CSD

**CENTER FOR
THE STUDY OF
DEMOCRACY**

Reports *Анализи*

Monitoring

Anti-Corruption

in Europe

31

MONITORING ANTI-CORRUPTION IN EUROPE

BRIDGING POLICY EVALUATION AND CORRUPTION MEASUREMENT

CSD

CENTER FOR
THE STUDY OF
DEMOCRACY

Anticorruption policies and their monitoring are applied mostly at the general societal level, which restricts their potential effect. The report outlines a solution to this problem, which has the potential of a breakthrough in anticorruption policy-making. The *Monitoring Anticorruption Policy Implementation* (MACPI) supplies evaluators and policy makers with a precision instrument for assessing the design and impact of anticorruption policies at the point of their actual enforcement – the individual public organisation. MACPI is capable of identifying the specific zones of corruption vulnerability in public organisations and assessing the policies that target these vulnerabilities. The report outlines the conceptual justification and the policy implications of the tool, as well as the findings of its pilot implementation in Bulgaria and Italy.

This report was authored by:
Dr. Alexander Stoyanov, Director of Research, Center for the Study of Democracy – Chapter 1, Chapter 2: Introduction and Bulgarian public organisations, and Chapter 3;
Alexander Gerganov, Senior Analyst, Center for the Study of Democracy – Chapter 2: Introduction and Bulgarian public organisations, and Chapter 3;
Dr. Andrea Di Nicola, Scientific Coordinator, eCrime, University of Trento – Chapter 2, Italian public organisations;
Dr. Fabrizio Costantino, Researcher, eCrime, University of Trento – Chapter 2, Italian public organisations.

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

EXECUTIVE SUMMARY

Anticorruption policy making has gained considerable experience over the last decade, both within member-states and in the institutions of the European Union. The methods of evaluating policy effectiveness, however, are insufficiently developed and applied mostly at the macro (country and/or society) level. Refocusing these on the individual public institution has the potential of a breakthrough in anticorruption policy assessment and design. It is for this purpose that the *Monitoring Anticorruption Policy Implementation* (MACPI) was developed as a tool allowing evaluators and policy makers to review the anticorruption setup of individual public sector organisations.

The blueprint

MACPI is premised on the notion that the content of corruption at the macro level (society) and micro level (public organisation) differ substantially. While micro level corruption transactions represent cases of deliberate noncompliance with rules and regulations for some kind of private gain, at the macro level corruption can be described as a governance regime, which allows policies deviating from the public good to be put forward. Although bringing about macro level political change has proven a demanding and often elusive longer-term objective, most national governments in the EU confine themselves to national level anticorruption policies. To reduce the prevalence of actual corrupt transactions these policies need to be translated into mechanisms and protocols that operate in individual public organisations. This, however, has rarely been the case.

MACPI is capable of mapping and **assessing the anticorruption policies implemented in public organisations**. This includes a set of qualitative and quantitative instruments (MACPI tool), which: (i) review all cross-sections of activities of the organisation and types of associated corruption risks; (ii) identify corruption vulnerability zones – in other words, mechanisms of noncompliance with rules that make it possible for public officials to enrich themselves at the expense of the public; and (iii) map and assess anticorruption policies. The diagnostic carried out with MACPI produces findings in the following fields of inquiry:

- the level of corruption vulnerability of a public organisation for each of its specific activities;
- the coverage of the activities of the organisation by anticorruption policies, and the effectiveness of these policies;
- the level of implementation of anticorruption policies.

MACPI ascertains **whether the corruption vulnerabilities of a public organisation are adequately addressed** by anticorruption policies and how effective these policies are. The tool also informs policy makers on the existence of two gaps:

- an implementation gap – there is only formal compliance with anticorruption policies;
- a policy design gap – corruption vulnerabilities are not addressed by any policy.

MACPI implementation cycle
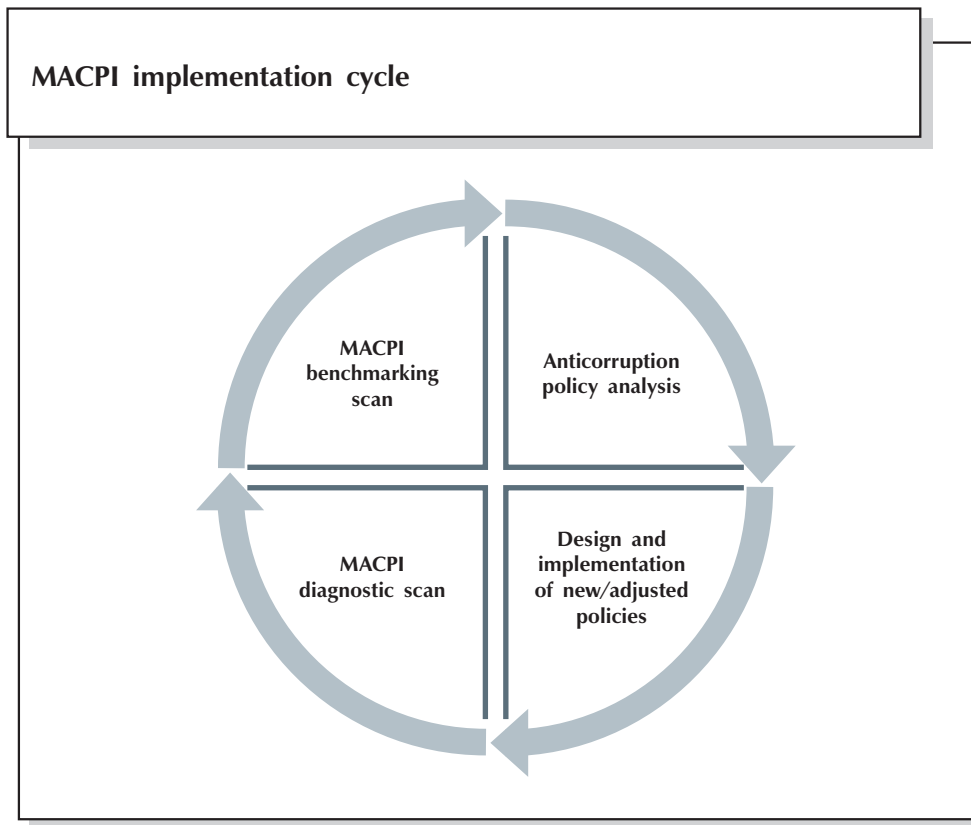
The identification of the two gaps is the first stage of the MACPI cycle. Based on the benchmarking results of MACPI diagnostics policy-makers can then make adjustments to policies and introduce a new round of diagnostics in the second stage.

MACPI was tested in two public organisations and two municipalities in Italy and Bulgaria. The piloting results demonstrate that it is predominantly general anticorruption policies that are applied, with few measures tailored to the specific vulnerabilities of the organisations. This emphasises the need for prioritising the public organisation level in the anticorruption policy process.

The policy implications

MACPI comes at a time of search of the reasons for the limited progress against corruption in many countries and has implications for policy making at the national and EU levels. The tool operationalises the need for monitoring the implementation of anticorruption policies and is suitable as an input to policy design.

At the **national level**, policies should be MACPI tested before implementation; only after successful results (confirmed by MACPI), the policy should be recommended

for adoption. Anticorruption policies at the national level that do not have any implementability at the organisational level should be discouraged.

At the **EU level**, MACPI is relevant to the work carried out in the wake of the *EU Anticorruption Report*. Anticorruption policy has been mainstreamed in the EU economic governance and in the programming of the European funds, which means that the need will arise to evaluate the anticorruption preparedness of national public institutions. Given that anticorruption would feature in the non-binding guidelines being developed for member states on how to strengthen the functioning of their public sector institutions and invest in administrative capacity, MACPI can be valuable in producing evaluation findings used to formulate targeted solutions. The improvement of administrative capacity in the member states following European Semester recommendations can also benefit from the capacity of MACPI to overhaul integrity measures and procedures in the institutions of economic governance.

MACPI provides the missing link between the measurable evaluation of specific public services and the design of anticorruption policies targeting their actual corruption vulnerabilities.

FOREWORD

Corruption and measures to counteract it have been subject to so much research and political attention that it would seem that their every aspect must have been explored. Yet corruption proves bafflingly resilient, always finding new conduits for spreading; squeezed temporarily out of one public sector, it reappears in another. It could only benefit the anticorruption effort, therefore, if novel methods for analysis and prevention were found.

It is in response to this need that the current report seeks to build bridges between the evaluation of anticorruption policies and the measurement of corruption. *Monitoring Anticorruption Policy Implementation (MACPI)* was born of the understanding that innovation in anticorruption is as important as it is in other social and economic fields. MACPI provides the anticorruption community with a precision-guided tool, which gives exhaustive feedback on the enforcement of policies.

Corruption has been blamed for contributing to just about every contemporary problem – from a degrading natural environment to international conflict. What is certain, however, is that it undermines one of the fundamental civic rights – the right to good governance. The ill effects of the denial of this right manifest themselves at the societal level – the list ranges from mistrust of public institutions to the various forms of discrimination. The practical mechanisms of the denial, however, are to be found in the operation of specific public sector institutions. The rule of law is compromised not by some grand invisible force called 'corruption' but by the daily micro-level choices of concrete public officials, individual citizens, businesses. It is by understanding and thus guiding these choices that a lasting good governance effect can only be produced.

Scale matters in policy making. The numerous initiatives evaluating anticorruption policies have found many deficiencies, but they have rarely faulted these policies for being too general. While suitable for the politics of anticorruption, grand strategies have been of limited utility in actual policy design. What anticorruption needs now are not more strategies but the ability to **tailor prevention and enforcement policies to the specific circumstances of specific public organisations**. Effective policies and their cost-efficient delivery require that policy designers zoom in on the actual actors and transactions; that they understand what drives these actors and adjust their anticorruption interventions accordingly.

Scaling down the focus of anticorruption policy making has a number of general advantages:

- It would **empower accountability demands** by targeting them at the point of delivery of public services. While much attention has been paid – and

justifiably so – to the accountability of elected politicians for the failure of anticorruption efforts, the senior management of public organisations has largely been spared such demands.

- It would allow anticorruption policy to balance proscriptions with prescriptions. It is not by chance that anticorruption policies at the national level have been mostly **confined to an expansion of the range of incriminated practices**. As national policies find it difficult to account for the multitude of circumstances that give rise to the various types of corruption, they opt for the supposedly fail-proof tool – make it a crime. While being important in the overall anticorruption architecture – raising the costs and risks of corruption should be a permanent feature of policy – such an approach can turn counterproductive if implemented alone. Law enforcement is an expensive solution to social problems, especially for latent ones such as corruption (and even more so in countries where it is widespread). In order to **complement investigation with incentivisation** policies should be able to account for the drivers of specific actors – both civic clients and public officials – in the specific conditions of specific public organisations.

- By seeking to understand **how national policies translate** – or more often do not – **into organisational level protocols**, watchdogs and policy makers would gain an insight into the arguably key factor for the success or failure of anticorruption efforts: the processes and implementation procedures in public organisations. It is most often through the absence of standard protocols, operating procedures and due processes in these organisations that otherwise well designed policies fail to deliver.

- Developing tools for the evaluation – and hence the redesign – of policies at the level of individual organisations would allow the introduction of **anticorruption benchmarking** among public sector institutions both within and across countries. The absence of such benchmarking has plagued anticorruption efforts at the national and EU levels. Benchmarking would, in turn, facilitate the development of anticorruption policy templates for the various types of public institutions, thus assisting their policy design and delivery efforts.

A shift of focus from the national to the institutional level will benefit the **EU anticorruption efforts** as well. All the channels through which the European Commission seeks to engage member states in the follow-up to the EU Anticorruption Report – programming for the EU structural funds, the Cooperation and Verification Mechanism, the European Semester – one way or another end up dealing with specific public institutions in the member states. The significance of the public institution level in anticorruption has been recognised in the EU Anticorruption Report, which acknowledges that where strategic programmes have been lacking, corruption has been reduced by preventive systems and practices involving the suppliers and recipients of public services. One of the thematic *ex ante* conditionalities of the European structural and investment funds relates to the institutional capacity and efficiency of the public administration. Anticorruption would feature in the non-binding guidelines being developed for member states on how to strengthen the functioning of public sector institutions and invest in administrative capacity. In this respect, tools such as the one presented in this

report can be valuable in producing evaluation findings used to formulate specific, targeted solutions.

Recommendations for further efforts on anticorruption have also been made in the context of the European Semester of economic policy coordination to both Bulgaria and Italy – the two countries involved in the current report. Given the significance of the quality of the public administration for economic governance, the ability to assess the anticorruption preparedness of individual public organisations is indispensable to the European Commission efforts in this area.

MACPI will allow evaluators and policy designers to make in depth reviews of the anticorruption setup of public sector organisations. The report outlines the conceptual justification and the policy implications of the monitoring instrument developed during its pilot application in Bulgaria and Italy. The development of the tool was preceded by mapping of the international measurement and monitoring landscape.[1]

The report presents the findings in three sections. First, it gives details of the theoretical background of MACPI and the methodology it employs. Next, the results of the piloting of the MACPI tool in four public sector organisations in Italy and Bulgaria are presented. Finally, the report provides a methodological assessment of the instrument and discusses the process of its implementation and its implications for policy making.

---

[1] For further methodological discussion of MACPI and the result of the mapping see: Center for the Study of Democracy. (2015). *Mapping Anticorruption Enforcement Instruments*. Center for the Study of Democracy.

1. MONITORING THE IMPLEMENTATION OF ANTICORRUPTION POLICY

Corruption monitoring has progressed substantially over the years and now includes a number of fairly sophisticated instruments applied nationally and across countries. The methodology for assessing the policies which counter corruption, however, has not managed to catch up with these developments – its tools are mostly general and provide little feedback to the policy cycle. Thus, the construction of a method for a comprehensive examination of anticorruption policies – especially at the point of their concrete application – has been overdue.

This report details the design and results of the pilot application of a tool that is intended to fill this gap. The *Monitoring Anticorruption Policy Implementation (MACPI)* tool is both a research and a policy instrument designed to measure the enforcement of anticorruption policies at the level of public organisations. From a research perspective the MACPI is capable of diagnosing vulnerability to corruption and the implementation of anticorruption policies and of tracking progress of both the vulnerability and policy implementation. As a policy tool the MACPI could serve two functions: 1) to trigger policy and shape response to corrupt practices identified at the stage of diagnostics; 2) to evaluate the effectiveness of anticorruption interventions at the public organisation level.

The MACPI methodology is based on several key propositions:

- the effectiveness of anticorruption enforcement is measurable;
- its measurement should be linked to corruption victimisation metrics;
- the measurement needs to be done in a cooperation between independent watchdogs and public authorities.

The tool is expected to serve three main purposes:

- Analytically, it will combine existing monitoring instruments and indicators into an **integrated approach to corruption diagnostic at the public organisation level**.
- Politically, it will **advance accountability in policy making and policy delivery.**
- Procedurally, it will promote the use of **public-private-partnerships in monitoring**.

There are several options regarding the scope and mode of application of the MACPI tool:

- The **sector-based approach** focuses on anticorruption measures and the mechanisms for their enforcement in sectors highly vulnerable to corruption: law enforcement, healthcare, media, or political parties.

- The **process-based approach** relies on measures of a range of key regulatory processes and regimes, such as political party financing, public procurement, conflict of interest declarations.
- The **actor-based approach** looks into the specific locations where corruption transactions occur (public sector organisations) and examines the policies they employ to address corruption risks and corruption practices.

The choice between approaches needs to be based on suitable criteria. The main assumption in the targeting and scoping MACPI is to construct an instrument which **evaluates and monitors anticorruption policies at the level where they are actually implemented**. This gives preference to the actor-based approach and specifies public organisations as the primary target of the tool. The principal argument for such a choice is that whatever the design of anticorruption policies, in order to "work" they need to be implemented at the level of a concrete public institution. An anticorruption policy that does not take into account the specific activities of specific employees is not viable. Corruption transactions happen at the level of officials in public organisations; anticorruption measures and policies, therefore, would not be implementable without addressing concrete behaviour patterns of public employees.

A special emphasis in the design of MACPI is placed on defining **what an anticorruption policy actually is.** While in general such a task might seem trivial, when facing the concrete public organisation it is often difficult to compile a specific list of policies and/or measures. Such a difficulty is due to two groups of problems, which have been discussed in the research literature: 1) the variety of corruption definitions and approaches to corruption; 2) inconsistencies between general laws and regulations relevant to (anti)corruption and the anticorruption measures and procedures adopted by the concrete public organisation. In addition, public organisations vary greatly in structure, functions and powers and therefore both corrupt practices and anticorruption measures could be considerably different.

There is a consensus that in the EU member states there are some institutions and categories of public officials that are more vulnerable to corruption than others. Monitoring by Eurobarometer, Transparency International and the World Bank focuses on eight major groups of public officials: police, judiciary (judges and prosecutors), customs, tax officials, politicians, healthcare, and civil servants involved in issuance of permits and public procurement. The focus of MACPI lies primarily within the scope of these vulnerable public sectors.[2]

The development and design of the instrument rests on multiple assumptions, derived from current developments in the theoretical conceptualisation of corruption and the evolution of empirical research of corruption behaviour.

---

[2] Anticorruption measures within private companies are another category, which – since it overlaps with anti-fraud measures – remains outside the scope of MACPI.

