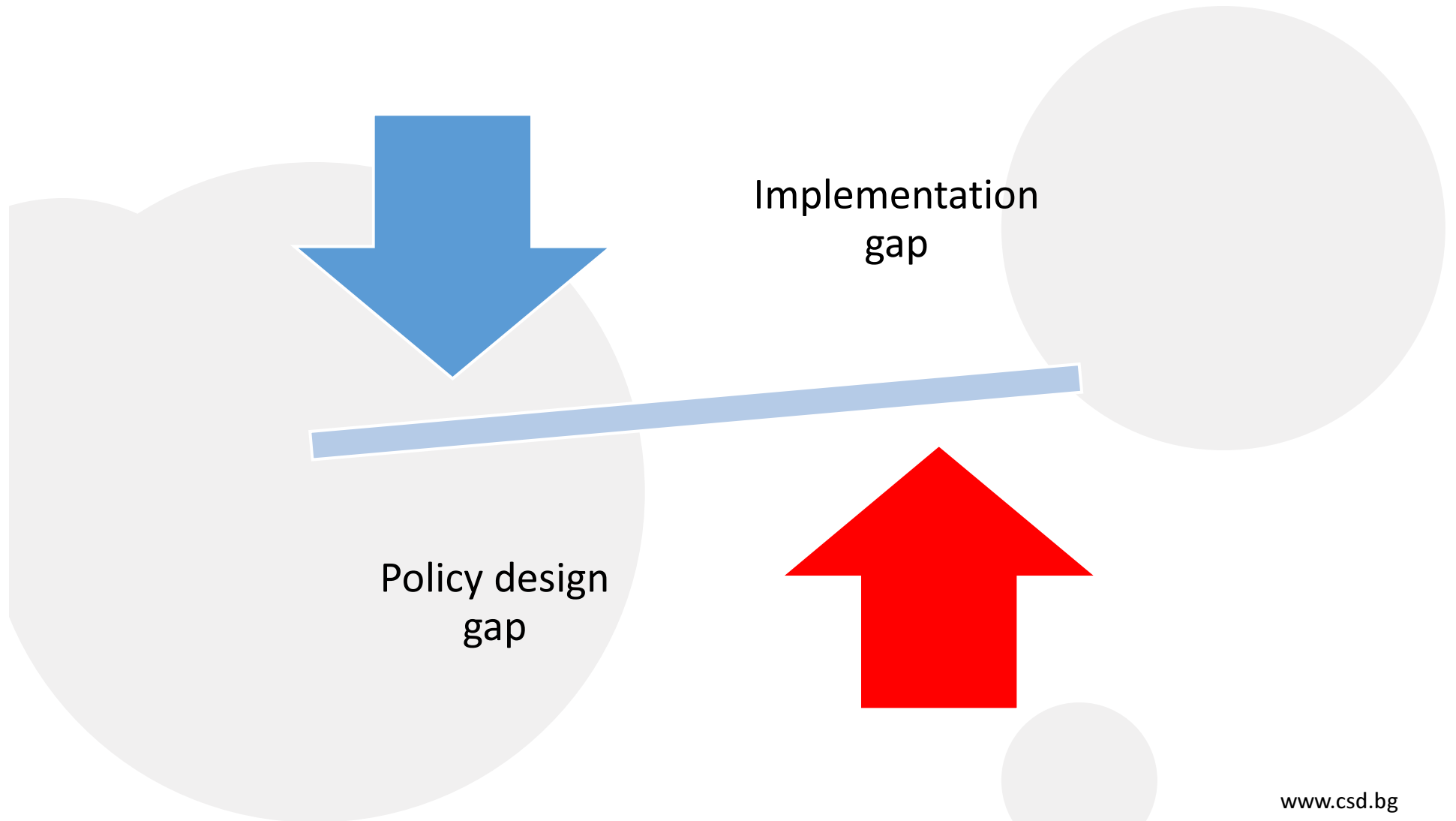
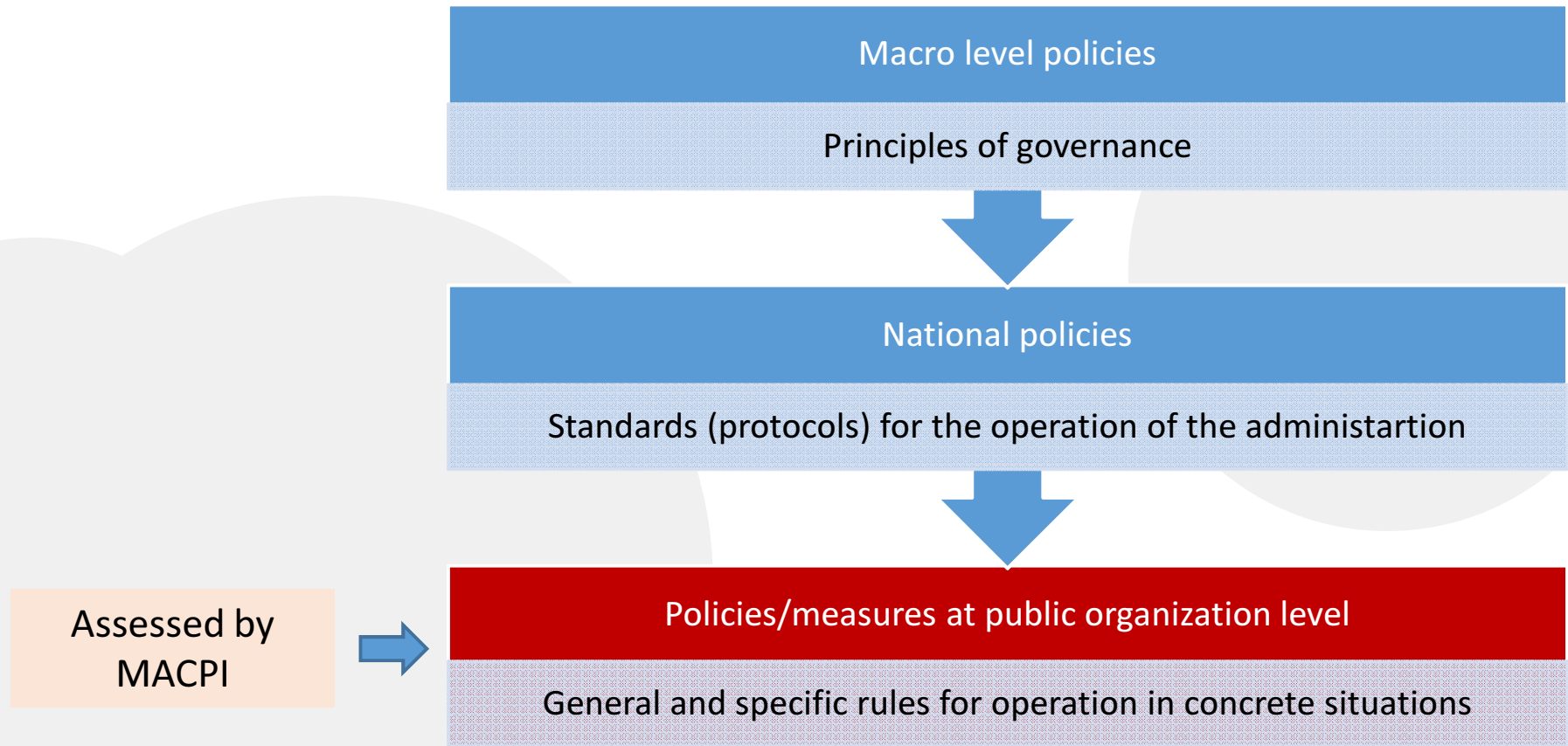


