces the procurement segment of its transparency online portal established in 2003/2004 ([www.imss.gob.mx/transparencia](http://www.imss.gob.mx/transparencia)). The new portal was created with the intention of enhancing public accountability and transparency and improving the understanding of IMSS expenditures. It is based on the Transparency Law and inspired by the US portal <http://usaspending.gov/>. IMSS personnel were key participants in its development. Responsibility for its deployment has been given to the unit already developing and maintaining the main IMSS portal. This allows the integration the two portals in terms of content and consistency, ensures synergies in their development and maintenance, avoids overlaps and provides a clear and coherent image to the portals' users. The resulting IMSS procurement transparency portal is operational since April 2011 and targets a wider public audience. It presents IMSS public procurement activities in a user-friendly manner, and provides a full picture on how, on what and why IMSS spends its resources, as well as the benefits achieved through these activities.

The portal not only focuses on a more advanced external audience – suppliers with a high number of public tenders – but also appeals to citizens in general. Currently the IMSS portal includes a database, which sorts and provides specific information (e.g. price paid and quantity procured) based on the type of acquisition, service or public work. It also includes procurement planning and solicitation documents, as well as other relevant information. Details concerning suppliers, such as the value of contracts and non-performance, will also be available in the future. Nonetheless, IMSS could include additional information, such as contract modifications and list of contracts awarded to each supplier, in order to further increase transparency. Plans also include the live transmission of key stages of the bidding process, as well as the possibility for any citizen to subscribe and receive automatic email alerts on public procurement. The goal is to strengthen the use of social media networks in connection with the IMSS portal in order to share relevant information on its overall procurement process, such as information on savings achieved.

In addition to providing important information to suppliers and the wider public, the portal functions as a knowledge tool for internal stakeholders such as local entities (*delegaciones*) and high specialty medical units (*Unidades Médicas de Alta Especialidad – UMAEs*). Its intention is to offer them useful information, such as reference prices and past procurement conditions, in order to enhance the efficiency of the process and increase competition.

With this new portal, IMSS will have the challenge of incorporating the same kind of information provided in different portals such as the Portal de Obligaciones de Transparencia and Compranet. IMSS must ensure that the versions of a same solicitation documents published through different websites are identical, as any small change can result in confusion in the process, needs for clarifications meetings and amendment to the solicitation documents and, in some cases, an unsuccessful public tendering procedure. IMSS could arrange for adequate co-ordination in order to avoid duplication of work and ensure consistency of the information and documentation available through the different websites.

## Social scrutiny

### ***Strengthening the role of the social witness and increasing the participation of social stockholders is needed to improve civil society scrutiny***

Citizen participation has long been a subject of active discussions in the field of political and administrative sciences. The term itself is often defined as a citizen action that influences or seeks to influence policy decisions, or as an action that incorporates the demands and values of citizens into public administration services. For procurements that involve important risks of mismanagement and possible corruption, governments could consider the possibility of involving representatives of civil society, academics or end-users in scrutinising the integrity of the procurement process. “Direct social control” mechanisms encourage their involvement as external observers of the entire procurement process or of key decision-making points. This practice of “direct social control” completes traditional accountability mechanisms under specific circumstances. Strict criteria could be defined to determine when direct social control mechanisms may be used, in relation to the high value, complexity and sensitivity of the procurement, and for selecting the external observer (Young Suh, 2007).

In this regard, Mexico is also one of the most advanced countries. Since 2004, Mexico has implemented the role of the social witness to facilitate the participation of civil society as external observers in public procurements processes. Following the 2009 amendments to the Law on Acquisitions, Leasing and Services (*Ley de Adquisiciones, Arrendamientos y Servicios del Sector Público – LAASSP*), social witnesses are now legally required to participate in all stages of the procurement process for major procurements exceeding regularly adjusted thresholds. In 2010, these thresholds were of MXN 299 million (approximately USD 23 million) for public tendering for goods and services and of MXN 598 million (approximately USD 47 million) for public tendering for public works. If deemed appropriate by the SFP, social witnesses can also take part in all the stages of the procurement process in lower value public tendering procedures, direct award procedures or invitations to at least three people.

Social witnesses’ functions are to propose strategies that improve the transparency, the impartiality and compliance with the legal framework, reporting any illegal acts they may find. They are elected by the SFP through a public call and must meet various requirements stated in the LAASSP. The SFP keeps a registry of the social witnesses and evaluates their performance, upon which they may revoke their participation if found unsatisfactory.<sup>1</sup> The buyer entity requiring the participation of a social witness asks the SFP to designate one to oversee the process.