1.1. THEORETICAL BACKGROUND

1.1.1. Levels of analysis of corruption

Research of corruption behaviour has defined several aspects (levels) of corruption measurement and monitoring:[3]

Societal/macro level assessments	
Anticorruption policies	Studies designed to assess the existence, the level of enforcement, and the results of a given set of anticorruption policies.
Enforcement of international anticorruption agreements and conventions	Studies designed to track the implementation of important international agreements aimed at curbing corruption.
Assessments of levels of corruption based on macro (economic) indicators	Studies focus on various aspects of spending of public funds which aim to identify specific spending patterns associated with waste of funds/corruption behaviour.
Experience with corruption behaviour	Measure experience with corruption behaviour of citizens and companies. Most often focused on bribery.
Perceptions of corruption behaviour	Measure perceptions of the spread of corruption behaviour of citizens and companies. Most often focused on bribery.
Micro level assessments	
Anticorruption policies	Studies designed to measure/assess the specific anticorruption policies of concrete institutions and evaluate their implementation and effects.
Experience with corruption behaviour	Studies focused on measuring corruption behaviour patterns related to specific activities and/or groups of public officials.
Perceptions of corruption behaviour	Studies focused on measuring perceptions of corruption behaviour related to specific activities and/or groups of public officials.

Since MACPI is designed to assess anticorruption policies at the level of public organisations and their potential impact on corruption levels, it is a typical micro level assessment model intended to:

- be based on micro level data which link specific anticorruption policies to specific activities in a given institution;
- link specific types of activities to possible types of corruption;
- provide baseline data about a given institution and, at a later stage, to enable several successive measurements in order to gauge the relations between changes in the anticorruption policy setup (e.g. adoption of new policies) and their impact on levels of corruption;

---

[3] A brief review of the most well-known societal level corruption measurement and monitoring methods and methodologies is given in: Center for the Study of Democracy. (2015). *Mapping Anticorruption Enforcement Instruments.*

- explore corruption experience based on information from social actors that are directly linked to the operation of the institution.

Monitoring anticorruption policy enforcement could produce different solutions and tools. In order to assess their relative merits properly, the construction of its tools should be located in the overall context provided by corruption research. The review of existing corruption monitoring methodologies has shown that the elaboration of a tool evaluating anticorruption policy enforcement would not be practically possible without some analysis of the concept of corruption measurement. In the last 10-15 years, this measurement has encountered a number of problems and some of them have still not found satisfactory solutions. They are related to two main issues: **what is measured** when corruption is studied and **how to measure** corruption. Available solutions to these issues directly relate to the monitoring of anticorruption policy enforcement. In this respect several reviews of accomplishments and weaknesses have been published in recent years.[4]

One of the key issues in corruption measurement is the level at which the phenomenon is actually manifested and the level at which conclusions are being inferred. The difficulty is that although corruption is a micro level transaction, most corruption research has been focused on the society level and most well-known measurement methodologies gauge how much corruption there is in a society (country). This focus has achieved central importance for a variety of theoretical and practical reasons. Conceptually, society level analyses have been promoted by the Corruption Perceptions Index (CPI) of Transparency International. The CPI has been followed conceptually by measurement systems developed by the World Bank and other institutions. Despite all criticisms of these measurement systems, society level aggregate analyses of corruption have proved useful for donor and international organisations in the pursuit of better targeting of assistance programmes and construction of appropriate development aid conditionalities. In the specific context of the EU, the issue gained particular significance for the 2014 – 2020 programming period and the envisaged conditionalities regarding the European structural funds.

Making macro level conclusions based on observations of a practice at the micro level can lead to mixing up different types of phenomena: "Thus, we can speak of corruption as deviation from the norm only at individual or organisation level, and even then, it is problematic as we do find many regimes where the norm is corruption itself, and governance works as a form of permanent spoliation of public resources by private actors. Corruption in this context includes behaviour ranging from favouritism to bribes. Some of its forms are criminalised, others not, but the defining characteristic at the national level, which makes people speak of 'corrupt' versus 'non-corrupt' countries, is not a legal definition of corruption, but rather the answer to the question whether transactions carried out by the state respect the norm of ethical universalism or are influenced by some particular ties which lead to privileged treatment and discrimination, respectively."[5]

---

[4] See Norad. (2008). *Anti-Corruption Approaches. A Literature Review*. Oslo: Norad.

[5] Mungiu-Pippidi, A., Mondo, B. and Kukutschka, R. (2013). *Global Comparative Trend Analysis Report*. Retrieved from http://anticorrp.eu/publications/global-comparative-trend-analysis-report/

The level of analysis of corruption is important because of the nature of the phenomenon for which conclusions are drawn. Most analyses are based on micro level data (citizens, companies) which cannot be a basis for conclusions for a macro level phenomenon. Rather, there would be aggregate data about different aspects of corruption transactions, which reflect average prevalence rates in a given society/country. There are various proposals on how to interpret corruption at the macro level. One solution for interpreting corruption as a macro phenomenon is to view it as a deviation from universalism in the universalism-particularism continuum, i.e. corruption is a phenomenon which shows the level of misuse of public resources in favour of private interest (particularism).[6] Another interesting solution is to define corruption as the opposite of good governance and define it as a deviation from the norm of a governance model, serving the public good.[7]

While the discussion about the nature of corruption at the macro level has started relatively recently, its implications are that both indicators and concepts of macro and micro level analyses should be different as the phenomenon explored has qualitatively different characteristics.

1.1.2. The principal-agent model

The main assumption of MACPI is that **corrupt behaviour is located at the level of public organisations**, defined as relatively autonomous collective actors with a principal-agent structure that operate through specific formalised processes guided by certain procedures. In order to appreciate the grounds for this assumption, a brief discussion is required about the measurement implications of the difference between the micro and macro levels.

Measurements of corruption typically capture different forms of bribery through experience or perception based indicators.[8] It might be argued that experience based measurements are superior and/or more accurate than perception based ones, or that bribery is socially perceived differently in various regions and cultures. However, as universally acknowledged, corruption is a multifaceted phenomenon that cannot be reduced to bribery (and bribery itself is a complex phenomenon). Therefore, it would be logical to assume that **measurement should be based on an operationalised concept of corruption**; that a summary measurement of corruption (at society level) should gauge all its elements, subcomponents and levels.

These observations form the starting point for defining the landscape of monitoring the enforcement of anticorruption policies. Corruption transactions (irrespective

---

[6] Ibid.

[7] Rothstein, B. (2014). "What is the Opposite of Corruption?" *Third World Quarterly*, 35(5), 737-752. doi:10.1080/01436597.2014.921424

[8] In this respect the Center for the Study of Democracy has published analyses addressing both societal level measurements of incidence of corruption behaviour (Center for the Study of Democracy. (1998). *Clean Future*. Sofia: Center for the Study of Democracy) as well as assessments of the implementation of anticorruption strategies (*Monitoring of Anticorruption Reforms in Bulgaria*. (2006). Sofia: Center for the Study of Democracy).

of their definition) are specific exchange relations between concrete actors. All final corruption transactions occur in the interactions between public officials as representatives of public organisations managing public resources, on the one hand, and citizens and businesses, on the other. These interactions are structured in specific processes and procedures that make the corruption transactions more or less easy. Thus the anticorruption policies and therefore, the primary focus of anticorruption policy[9] enforcement monitoring should have a dual target: the **processes** and their **outcomes** (the interactions between citizens and public organisations that may be more or less corrupt). A meta-level monitoring of society may provide valuable insights on the specific cultural context and/or on the long-term implications of corruption-tolerant behaviour on the social fabric but is not sufficient for operationalising anticorruption policies.

Resolving corruption into its factors is of crucial importance for monitoring anticorruption policy enforcement for several reasons:

- If an anticorruption policy is defined as a set of norms and formalised rules and procedures aimed at preventing or penalising corrupt behaviour, then the monitoring of anticorruption policies would need to start with a comprehensive list of these policies and of the respective rules and procedures matched by a list of behaviours they are supposed to target.
- In order to be monitored, corruption behaviour needs to be specified and localised in the overall space of social action. This means to identify the specific actors and exchanges they engage in that ultimately constitute the building blocks of corruption in a given social system or subsystem.

Many variations of the classic definition of corruption of V. Tanzi – abuse of public power for private gain[10] – have been published. For example, a more recent proposal that is slightly broader and contains the possibility to include private sector corruption has been formulated as the "illicit use of entrusted power for private gain."[11] As noted above, the level of analysis presupposes different approaches to the definition. While at the micro level corruption appears as abuse of power (rules) for private benefit, at the macro level this translates the level of corruption into a characteristic of the type of governance regime (ranging from particularism to ethical universalism).[12] It is important to bear in mind that the way the 'rules' are not corruption behaviour neutral; the way they are defined (and structure the processes) can be corruption-conducive.

---

9   The term 'policy' refers to more abstract propositions about type and objectives of interventions in different social spheres. A policy is (or should) then be followed by a set of measures, rules, protocols, etc. which are the concrete tools that effect the policy. These are carried out through institutional processes and implementation procedures which often hold the key to the success or failure of policies. The term policy could also be used to refer to its set of measures and tools, i.e. to refer to the application of the policy in a more abstract sense. For convenience and simplification in this report, except when explicitly noted, the term policy is used in its more concrete meaning throughout the text.

10 Tanzi, V. (1998). *Corruption Around the World: Causes, Consequences, and Cures*. IMF Working Paper.

11 Matsheza, P., Timilsina, A., & Arutyunova, A. (Eds.). (2011). *Fighting Corruption in the Water Sector: Methods, Tools and Good Practices*. New York: UNDP.

12 Mungiu-Pippidi, A. (Ed.). (2011). *Contextual Choices in Fighting Corruption: Lessons Learned*. Oslo: NORAD, p. 15.

When shifting from the micro to the macro level, both corruption and anticorruption policies have different content. While micro level targets of anticorruption policies would be focused on the specific processes allowing for abuses of power, macro level policies would and should rather target a political change of the governance regime or, more specifically, the definition of the rules and the processes. Both these levels are qualitatively different and require different types of interventions. The need to find the "modes of conversion" of social phenomena in micro-macro transitions has been noted by many authors.[13] However, this is rarely accomplished in the analyses of concrete phenomena, especially with respect to corruption. The statistical summary of individual measures of bribery/corruption therefore only creates the illusion that we are assessing the "amount of corruption."

While the argument about levels of analysis of corruption is important from a more general perspective, its role in developing the MACPI is primarily in the enforcement of anticorruption policies. What follows from the arguments above is that **anticorruption policies could primarily be developed to target individual behaviour of officers in public organisations and, in particular, focusing on how the policies are translated into processes and procedures**. Societal level policies would have a different design and would target other phenomena.

Analyses have shown that it is not only the definition of corruption that could be considered problematic. A relatively underdeveloped aspect of corruption research is also the operationalisation of corruption definitions into sets of specific types of corrupt acts. Concepts in this respect produce more variations and differences in interpretations of corruption at the micro level.

One descriptive model that enhances the analysis of corruption behaviour is the so-called **principal-agent model**.[14] It includes several assumptions:

a. Corruption occurs in the interactions (exchanges) between two actors: **public organisations and citizens/businesses**. At least one on the actors is a collective unit (the public organisation), which consists of at least two individual actors: principal and agent. Every public organisation is created to serve a public function. The embodiment of this function and the associated discretionary power is with the principal. The agent is the public official who is directly responsible for the implementation of the public function. While the principal is "the holder" of public power, the agent is entrusted with this power by the principal.

b. **Due behaviour of public officials** (the agents) is prescribed by the rules (laws, norms, prescriptions, etc.) and processes governing the work of the public organisation. Corruption in this context is defined as either (a) noncompliance with rules (violation), which is aimed at and/or results in private benefits for the official or (b) misusing the gaps in the existing processes for exercising corruption transaction. As the behaviour of officials is essentially the use of

---

[13] See Coleman, J. (1994). *Foundations of Social Theory*. Cambridge, New York, etc.: Harvard University Press.

[14] For a further discussion of the implications of the principal-agent model for MACPI, see CSD (2015) *Mapping Anticorruption Enforcement Instruments*.

entrusted public power, corruption is the abuse of this power and also the breach of trust in the relation between the principal and the agent in favour of the client.

c. **Corruption acts** have two main characteristics which make them difficult to observe and categorise: they **are hidden and involve mimicry**.[15] These complement each other: if/when a corruption act is exposed, officials almost always make an attempt to interpret their noncompliance with rules as a mistake, poor performance, lack of competence, etc., in order to hide that the noncompliance was deliberate for private gain. As mistakes happen in all contexts, it is often very difficult to distinguish between "normal" noncompliance and deliberate noncompliance.

d. The public sector is comprised of **hierarchies of organisations** (central government, local government, agencies, departments, etc.) governed by their internal processes. Except for the highest levels of government, public organisations are in turn agents of the highest level – the President, Prime Minister, etc., which appear as "superior principals." This creates the possibility for corruption to become a multilevel principal-agent interaction in which the corrupt official is at the higher level, while lower level officials commit corrupt acts following orders of their superiors. This does not necessarily clean the latter from the legal and moral responsibility but it needs to be weighted by the administrative power the individual elements of the corruption chain have. The breach of trust in such a scheme is not with the formal principal (the higher level of government) but with the client (in other words, against the public good). Mimicry at this level is more complicated and most often high level principals attempt to interpret corrupt acts as their specific understanding of the public good.[16] Very often it is possible to present and interpret noncompliance with rules that guard or define the public interest (high level political corruption) as beneficial for society or as something unavoidable. The argument works also in reverse: often the rules are defined in a way that enforces both sides of the administrative service provision to resort to corrupt behaviour in order to achieve the desired result.

e. A corruption transaction can be described as an **exchange of resources**. The resource of the agent is discretionary power and it is exchanged for the resource of the client – the benefit or gain that the agent receives (money, favours gifts, etc.). In a hierarchical system of public organisations (hierarchy of principals), the exchange relations are more complicated. The superior principal exchanges his power over subordinate principals for private benefit. Relations between principals form an additional layer of power relations and exchange of resources between principals: either the "final" gain could be split or principals could engage in more complex relations like nepotism, favouritism, clientelism,

---

[15] See: Gambetta, D. (2002). Corruption: An Analytical Map. In S. Kotkin & A. Sajo (Eds.), *Political Corruption in Transition: A Skeptic's Handbook* (pp. 33–56). Budapest: CEU Press.

[16] For more details on the public good aspect of corruption see Rothstein, B. (Ed.). (2014). *State-of-the-Art Report on Theories and Harmonised Concepts of Corruption*. Quality of Government Institute. Retrieved from http://anticorrp.eu/publications/d1-1-state-of-the-art-report-on-theories-and-harmonised-concepts-of-corruption and Rothstein, B. (2014). "What is the Opposite of Corruption?" *Third World Quarterly*, *35*(5), 737-752. doi:10.1080/01436597.2014.921424

etc. Such relations could be established within one public organisation and between subordinated organisations.

f. The **main driver of corruption exchanges is interest**. For the agent the interest is defined by the possible gain or benefit. For the client, the interest lies in the need to 'get things done' and this entails either deliberate noncompliance with rules by the official (when the client wants to bend the rules in his/her favour) or enforcing compliance with the rules when the agent deliberately resorts to procedural tricks for indefinitely postponing the required decision ('oiling the cogwheels'). Depending on the way the rules, procedures and the internal institutional processes are defined, the client's benefits could vary,

Figure 1. Supply and demand factors of corruption
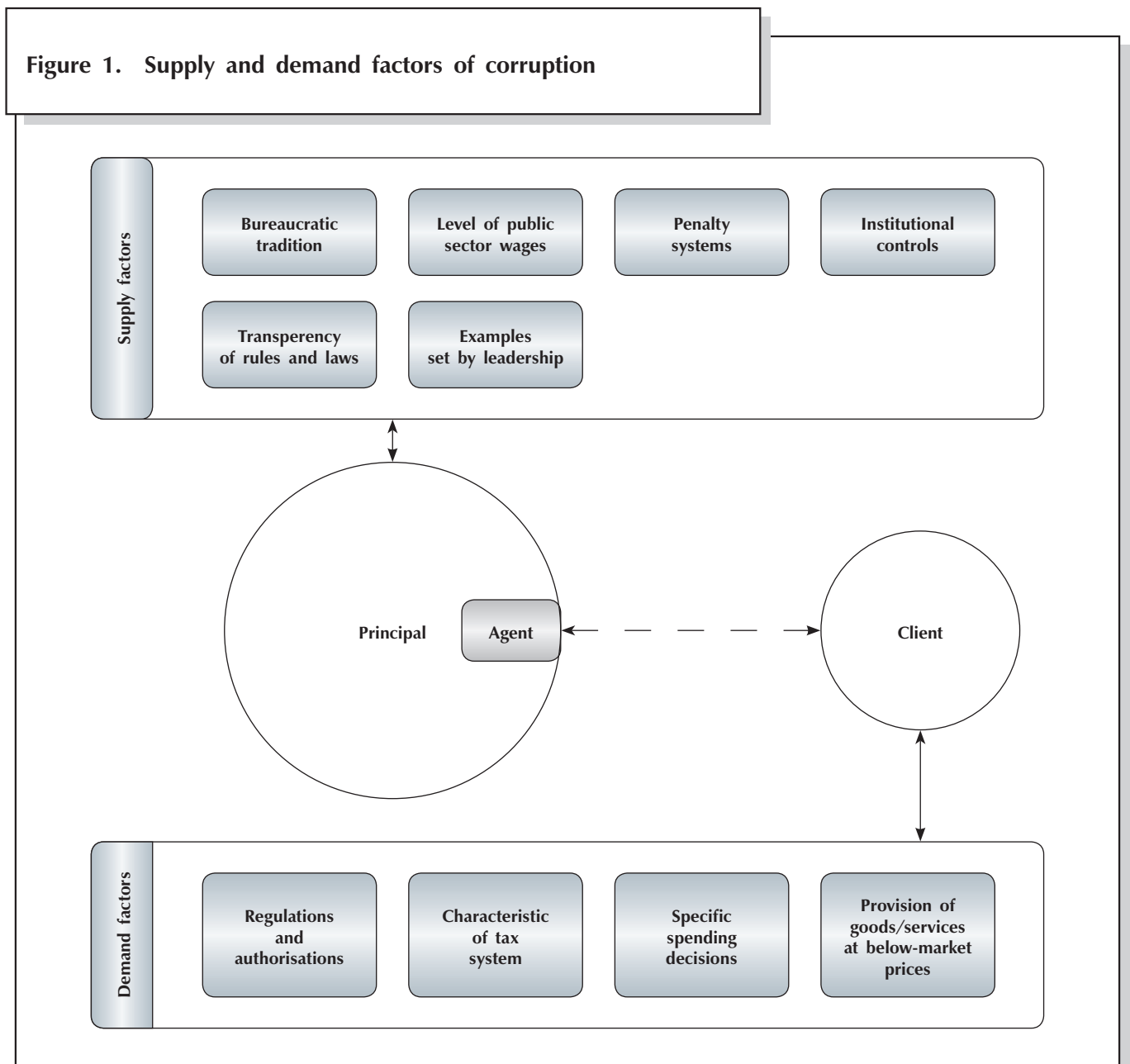
Source: Authors' elaboration on Tanzi (1998).

including preferential treatment, competitive advantage, privileged access to resources, exemption from sanctions, etc. Pressure to get involved in corruption exchanges increases or decreases proportionally to the interests of both agents and clients. In hierarchies of organisations (or even in the hierarchy of a single organisation) corruption pressure directed towards agents could come both "from below" (clients) and "from above" (principal, supervisors). Similarly, pressure directed towards clients could be generated by agents (or principals), who manipulate the rules of public organisations in a way that the interest of clients to get involved in corruption increases.