Monitoring anticorruption policy implementation (MACPI)

Identification of two types of gaps in anticorruption policies/measures:



Levels and content of anticorruption policies



Assumptions

- ▶ Anticorruption policies at macro level are related to political choice (elections)
- ▶ National policies can be implemented only if adequately translated into policies/measures at the level of public organisations
- ▶ At the public organization level anticorruption policies/measures would be effective if they:
 - ▶ Address real risks and vulnerabilities (adequacy)
 - ▶ Have rational/optimal design (implementability)
 - ▶ Induce both formal and real compliance (implementation)
 - ▶ Reduce corruption pressure

MACPI anticorruption policy
assessment indicators

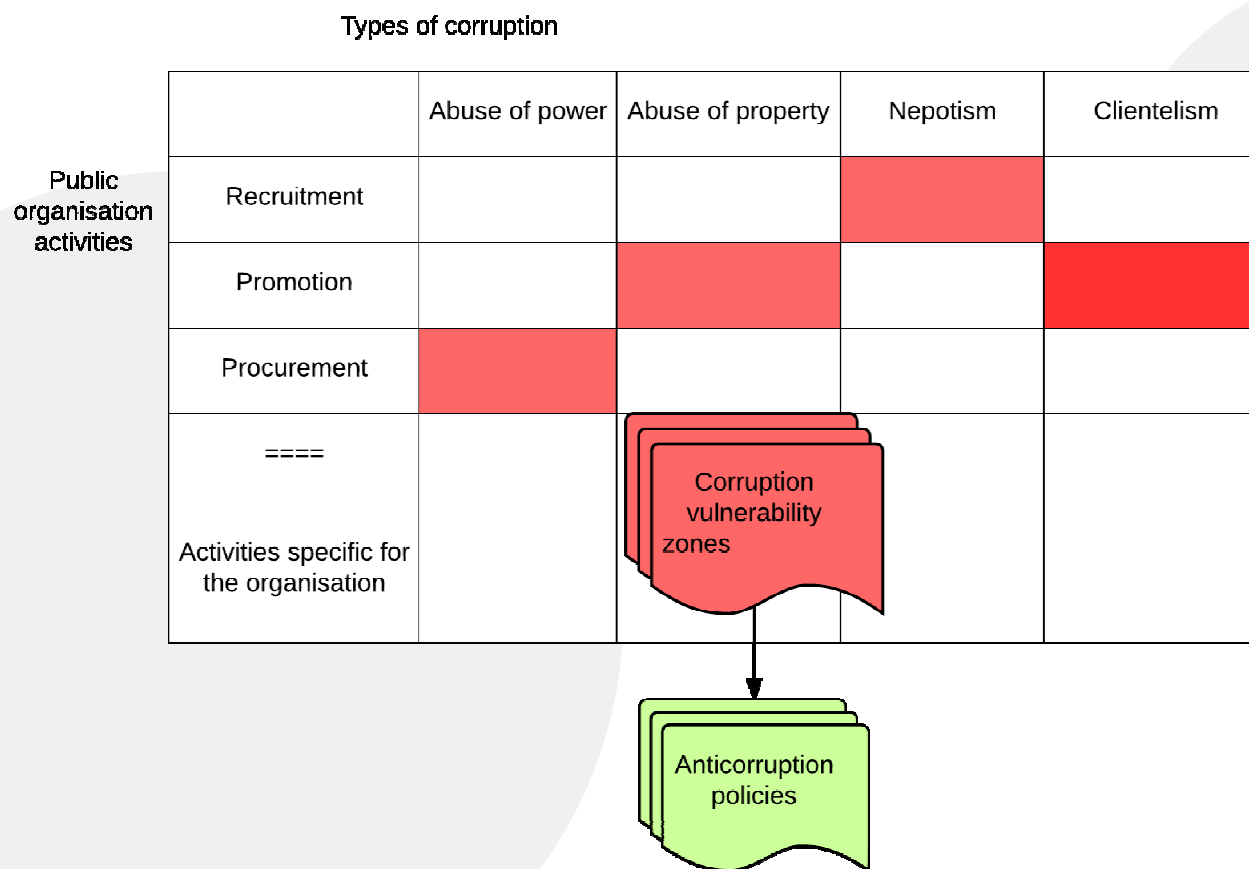
Assessment of activities

(1) Corruption interest

- ▶ Reflects the theoretical possibility (sense) of corruption transactions of different types associated with specific activities of the public organisation
- ▶ Helps identify corruption vulnerability zones

Assessment of corruption vulnerability (risk)