As of August 2011, SFP had registered 39 social witnesses for public procurement projects, five Civil Society Organisations<sup>2</sup> and 34 individuals.<sup>3</sup> This number has grown exponentially, from 5 social witnesses in 2005 to 39 in 2010. In that year, they participated in 123 procurements valued at MXN 183 billion (approximately USD 14.3 billion) (SFP, 2011). Despite the increase in the number of social witnesses, they remain few for the total number of public tendering procedures in the federal government in that year, i.e. almost 96 000 such procedures for goods, services and public work. This can partly be explained by the fact that the legal requirements to apply and be registered as a social witness are numerous and difficult to meet, limiting the total number of social witnesses available. As shown in Table 14.3, IMSS ranks second as the public entity using the most social witnesses, preceded by Mexican Petroleum (*Petróleos Mexicanos – PEMEX*).



Table 14.3. **Entities using the highest number of social witnesses: Appointments and total value of public tenders for goods, services and public works**

Entity	2008		2009		2010		2008-10	
	Number of appointments	Contract value (USD million)	Number of appointments	Contract value (USD million)	Number of appointments	Contract value (USD million)	Number of appointments	Contract value (USD million)
Total Federal Government	194	31 077	127	23 375	123	14 501	444	68 953
Federal Electricity Commission (CFE)	5	8 528	11	1 313	22	3 594	38	13 434
<b>IMSS</b>	<b>13</b>	<b>1 440</b>	<b>8</b>	<b>2 795</b>	<b>33</b>	<b>4 755</b>	<b>54</b>	<b>8 990</b>
PEMEX, excluding PEMEX Petroquímica	151	19 771	62	15 406	26	2 983	239	38 160
Ministry of communications and transports	3	434	4	467	2	179	9	1 080
Other federal entities	22	904	42	3 394	40	2 991	104	7 289

Source: Secretaría de la Función Pública (SFP) (2011), “Quinto Informe de Labores” [Fifth Activities Report], [www.funcionpublica.gob.mx/web/doctos/temas/informes/informes-de-labores-y-de-ejecucion/5to\\_informe\\_labores\\_sfp.pdf](http://www.funcionpublica.gob.mx/web/doctos/temas/informes/informes-de-labores-y-de-ejecucion/5to_informe_labores_sfp.pdf), accessed 7 April 2013.

At the end of a procurement process, the social witness will issue a final testimony including their comments and recommendations, which will be published on the IMSS website as well as on Compranet. However, evidence shows that these testimonies are not easily accessible. For example, IMSS does not publish this information on their website in a clear and consistent manner and the testimonies are mostly inaccessible. However, in the new transparency portal, all testimonies from 2009 to date are accessible. Testimonies from NGOs (such as Contraloría Ciudadana para la Rendición de Cuentas) are also available on this transparency portal, as well as on the NGOs website.<sup>4</sup>

As rightly pointed out by SFP: “the monitoring of the most relevant procurement processes of the federal government through social witnesses have had an impact in improving procurement procedures by virtue of their contributions and experience, to the point that they have become a strategic element for ensuring the transparency and credibility of the procurement system” (SFP, 2010). An OECD-World Bank Institute study (2006) indicates that the participation of social witnesses in procurement processes of the Federal Electricity Commission (*Comisión Federal de Electricidad*) had already brought it savings of approximately USD 26 million in 2006 and increased the number of bidders by over 50%.

The OECD agrees with the importance of the social witness presence to provide technical advice as well as oversight during the procurement process. Nevertheless, concerns<sup>5</sup> have been raised regarding the extent to which a social witness can express an opinion and to make significant changes. Even though they are appointed by SFP, the buying entity finances the participation of the social witness. There is little evidence showing social witnesses reporting potential cases of corruption during a procurement process.<sup>6</sup>

According to the law, social witnesses do not have the authority to stop a procurement process or to revoke a decision. They may express opinions, but do not have any influence or right to make decisions. When a social witness raises concern over a possible corrupt action during a procurement process, their opinions and concerns are recorded in their testimony. IMSS takes these opinions and concerns into account and addresses them. Evidence shows,

however, that IMSS addresses the concerns of the social witness sporadically, rarely responding to them.<sup>7</sup> This gives the impression that the organisation does not take witness recommendations seriously. IMSS could make the social witness role more influential and reinforce witness oversight during the procurement process by providing a written response to every suggestion or comment received from social witnesses and allowing their inclusion in the final testimony. IMSS could even amend its Guidelines on Acquisitions, Leasing and Services (*Políticas, Bases y Lineamientos en Materia de Adquisiciones, Arrendamientos e Servicios – POBALINES*) to reflect that obligation.