The structure of interests that induce corruption transactions is complex. Based on Tanzi's analysis, drivers of corruption interest divided into supply and demand factors[17] are summarised in Figure 1.

1.1.3. Form and content of the corruption exchange

Corruption exchanges of resources could consist of two principal components: form and content.

Form is the bribery aspect of corruption, i.e. the receipt of private gain by agents. Equating bribery with corruption might sometimes be misleading as it could narrow the scope of the exchange. If the form of corruption is defined as exchange of resources – private goods, money, services, control over one's own actions, control over the outcome of events, etc. – rather than as exchange of specific resources (money and services), this component of the corruption act could better fit the numerous types of corruption exchanges that have been documented in different settings. Exchange of resources refers to a wider range of possible benefits: private goods, money, services, control over one's own actions, control over the outcome of events and others.[18] A broader understanding of the exchange would also enable the inclusion of more complex multilevel schemes for exchange of resources which include officials at different levels of the hierarchy of public organisations. The preferred type of resource to be used in the exchange depends on the actors involved, the specific situation, the cultural context and a multitude of other factors.

The **content** of the corruption exchange refers to the type of deliberate noncompliance with rules performed by the agent or enforcing compliance with the rules in case of the agent's deliberate "dragging his feet." Preoccupation with bribery *per se* has left this aspect of corruption neglected. However, recent developments have shown the need for a more in-depth analysis of dimensions of content. An interesting and empirically useful idea in this respect is about corruption being an "umbrella concept" encompassing certain social interactions, which have their own specific content in addition to corruption.[19]

---

[17] See Tanzi (1998).

[18] See Coleman, J. (1994). *Foundations of Social Theory*. Cambridge, New York, etc.: Harvard University Press.

[19] See Varraich, A. (2014). *Corruption: An Umbrella Concept,* Working Paper Series 2014:05, Gothenburg: Quality of Government Institute; Rothstein, B. (Ed.). (2014). *Social, Legal, Anthropological and Political Approaches to the Theory of Corruption*. Quality of Government Institute.

Within this concept, the content of corruption is defined as a core of several practices, including clientelism, patronage, patrimonialism, particularism and state capture.

Figure 2 illustrates the idea about the structure of corruption being resolved into its main factors – form and content - and their respective breakdown into specific sub-elements.

Figure 2.   The elements of corruption exchange
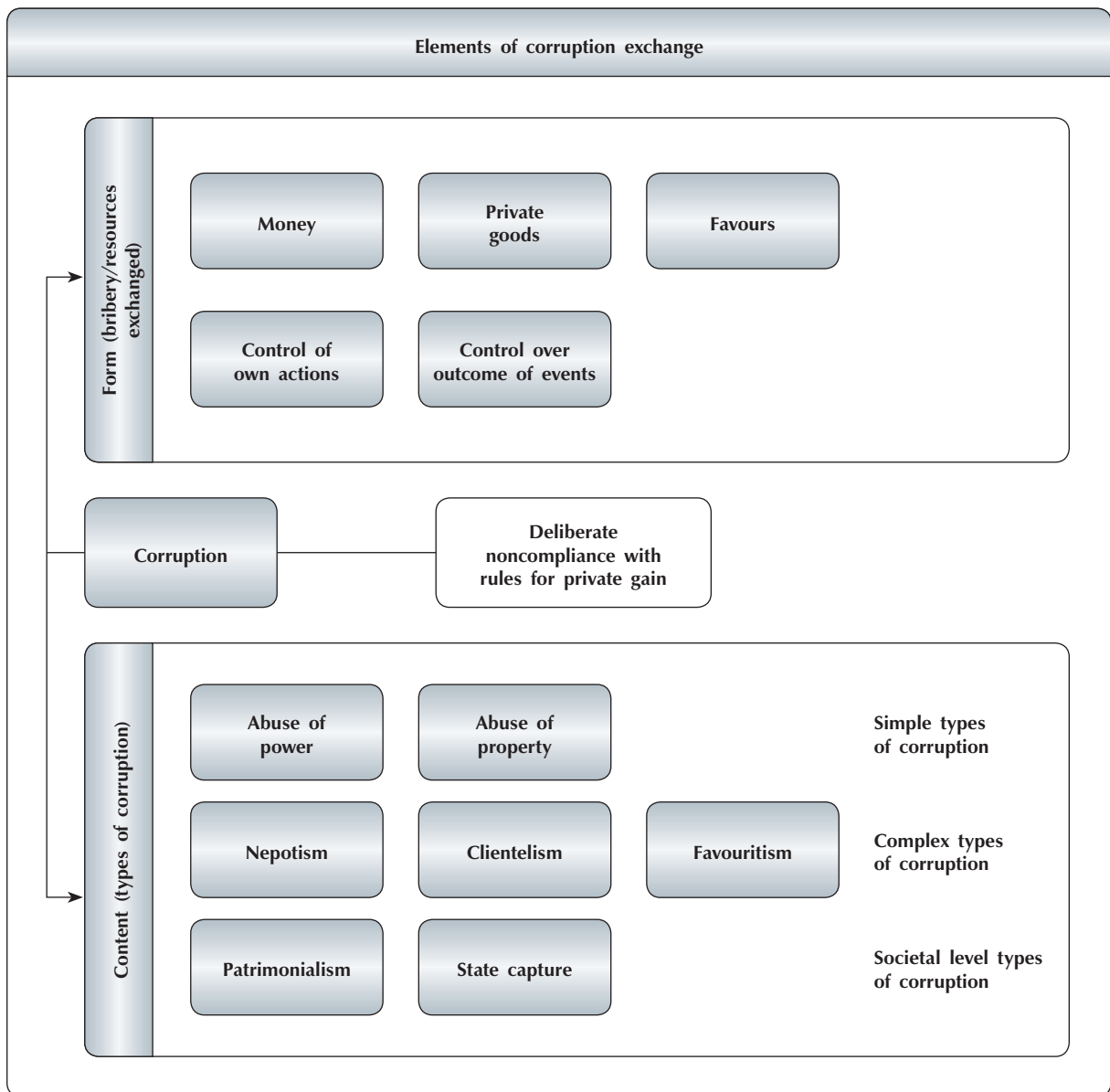
The common denominator of these types of social action is noncompliance with rules of public organisations and/or noncompliance with the politically defined aspects of the public interest. For these types to be identified as corruption, the *form* aspect of corruption – deliberate noncompliance for private gain – needs to be present. The idea conveyed by this concept is that corruption exchanges combine with specific forms of social interaction. Therefore the *content* aspect of corruption comes in "bundles" of actions, each bundle representing a specific form of noncompliance (violation) of rules or norms, which serve any client, groups of clients who also have additional social ties to the agent.

It is important to note that abuse of entrusted power (or boycotting the standard procedures in anticipation of additional reward for performing one's obligations) is always a violation (noncompliance) of rules. In this respect definitions of rules are crucial for identifying the specific content of corruption acts. That this approach to corruption transactions fits into the legal approach, while other alternative approaches are also discussed:

- the legal approach considers noncompliance with formal rules;
- the sociological approach targets noncompliance through the oppositions legal-illegal and moral-immoral;
- the anthropological approach stresses on the legitimacy of rules by analysing the link between the characteristics of custom and culture and existing sets of public organisation rules.

From the point of view of operationalising corruption for the purpose of policy making, the above approaches indicate that the content of corruption is not a universally defined concept. Rather, the dimensions of its form and content are specific to the social context examined; as societies evolve, the scope of corruption exchanges also evolves to reflect new definitions of the public good.

1.1.4. Corruption exchanges and anticorruption policies

Theoretically, the principal solution that would give clients enough power to counterbalance discretionary power of officials is the application of anticorruption principles such as transparency, accountability, checks and balances. The implementation of these principles in practice introduces market-type regulation giving actors bargaining power that counterbalances the power of public institutions and their agents (public officials). The practical implementation of these principles and related policies at the macro and micro levels has been extensively analysed and commented. It is widely acknowledged that a relevant set of anticorruption policies that are adequately reflected in institutional processes is one of the important factors for countering corruption. It is however not the only factor.

Corruption vulnerability, or the likelihood for a corruption transaction to occur, summarises a multitude of factors which facilitate or curb corruption transactions starting from societal level factors and ending up with the specific set of rules that prescribe the behaviour of public officials. Anticorruption policies and the quality (simplicity, transparency, internal and external consistency) of the underpinning processes are among the main tools used to reduce corruption vulnerability. While

numerous studies have explored the relative importance of different factors for corruption vulnerability and corruption risk, the analysis and measurement of the link between corruption vulnerability and the anticorruption policies of public organisations is mostly absent.

Corruption vulnerability is a concept referring to **specific activities** and respectively to **specific actors** engaged in these activities. It seems impossible to assess vulnerability without making summary conclusions about its concrete levels for each specific activity. This would include the concrete procedures associated with specific activities, administrative protocols, etc. It also seems impossible to evaluate corruption vulnerability without concrete experience (knowledge) of existing corruption behaviour patterns.

Corruption vulnerability would be high if the following more important corruption related outcomes are observed:

- many officials performing a specific activity are engaged in corruption behaviour;
- acts of corruption are frequent, i.e. in many cases the activity is performed;
- a significant part of the activity is accompanied by corruption transactions.

The role of anticorruption policies is to **reduce corruption vulnerability** and in this way to **reduce the level of corruption** (prevalence of corruption transactions). As noted in the literature on corruption measurement[20] the general assumption in corruption research is that corruption is a result of a country's policy and institutional environment. Based on the model outlined above this is partially true; however not much can be said about the concrete level of interrelationship between the set of anticorruption policies and the levels of corruption.

From the point of view of monitoring the enforcement of anticorruption policies, the structuring of the content of corruption exchanges facilitates the construction of indicators of noncompliance and respectively areas of corruption risk and anticorruption policies. Public organisations are structured by laws and rules, which prescribe the behaviour of officials, define goals and objectives and ensure that the function of the organisation is fulfilled. This constitution of public organisations could be facilitating or preventing corruption by enhancing or reducing corruption vulnerability. Irrespective of the level of vulnerability, public organisations should have oversight mechanisms that monitor areas of corruption risk. Such mechanisms would not be so significant if transactions between officials and citizens had inbuilt controls, i.e. when citizens have effective ways to control the behaviour of officials. The latter cases are however relatively rare. Most public officials have monopoly power over clients of public organisations; clients have few or no possibilities of control.

The main indicator of the existence of corruption vulnerability is **corruption pressure**. It can be defined as the specific act which initiates the corruption transaction. Pressure could both come from the official or the client and even

---

[20] Reinikka, R., & Svensson, J. (2003). *Survey techniques to measure and explain corruption.* World Bank Policy Research Working Paper 3071.

from the principal (who orders the official to commit a corrupt act). Pressure is the specific proposal by clients or officials to start a corruption transaction. In many legislative systems the proposal itself is also considered corruption. However, as it is difficult to document and prove, it is usually the fact of the act of corruption that is incriminated.

The institution-level anticorruption policy is the set of rules, regulations and laws which define the functions and the operations of a public organisation. Within this set of rules there is always a subgroup of rules and procedures that is aimed at monitoring the compliance of agents with the established rules. Most often compliance is monitored by supervisors or by the principal. Noncompliance could result from a multitude of factors (incompetence, low qualification, etc.). In the context of corruption analysis the important distinction is between deliberate and non-deliberate noncompliance. Deliberate noncompliance is the area of corruption behaviour. However, for deliberate noncompliance to be categorised as corruption, the element of private benefit needs to be present: in an organisational context corruption can be defined as **the deliberate noncompliance with rules and organisational standards which results in private benefit for the respective official.**

Within this subgroup of compliance monitoring rules is the subset of anticorruption policies: they target deliberate noncompliance that leads to or is motivated by benefits for agents (officials) extended to them by clients. Consequently, monitoring policy enforcement contains a number of assessment/evaluation tasks which fall into two groups: **definition** and **evaluation** of anticorruption policies.

The **definition** of anticorruption policies includes:

- identification and description of policies;
- definition of the elements of the policy: formal rules, executing agent, officials who are subject to the policy, mode of implementation, system of control, system of sanctions.

Given the outlined models of the structure of corruption transactions and the fact that public organisations are the target of the assessment model, several important issues need to be considered. First, public organisations are defined as relatively independent units of government authority aimed at providing for a specific public function. Relative autonomy is an important criterion as it allows the identification of a concrete principal and the definition of his functions with regard to the organisation. Second, a crucial part of the evaluation model is the identification of the set of existing anticorruption policies in an organisation. Corruption transactions are usually linked to specific activities. It would therefore be necessary to:

- compile a list of activities the public organisation performs in order to serve its public function;
- review of the processes involved;
- evaluate the corruption vulnerability associated with each activity;
- identify existing anticorruption policy procedures;
- link existing policies to the corruption vulnerability they are targeting.

The **evaluation** of anticorruption policies includes:

* evaluating the level of their implementation;
* evaluating their effectiveness (goal/result);
* evaluating their efficiency (cost/result).

Anticorruption policies in a public organisation could be considered effective if they mitigate existing corruption risks and reduce deliberate noncompliance for private gain. In this respect the main indicators that would provide an accurate assessment of each policy would be:

Enforceability. The measure of enforceability of a policy is in essence an evaluation of its design quality. An enforceable anticorruption policy should meet several criteria:

* Design: policy has well-described, complete and clear procedure and algorithm of implementation;
* Adequacy: it is practically possible (easy) to follow the procedures;
* Familiarity: the employees (the officials) are familiar with it;
* Meaningfulness: the employees consider the procedures to be "making sense";
* Control: the managers exercise regular and effective control;
* Sanctions: there are sanctions for noncompliance with rules and regulations.

Enforcement. Given the above definitions of a well-defined policy, a policy could be considered enforced (implemented), if there are records of control and sanctions. Such records would be evidence that the mechanism of the policy is in operation.

Effectiveness. The most important function of an anticorruption policy is its contribution to mitigating specific corruption risks and/or reducing instances of corrupt behaviour.

This procedure allows the **evaluation of the corruption vulnerability and the anticorruption preparedness of public organisations** by identifying vulnerable areas and cross referencing each of these with the corresponding anticorruption policy.

1.1.5. Corruption vulnerability

A key element in evaluating the anticorruption preparedness of public organisations is the concept of corruption risk and corruption vulnerability. Based on the assumptions made above, corruption risk could be defined as the **presence of interest for corruption exchanges of any type by agents or clients of a public organisation**. Corruption risk would be high, if benefits for both sides are high relative to potential losses in case the transaction is disclosed or in case the transaction is not performed at all.

The existence of interest for corruption transactions further needs to be broken down into types of activities in the organisation and content of corruption transactions (Figure 3).

