FALCON
Fighting Corruption & Organised Crime

Policy Brief:

Recommendations for Combatting Border Corruption

FALCON – GA101121281

1. Who is this for?

This brief seeks to inform EU policymakers and officials involved in preparing legislation and policy initiatives to detect, prevent and combat border corruption.

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 border corruption under the FALCON Project.

The integrity of the European Union's external borders constitutes a cornerstone of both the Schengen Area and the Union's broader internal security architecture. While significant investments have been made in physical and digital surveillance infrastructure, the effectiveness of these systems ultimately depends on the institutional integrity and accountability of the personnel responsible for their operation. Technological sophistication cannot compensate for vulnerabilities arising from corruption within border management institutions.

Executive Summary

- While legislative frameworks governing public procurement measures are quite robust, the limited scope of their applicability restricts efforts in preventing corruption.
- The effectiveness of surveillance technologies and border control systems depends on institutional integrity.
- Corruption is adaptive and evolves in response to new enforcement measures, requiring continuous risk assessment and corruption-sensitive implementation frameworks.

Funded by the European Union

FALCON is funded under the Horizon Europe Framework Program Grant Agreement ID 101121281. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Research Executive Agency. Neither the European Union nor the granting authority can be held responsible for them. CENTRIC's work is funded by UK Research and Innovation (UKRI) under the UK government's Horizon Europe funding guarantee [grant number 10078194]

Border corruption is not static. Like other forms of illicit exchange, it evolves in response to new controls, technologies, and enforcement strategies (Kassa & Costa, 2025; Costa and Baez Camargo, forthcoming). Criminal actors continuously adapt by identifying points of least resistance within regulatory, operational, and technological systems. These adaptive dynamics generate emerging corruption risks affecting public officials, procurement processes, operational procedures, and transit routes. As a result, even well-designed measures may experience diminished effectiveness over time if institutional safeguards fail to evolve accordingly.

Although the existing EU public procurement framework (Directives 2014/23/EU, 2014/24/EU and 2014/25/EU) provides a comprehensive regulatory basis, its scope and implementation variability across Member States limit its preventative capacity in high-risk border governance contexts. Persistent divergences in national oversight mechanisms create structural vulnerabilities that can be exploited by corrupt networks. The forthcoming implementation of the Pact on Migration and Asylum (2026) and the new EU Anti-Corruption Directive (2024/2026) represent important steps toward harmonisation. However, legislative convergence alone will not suffice. Effective enforcement requires targeted operational safeguards, enhanced inter-agency coordination, and corruption-proof implementation mechanisms that address identified legal, institutional, and technological gaps.

3. Policy Recommendations

3.1. New Tools and Protocols

A primary intervention involves systematically reducing unnecessary face-to-face interactions between border guards, customs officials, and economic operators at Border Crossing Points (BCPs). Border management functions are characterised by frequent, high-discretion exchanges with traders, transport operators, clearing agents, and individual travellers. While such interactions are operationally necessary, they can create environments conducive to informal bargaining, preferential treatment, and illicit payments.

Digitalisation offers a structural response to these vulnerabilities. The implementation of National Single Window systems can significantly reduce discretionary contact points (OSCE/UNECE, 2012; WCO, 2014). By centralising data submission, automating verification processes, and enhancing traceability, Single Window systems limit opportunities for opaque negotiations while increasing auditability and oversight capacity.

At EU level, the implementation of the EU Single Window Environment for Customs (EU SWE-C) represents a critical step toward harmonised and digitised customs governance. The first implementation phase was completed in 2025, with further system integration foreseen by 2031. However, to maximise its anti-corruption potential, the EU SWE-C should be complemented by:

- Mandatory digital trace logs for all risk-based inspections,
- Automated risk profiling systems subject to independent oversight,
- Randomised allocation of physical inspections to reduce collusive predictability,
- Interoperability with anti-fraud and integrity-monitoring systems.

3.2. Uniform Procedures and Risk-Based Digital Infrastructures

A key priority is the development of harmonised digital procedures and risk-based infrastructures capable of detecting anomalies and corruption-prone patterns in border-crossing activities. Data-driven red flag systems and behavioural risk indicators can identify irregular patterns, such as unusually frequent crossings, atypical transit durations, or deviations from established trade routes. This enables more targeted and intelligence-led inspections. Tools such as the Advanced Corruption Risk Assessment model developed under the FALCON project demonstrate how analytics can support law enforcement in prioritising high-risk environments. At EU level, the European Border Surveillance System (Eurosur) already classifies border sections according to risk levels; integrating corruption-sensitive indicators into its analytical framework would strengthen integrity safeguards alongside existing security objectives.