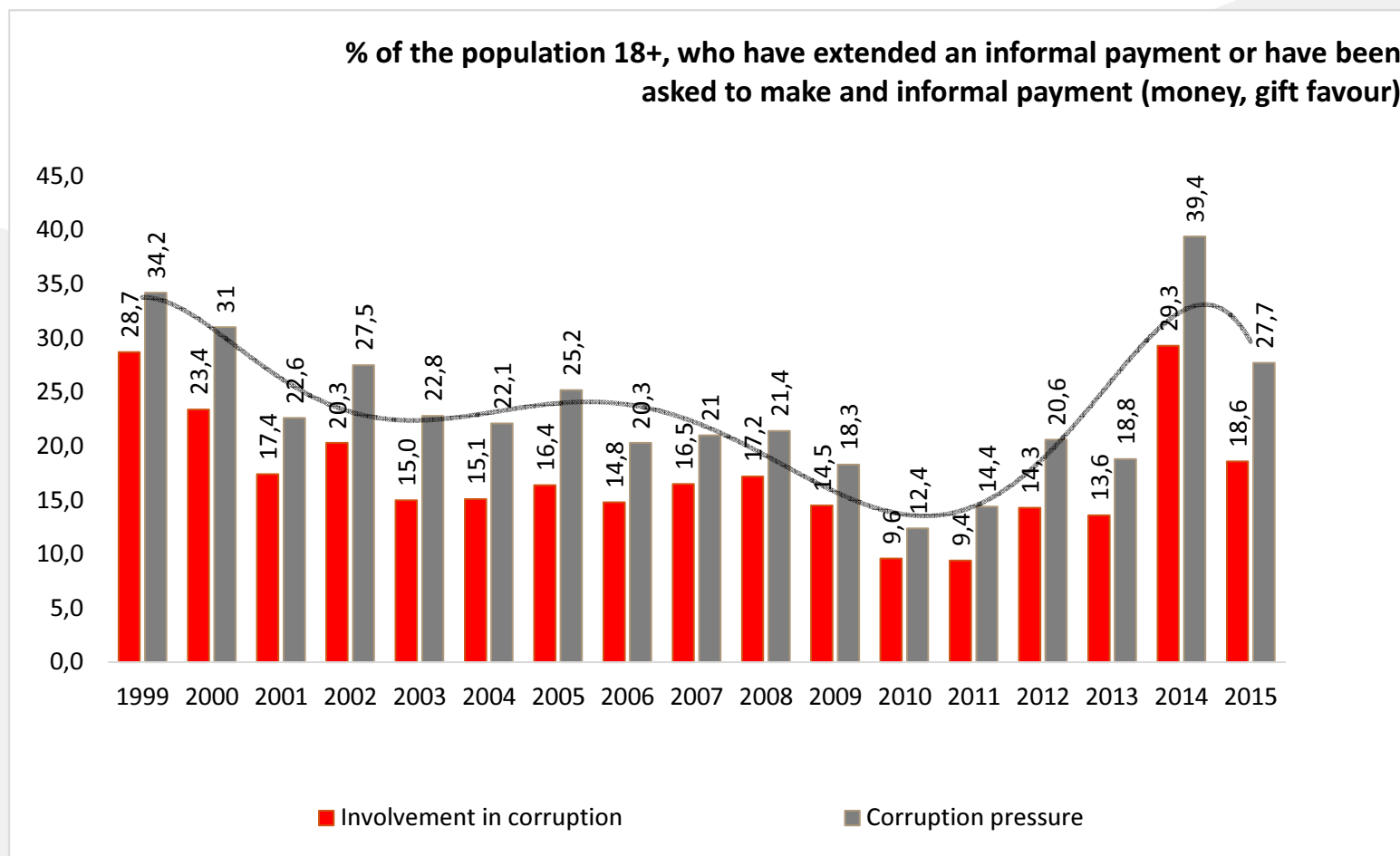
Corruption vulnerability zones in public organisations
(activities by types of corruption) and anticorruption policies



(2) Corruption pressure and involvement in corruption

(results at national and public
organization level)

Direct measurement of cases of corruption pressure and involvement in corruption (general population, Bulgaria)



General and specific indicators for assessment of activities

General indicators	Specific indicators	Content/interpretation
Corruption interest	Existence of interest for basic types of corruption transactions	Reflects the principle interest and practical feasibility/sense of select types of corruption transactions, given the situation in the country and the organisation.
Corruption pressure	Evasion of regulations	Share of officials who gave above average score on how many individuals/companies (clients) try to circumvent the rules in this activity.
	Outside pressure associated with activity	Share of those who answered that there is some level of outside corruption pressure in this activity.
	Susceptibility to pressure from above	Share of officials who consider it likely that employees would perform illegitimate activities if ordered by a superior.
	Susceptibility to pressure from outside	Share of officials who consider it likely that employees would accept or ask for a bribe associated with activity.

Corruption vulnerability of activities (Border Police, Bulgaria)

Activities	Corruption interest	Corruption pressure			
		Evasion of regulations (0 - 100%)	Outside pressure (0 - 100%)	Susceptibility to pressure from above (0 - 100%)	Susceptibility to pressure from outside (0 - 100%)
Administrative and punitive	75	33,3	53,8	19,2	23,1
Public procurement	75	30	55,2	27,6	20,7

MACPI indicators for
assessment of anticorruption
policies/ measures

Assessment of policies/ measures

MACPI assessment of anticorruption policies (Border police, Bulgaria)

Policies/ measures	Implementability		Implementation				Effectiveness	
			Formal compliance		Real compliance			
	Ease of implementation (%)	Difficult to evade (%)	Awareness (%)	Strick implementation (%)	Strict control (%)	Strict application of sanctions (%)	Estimated potential effectiveness (%)	Estimated actual effectiveness (%)
Declarations of assets and incomes	95,1	71,3	93,9	91,1	63,1	59,3	73,1	66,5
Control by direct supervisors of the declarations of their subordinates.	93,6	72,9	91,2	88,8	59,8	51,2	73,1	68,7
....								

Summary: MACPI indicators for assessment of anticorruption policies/ measures

General indicators	Specific indicators	Content /interpretation
Implementability	Ease of implementation	Share of officials evaluating the policy as “very/rather easy to implement.”
	Difficult to evade	Share of officials considering the policy difficult to evade.
implementation	Awareness	Share of officials who agree that the policy is well-known to the employees whom it concerns.
	Strict implementation	Share of officials who agree that policy is strictly applied.
	Strict control	Share of officials who think that control is strictly applied.
	Strict application of sanctions	Share of officials who think that sanctions are always applied in cases of violation of the policy.
Estimated effectiveness	Estimated potential effectiveness	Share of officials who think that the implementation of this policy “ <u>could reduce cases of corruption.</u> ”
	Estimated actual effectiveness	Share of officials who think that this policy “ <u>reduces corruption risk.</u> ”



MACPI architecture

Qualitative
diagnostics

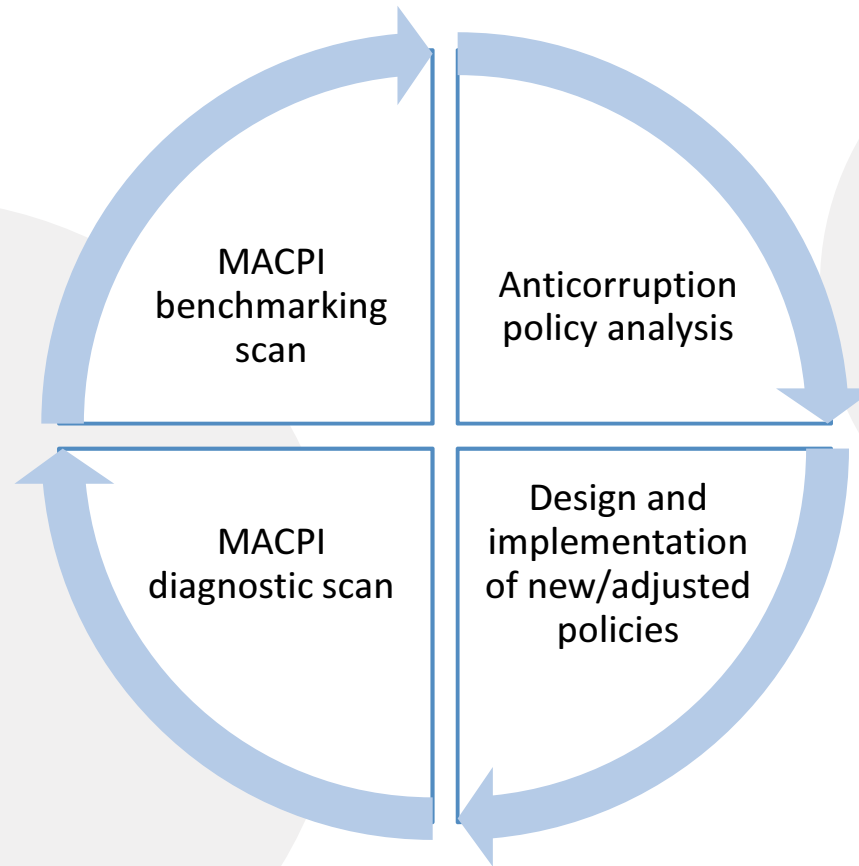
Quantitative
diagnostics

Policy
analysis

MACPI indicators and methods

Indicators	Desk research	In-depth interview	MACPI online	MACPI general population/ stakeholders
Corruption interest	X	X	X	
Corruption pressure			X	X
Involvement in corruption				X
Corruption attitudes				X
Corruption reputation of sectors/ officials				X
Implementability of AC policies			X	
Implementation of AC policies			X	
Estimated effectiveness of AC policies			X	