Figure 3. Zones of corruption vulnerability in public organisations
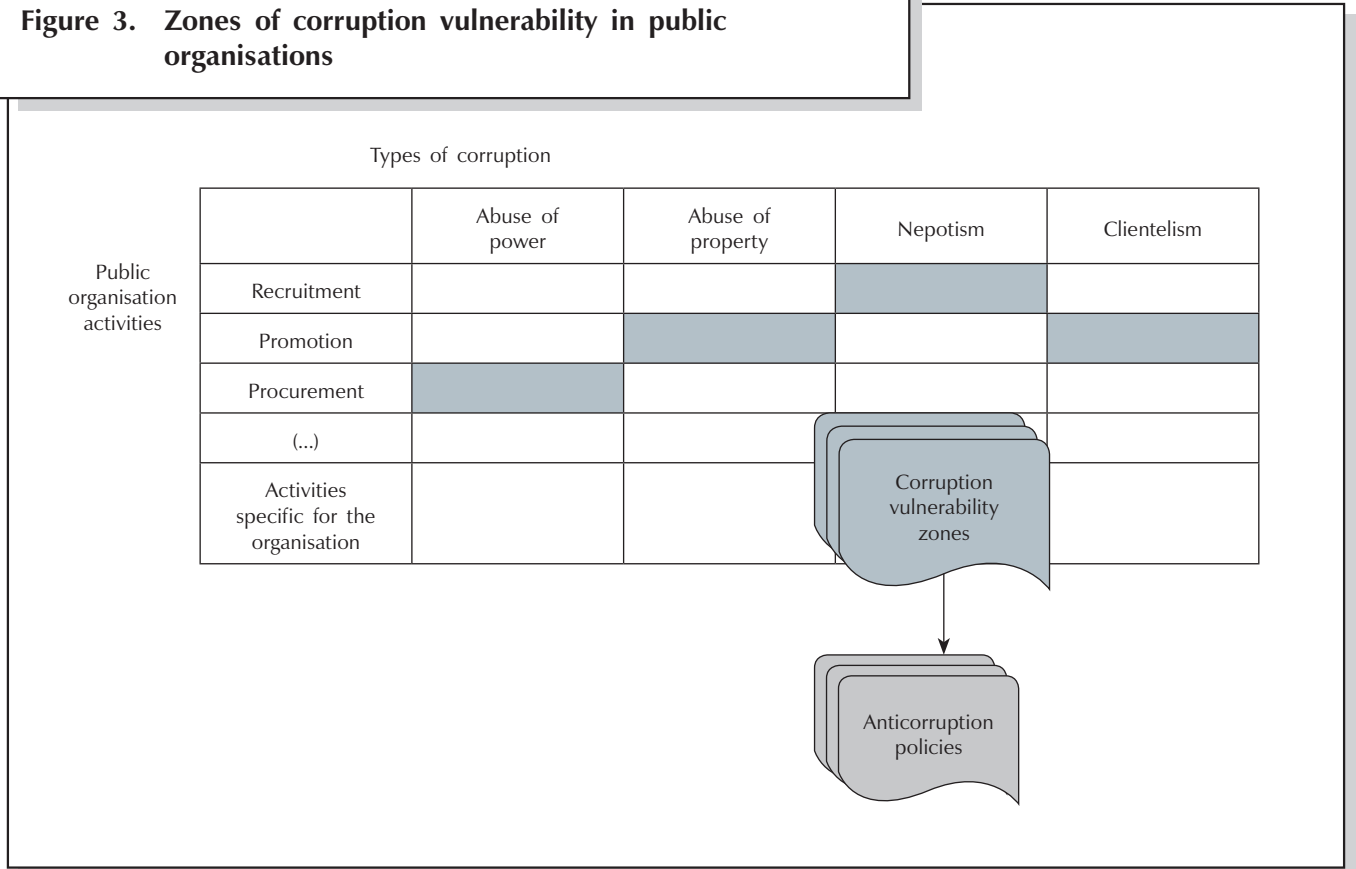
Bribery is not included in the map as it is a *form* of the corruption exchange, i.e. all types of corruption involve a benefit for the agent, but the type of deliberate noncompliance could vary.

Each cell in the map of potential corruption vulnerability should be evaluated in order to assess the probability for a corruption type to exist, i.e. whether it could be an area of potential interest for the agent or the client. The empirical manifestation of corruption vulnerability is corruption pressure, defined as the proposal to initiate a corruption act. In more complex types, corruption pressure could come not as an explicit proposal but rather with the existence of social norms and/or obligations of agents to prioritise the interest of kin, associates, other group interests, etc. Pressure could come "from above" (supervisors, principal), "from below" (clients) or as a result of obligations of the agent to other external interests or groups.

Developing the corruption vulnerability matrix for an organisation would reveal differences between organisations. However, similarities also exist and refer to the structure of the activities in an organisation. Three principal areas exist in most organisations:

- personnel recruitment (hiring and dismissal);
- personnel development (promotion, demotion);
- procurement of goods and services;

- other activities are specific as they materialise the public function of the organisation.

A crucial part of the assessment model is the identification of anticorruption policies specific to an organisation. In principle, the statutory framework of a public organisation (the set of rules, norms, laws, application guidelines, processes, etc.) prescribes behaviour and thus constitutes its primary anticorruption policy matrix. As noted, however, corruption interest and corruption risk could appear for certain activities within the existing primary anticorruption policy matrix. Therefore organisations would need to develop an additional set of measures to monitor compliance in critical corruption risk zones. In this respect, anticorruption policies could be defined as **measures which supervise compliance or rather identify deliberate noncompliance for private gain**. Such measures would identify and sanction specific forms of noncompliance associated with corruption in its various forms (gain) and types (content).

Organisational level anticorruption policies can be divided into two main types: a) policies that apply to most kinds of corruption risk; b) policies which address specific risks and types/forms of corruption.

1.2. MACPI METHODOLOGY

1.2.1. Scope of the tool

MACPI assesses the enforcement of anticorruption policies at the institutional level but MACPI is not designed as an instrument for assessment of corruption levels or corruption risks. Other tools exist for these purposes and they are compatible with MACPI since they measure different aspects of the same problem – the successful enforcement of effective anticorruption policies should eventually lead to decrease of corruption measured by external tools.

Since MACPI is focused on the evaluation of the implementation of anticorruption policies (and not on tracking the actual corruption incidents), the assumption is that the phenomena falling in the scope of MACPI are legally and morally neutral, thus do not need to be hidden as in the case of corruption transactions. As a consequence, the different parties participating in the assessment process are expected to be willing to provide helpful information about anticorruption measures and policies. In addition, this information is public and quite often is being advertised by public organisations.

MACPI can be used by an organisation to assess changes in its anticorruption policy setup – new policies, potential vulnerabilities, etc. If there is no anticorruption policy, or there is no political will to assess and improve effectiveness, MACPI is not applicable and would be indicative of embedded corruption problems and unwillingness by the public organisation to face them. For such extreme cases the MACPI tool would not be helpful. For most other cases – ranging from the basic anticorruption policy setup to very thorough and complicated asset of

anticorruption policies – MACPI would be the appropriate tool to assess and improve anticorruption policies.

MACPI is flexible and could be used with minimum changes in various types of public organisations. Since there are large differences between public organisations, the tool cannot provide absolute scores for a certain public organisation. Instead, the MACPI tool should be used to **monitor the enforcement of anticorruption policies over** correlating the outcomes (decreased or increased corruption vulnerability) with the adoption and the implementation of certain policies. Time comparisons allow public organisations to assess whether new policy tools have actually improved their anticorruption setup or reduced their corruption vulnerability. In addition, the methodology allows for making **cross-country comparisons** between similar public organisations.

The MACPI tool can be helpful even in one-time implementations – different activities can be rated according to the degree of corruption risk they induce; based on that, the list of anticorruption policies can be linked to the corresponding risks and finally assessed in terms of relative effectiveness. This produces a clear picture of the anticorruption policy architecture of a public organisation, identifies possible vulnerabilities and helps analyse and improve anticorruption policies of public organisations.

1.2.2. Sources of information

The primary sources of information for MACPI are the employees of public organisations; secondary sources are clients of the public organisation (stakeholders). The quality of the processes from their corruption vulnerability perspective will be assessed through desk research and expert analysis of procedure, operational manuals, process flow charts, job descriptions etc. Since the required information is not hidden, as noted above, participants in the assessment are not considered (and most probably do not perceive themselves as) whistle-blowers. The instrument doesn't include sensitive questions about particular corruption transactions, but inquires about general tendencies and risks, and about the implementability and effectiveness of policy tools.

The answers of surveyed employees are kept strictly confidential in order to ensure cooperation and honest assessment. Very often corruption surveys and tools regard the clients of a public organisation (citizens, businesses) as victims of the agents (employees). The MACPI methodology encourages honest answers by addressing issues, which are more or less openly commented and thus not dependent on the potential involvement of the source of information in corruption practices.

The only requirement for the sources of information (participants in interviews and surveys) is that they are informed and familiar with the activities and policies in the assessed organisation. External experts can be included as well as current employees.

1.2.3. MACPI modules

The application of the tool involves several modules, each having a specific function in the final assessment of the corruption vulnerability and the effectiveness and implementation of anticorruption policies.

(1) Assessing corruption vulnerability

Corruption vulnerability expresses the **likelihood of corrupt transactions in a public organisation.** Higher vulnerability is associated with higher corruption risk. Corruption vulnerability could be decomposed into two elements: interest and pressure.

Interest arises in situations where agents or clients have identified a possible gain from deliberate noncompliance with rules (or optimising the unnecessarily complicated rules) combined with a relatively low probability of effective sanctions. This is related to the match between factors of supply and demand along with the probability of the public organisation to identify and sanction (punish) deliberate noncompliance of officials.

Pressure is one of the two elements of the process of a corruption transaction: corruption pressure and corruption exchange. Pressure points to **the initiation of the transaction – the proposal to conclude a "deal"** either made by the official (agent) of the citizen (client). In many legislations, the proposal itself is considered corruption and is therefore illegal. Research[21] has shown that proposals to engage in corruption activities are relatively common, and that a substantial part of these proposals lead to effective corruption transactions. In this respect pressure could be considered a relatively good proxy for the existence and incidence rates of corruption transactions.

The typical relationship between interest, pressure, and corruption transactions can be described as follows: 1) the existence of interest is a precondition of pressure; 2) existence of pressure preconditions corruption transactions; 3) not every instance of pressure and interest translates into a corruption transaction.

The need to use proxies in order to identify corruption vulnerability stems from the reluctance of public officials or clients to admit involvement in corruption transactions. This would even be more valid, if the focus is on a single public organisation. However, identification of interest and pressure could be considered easier as it could rarely lead to effective self-indictment.

(2) Mapping corruption interest

In order to map the structure of corruption interest, it is necessary to analyse the theoretical possibility of all types of corruption transactions for each of the activities of the public organisation. The final result would be a table of organisational

---

[21] See: Shentov, O., Stefanov, R., & Todorov, B. (Eds.). (2014). *Anti-Corruption Reloaded. Assessment of Southeast Europe.* Sofia.

activities, types of corruption and corruption zones (specific activities and types of corruption) for which and interest can be identified.

The main methods to be used to prepare the table of corruption zones are desk research and in-depth interviews (IDIs) with experts. Desk research is intended to:

- compile a draft list of the main groups of activities carried out by the organisation using organisational documents (statutes, laws, bylaws, etc.). The draft list is consulted with experts from the organisation during IDIs in order to arrive at a final list to be used in the assessment.
- compile a list of the most common corruption practices based on media reports, organisational reviews and other available information about the public organisation. This information is used in the IDIs with experts to facilitate the conversation and to help the in-depth analysis of specific corruption interests for each activity.

IDIs evaluate the existence of corruption vulnerability for each cell of the corruption zone table. Questions about corruption interest (demand and supply factors, sanctioning mechanisms, existing practices, etc.) are discussed with experts activity by activity. For each activity the interest for each type of corruption is explored:

- Whether a demand exists;
- Whether supply could be organised in practice;
- Whether possibilities for sanctions exist and can/are implemented in practice.

The structure of questions and the discussion depends on the characteristics of the public organisation and the way its activities are organised and regulated for in legislation and other regulations. The main task during the interview is to explore the structure and rationale of the specific corruption transactions, which are possible/probable for each activity and type of corruption. Further, a decision needs to be made whether certain intersections of corruption types and activities have corruption potential. The final result of the IDIs and the subsequent analysis is the identification of corruption zones, i.e. those intersections where corruption transactions are likely. It is in these intersections that corruption vulnerability will be located.

The definitions of the types of corruption used are as follows:

- **Abuse of power by a public official**: intentional abuse of functions or position, by performing or failing to perform an act, in violation of laws, by a public official for the purpose of obtaining an undue advantage for himself/herself or for another person or entity.
- **Abuse of property by a public official** (not included in the previous cases): intentional misappropriation or other diversion of any property, public or private funds or securities or any other items of value entrusted to the public official by virtue of his/her position, by said public official for his/her benefit or for the benefit of another person or entity.

Table 1. Corruption vulnerability zones*

	Abuse of power	Abuse of property	Nepotism	Clientelism	Aggregate vulnerability for activity
Human resources	P**		P	P	High
Procurement	P	P		P	High
Preventive investigation	P			P	Medium
Border security (green border)	P		P	P	High
Investigation	P		P	P	High
Provision of information					Medium
Border check-point control	P			P	Medium
Administrative and punitive activities	P		P	P	High
	High	Low	High	High	

   * As identified in the Bulgarian Border Police.

  ** "P" is a variable with two values – present and absent.

Source: MACPI, Border Police diagnostics, Bulgaria.

- **Nepotism**: the exploitation by a public official of his/her power and authority to procure jobs or other favours for relatives (family members and close friends), which can take place at all levels of the state, from low-level bureaucratic offices to national ministries.
- **Clientelism**: the informal relationship between people of different social and economic status (and not relatives): a 'patron' (boss) and his 'clients' (dependents, followers, protégés). The relationship includes a mutual but unequal exchange of corrupt favours.

(3) Identification of anticorruption policies

In the context of MACPI, anticorruption policy is defined as a **set of rules and/or mechanisms which target deliberate noncompliance combined with personal gain**. Usually, these policies focus on areas of corruption vulnerability (corruption zones) and aim to identify and prevent noncompliance.

The main method used to identify anticorruption policies is the IDI, and desk research is the complementary method. Since it is not always possible to compile a comprehensive list of anticorruption policies in public organisations, an in-depth review of the rules in the organisation is necessary.

During IDIs each corruption zone is explored in order to identify proper anticorruption policies. During the review several issues need to be taken into consideration:

- Most (or even all) rules which guide the activities in a public institution are in a way anticorruption policies – they prescribe due behaviour and procedures of officials and are aimed at ensuring the proper functioning of the organisation. This also applies to national level laws and other regulations that should be implemented in all public organisations (procurement, conflict of interest, etc.).
- The specific characteristic of anticorruption policies in this context is that they are usually rules, regulations or procedures designed to be an addition to the organisational setup. Their specific function is to target violations of the institutional rules and work as an oversight mechanism.
- At any moment a given organisational setup has the potential to generate a certain level of corruption vulnerability. Anticorruption policies should address any specific organisational setup and would be subject to change, if this setup is modified. This characteristic should be taken in consideration when making multiple assessments at different moments.

Anticorruption policies, depending on the processes they address, fall into two categories: general and specific. **General anticorruption policies** refer to more than one activity and/or corruption zone. They focus not on specific corruption zones but on common preconditions of corruption behaviour and the consequences of corruption such as:

- common standards of organisational behaviour (ethical codes, charters, etc.);
- the knowledge of officials and clients about corruption practices (information campaigns, training sessions, etc.);
- civic control mechanisms (whistleblowers, corruption mail boxes, websites, etc.)
- integrity rules for officials (declaration of assets, conflict of interest declarations, etc.)

Specific anticorruption policies target specific activities and types of corruption. Most often they are the result of identified forms of corruption transactions.

The examination of anticorruption policies in IDIs is a two-stage sequence: a) identify and review general policies and attempt to specify whether they could be linked to specific activities; b) identify specific anticorruption policies and link them to activities and types of corruption. An important characteristic of anticorruption policies to be included in the assessment is their formal "completeness." In order to be considered a policy, a rule should have:

- formal description (rights, responsibilities);
- clear implementation instructions;
- clear mechanism of control;
- system of sanctions in case deliberate noncompliance with the policy is identified.

In the pilot stage of doing the IDIs, it proved useful to split up interviews in different days in order to give experts some time to review organisational documents and their personal experience and even consult colleagues. The need to split the IDIs arises when experts are confronted with the above criteria. It is very common that perceptions of anticorruption policy refer to the rules of the organisation and not to the oversight mechanisms/rules which monitor deliberate noncompliance.

Table 2. Corruption vulnerability zones and anticorruption policies*

Activities	Anticorruption policies											
	Specific					General						
	1**	2	3	4	5	6	7	8	9	10	11	12
Human resources					X	X	X	X	X	X	X	X
Procurement						X	X	X	X	X	X	X
Preventive investigation			X	X		X	X	X	X	X	X	X
Border security (green border)	X	X	X	X		X	X	X	X	X	X	X
Investigation				X		X	X	X	X	X	X	X
Provision of information				X		X	X	X	X	X	X	X
Border check-point control		X		X		X	X	X	X	X	X	X
Administrative and punitive activities				X		X	X	X	X	X	X	X

* As identified in the Bulgarian Border Police.
** Digits indicate the policies as presented on page 67 below.
Source: MACPI, Border Police diagnostics, Bulgaria. (For further details, see chapter 2 of this report.)

(4) Evaluation of anticorruption potential

The anticorruption potential of a public organisation is the degree to which corruption zones are covered by general and specific anticorruption policies. The term "potential" shows that this type of evaluation only **accounts for the corruption vulnerability and the policies designed to counter it** but does not include implementation. An anticorruption potential is high when there are no corruption zones that are not targeted with general and specific anticorruption policies. This indicator is a result of the cross tabulation of activities, types of corruption, mapping of corruption interest (corruption zones) and anticorruption policies.

(5) Mapping corruption pressure

As noted above, corruption interest shows the theoretical possibility for corruption, given the existing organisational setup and the combination of existing demand and supply for deliberate noncompliance. The practical manifestation of corruption interest is corruption pressure: the existence of a concrete proposal to initiate a corruption transaction either by an official (agent) or a citizen (client). Two types of corruption pressure can be identified: outside pressure and inside pressure.

Outside pressure refers to the relationship between officials and clients of the public organisation. Corruption research[22] has shown that although pressure is illegal citizens tend to disclose instances when it has been exercised on them. Hesitation to report pressure is observed when the question is whether the respondent himself has tried to initiate a corruption transaction. In this respect, though embarrassing, experience with corruption pressure is reported and could be considered a relatively accurate measure of the incidence rate of this phenomenon. In the MACPI methodology outside pressure is measured by registering the prevalence rate of citizens offering officials to get involved in a corruption transaction.

Studies in South-eastern Europe,[23] for example, have shown that in 30-50% of the cases citizens initiate the corruption transactions, while officials usually initiate the better part of the transactions. In this respect, measuring outside pressure though the accounts of officials would be an underestimation of the phenomenon.

Inside pressure refers to instances when public officials initiate corruption transactions ordering their subordinate officials to deliberately violate rules for certain gain. This type of transaction is difficult to measure. In the MACPI tool, a proxy has been constructed measuring the readiness of officials to execute deliberate noncompliance orders of their superiors. This indicator is not a direct measure of existing inside pressure. However, if readiness to obey noncompliance instructions exists, this shows that such instructions are not uncommon. Greater readiness levels would be an indicator that corruption transactions have penetrated the public organisation and that "corruption services" are offered both by the agents (officials) and the principal (the supervisors).