Furthermore, evidence shows that the same social witness can participate in more than one process in the same entity, increasing the risk of familiarity between the procurement agents and the potential suppliers (Table 14.4). Evidence also shows that some public tendering procedures have been flagged as irregular after having been endorsed by social witnesses. These social witnesses are still part of the list provided by SFP.<sup>8</sup>

Table 14.4. List of social witnesses used by IMSS from 1 January 2010 to 15 June 2011

Person/Institution	Number of assignments
Transparencia Mexicana, A.C.	20
ONG Contraloría Ciudadana, A.C.	4
Lic. Gerardo Mendoza Briseño	3
Ing. José Francisco Ponce Córdoba	2
Lic. José Antonio Nava Gutiérrez	2
Lic. Pascual Sánchez Torres	2
C.P.C. Alejandro Frank Díaz	2
C.P. Fernando Dablantes Camacho	1
Ing. Enrique Alcántara Gómez	1
Ing. Héctor Alejandro Genis Juárez	1
Ing. Javier Delgado Serrano	1
Ing. Jorge Javier Jiménez Alcaraz	1
Instituto Mexicano de Auditoría Técnica, A.C.	1
Lic. Roberto Zavala Chavero	1
<b>Total 1 January 2010 to 15 June 2011</b>	<b>42</b>

Source: Information provided by IMSS.

Apart from the use of social witnesses, IMSS uses three other mechanisms to enhance civil society participation, such as IMSS “oportunidades social comptroller”, citizen oversight and social observers other than social witnesses. Only social observers are related to the procurement process. IMSS social observers consist of volunteers taken from the public who are interested in participating in various acts of public tenders made by the IMSS central level. They will attend as an observer to monitor transparency in the development of the acts, the application of laws and the impartiality and honesty of public servants responsible for their implementation. At present, it is difficult to measure the use of social observers and the impact of their participation on the procurement process.

Governments are seeking to inform, consult and engage citizens to enhance the quality, credibility and legitimacy of their decisions. In order to guarantee civil society’s adequate participation and broad engagement in procurement monitoring, information could be complete, objective, reliable, relevant, and easy to understand and find. Making large quantities of

information available does not ensure that the information is of good quality. Similar to other Mexican public entities, IMSS is making enormous efforts to improve transparency through access to information and civil society participation. However, in order to achieve transparency through the use of different online portals, IMSS needs to ensure that the information disclosed is reliable, consistent and easily understood by both potential suppliers and social stakeholders in general.

## Proposals for action

In order to enhance transparency of its procurement function and its scrutiny by civil society, IMSS could consider the following proposals:

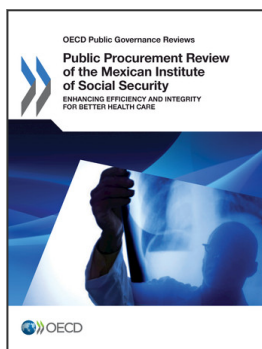
1. Ensuring that the information made available through these portals is consistent, impartial, reliable, accessible and easily understood.
2. Organising the website's data and information for easier use and access, and ensuring that it complies with the law regarding information disclosure.
3. Providing a more standardised/consistent approach to classify information as reserved or confidential.
4. Implementing a survey and publishing indicators to measure suppliers' perceptions of the procurement process in terms of transparency and in relation to other federal entities.
5. Engaging with SFP in order to explore ways to strengthen the transparency and independence of social witnesses.
6. State in its guidelines on acquisitions, leasing and services (POBALINES) that every suggestion or comment from social witnesses will receive a written response that will also be published in the testimony.
7. Increasing the use of social observers and measuring their impact in order to further encourage citizens to participate in and oversee IMSS procurement processes.

## Notes

1. LAASSP, Art. 66.
2. *i)* Academia de Ingeniería, *ii)* Academia Mexicana de Auditoría integral y al Desempeño, *iii)* ONG Contraloría Ciudadana para la rendición de cuentas, *iv)* Transparencia Mexicana Capitulo Nacional de Transparencia Internacional en México, and *v)* Instituto Mexicano de Auditoría Técnica.
3. [www.funcionpublica.gob.mx/unaopspf/tsocial/tsocial.htm](http://www.funcionpublica.gob.mx/unaopspf/tsocial/tsocial.htm).
4. [www.contraloriaciudadana.org.mx/documentos/TESTIMONIO\\_IMSS011.pdf](http://www.contraloriaciudadana.org.mx/documentos/TESTIMONIO_IMSS011.pdf).
5. Such concerned were identified in interviews during the mission to Mexico and other documentation such as <http://contralinea.info/archivo-revista/index.php/2008/11/01/testigos-sociales-la-simulacion/>.
6. <http://contralinea.info/archivo-revista/index.php/2008/11/01/testigos-sociales-la-simulacion/>.
7. Interviews with social witnesses, OECD field mission to Mexico August 2011.
8. <http://contralinea.info/archivo-revista/index.php/2008/11/01/testigos-sociales-la-simulacion/>, and [www.funcionpublica.gob.mx/unaopspf/tsocial/tsocial.htm](http://www.funcionpublica.gob.mx/unaopspf/tsocial/tsocial.htm).

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