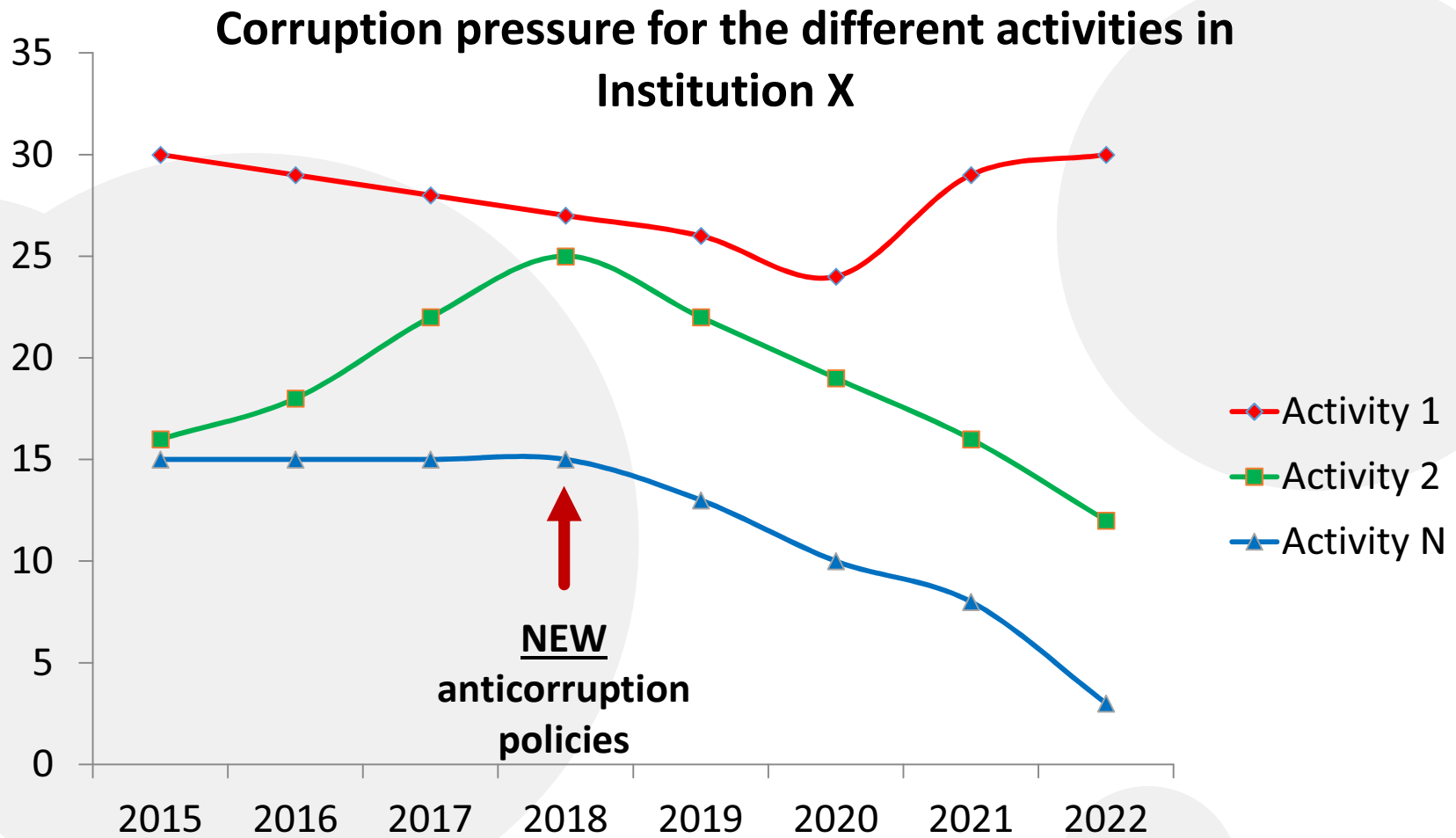
MACPI implementation cycle



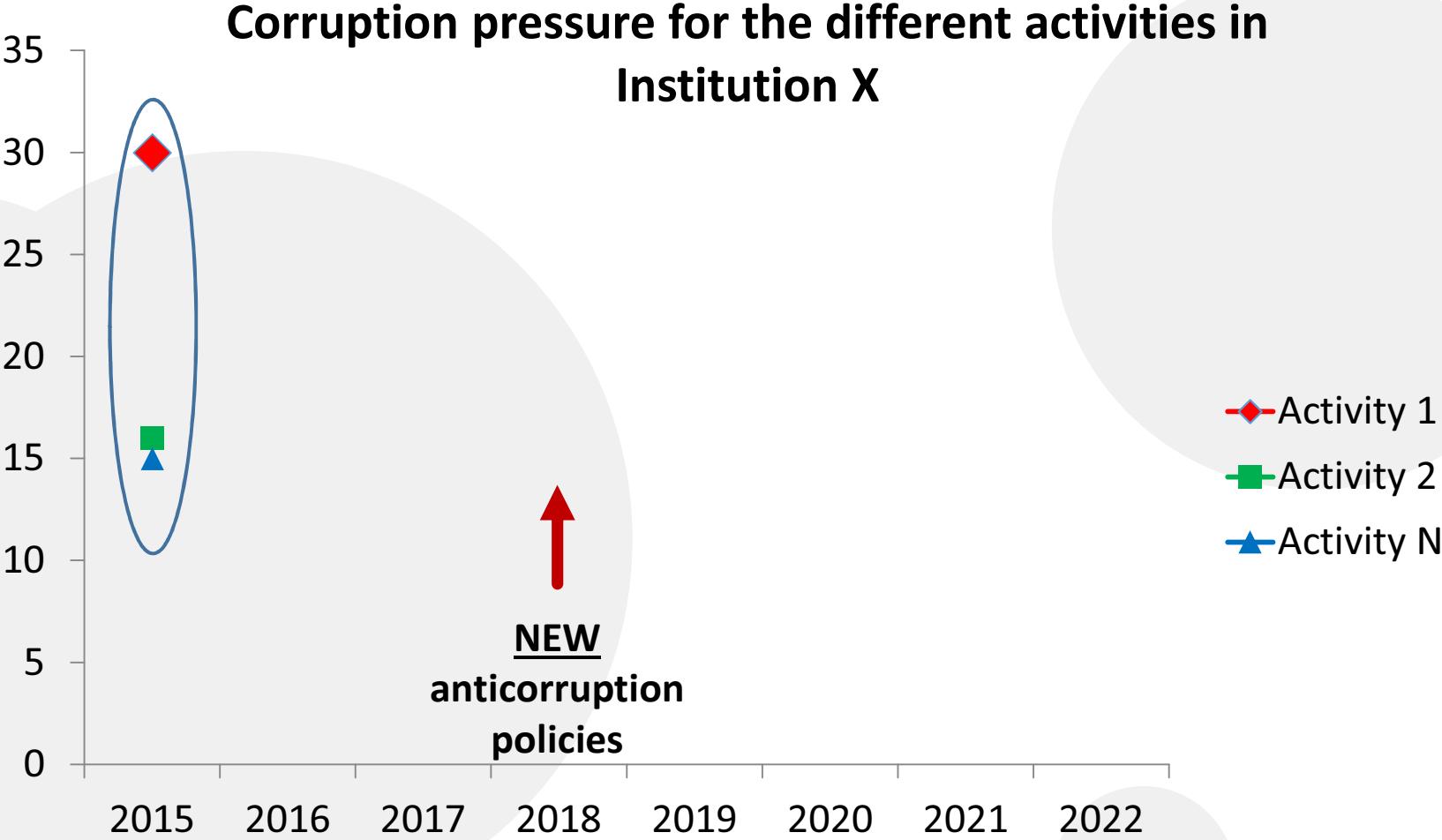


MACPI pilot test implementation results

Corruption pressure trend in time (requires repeated MACPI assessments)



Corruption pressure trend in time (What we currently have)



MACPI: other possible usage

- ▶ Comparisons of the current AC policies' scores with the ideal values
- ▶ Comparisons of the corruption vulnerability for the different activities of the organization
- ▶ Comparisons between the existing AC policies' scores (and their components – Implementability, Implementation, Effectiveness)
- ▶ Comparisons between similar institutions' AC policy setups
- ▶ Comparisons between different groups – employees with and without management functions, external experts, etc.
- ▶ Assessment of possible systematic deviations, e.g. institutional patriotism (positive response bias)



Bulgarian Border Police

MACPI implementation phases

Phase 1:

List of activities
List of AC policies

Phase 2:

Survey among
employees

General information about pilot tests with MACPI in the Bulgarian Border Police

- ▶ First stage – several interviews with experts from Border Police; compilation of a list of the activities of Border police and a list of the anti-corruption policies