(6) Implementability of anticorruption policies

This indicator evaluates both the quality of the design of a policy and the capacity to enforce it. Policies which do not meet this criterion usually produce formal compliance and remain "on paper." For example, if possibilities and resources to check declarations of assets of officials are limited, its anticorruption potential is

---

[22] See: Center for the Study of Democracy. (2014). *Anti-Corruption Policies against State Capture*. Sofia: Center for the Study of Democracy; TNS Opinion&Social. (2012). Corruption. Special Eurobarometer 374. Brussels: Directorate-General Home Affairs, European Commission; TNS Political & Social. (2014). Flash Eurobarometer 374: Businesses' attitudes towards corruption in the EU. Brussels: European Commission, Directorate-General for Home Affairs.

[23] Shentov, O., Stefanov, R., & Todorov, B. (Eds.). (2014). *Anti-Corruption Reloaded. Assessment of Southeast Europe*. Sofia.

also limited; compliance is formal and the policy would be easy to bypass by those who need to do so.

Two criteria are used to evaluate implementability in MACPI: a) that a policy is easy to implement in practice and/or is allocated the needed resources for implementation; b) that the policy is not easy to evade.

(7) Implementation of anticorruption policies

Following the identification of anticorruption policies and the evaluation of their implementability, the following criteria are applied to check whether a policy is properly implemented:

- officials in the public organisation are well aware of the policy and its specific requirements;
- the policy has a clearly defined mechanism of control;
- control (as defined in the policy) is being implemented;
- clearly defined sanctions exist for noncompliance;
- sanctions are applied.

The evaluation of implementability and implementation can only be made with the assistance of officials in the public organisation. This poses a risk of bias related to organisational loyalty which tends to present the organisation in a favourable way. This problem is difficult to address and should therefore be taken into account in the analysis. The main method of addressing evaluation bias is to explore discrepancies between the assessments of different criteria. The most probable discrepancy that would identify bias is that between indicators of the quality of policy design and the implementation of control and sanctions.

(8) Effectiveness of anticorruption policies

The objective of all anticorruption policies in terms of the above indicators is to **reduce corruption interest and corruption pressure**. This would mean an effective reduction of the corruption transactions in which officials of the organisation are involved. Measuring trends in prevalence rates of corruption transactions would be the direct way to account for the effectiveness of anticorruption policies. However, as noted above, such measurement is difficult and proxies need to be used. In this respect there are several possibilities:

a. To use **assessments by officials** (agents) for the potential and real effectiveness of an anticorruption policy. Such assessments could produce a diversified account of the effectiveness of various policies. Assessments would include both bias and level of knowledge and experience with organisational mechanisms. However, assuming that both these factors work in the same direction, the assessments would probably give a relatively fair differentiation between effective and less effective anticorruption policies.
b. Use **assessments by citizens** (clients). Such assessments would include less organisational bias. However, organisational knowledge and experience would probably introduce a competence bias. The assumption of bias factors working in the same direction could not be justified.

c. Use the already described indicators: **interest-pressure-transaction**. While measuring the prevalence of transactions could prove, the existence of interest and pressure could be used as a proxy of the current effectiveness of the existing set of anticorruption policies. The added value of the interest-pressure indicators in evaluating change in the effectiveness of anticorruption polices would rather be in the dynamic perspective, i.e. when MACPI is being applied multiple times and the change in the values of parameters is analysed. In principle, the existence of corruption pressure is a measure of the real effectiveness of the evaluated policies. High levels of pressure show that a combination of factors like ineffective anticorruption policies, suboptimal organisation of a specific activity or the susceptibility to corruption of clients and officials operate and are not adequately countered.

In the pilot application of MACPI, the (a) and (c) indicators were used to evaluate effectiveness, while the indicators under (b) were evaluated though a general population survey. In this way the indicators of vulnerability were also used to assess effectiveness of anticorruption policies.

1.2.4. Distribution of MACPI indicators by methods

MACPI uses three methods to produce the anticorruption policy enforcement diagnostics: desk research, in-depth interviews with experts and online survey with officials of the public organisation.

The main objective of **desk research** is to prepare the content of the IDIs with experts in the surveyed public organisations. The sources of information are all publicly available documents describing the organisation, such as statutes, laws and bylaws, organisational structure, documents describing organisational rules and procedures, etc. The concrete tasks to be completed include:

- compiling a preliminary list of the main activities in the organisation;
- compiling a preliminary list of anticorruption policies;
- compiling a list of the most common type of corruption transactions associated with the organisation based on reports and analyses;
- gathering information about prevalence rates and cases of corruption associated with the organisation.

At least two experts need to be recruited in order to compare and verify the information obtained. The experts to be interviewed are suggested by the public organisation. However, they should have a good knowledge of all departments of the organisation and relatively long work experience. Typically, such experts are officers in the internal control or human resource departments.

In-depth interviews (IDIs). IDIs would include two stages, during the first of which the list of activities of the organisation is verified and corrected if necessary. A second task for this stage is to explore interest for corruption transactions by types of corruption and activities in order to identify the corruption zones in the organisation. The first stage concludes with a discussion of anticorruption policies by identifying general policies, applicable to the organisation, and discussing the

characteristics of its specific polices. Experts are asked to review the preliminary list of anticorruption policies and to prepare their own list. At the second stage each anticorruption policy is discussed in greater detail. The objective at this stage is to finalise the list of anticorruption policies, which will be used in the online survey.

The **online survey** of officials is conducted in the final stages of data collection using a mostly standardised questionnaire. The variable part of the questionnaire is the list of activities and the list of anticorruption policies of the surveyed organisation. The questionnaire needs to be coordinated with the management of the public organisation. Also coordinated with the management is the procedure of implementing the survey. The best practice in this respect is to propose to the management a draft introduction letter to officials in the organisation. The letter introduces the survey and its objectives and includes a link to the online survey. The letter is endorsed by the management and sent by e-mail to officials included in the survey sample.

Except for organisation-specific lists (activities and policies) MACPI indicators are implemented in a uniform way in all surveyed public organisations. The distribution of indicators by methods is presented in Table 3.

Table 3. The main groups of MACPI indicators by methods

	Desk research	IDI	Online survey
I. Assessment of corruption vulnerability			
1. List of activities of the public organisation	X	X	
2. Identification of anticorruption policies	X	X	
3. Assessment of corruption interest (corruption zones)	X	X	
4. Assessment of outside pressure (proposals to initiate corrupt transaction)			X
5. Assessment of outside pressure (attempts by clients/ citizens to evade rules)			X
II. Assessment of the implementability of anticorruption policies			X
6. Practical ease of implementation			X
7. Difficult to evade			X
III. Implementation of anticorruption policies			
8. Awareness of policy			X
9. Defined system of control			X

Table 3. The main groups of MACPI indicators by methods (continued)

	Desk research	IDI	Online survey
10. Implementation of control			X
11. Application of sanctions			X
IV. Effectiveness of anticorruption polices			
12. Estimated potential effectiveness			X
13. Susceptibility of officials to corruption			X

One of the important advantages of using an online survey is the relative ease of ensuring anonymity. The latter is crucial for eliminating bias and ensuring reliable information, especially in view of the sensitivity of the topic and the specific questions. Anonymity is also ensured by substantially reducing demographic questions (only gender and length of work experience in the organisation) and by keeping the online database on the server of the implementing institute.

With respect to sampling, since the online diagnostics focus on a single organisation, ensuring random selection of respondents is relatively easy. A list of all employed officials is always available. The recommended method of sample selection is simple random sample. In this respect two scenarios are most common:

a) Sampling of small public organisations (50-100 employees). The recommended sampling model in these cases is an exhaustive survey of all employees.
b) Sampling of bigger public organisations. The recommended sample in such cases is to ensure a sample size of about 400-500 employees. The reasons for such a recommendation are practical: the stochastic error is reasonable and this number of surveyed officials does not present a substantial problem (time and effort) for the cooperating organisation.

The distribution of questions in the online questionnaire by MACPI indicators is presented in Table 4.

Population/client survey. This survey is used to verify common patterns of corruption affecting the transactions between citizens and public officials and to validate basic relationship between corruption indicators. The survey will use the methodology of the Corruption Monitoring System (CMS), developed by the Center for the Study of Democracy. The CMS was designed and developed by CSD in 1998[24] and provides assessments about the dynamics of the prevalence of corruption behaviour patterns in a society. The CMS

---

[24] Center for the Study of Democracy. (1998). *Clean Future*, pp. 64-91.

Table 4. MACPI indicators and questions in the online survey

MACPI online survey indicators	Survey questions
General corruption pressure estimates for the organisation as a whole	A12A, A12B
I. Corruption pressure	**Q8,Q9, Q10, Q12**
1. Outside pressure associated with activity	Q8
2. Susceptibility to pressure from above	Q10
3. Susceptibility to pressure from outside	Q9
4. Evasion of regulations	Q12
II. Implementability	**Q23, Q26**
5. Ease of implementation	Q23
6. Difficult to evade	Q26
III. Implementation	**Q27A, Q27B, Q27C, Q27D**
7. Awareness	Q27A
8. Strict implementation	Q27B
9. Strict control	Q27C
10. Strictly application of sanctions	Q27D
IV. Effectiveness	**Q24, Q25**
11. Estimated potential effectiveness	Q24
12. Estimated actual effectiveness	Q25

methodology ensures comparability of data across countries and registers the actual level and trends of direct involvement in administrative corruption, as well as the public attitudes, assessments and expectations in relation to corruption. The CMS has been implemented in Bulgaria since 1998,[25] at the regional level (South-eastern Europe) in 2001, 2002 and 2014,[26] and in select years in Georgia and Moldova. Some CMS concepts have also been modified and included in the Eurobarometer surveys on corruption, making CMS data comparable to Eurobarometer data.[27]

---

[25] All Corruption Assessment Reports can be found at the web page of CSD at: http://www.csd. bg/artShow.php?id=1339

[26] A. Stoyanov et al., eds., *Anticorruption in Southeast Europe: First Steps and Policies* (Sofia: Center for the Study of Democracy, 2002).

[27] TNS Opinion&Social, *Corrruption. Special Eurobarometer 374* (Brussels: Directorate-General Home Affairs, European Commission, 2012); TNS Opinion&Social, *Corruption. Special Eurobarometer 397* (Brussels: Directorate-General for Home Affairs, European Commission, 2014).

The CMS is one of the possible measurement approaches to corruption. Its main objective is to provide statistical estimates of the prevalence of the most common incidents of corruption and has diagnostic and descriptive functions. In the CMS context, corruption is conceptualised as a specific type of social behaviour which includes specific forms of interaction between actors, attitudes associated with these interactions and a set of perceptions which relate to the interactions (serving both as reflections of the interaction and prerequisites which define the behaviour strategy of the actors). Corruption refers to a specific group of interactions: citizens are provided with public services by public institutions by contacting officials who are employed by these organisations. Corruption is an interaction in which officers in public institutions (agents) abuse the discretionary power they are entrusted with by the public organisation (principal) in their interaction with citizens (clients).

While a summary model of corruption could be further elaborated in order to list most possible variations of form and content, it is important to note that form and content could easily be used as proxies to each other. If there is a bribe, there is most probably some kind of abuse; on the other hand, if there is an abuse, there probably is some material gain. Therefore, in order to measure the prevalence of corruption behaviour, attempt should be made to either measure the number of bribe incidents, or the number of abuses of different types. In empirical terms, the easier way to access corrupt behaviour is through identification of instances of bribery. Types, violation models and levels are more difficult to observe and account for. Even when the latter is the case, there is always a possibility that a violation has occurred without any personal benefit for the perpetrator (the official).

The specific objective of the CMS is to address the most common forms of abuse. In terms of the above classification this would be **low level (administrative) corruption of all types and violation models**. The reason for choosing such a criterion is that its expected prevalence can be registered with random sample techniques. The proxy to these abuses is the occurrence of bribery which is defined as benefit received informally by the agent (the public official) in the form of money, gift or favour. It is an addition to public services clients are entitled to, given the organisation of the public service system of a country.

The main indicators of the CMS describe corruption (as a social phenomenon) using three groups of concepts: experience, attitudes, and perceptions (Figure 4).

Information on CMS indicators is collected through a survey questionnaire. Indicators are first broken down into survey questions and, at the analysis stage, the information is aggregated to form the CMS indexes. This allows for a more robust interpretation of findings and has been a way to keep findings aligned to the theoretical background of the study.

Involvement in corruption. Involvement in corruption captures the instances when citizens make informal payments to public officials. The concrete questions used to gather information about this indicator are victimisation questions and reflect experience during the preceding year. The indicator summarises citizens' reports

Figure 4. Structure of the CMS Indicators
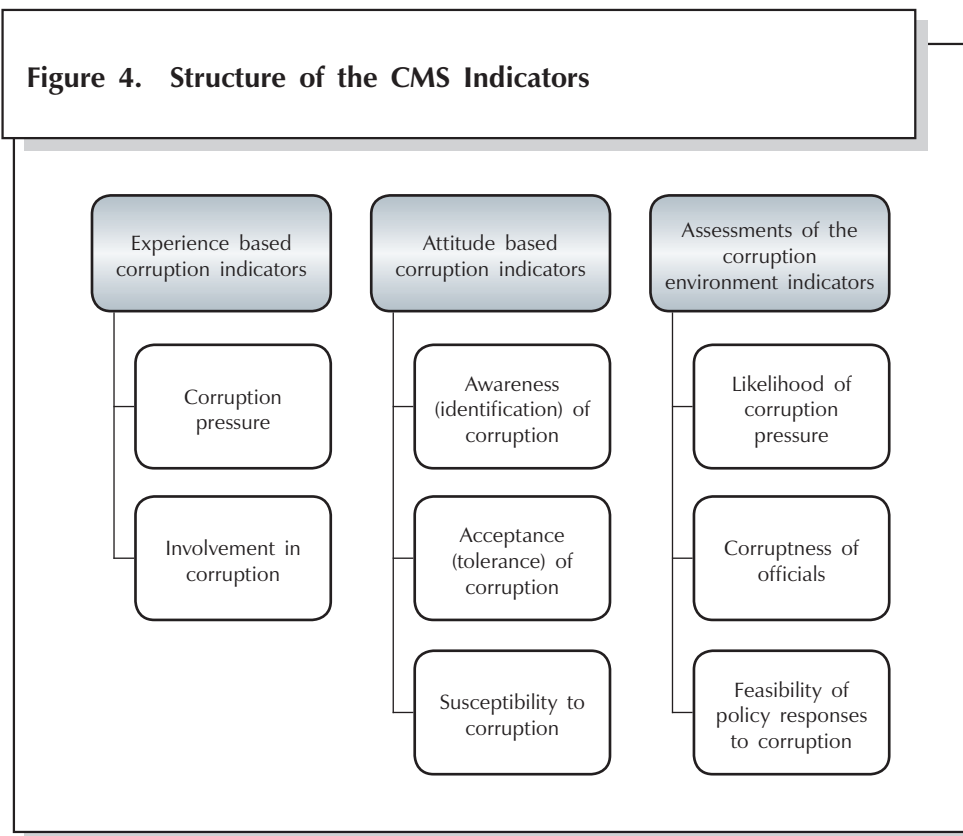
and divides them into two categories: people without corruption experience (have not given bribes) and people with corruption experience (have given bribes at least once during the preceding year).

Corruption pressure. Corruption pressure reflects instances of initiation of bribe seeking by public officials: directly by asking for an informal payment or indirectly by indicating that informal payment would lead to a positive (for the citizen) outcome. CMS results have shown that pressure has been a decisive factor for involvement – most corruption transactions occur after the active solicitation of payments by officials.

Direct involvement in corruption transactions is accompanied by the prevalence of specific **attitudes towards corruption** and corruption behaviour and by perception of the spread of corruption in society. Ideally low levels of involvement in corruption would be paired with negative attitudes towards corrupt behaviour and perceptions that corruption is rare and unlikely. This does not mean that perceptions and attitudes directly determine the corruption behaviour of individuals. Rather, they could influence behaviour to a certain degree but essentially express the general social and political atmosphere in society related to corruption.

Awareness (identification) of corruption. Awareness (identification) of corruption is an index accounting for the level of understanding of citizens as to what constitutes corruption behaviour. The index differentiates between three categories of awareness: high (people who identify all or most of the common corruption

behaviour patterns as corruption), moderate (many of the common corruption practices are identified but some forms of corruption are classified as "normal behaviour"), low (few corruption patterns are identified as corruption).

Acceptance (tolerance) of corruption. While awareness captures the knowledge component, acceptability of corruption captures tolerance (or lack of tolerance) towards corruption. It summarises the assessments of the public of the acceptability for members of parliament or government as well as civil servants at ministries, municipalities and mayoralties to take gifts, money, favours or receive a free lunch (get "a treat") in return to solving someone's personal problems.

Susceptibility to corruption. Susceptibility to corruption reflects the tendency of the respondents to react in two hypothetical situations – one involves being in the role of an underpaid public official and accepting or denying a bribe that is being offered, the other situation asks about giving a bribe to a corrupt public official if one had a major problem to solve and was asked explicitly for a bribe (cash). Declaring the denying of a bribe in both situations is interpreted as the respondent being not susceptible to corruption, accepting/giving a bribe in both is interpreted as susceptibility, while giving/taking a bribe in one of the situations and not in the other is defined as "mixed behaviour".

The experience with corruption and the attitudes towards corruption, as well as the general current sentiment and level of trust towards public institutions in society determine the public's assessment of the corruptness of the environment. These perceptions are summarised in the following indexes:

Likelihood of corruption pressure is an index measuring expectations of citizens for the likelihood to face corruption pressure in interaction with public officials. Overall this is an index gauging perceptions of the corruptness of the environment. In principle corruption theory considers that people would be more likely to resort to corruption if they assess the environment being intrinsically corrupt.