Sustained investment in research and innovation, including through Horizon Europe, remains essential to refine predictive analytics and ensure interoperability across Member States. However, digitalisation and algorithmic profiling must be accompanied by transparency, auditability, data protection safeguards, and independent oversight to prevent bias, misuse, or new forms of manipulation. Harmonised and integrity-sensitive risk infrastructures would not only improve operational efficiency but also reinforce mutual trust within the Schengen governance framework by reducing enforcement asymmetries and systemic vulnerabilities.

3.3. Limitation of Data Access and Manual Data Handling

A further safeguard against border-related corruption involves reducing the discretionary role of public officials in the collection, manual entry, and transmission of data concerning individuals, vehicles, and border-crossing activities. Current practices in several contexts still rely on officers to collect information, input it into national or EU databases, and manage subsequent data sharing. Research conducted under the FALCON project indicates that such manual handling processes create opportunities for data manipulation, selective omission, delayed entry, or the suppression of alerts linked to suspicious or anomalous behaviours. Minimising manual intervention in high-risk data processes can therefore reduce opportunities for corruption and reinforce data integrity.

The full deployment of the Entry/Exit System (EES) and the European Travel Information and Authorisation System (ETIAS), expected in 2027, offers an opportunity to shift toward automated data capture, biometric verification, and system-generated cross-checks that limit human discretion. To maximise their anti-corruption potential, these systems should be complemented by strict role-based access controls, automated logging of all data modifications, and regular integrity audits. Reducing discretionary access while strengthening traceability will enhance both operational reliability and mutual trust across the Schengen area.

3.4. Reframing concepts and conceptual frameworks

A critical reform priority lies in strengthening the conceptual alignment between anti-trafficking and anti-corruption strategies in border governance. Research (Kassa & Costa, 2025) demonstrates that these policy domains are frequently treated as functionally equivalent, despite

addressing distinct, though interrelated risks. Corruption operates as an enabling mechanism that facilitates illicit activities such as smuggling and trafficking. When enforcement measures become more stringent or technologically sophisticated, they may inadvertently increase incentives to corrupt officials as a means of bypassing new controls. In this sense, intensified anti-trafficking interventions can, if not properly designed, generate parallel corruption risks.

Effective border reform therefore requires integrated policy frameworks that anticipate and mitigate these unintended consequences. Anti-trafficking strategies should be systematically assessed for their corruption impact, particularly in high-risk environments such as Border Crossing Points and maritime ports. Embedding corruption risk analysis into the design, deployment, and evaluation of new border technologies and protocols would promote coherence between security and integrity objectives. Aligning these policy domains strengthens institutional resilience, reduces enforcement blind spots, and ensures that efforts to combat trafficking do not inadvertently create new systemic vulnerabilities.

4. Policy Implications

Coping with the issues raised above is anything but easy or immediate. For example, when proposing reforms or innovations aimed at reforming customs procedures or control mechanisms, we should consider the potential unintended consequences that these changes could have on corruption from the very beginning of the process. This will help us to take appropriate measures to manage and mitigate these risks and prevent the innovations from being undermined or neutralised.

Similarly, adopting foresight techniques and anticipatory governance approaches will greatly help to explore potential patterns in the evolution of corruption over time. These approaches can also be used to depict different scenarios and models for interpretative purposes (Tõnurist & Hanson, 2020). At the same time, this can also help us build a Corruption Intelligence Picture (CIP), a core concept of the FALCON project, by following changes and evolutions characterising corruption strategies and its specific risks. This is not an easy change; rather, it requires a radical shift in how we design and conduct our legislative and policy activities. New measures must be introduced to keep our anti-corruption frameworks up to date in relation to new risks and modus operandi that emerge due to these evolving and adaptive mechanisms. In parallel, focus will shift from continuously introducing new and innovative solutions to maintaining and caring for existing ones. This is certainly a radical change in our approach to anti-corruption legislation, but also necessary if we are to continue to counter the relevant risks of criminal activities and corruption in border spaces.

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6. Further Reading

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Glossary

AI	Artificial Intelligence
EU MS	EU Member States
LEA	Law Enforcement Agency
CIP	Corruption Intelligence Picture
ETIAS	European Travel Information and Authorisation System
EES	Entry/Exit System
BCP	Border Crossing Point

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We would like to thank Giorgia Cascone and Bence Tóth for their contributions.

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.

Coordinator: Jenny Adamopoulou, Institute of Communication & Computer Systems (ICCS)
Duration: 09/2023 – 08/2026
Call / Topic: HORIZON-CL3-2022-FCT-01-05
Budget: € 5 080 455,00

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