- ▶ Second stage – anonymous online survey among employees of Border Police; random sample; 506 cases
- ▶ 109 employees with management functions (10 of whom are “head of department or higher management staff”); 385 employees without management functions

Assessment of the corruption vulnerability of the activities:

COMPARISON BETWEEN ACTIVITIES; COMPARISON WITH THE IDEAL VALUES
BULGARIAN BORDER POLICE

Corruption vulnerability of activities

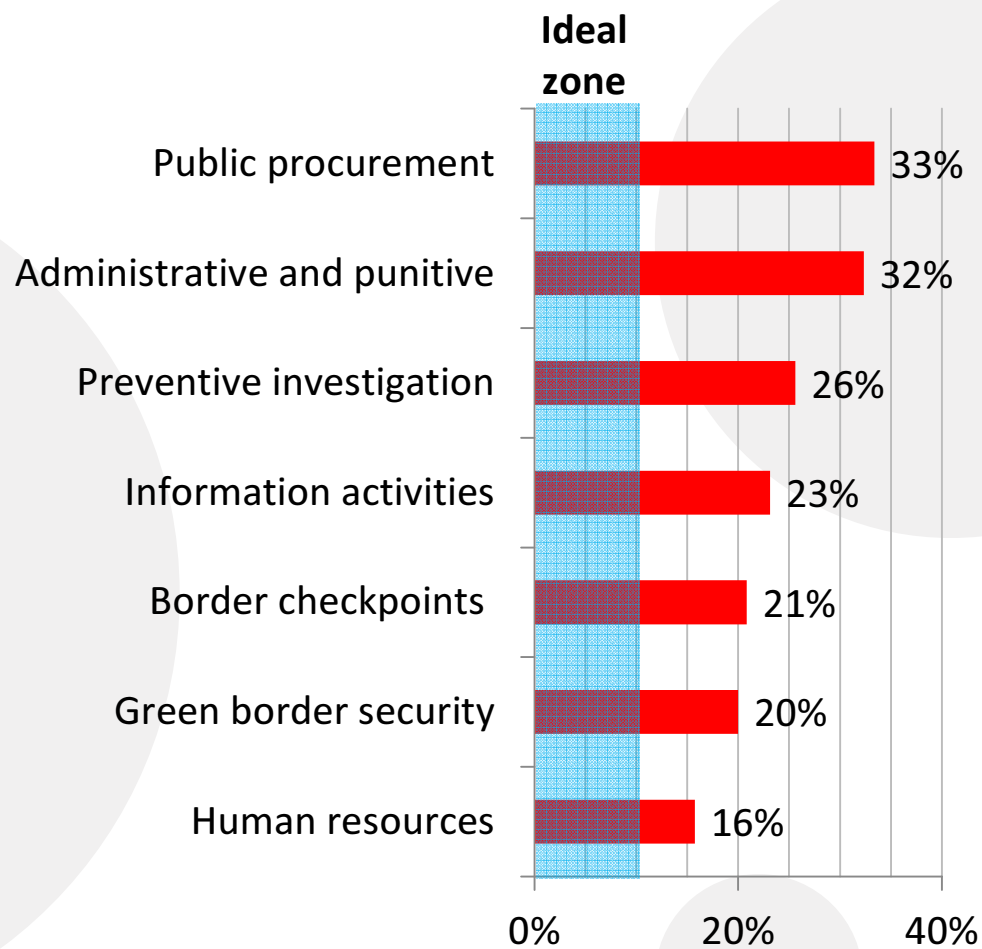
Border Police Bulgaria, pilot MACPI assessment

Activities	Corruption interest	Corruption pressure			
		Types of corruption possible (0 - 100%)	Evasion of regulations (0 - 100%)	Outside pressure (0 - 100%)	Susceptibility to pressure form above (0 - 100%)
Border Police Bulgaria					
Administrative and punitive	75	33	54	19	23
Border checkpoints	50	21	41	7	15
Green border security	75	27	33	9	10
Human resources	75	13	41	9	0
Information activities	25	25	33	19	17
Preventive investigation	50	27	52	10	14
Public procurement	75	30	55	28	21

Corruption vulnerability



Average corruption pressure for the different activities



Corruption vulnerability:

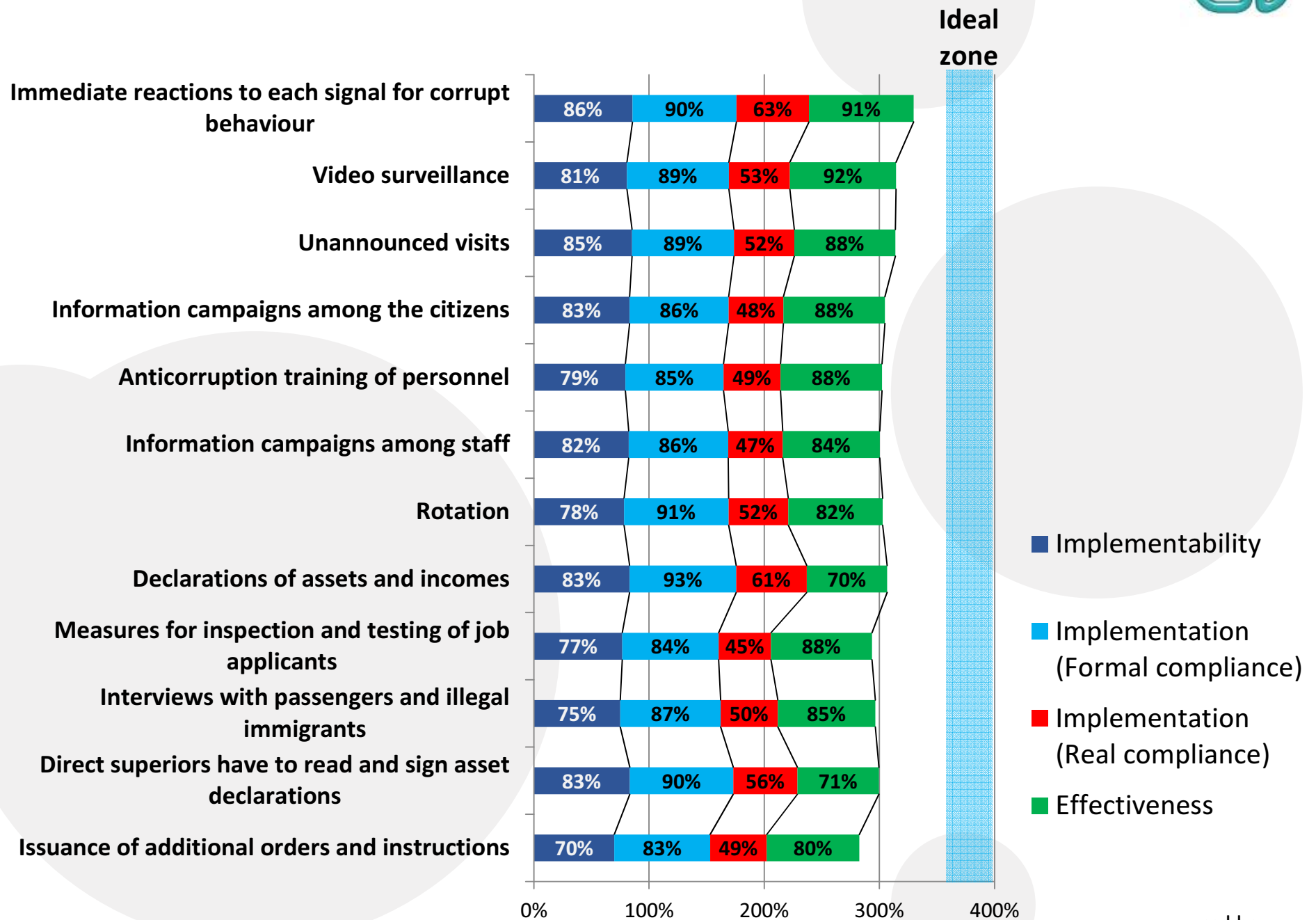
Average corruption pressure and coverage with specific and general anticorruption policies (ACP)

	Average Pressure	Sp. ACP 1	Sp. ACP 2	Sp. ACP 3	Sp. ACP 4	Sp. ACP 5	Gen. ACP 6	Gen. ACP 7	Gen. ACP 8	Gen. ACP 9	Gen. ACP 10	Gen. ACP 11	Gen. ACP 12
Human resources	16%					Y	Y	Y	Y	Y	Y	Y	Y
Public procurement	33%						Y	Y	Y	Y	Y	Y	Y
Preventive investigation	26%						Y	Y	Y	Y	Y	Y	Y
Green border security	20%			Y	Y		Y	Y	Y	Y	Y	Y	Y
Information activities	23%						Y	Y	Y	Y	Y	Y	Y
Border checkpoints	21%	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y
Administrative and punitive	32%						Y	Y	Y	Y	Y	Y	Y

Assessment of the implementation of anticorruption policies

COMPARISON BETWEEN AC POLICIES; COMPARISON WITH THE IDEAL VALUES
BULGARIAN BORDER POLICE

Assessment of AC policies



Assessment of AC policies in Border Police

Results and conclusions

Results:

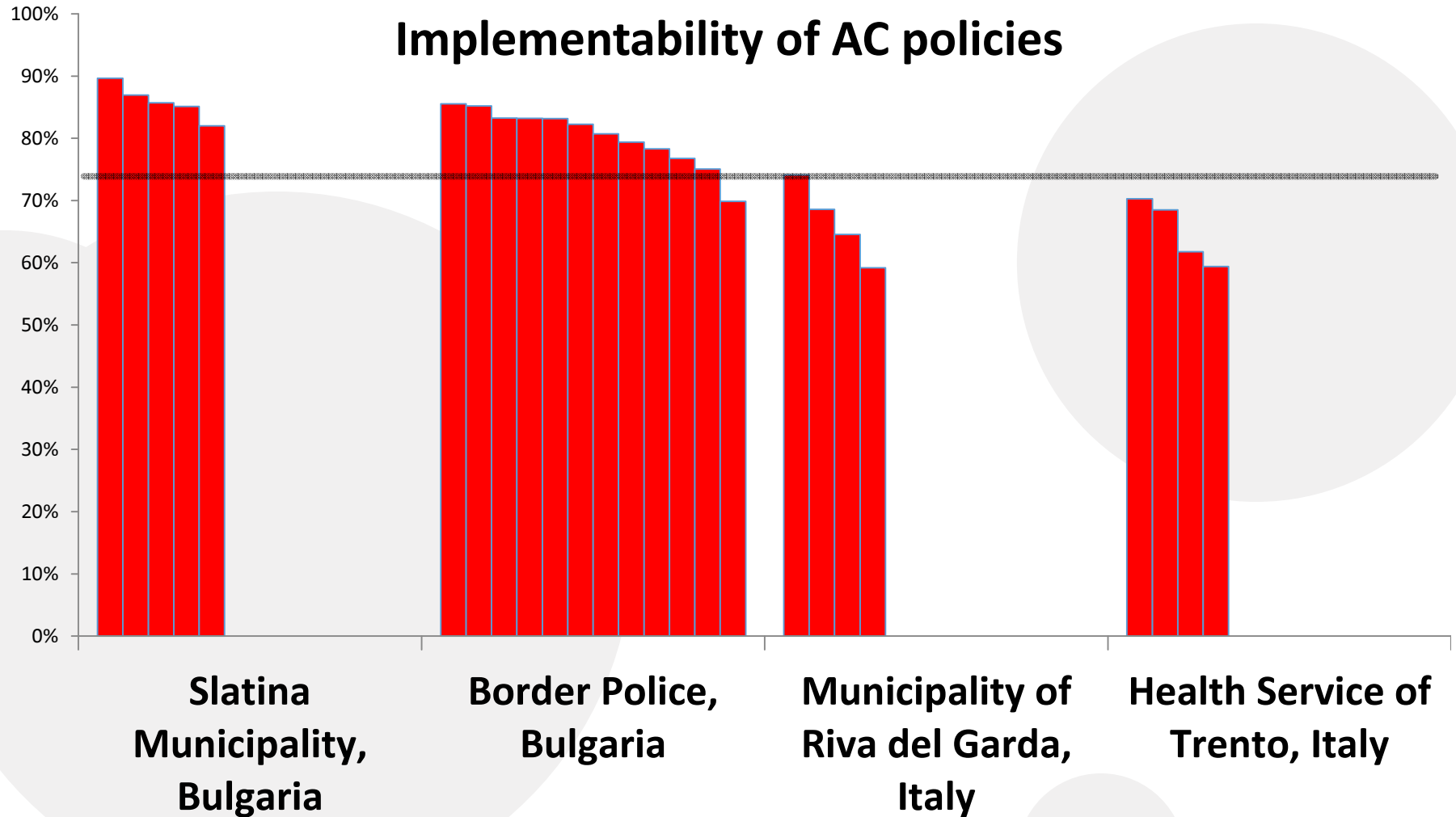
- ▶ Control and sanctions have relatively low scores for all policies
- ▶ Asset declarations are the most implementable and most strictly implemented AC policy but at the same time – the least effective