Corruptness of officials. Corruptness of officials is an index reflecting perceptions of the integrity reputation of different groups of public officials; it thus constitutes an estimate by the public of the corruptness of the various public services. The interpretation of this index is specific, as it is an assessment of attitudes of citizens towards public officials rather than a measure of the prevalence of corruption in the respective offices. The added value of this index is that it helps identify top ranking sectors affected by corruption or being least trusted by the public.

As regards the sampling, there are two alternatives approaches to constructing it for the population/client survey. The first approach would be to conduct a general population survey with a representative sample of the adult population (18+). Its advantage is that it enables testing several assumptions:

• accounting for the general corruption atmosphere in a country;
• exploring attitudes towards corruption transactions;
• exploring values and relationships between the main experience and attitude based indicators (involvement in corruption transactions, corruption pressure, and susceptibility to corruption.

Table 5. The main groups of MACPI indicators to be used in the population survey*

MACPI population survey indicators	Research questions
I. Experience based indicators	
1. Involvement in corruption transactions	A13
2. Corruption pressure	A12
II. Attitude based indicators	
3. Awareness of corruption (knowledge)	A1B
4. Acceptance of corruption behaviour	A9, A10
5. Susceptibility to corruption	A8, A15
III. Assessments of the corruption environment	
5. Likelihood of corruption pressure	A3
6. Corruptness of officials	A2, A4

  * See also Appendix 2 for the wording of questions.

The second approach to sampling is to design a targeted sample of the clients of public organisations where the MACPI tool is being applied. Involving stakeholders in the assessment of corruption transactions would make it possible to compare research findings from the surveys of officials and clients. The application of this approach involves some important difficulties:

• some public organisations have a limited number of clients, who could be difficult to access;
• recruitment of appropriate respondents would be costly and difficult in logistical terms; such difficulties increase costs substantially;
• asking questions about corruption experiences with a concrete public organisation could lead to hesitation and insincere answers.

1.2.5. Operating procedures of MACPI diagnostics

The implementation protocol of MACPI that proved optimal includes the following sequenced procedures:

1. Establishing contact with the public organisation.
2. Desk research stage – preparing draft lists of activities and anticorruption policies.
3. First meeting with selected experts and conducting IDIs (first stage). Review of activities, review and identification of corruption zones, discussion about the criteria for identifying anticorruption policies.
4. Second meeting with experts and conducting IDIs (second stage). Defining the final list of anticorruption policies.

5. Review of the draft questionnaire by experts and management.
6. Third meeting with experts and management. Defining sampling procedure and technical details for the online survey. Draft letter to participants.
7. Implementing the online survey.
8. Implementing the population/client survey.
9. Data analysis and report.

2. PILOT IMPLEMENTATION OF MACPI DIAGNOSTICS

MACPI is a comprehensive tool which is relevant to the entire policy cycle; its end result can be a potentially profound overhaul of an institution's anticorruption policy. During the development stage of the instrument, its diagnostics component was tested in several public institutions in Bulgaria and Italy.[28]

The review of the results of the pilot application of MACPI, presented in this section, includes aspects of the analysis which are related to two of the instruments of MACPI diagnostics: a general population survey and online survey of public officials. For the purpose of the pilot implementation, assessments of clients were used to obtain information about the general parameters included in MACPI (corruption pressure, involvement in corruption, susceptibility to corruption and general perceptions about the corruption reputation of specific groups of officials. Still, as described in chapter 3 of this report, the full scale application of MACPI diagnostics should necessarily include a dedicated sample of clients of surveyed organisations.[29]

The testing of MACPI provided the development team with feedback which has methodological value, especially as regards the role of experts in the diagnostics. The level of involvement and the sophistication of input by experts would vary among public institutions. In the pilot implementation, many of the cooperating experts had limited "corruption imagination" (the predominant concept and way of perceiving different types of corruption was bribery); it thus proved difficult and time consuming to steer experts out of clichés and reduced the time available for discussion of corruption zones and anticorruption policies. Experts were also reluctant to discuss details about specific forms of corruption and mechanisms of corruption transactions. For some, such a discussion was equivalent to disclosing the most guarded secrets of the organisation. One explanation is that going greater depths would disclose classified information. The intention to compare assessments of experts and identify eventual discrepancies encountered considerable bias – some experts were more open and critical, while others remained reserved and demonstrating strong organisational loyalty. The reluctance to speak openly rather showed that there was a tendency to avoid or play down certain corruption practices. Experts were more inclined to evaluate propositions from researchers than come up with details on "how things work."

The need to eliminate bias was addressed by substantially enlarging the initially envisaged sample design. Instead of including selected officials from various

---

[28] Border Police and Slatina Municipality in Bulgaria and the Health Service of Trento and Municipality of Riva del Garda in Italy.

[29] In most cases the resources and the capacity available are sufficient only for a general public survey and online surveys of organisations. Conducting surveys of the clients of a single public organisation require a specific and costly (in terms of resources and logistics) population sample.

departments, a random sample design was preferred. In such a sample all types of officials at all levels were included and the number of respondents was substantially increased – exhaustive sample (practically all or most officials) in smaller organisations and big simple random samples (400-500) in larger organisations.

2.1. ACCEPTANCE OF THE INSTRUMENT

The implementation of a methodology for assessing anticorruption policy enforcement is a sensitive endeavour for most public organisations. First, because this requires devoting time and effort by management and the participating experts. Second, in the course of the assessment organisation officials who participate need to admit and discuss in depth corruption problems of the public organisation they work for. Existence of corruption is always a problem for the management of a public organisation. In this respect, the mere discussion of corruption risks is seen by officials as admitting that the organisation has not resolved this problem effectively.

A factor that contributed to the acceptance of the MACPI method is the existence – even if only formally – of political will at the central or local government level to develop and implement anticorruption policies. In Bulgaria, such a situation developed after accession to the EU in 2007. In Italy, central and local governments have a clear understanding of the scope of corruption problems in the country. A law has been adopted and implemented which provides for the development of anticorruption plans at the level of public organisations; the law also prescribes that every public organisation dedicates at least one officer whose main responsibility is to develop and implement anticorruption policies.

Another factor which facilitated the pilot implementation of MACPI were the research credentials of the implementing institutes[30] and also assurance that results would not be used for political or other evaluations of the management of surveyed public organisations. In this respect, it is possible that in EU member states where corruption is not on the political agenda, the attitude to implementation of the MACPI could be reserved or even negative.

2.2. SOCIETY LEVEL SUMMARY MEASUREMENTS OF CORRUPTION VULNERABILITY

Research has shown that corruption transaction patterns easily spill over from one sector to another and that high levels of corruption in one sector of society are usually not unique to that sector. This is specifically valid for governance regimes that score low on neutrality (particularism vs. ethical universalism) and good governance indicators. In such settings, the bribery and corruption pressure also tend to have high levels of prevalence. This could be derived from comparative surveys of corruption like Eurobarometer. While direct involvement in corruption

---

[30] The Center for the Study of Democracy and the University of Trento.

transactions is measured rarely, experience with corruption pressure (proposal or request to engage in a corruption transaction) is an indicator that is often measured by various instruments. Based on that, the range of variations in the prevalence of corruption pressure in EU member states can be established. The most favourable values of this indicator have been registered in the Scandinavian countries. Denmark has the lowest prevalence levels – experience with corruption pressure is reported by about 2-3% of the adult population (18+). This value could be categorised as a "practical minimum" and used for benchmarking purposes.

In both countries (Bulgaria and Italy) where MACPI was piloted, overall corruption levels (as measured by CPI, Eurobarometer) were high, Italy being in a more favourable position that Bulgaria. Society level MACPI indicators have been tested only in Bulgaria through a random sample national representative survey (18+). Findings from the MACPI general population survey confirm previous research in Bulgaria and could be summarised as follows:

Figure 5. **Share of Border Police and Slatina Municipality officials having experience with corruption pressure from citizens**
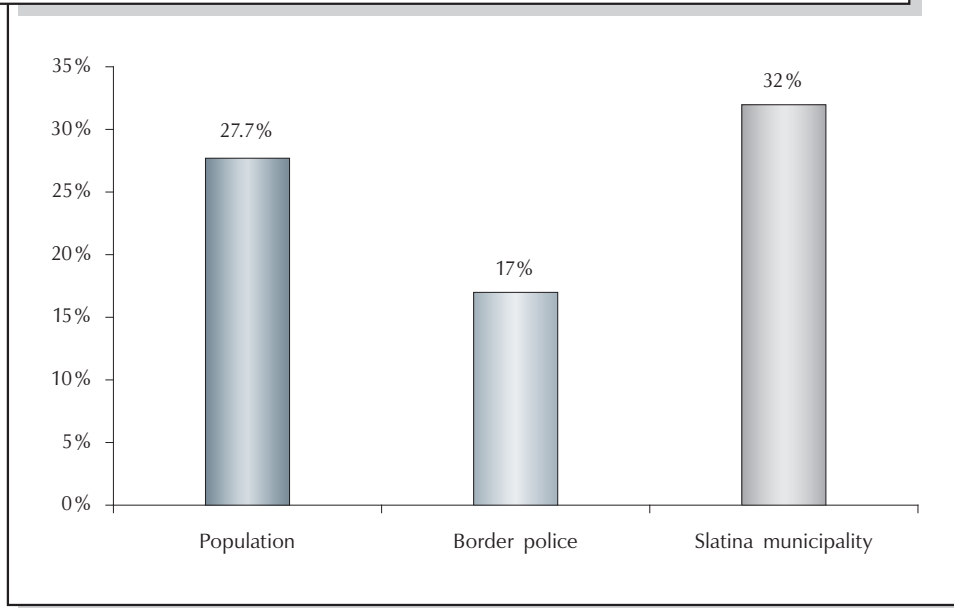
Source: MACPI online and MACPI general population instruments (2015).

Corruption pressure. About 21% of Bulgarians report to have experienced corruption pressure (at least in one case) when dealing with public officials. On the other hand, officials in the public organisations surveyed in the pilot application of MACPI also reported receiving corruption proposals (much more in the municipal administration than in the Border Police).

In order to explore society level prevalence of corruption transactions, the public were asked about their direct involvement in corruption transactions: extending money, gifts or favours to officials in exchange for services. Results in Figure 6

show both a substantial involvement of large parts of the population in corruption transactions and a shared responsibility in initiating the transaction. A sizeable share of those who gave a bribe did so without experiencing pressure from officials.

These results show that the average levels of corruption pressure in Bulgaria are comparable to levels observed in the surveyed public organisations. They also indicate that a substantial part of the corruption pressure translates into corruption transactions initiated by officials (the larger part) and by clients (individuals or businesses). A more accurate comparison of these survey values would be possible with a focused sample of citizens, targeting only clients of specific organisations.

Figure 6. Overall involvement in corruption transactions in Bulgaria

(Share (%) of the population 18+ who gave a bribe, gave a bribe without pressure and gave bribe because of pressure)
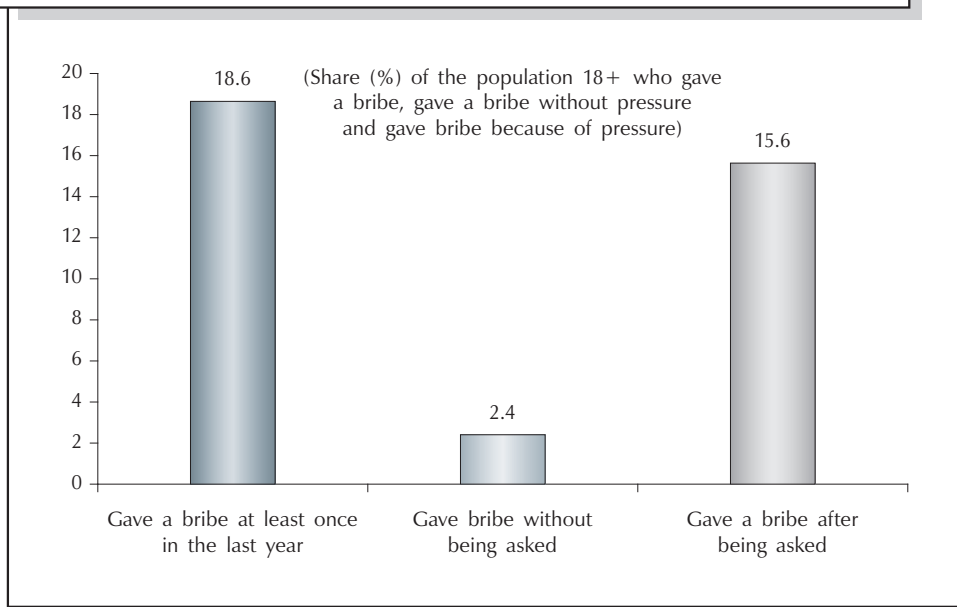
Source: MACPI online and MACPI general population instruments (2015).

In terms of susceptibility to corruption, Bulgarian citizens score relatively high. A quarter would consent to corruption transactions in the role of officials or citizens and another 39% would commit to corruption transactions in one of these roles (Figure 7). The corruption reputation (assessment of corruptness of officials) of public sector officials in the country is unfavourable (Figure 8). The sectors of the organisations included in the MACPI test – law enforcement and local government – are among those where corruption is considered a serious problem.

Although the MACPI general public survey was not implemented in Italy, both corruption pressure reported by officials in surveyed public organisations and international rankings show that the corruption situation in Italy is more favourable that the one observed in Bulgaria. This has had an impact on the values of all MACPI indicators.

Figure 7. Susceptibility to corruption in Bulgaria

(% of the population 18+ that would give or accept a bribe in the role of citizen or official)

41	20	39
Susceptible to corruption	Not susceptible to corruption	Mixed behavior
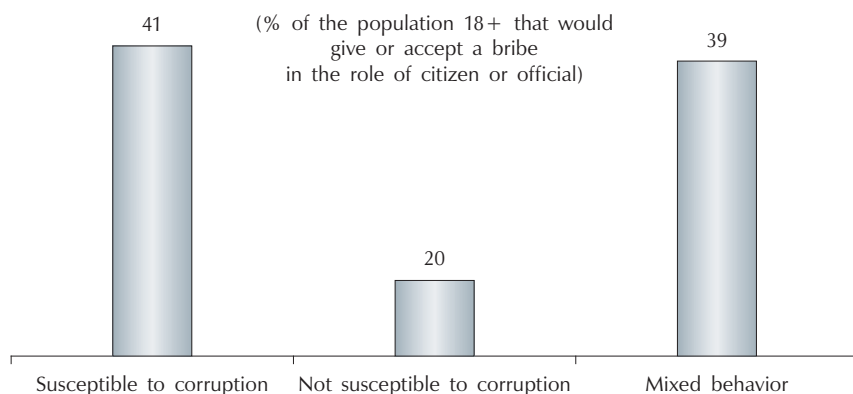
Source: MACPI general population instrument (2015).

Figure 8. Corruptness of public officials in Bulgaria*

Official	Score
Customs officers	3.7
Political party and coalition leaders	3.4
Judges	3.4
Local political leaders	3.4
Public prosecutors	3.4
Members of parliament	3.3
Ministers	3.3
Lawyers	3.3
Investigating officers	3.3
Municipal councilors	3.3
Police officers	3.2
Tax officials	3.2
Officials at ministries	3.2
Business persons	3.1
Bankers	3.1
Doctors	3.1
Administration officials in the judiciary	3.0
Municipal officials	3.0
NGO representatives	2.9
University officials or professors	2.8
Journalists	2.5
Teachers	2.0

* *Officials perceived as most corrupt on a scale from 1 to 4, where 1 is "Almost no one is involved" and 4 is "Almost everyone is involved"*

Source: MACPI general population instrument (2015).

Figure 9. Employees of the Health Service of Trento (Italy) who have been offered a bribe at least in some cases (%)
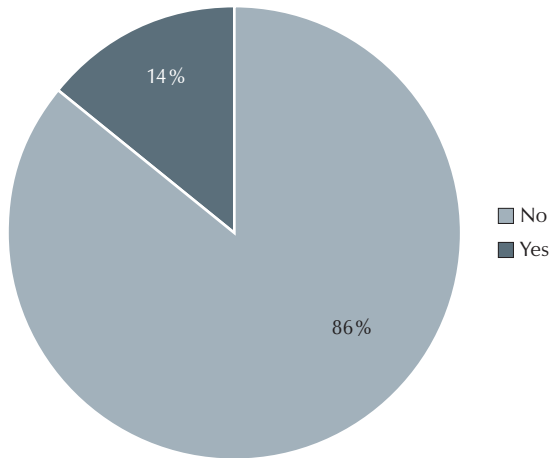
Source: MACPI online instrument (2015).

General external corruption pressure in the Health Service of Trento is relative low – during the preceding year, 14% of the employees were offered (directly or indirectly) a bribe at least in some cases. This percentage, however, demonstrates that there is some definite external corruption interest in the activities of this organisation indicating that there is a risk of corruption transactions.

Figure 10. Employees of the Municipality of Riva del Garda (Italy) who have been offered a bribe at least in some cases (%)
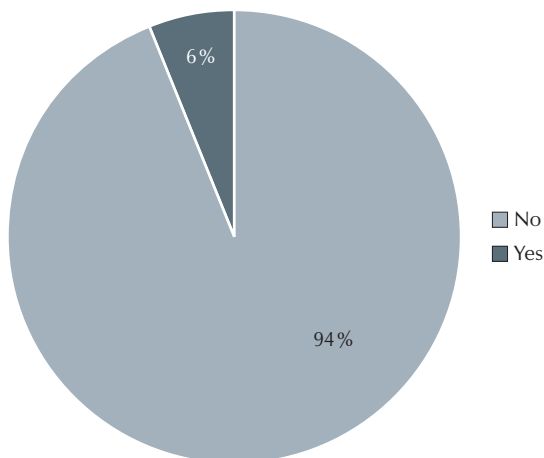
Source: MACPI online instrument (2015).

General external corruption pressure in the Municipality of Riva del Garda is quite low, according to the answers of the employees – during the preceding year, 6% of the employees were offered (directly or indirectly) a bribe at least in some cases. This percentage is the lowest among all of the tested institutions and demonstrates that external corruption interest for the activities of this organisation is quite low.