General Conclusions:

- ▶ Asset declarations could become more effective (improve scope and control)
- ▶ A more detailed analysis by the organisation experts is needed

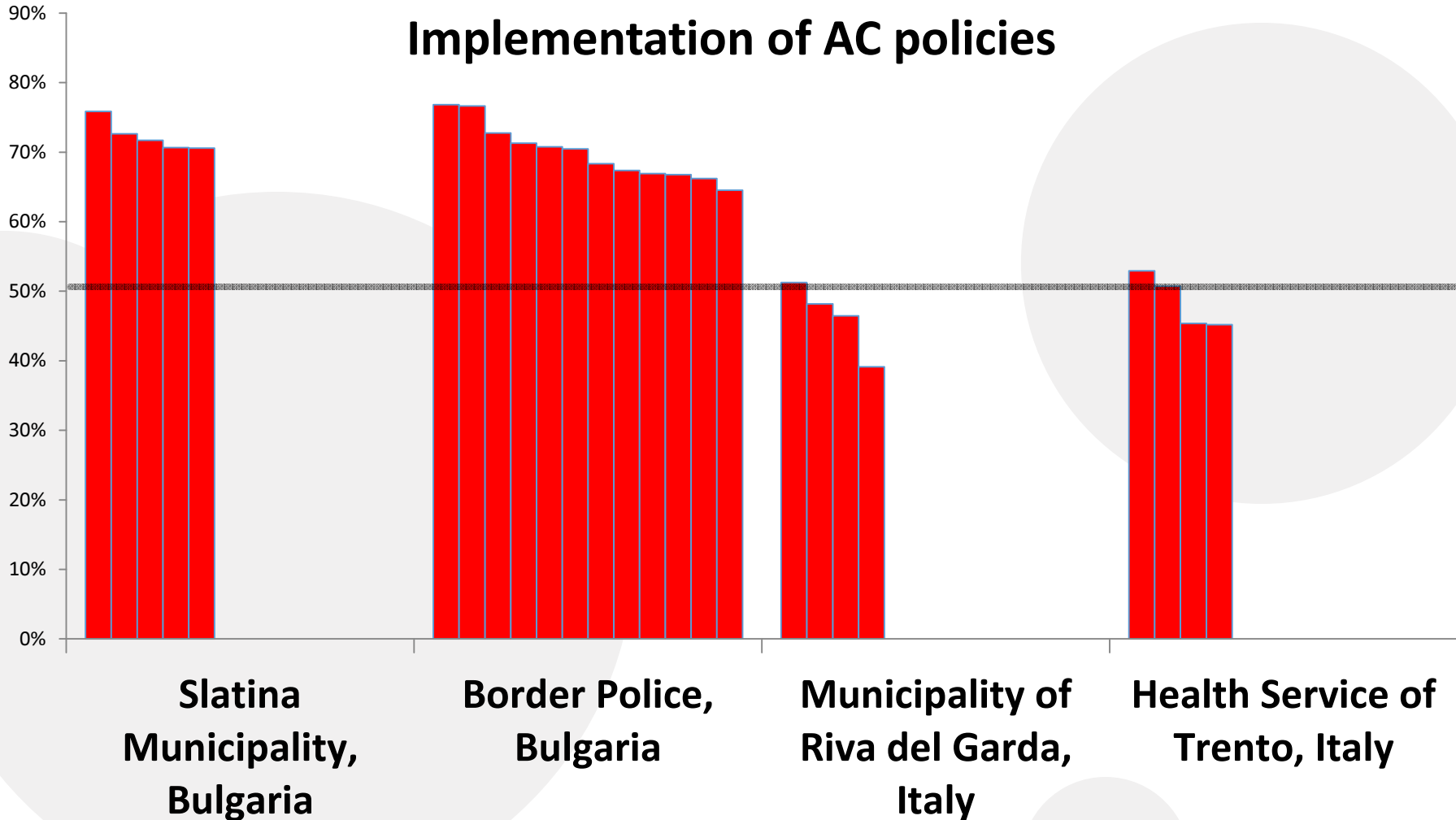
Comparison between Bulgarian Border Police and other public organizations

MACPI AC policy assessments in Bulgarian and Italian public organizations

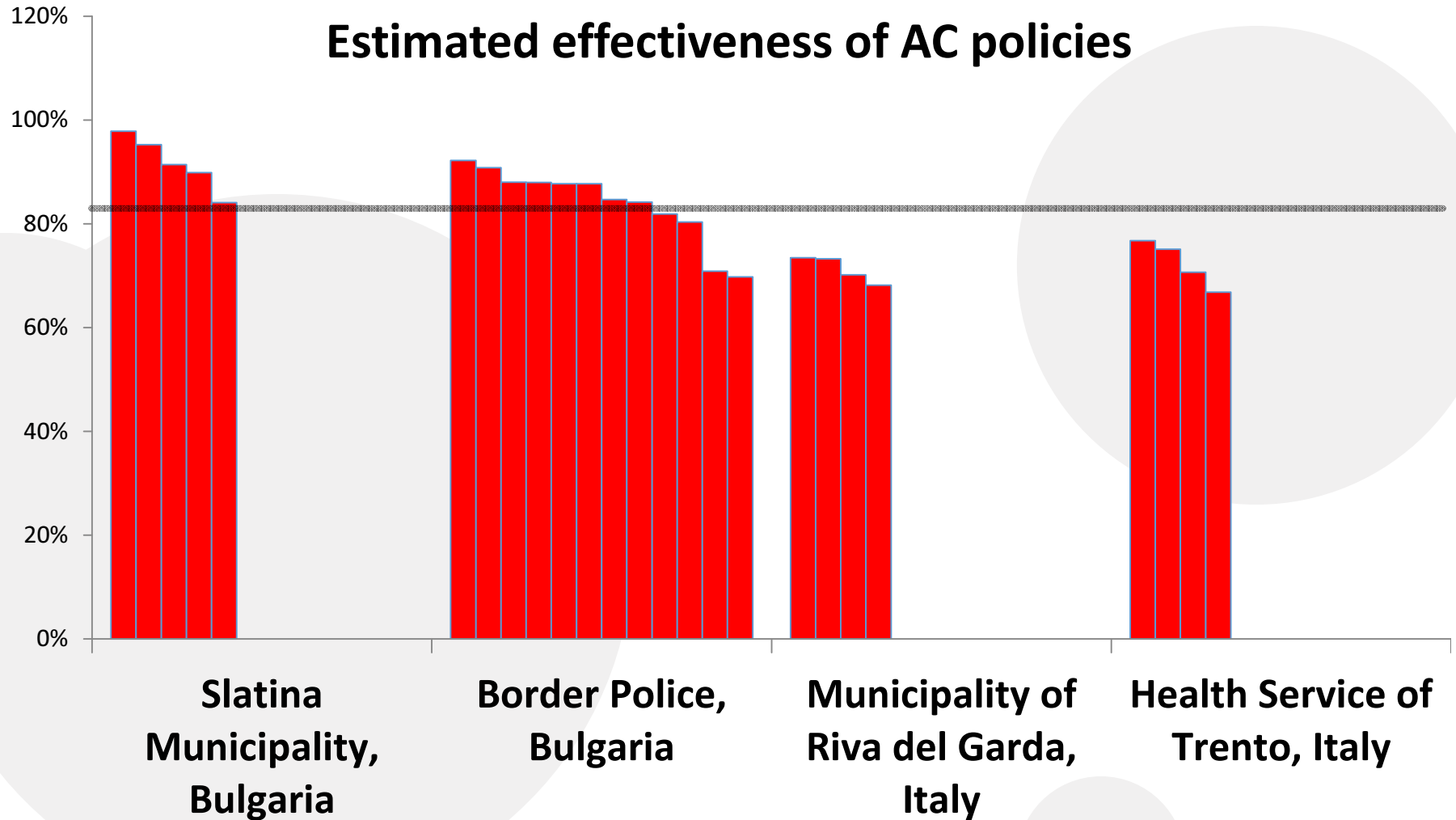


MACPI AC policy assessments in Bulgarian and Italian public organizations

Implementation of AC policies

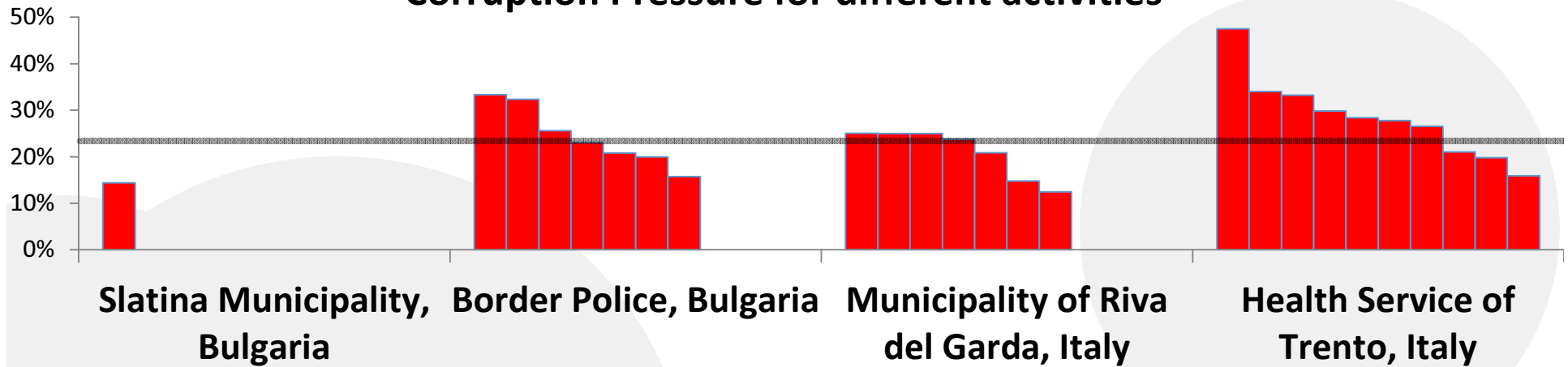


MACPI AC policy assessments in Bulgarian and Italian public organizations

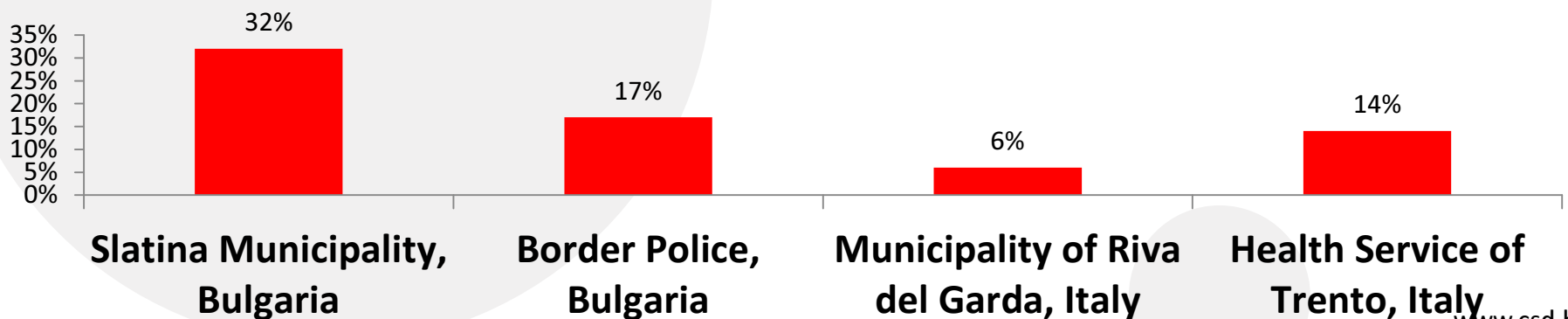


MACPI AC policy assessments in Bulgarian and Italian public organizations

Corruption Pressure for different activities



% employees who have been offered a bribe in the previous year





Thank you