2.3. INTERPRETATION OF MACPI INDICATORS

The analysis of the enforcement of anticorruption policy in selected public organisations in Italy and Bulgaria was based on the methodological assumptions outlined in the previous section. As MACPI is a new instrument, there were no benchmarks for the values of the indicators.

A key assumption of the MACPI tool is that it would be applied multiple times: at least in an initial diagnostic stage and – after a revision of the anticorruption policy set of the surveyed organisation – in a follow-up stage. Comparisons between values of indicators would indicate whether the organisation is evolving or deteriorating in anticorruption terms.

In a test implementation, however, it would be feasible to use the theoretical background parameters of each indicator – its "Reference values (ideal)" – in order to assess the state of anticorruption policy enforcement of the surveyed organisation. They reflect a hypothetical case in which a public organisation is practically corruption free, or corruption is reduced to the minimum possible level. In such a hypothetical situation all officials make efforts to comply with rules and regulations and follow prescribed protocols, i.e. behaviour is not shaped by random response to stimuli but individuals are making sincere efforts to reach prescribed goals. The main difference between such a hypothetical situation and actual performance is shaped by capability and qualification. In a situation of normal distribution of capabilities, about 5-10% of officials could be expected to be "poor performers", another 5-10% would be "excellent performers," while the remaining about 80% of official would be "medium performers." Therefore an expected ideal value for compliance with a rule would be that 90-95% of officials manage to meet standards, while 5-10% would not be able to do so for various reasons. Regarding compliance with rules the reference values have been set at 90%, while for corruption pressure indicators the reference value for noncompliance has been set to a lower value – 5%.

The analysis of the information from the public institutions was based on two cross sections:

- evaluation of the implementation and effectiveness of anticorruption policies;
- evaluation of the anticorruption policy coverage of activities.

In addition, each institutional report includes reference tables with most of the information collected (Appendix 5).

2.4. PILOT IMPLEMENTATION RESULTS: BORDER POLICE, BULGARIA

The application of the MACPI tool to the Bulgarian Border Police was launched with meetings between the evaluators and experts from Border Police with whom the activities and the applicable anticorruption policies of the institution were discussed. Two lists – activities and anticorruption policies – were compiled to be used in the second phase of the evaluation. The staff survey was conducted in several stages:

- collection of general information about the respondents;
- respondents were asked about their job and the activities included in it;
- respondents were asked about corruption risk related to the various activities.

Participants in the survey answer only about activities they are familiar with (activities which are part of their job). Thus, the number of respondents for each activity should be monitored carefully – if there are less than 20 respondents for an activity (as with "Investigations" in Table 6), the base for the following questions is too small and results should be interpreted with caution.

Table 6. Structure of the sample of surveyed officials in the Bulgarian Border Police

Activity	No. of respondents	Share
Human resources – recruitment, dismissal, promotion	23	4.5%
Public procurement	30	5.9%
Preventive investigation – prevention of illegal migration, smuggling and trafficking	60	11.9%
Border security (guarding the country's borders) – prevention of unauthorised passage of persons, vehicles and immigrants	233	46.0%
Investigations carried out by investigating officers	5	1.0%
Information activities – risk analysis and information campaigns	81	16.0%
Border checkpoints – processing of documents of persons and vehicles crossing the border legitimately and preventing unauthorised passage of persons and vehicles through checkpoints	126	24.9%
Administrative and punitive – control and penalties for illegal immigrants; traffic control near the airport, railway stations; issuing passes to employees of companies operating in the area of border crossing	27	5.3%
Level in the organisational hierarchy		
Head of department or higher management staff	10	2.0%
Staff with management functions	99	19.6%

Table 6. Structure of the sample of surveyed officials in Border Police (Bulgaria) (continued)

Activity	No. of respondents	Share
Staff without management functions	384	75.9%
Other or no answer	13	2.6%
Total	506	100%
Responsibility with regard to anticorruption		
Reducing corruption is my only function/responsibility	18	3.6%
Reducing corruption is a major part of my function/responsibilities	121	23.9%
Reducing corruption is a minor part of my function/responsibilities	148	29.2%
Reducing corruption is not an explicit part of my responsibilities	209	41.3%
Other or no answer	10	2.0%
Total	506	100%

*   *The number of respondents for the activity "Investigations carried out by investigating officers" is too small.*

The survey was conducted through a simple random representative sample (randomly selected employees were asked to participate by the management) carried out by the organisation itself following a list of instructions provided by the research team. This ensured both representativeness of the sample for the whole Border Police and a high response rate. The target sample size was 500 interviews and the actual sample consisted of 506 interviews.

2.4.1. Mapping corruption interest

Mapping started with interviews with experts about potential areas of corruption vulnerability and respective corruption transaction mechanisms. The most important vulnerability identified in the Border Police was related to organised passage of illegal immigrants which involves corruption transactions with agents from the Border Police who facilitate the passage of organised groups often traveling openly by bus. This vulnerability is related to the main function of Border Police and therefore there are different very specific policy measures which address it. Since corruption is a major part of the problem, these measures could be considered to be of anticorruption nature. However, in this case the focus of management is not so much on reducing corruption but on preventing illegal passage. Prevention can be achieved, inter alia, by decreasing petty corruption (bribery of border guards). Higher forms of corruption in other departments were often not considered possible at all or were considered only hypothetically possible and experts were not willing to discuss particular mechanisms in these cases.

From these preliminary meetings, it could be concluded that corruption vulnerabilities at the border checkpoints are openly recognised and discussed, and there are attempts to cover these corruption vulnerabilities with specific policy measures. However, hidden corruption vulnerabilities (not recognised and discussed) could still be possible for the other activities. Such corruption risks are addressed with more general anti-corruption policies such as the requirement by all employees to submit annually declarations of assets.

Table 7.   Corruption vulnerability zones in the Bulgarian Border Police

	Abuse of power	Abuse of property	Nepotism	Clientelism	Aggregate vulnerability for activity
Human resources	P*		P	P	High
Public procurement	P	P		P	High
Preventive investigation	P			P	Medium
Border security (green border)	P		P	P	High
Investigations carried out by investigating officers	P		P	P	High
Information activities	P				Medium
Border checkpoints	P			P	Medium
Administrative and punitive	P		P	P	High
Aggregate vulnerability for type of corruption	High	Low	High	High	

*   "P" is a variable with two values – present and absent.

2.4.2. Corruption vulnerability of activities

The vulnerability of the various activities of a public organisation is assessed with the use of the indicators presented in Table 8.

Table 8.   Indicators for the assessment of the corruption vulnerability of activities

Abuse of power	Reflects the principle interest and practical feasibility/sense of such type of corruption transactions, given the situation in the country and the organisation.

Table 8. Indicators for the assessment of the corruption vulnerability
         of activities (continued)

Evasion of regulations	Share of respondents (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 respondents who consider it likely that employees would perform illegitimate activities if ordered by a superior.
Susceptibility to pressure from outside	Share of respondents who consider it likely that employees would accept or ask for a bribe associated with activity.

The following results were obtained through the application of these indicators to the activities of the Bulgarian Border Police:

Human resources (recruitment, dismissal, promotion)

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	13.0%	5-10%
	Outside pressure associated with activity	40.9%	5-10%
	Susceptibility to pressure from above	9.1%	5%
	Susceptibility to pressure from outside	0%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Measures for vetting of job applicants	86.7%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and incomes	66.5%	80

Conclusions:

Corruption interest. Human resource management is an activity in where most types of corruption are possible.

Corruption pressure. Values for all indicators are relatively high, especially for pressure from outside. Attempts to evade regulations are not uncommon. Susceptibility to pressure is reportedly non-existent. Proposals to engage in deliberate noncompliance from inside are not uncommon.

Coverage by anticorruption policies. This activity is covered only by one specific and several general measures which have an estimated high level of effectiveness. This makes anticorruption policy coverage moderate.

Public procurement

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	30.0%	5-10
	Outside pressure associated with activity	55.2%	5-10
	Susceptibility to pressure from above	27.6%	5
	Susceptibility to pressure from outside	20.7%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and income	66.5%	80

Conclusions:

Corruption interest. Procurement is a complex activity in which practically all types of corruption are possible. An additional factor in this respect is that Border Police is part of the country's security infrastructure. This shields the procurement process with a veil of confidentiality.

Corruption pressure. Values for all indicators are very high. This would mean that procurement officials face proposals for corruption transactions on a permanent basis. The majority of their clients show aptitude to violate regulations and half of officials report to have received a corruption proposal at least once. Susceptibility to pressure is also very high. Border Police officials are more likely to agree to engage in corruption transactions if proposals come from inside the organisation.

Coverage by anticorruption policies. In terms of anticorruption measures, procurement relies on general policies which have a relatively high level of estimated effectiveness. This makes policy coverage low as it does not match the level of corruption vulnerability of this activity.

Overall conclusion: a detailed review of the way procurement is organised is necessary to identify an adequate model of change.

Preventive investigation

	Indicator	**Value**	**Reference value (ideal)**
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	26.7%	5-10
	Outside pressure associated with activity	51.7%	5-10
	Susceptibility to pressure from above	10.2%	5
	Susceptibility to pressure from outside	13.8%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and incomes	66.5%	80

Conclusions:

Corruption interest. For this activity two types of corruption are possible and vulnerability in this respect is at a medium level.

Corruption pressure. Values for all indicators are very high. This would mean that officials face proposals for corruption transactions on a permanent basis. Many of their clients show aptitude to violate regulations and every second official reports to have experienced corruption pressure at least once. Susceptibility to pressure is moderate. Officials are not very likely to accept engaging in corruption transactions if proposals come from inside or from outside the organisation.

Coverage by anticorruption policies. In terms of anticorruption policies preventive investigation relies on general policies which have an estimated high level of effectiveness. Anticorruption policy coverage could be considered low as only general policies are associated with this activity.

Green border security

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	27.3%	5-10
	Outside pressure associated with activity	33.3%	5-10
	Susceptibility to pressure from above	9.1%	5
	Susceptibility to pressure from outside	10.3%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Unannounced visits	87.0%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Interviews with passengers and illegal immigrants	80.2%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and income	66.5%	80

Conclusions:

Corruption interest. Corruption interest associated with this activity is high as three types of corruption are possible.

Corruption pressure. Values for all indicators are high. This would mean that officials face pressure on a permanent basis. Many of their clients show aptitude to violate regulations. Susceptibility to pressure is also moderate both pressure coming from outside and inside the organisation.

Coverage by anticorruption policies. In terms of anticorruption policies this activity relies both on general measures and two specific measures. This makes policy coverage moderate.

Investigations carried out by investigating officers*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	40%	5-10
	Outside pressure associated with activity	50%	5-10
	Susceptibility to pressure from above	0%	5
	Susceptibility to pressure from outside	25%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and income	66.5%	80

*   The number of respondents for this activity is very low.

Conclusions:

Corruption interest. Three types of corruption are possible with this activity which makes it vulnerable to corruption.

Corruption pressure. Values for corruption pressure indicators are very high. Susceptibility to pressure from outside is high while susceptibility to pressure from inside is non-existent.

Coverage by anticorruption policies. In terms of anticorruption policies this activity is covered only by general measures, which makes policy coverage low.

Information activities

Information activities	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Absent	Absent
Corruption pressure	Evasion of regulations	24.7%	5-10
	Outside pressure associated with activity	32.5%	5-10
	Susceptibility to pressure from above	18.8%	5
	Susceptibility to pressure from outside	16.5%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and income	66.5%	80

Conclusions:

Corruption interest associated with this activity is low.

Corruption pressure. Values for all indicators are high. This would mean that officials face proposals for corruption transactions on a permanent basis from outside and from superiors. Susceptibility to pressure is also high.

Coverage by anticorruption policies. Only general anticorruption measures target this activity. In view of the high levels of corruption pressure policy coverage for this activity could be considered low.

Border checkpoints

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	20.8%	5-10
	Outside pressure associated with activity	40.7%	5-10
	Susceptibility to pressure from above	6.5%	5
	Susceptibility to pressure from outside	15.3%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Video surveillance	92.2%	80
	Immediate reaction to each corruption complaint	89.1%	80
	Unannounced visits	87.0%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Interviews with passengers and illegal immigrants	80.2%	80
	Rotation	78.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and income	66.5%	80

Conclusions:

Corruption interest associated with this activity is moderate.

Corruption pressure. Values for all indicators are high especially outside pressure (coming from clients). Susceptibility to pressure is moderate. Pressure more often comes from clients that from superiors.

Coverage by anticorruption policies. This activity is covered both by general and four specific anticorruption measures. This makes policy coverage high.

Administrative and punitive

	Indicator	**Value**	**Reference value (ideal)**
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	33.3%	5-10
	Outside pressure associated with activity	53.8%	5-10
	Susceptibility to pressure from above	19.2%	5
	Susceptibility to pressure from outside	23.1%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Immediate reaction to each corruption complaint	89.1%	80
	Information campaigns for the public	86.1%	80
	Anticorruption training at the Police Academy	85.7%	80
	Information campaigns among staff	81.8%	80
	Additional orders and instructions	77.7%	80
	Direct superiors read and sign asset declarations	68.7%	80
	Declarations of assets and income	66.5%	80

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Values for all indicators are very high. Officials are subject to intense pressure of all types, most notably pressure from outside. Susceptibility to pressure is high. Officials are more likely to accept engaging in corruption transactions if proposals come from outside the organisation.

Coverage by anticorruption policies. In terms of anticorruption measures, this activity is targeted only by general measures and has therefore (in view of the level of corruption pressure) low coverage.

2.4.3. Assessment of anticorruption policies

The main measures through which anticorruption policies in the Border Police are implemented include four specific measures focused on border control and eight general measures.[31] The specific anticorruption measures are:

1. Rotation – change of shift schedules and rotation of shifts at border checkpoints.
2. Constant video surveillance of places of work at border checkpoints.
3. Interviews with passengers crossing the border and illegal immigrants detained on the territory of the country.
4. Unannounced visits (audits) by the heads of units.
5. General anticorruption measures for vetting job applicants to the Ministry of Interior.

The general anticorruption measures include:

General transparency and supervision measures

6. Annual submission of declarations of assets and income.
7. Immediate superiors are advised about employees' asset declarations. In order to guarantee they have really done so, immediate superiors are required to sign every declaration.
8. Internal orders and instructions are issued in response to certain offenses which are not covered by any existing law or regulation (for example, Border Police employees are prohibited to ask citizens to buy goods for them).

Civic control measures

9. An immediate reaction is required to each corruption complaint. This could include carrying out inspections, initiating disciplinary proceedings, informing the relevant departments, etc.

Awareness measures

10. Anticorruption training at the Police Academy.
11. Information campaigns among employees – promoting positive examples, disseminating quarterly reviews of corruption problems and the measures that have been taken.
12. Information campaigns among the general public to advertise phone numbers and internet addresses where people can report cases of corruption.

These general measures fall in three main groups which are typical for public organisations. The first group consists of additional rules which build upon existing institutional regulations. These rules are usually added when particular corruption complaints are received or corruption cases exposed. One example of such a rule

---

[31] As noted earlier, the term 'policy' refers to more abstract propositions about type and objectives of interventions in different social spheres. A policy is (or should) then be implemented through a set of measures, rules, protocols, etc. which are the concrete tools that effect the policy.

is about the practice of employees asking passengers to buy goods (for example cigarettes) for them from the duty free shops – this practice is prohibited because of cases when this was reported and was recognised as a potential corruption risk. There are many similar rules which concern very particular actions which might pose corruption risks.

The second group of measures involves education, training of employees and information campaigns trying to raise corruption awareness among the employees and the public. Finally, there are various declarations submitted by the employees – like annual declarations of assets and income, or statement of conflict of interest which could be submitted for example by committee members during recruitment of new personnel.

The specific measures are directed primarily towards reducing the main corruption vulnerability identified by Border Police – trafficking of illegal immigrants. All other potential vulnerabilities are hypothetically covered by the more general anticorruption measures.

Table 9. Coverage of Border Police activities by general and specific anticorruption measures

	Human resources	Public procurement	Preventive investigation	Border security	Investigating officers	Information activities	Border checkpoints	Administrative and punitive
Specific measures								
Rotation							✓	
Video surveillance							✓	
Interviews with passengers and illegal immigrants				✓			✓	
Unannounced visits				✓			✓	
Measures for vetting job applicants to the Ministry of Interior	✓							
General measures								
General transparency and supervision measures								
Declarations of assets and income	✓	✓	✓	✓	✓	✓	✓	✓
Control by direct supervisors of the declarations of their subordinates.	✓	✓	✓	✓	✓	✓	✓	✓
Additional internal regulations				✓			✓	

Table 9. Coverage of Border Police activities by general and specific anticorruption measures (continued)

	Human resources	Public procurement	Preventive investigation	Border security	Investigating officers	Information activities	Border checkpoints	Administrative and punitive
Civic control measures								
Immediate reactions to corruption complaints	✓	✓	✓	✓	✓	✓	✓	✓
Awareness measures								
Anticorruption training at the Police Academy	✓	✓	✓	✓	✓	✓	✓	✓
Information campaigns among employees	✓	✓	✓	✓	✓	✓	✓	✓
Information campaigns among the general public	✓	✓	✓	✓	✓	✓	✓	✓

Table 10. Indicators for the assessment of anticorruption policy measures

Assessment aspect	Indicator	Description
Implementability	Ease of implementation	Share of respondents evaluating the policy as "very/rather easy to implement."
	Difficult to evade	Share of respondents considering the policy difficult to evade.
Implementation	Awareness	Share of respondents who agree that the policy is well-known to the employees whom it concerns.
	Strict implementation	Share of respondents who agree that policy is strictly applied.
	Strict control	Share of respondents who think that control is strictly applied.
	Strict application of sanctions	Share of respondents who think that sanctions are always applied in cases of violation of the policy.
Effectiveness	Estimated potential effectiveness	Share of respondents who think that the implementation of this policy "could reduce cases of corruption."
	Estimated actual effectiveness	Share of respondents who think that this policy "reduces corruption risk."

Rotation

This is a well-established automatic system which distributes shifts at the checkpoint randomly and therefore prevents employees from knowing where and when they will be stationed during the day.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	80.8%	90
	Difficult to evade	75.8%	90
Implementation	Awareness	92.7%	90
	Strict implementation	88.8%	90
	Strict control	53.9%	90
	Strict application of sanctions	49.8%	90
Effectiveness	Estimated potential effectiveness	85.0%	90
	Estimated actual effectiveness	78.8%	80

Conclusions:

Implementability. This is a well-designed measure. Values of assessment indicators are close to the reference values.

Implementation. Formal compliance with the measure (strict implementation) is close to the reference value. Effective compliance with the measure however is almost at half those values. What could be inferred from these findings is that implementation of this policy lacks consistency. It is probable that violations are common and that deviations from this policy are most probably deliberate and have a potential to lead to corruption transactions.

Effectiveness. Values for effectiveness indicators are high and match formal compliance indicators but do not match the assessments for control and sanctions. The most probable explanation for this mismatch is that officials had been too optimistic in their evaluations.

Overall evaluation. The measure appears fairly well designed but inconsistently implemented. The critical issues are most probably compromises and inconsistencies in the implementation of control and sanction mechanisms. Alternatively, these two mechanisms of the measure have not been well designed.

Video surveillance

There is constant video surveillance of work stations, although the video is monitored live only at one of the checkpoints – the other video recordings are used if there is suspicion that a particular employee might be involved in corruption transactions. It should be noted that the known corruption mechanisms at the border checkpoints seldom involve taking money at the workplace but rather receiving it beforehand.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	87.8%	90
	Difficult to evade	73.6%	90
Implementation	Awareness	88.9%	90
	Strict implementation	88.4%	90
	Strict control	50.2%	90
	Strict application of sanctions	55.6%	90
Effectiveness	Estimated potential effectiveness	92.2%	90
	Estimated actual effectiveness	92.2%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure. Values of assessment indicators are close to the reference values.

Implementation. Formal compliance with the policy (strict implementation) is close to the established reference value. Control and sanction mechanisms however have lower values indicating that implementation is lagging behind.

Effectiveness. Values for effectiveness indicators are very high. In view of the mismatch of these values with control and sanctions indicators it is probable that officials have been deliberately positive.

Overall evaluation. The measure is well designed but inconsistently implemented. Critical issues are in the implementation of control and sanction mechanisms.

Interviews with passengers and illegal immigrants

When illegal immigrants are apprehended (regardless whether during second checking at the border checkpoints or later inside the country) they are interviewed and sometimes cases of corruption are exposed in the course of the interviews. However, there is no explicit instruction to ask corruption-related questions during such interviews and most often the corruption transaction takes place between the involved employee(s) and the person who is organising the trafficking of the illegal immigrant. The immigrants pay the person who is organising the passage but not the border guards.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	82.4%	90
	Difficult to evade	67.7%	90
Implementation	Awareness	91.0%	90
	Strict implementation	83.1%	90

	Indicator	Value	Reference value (ideal)
	Strict control	52.0%	90
	Strict application of sanctions	47.3%	90
Effectiveness	Estimated potential effectiveness	89.2%	90
	Estimated actual effectiveness	80.2%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure and easy to implement. Given the discretion of officials to choose when to implement the measure there might be cases when it is deliberately evaded.

Implementation. Formal compliance with the measure (strict implementation) is close to the established reference value. Control and sanction mechanisms are obviously not very strictly applied.

Effectiveness. The values of the effectiveness indicators are high. In view of the mismatch of the values with those of the control and sanctions indicators, it is probable that officials have been deliberately positive in their evaluation.

Overall evaluation. The policy appears fairly well designed but inconsistently implemented. Critical issues are most probably related to compromises and inconsistencies in the implementation of control and sanction mechanisms.

Unannounced visits

Unannounced visits (or audits) are intended to inspect whether employees follow strictly the rotation rules. At these visits, a second checking of passengers who have already passed through the checkpoint is carried out.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	88.9%	90
	Difficult to evade	81.5%	90
Implementation	Awareness	90.7%	90
	Strict implementation	86.4%	90
	Strict control	54.8%	90
	Strict application of sanctions	50.0%	90
Effectiveness	Estimated potential effectiveness	88.5%	90
	Estimated actual effectiveness	87.0%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure. Values of assessment indicators are close to the reference values.

Implementation. Formal compliance with the policy (strict implementation) is close to the established reference value. The mismatch between formal compliance and control and sanction mechanisms shows a possible implementation gap.

Effectiveness. The values of the effectiveness indicators are high and in view of the possible implementation gap indicate possible deliberate optimism on behalf of officials.

Overall evaluation. The measure appears fairly well designed but inconsistently implemented.

General anticorruption measures for vetting job applicants to the Ministry of Interior

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	80.9%	90
	Difficult to evade	72.6%	90
Implementation	Awareness	88.1%	90
	Strict implementation	79.4%	90
	Strict control	44.0%	90
	Strict application of sanctions	46.6%	90
Effectiveness	Estimated potential effectiveness	88.8%	90
	Estimated actual effectiveness	86.7%	80

Conclusions:

Implementability. This is a well-designed anticorruption policy. Values of assessment indicators are close to the reference values.

Implementation. Formal compliance with the policy (strict implementation) is close to the established reference value but a somewhat lower than in the other measures above. Control and sanction mechanisms are not strictly applied.

Effectiveness. The values of the effectiveness indicators are high signifying that the potential of the policy is high. However, in view of the possible implementation gap assessments are probably too optimistic.

Overall evaluation. The measure appears fairly well designed but inconsistently implemented.

Annual submission of declarations of assets and income

This measure requires all officials should fill in declaration of assets and submit them to their superiors. In turn superiors have to sign each declaration verifying that they have read the declaration. This procedure does not include checks of the information provided in the declaration.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	95.1%	90
	Difficult to evade	71.3%	90
Implementation	Awareness	93.9%	90
	Strict implementation	91.1%	90
	Strict control	63.1%	90
	Strict application of sanctions	59.3%	90
Effectiveness	Estimated potential effectiveness	73.1%	90
	Estimated actual effectiveness	66.5%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure. Values of assessment indicators are close to the reference values.

Implementation. Formal compliance with the measure (strict implementation) is close to the reference value. Effective compliance with the measure, however, is almost at half those values. What could be inferred from these findings is that implementation of this policy lacks consistency. It is probable that violations are common. What could be problematic given that rotation is a way to allocate people to working places, is that deviation from this policy are most probably deliberate and have a potential to lead to corruption transactions.

Effectiveness. The values of the effectiveness indicators are understandably lower than the values of the implementation indicators. This shows that inconsistent implementation is associated with lower effectiveness.

Overall evaluation. The measure appears fairly well designed but inconsistently implemented.

Advise immediate superiors about employees' asset declarations

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	93.6%	90
	Difficult to evade	72.9%	90

	Indicator	Value	Reference value (ideal)
Implementation	Awareness	91.2%	90
	Strict implementation	88.8%	90
	Strict control	59.8%	90
	Strict application of sanctions	51.2%	90
Effectiveness	Estimated potential effectiveness	73.1%	90
	Estimated actual effectiveness	68.7%	80

Conclusions:

Implementability. This is a good measure but evasion is most probably an issue in many cases.

Implementation. Formal compliance with the measure (strict implementation) is high but the system of control and sanctions does not appear to function smoothly and signals a gap in the implementation.

Effectiveness. The values of the effectiveness indicators are high but lower than in other measure. The implementation gap is probably one of the problems; the other is that without being able to check the content of declarations, supervisors cannot use this instrument to counter corruption. The high values of the evaluations of the effectiveness reflect an organisational bias.

Overall evaluation. The measure has both issues of design and is not consistently implemented.

Additional internal regulations and instructions

Additional internal regulations are issued in response to offenses which are not regulated by other laws or regulations.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	79.8%	90
	Difficult to evade	59.9%	90
Implementation	Awareness	89.7%	90
	Strict implementation	76.8%	90
	Strict control	49.0%	90
	Strict application of sanctions	49.3%	90
Effectiveness	Estimated potential effectiveness	83.0%	90
	Estimated actual effectiveness	77.7%	80

Conclusions:

Implementability. This measure probably has design issues as it seems easy to evade.

Implementation. Formal compliance with the measure (strict implementation) is lower than in other measure. Control and sanction mechanisms are not consistent.

Effectiveness. The values of the effectiveness indicators are high but given the implementation problems evaluations reflect bias.

Overall evaluation. The measure appears to have its anticorruption potential but has not found proper implementation.

Immediate reaction to each corruption complaint

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	88.3%	90
	Difficult to evade	82.8%	90
Implementation	Awareness	93.5%	90
	Strict implementation	87.3%	90
	Strict control	61.9%	90
	Strict application of sanctions	63.9%	90
Effectiveness	Estimated potential effectiveness	92.5%	90
	Estimated actual effectiveness	89.1%	80

Conclusions:

Implementability. This anticorruption measure is well designed and appears to be difficult to evade as discretionary power is not concentrated. The values of the assessment indicators match the reference values.

Implementation. Formal compliance with the measure (strict implementation) is very high. However, there are probably cases when sanctions and control are inconsistently implemented.

Effectiveness. The values of the effectiveness indicators are the highest possible. Provided assumption can be ruled out, this measure would be considered ideal in terms of effectiveness.

Overall evaluation. The measure appears fairly well designed but inconsistently implemented. The critical issues are most probably related to compromises and inconsistencies in the implementation of control and sanctions. Alternatively, the latter mechanisms of the measure have not been well designed.

Anticorruption training at the Police Academy

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	91.5%	90
	Difficult to evade	67.3%	90
Implementation	Awareness	89.8%	90
	Strict implementation	80.8%	90
	Strict control	48.2%	90
	Strictly applied sanctions	50.7%	90
Effectiveness	Estimated potential effectiveness	90.4%	90
	Estimated actual effectiveness	85.7%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure. The values of the assessment indicators are close to the reference values with respect to ease of implementation. However, the evasion indicator has lower values, which implies that design of procedures could be improved.

Implementation. Formal compliance with the measure (strict implementation) is close to the reference value. Effective compliance with the measure, however, is almost at half that value, which signals an implementation gap.

Effectiveness. If no bias is assumed, the values of the effectiveness indicators are among the highest possible.

Overall evaluation. The policy appears to need improvement in design and implementation of control and sanctions procedures.

Information campaigns among employees

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	94.8%	90
	Difficult to evade	69.7%	90
Implementation	Awareness	90.6%	90
	Strict implementation	82.2%	90
	Strict control	49.8%	90
	Strict application of sanctions	45.1%	90
Effectiveness	Estimated potential effectiveness	86.6%	90
	Estimated actual effectiveness	81.8%	80

Conclusions:

Implementability. The values of both indicators show a relatively big difference; this suggests the need for a more in-depth review of concrete procedures.

Implementation. Formal compliance with the policy (strict implementation) is close to the reference value but control and sanctions mechanisms do not seem to be implemented in full.

Effectiveness. Despite implementation gaps (and if no bias is assumed) this measure has the potential to be an effective anticorruption instrument.

Overall evaluation. The policy appears to need a revision of design especially with regard to control and sanction mechanisms.

Information campaigns among the general public

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	92.1%	90
	Difficult to evade	74.2%	90
Implementation	Awareness	93.0%	90
	Strict implementation	79.0%	90
	Strict control	51.3%	90
	Strict application of sanctions	43.8%	90
Effectiveness	Estimated potential effectiveness	89.9%	90
	Estimated actual effectiveness	86.1%	80

The conclusions about this policy are identical to those for "Information campaigns among employees."

The overall conclusion on the anticorruption policies of Border Police is that despite problems in implementation – difference between formal compliance indicators (awareness and strict implementation) and control and sanction procedures – the evaluations of the effectiveness measures are close to the theoretical maximum values. While this is possible in principle, the hypothesis is rather that officials have provided biased opinions trying to present their work and their organisation in the best possible way. Such an attitude has some grounds in the general atmosphere of the public discourse on corruption in Bulgaria: despite evident cases of corruption, authorities and officials make efforts to deny any wrongdoing; unfortunately this "strategy" has in most cases been successful.

2.4.4. Summary conclusions

The Border Police diagnostics was an informative pilot test because of the transparent and open discussion of corruption risks and the determination of the senior management to reduce them. This organisation has a well-developed anticorruption policy setup for a Bulgarian public organisation. The main problems identified by the MACPI diagnostics are:

● The specific anticorruption measures that are implemented focus almost exclusively on border security (checkpoints and green border). Other activities with high levels of corruption vulnerability (e.g. procurement) are not covered with specific anticorruption policies.
● An implementation gap (discrepancy between formal compliance elements and control and sanctions procedures) was identified for most measures.
● In view of the implementation gap, the potential effectiveness of measures estimated by officials in the organisation does not seem consistent. Most probably the high values of the effectiveness indicators are due to response bias – an issue that would be taken into account at the analysis stage of the MACPI online instrument.

2.5. PILOT IMPLEMENTATION RESULTS: SLATINA MUNICIPALITY, BULGARIA

Slatina Municipality is a public organisation within the framework of the larger Sofia Municipality. While the entire Sofia Municipality has over 2,000 employees, Slatina Municipality has only 58 employees. At the same time, Slatina has a department structure similar to that of Sofia Municipality and clear hierarchal structure with a mayor, deputy mayors, etc. The MACPI diagnostics tool was tested in the Slatina Municipality in an attempt to evaluate its applicability to a type of public organisation that is very different from Border Police both in terms of size and in terms of structure and activities.

In-depth interviews were conducted with Sofia Municipality representatives and later with Slatina Municipality experts in order to understand better the structure, activities, possible risks and anticorruption measures applied in a Bulgarian municipality in general and in Slatina Municipality in particular. The subsequent staff survey was conducted in several stages:

● collection of general information about the respondents;
● respondents were asked about their job and the activities included in it;
● respondents were asked about corruption risk related to the various activities.

Participants in the survey answered only about activities they are familiar with (activities which are part of their job). There were 41 participants in the survey (71% of the employees of the organisation). Because of this small number, there were very few answers in the activity component of the diagnostics. These answers and the corresponding percentages should be interpreted with caution. The survey sample was exhaustive – all of the employees were contacted by the management and were sent the survey link.

Table 11. Structure of the sample of surveyed officials in Slatina Municipality

Activity	Number of respondents	Share
Human resources	4*	9.8%
Public procurement	7*	17.1%
Administrative and Information Services	8*	19.5%
Public order, security, disaster protection	5*	12.2%
Legal and regulatory services; registration and control of commercial activities	9*	22.0%
Management of the municipal property and housing	2*	4.9%
Education, culture, social activities and sports	5*	12.2%
Financial and accounting services	7*	17.1%
Civil engineering, urban development and ecology	8*	19.5%
City planning, cadastre and regulation of construction	6*	14.6%
Total	41	100%
Level in the organisational hierarchy		
Head of department or higher management staff	7	17.1%
Staff member with management functions	2	4.9%
Staff member without management functions	30	73.2%
No answer	2	4.9%
Total	41	100%
Responsibility with regard to anticorruption		
Corruption reduction is my only function/responsibilities	1	2.4%
Corruption reduction is a major part of my function/ responsibilities	10	24.4%
Corruption reduction is a minor part of my function/ responsibilities	5	12.2%
Corruption reduction is not an explicit part of my responsibilities	25	61.0%
Total	41	100%

*   *The number of respondents is too small.*

2.5.1. Mapping of corruption interest

The employees of this organisation are more or less equally distributed across different activities. This means that most of the activities are performed by about 5-6 employees and the largest department (City planning and regulation of construction) has only 11 employees.

In a series of preliminary interviews with representatives of the larger Sofia municipality, it was established that there are certainly some corruption interests in the activities of Sofia municipality. Clear corruption transaction mechanisms, however, could not be defined and the topic of corruption was clearly more sensitive for representatives of Sofia Municipality than for Border Police. Perhaps for this reason, there were hardly any specific measures directed at counteracting particular corruption mechanisms. In its anticorruption setup, Sofia Municipality relies largely on the country-level procurement laws and other general country measures like asset declarations (which are mandatory in Bulgaria for all public officials). Secondary legislation and good practices are available for different departments within Sofia Municipality but are not generally very well-known. In this context, the anticorruption setup of Slatina Municipality was assessed in terms of the additional tools which build upon the general laws and the general Sofia Municipality anticorruption framework.

Table 12. Corruption vulnerability zones in Slatina Municipality

	Abuse of power	Abuse of property	Nepotism	Clientelism	Aggregate vulnerability for the activity
Human resources	P*		P	P	High
Public procurement	P	P		P	High
Administrative and information services	P			P	Medium
Public order, security, disaster protection	P		P	P	High
Legal and regulatory services; registration and control of commercial activities	P		P	P	High
Management of the municipal property and housing	P			P	Medium
Education, culture, social activities and sports	P			P	Medium
Financial and accounting services	P		P	P	High

Table 12.   Corruption vulnerability zones in Slatina Municipality (continued)

	Abuse of power	Abuse of property	Nepotism	Clientelism	Aggregate vulnerability for the activity
Civil engineering, urban development and ecology	P		P	P	High
City planning, cadastre and regulation of construction	P		P	P	High
Aggregate vulnerability for type of corruption	High	Low	High	High	

*   "P" is a variable with two values – present and absent.

2.5.2. Corruption vulnerability of activities

Human resources*

	Indicator**	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	0%	5-10
	Outside pressure associated with activity	50%	5-10
	Susceptibility to pressure from above	0%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Internal labour regulations	85.7%	80

  * Total number of respondents for this activity is very low.

** For a description of the indicators please see Table 8.

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Officials report only high levels of outside pressure (from clients). No susceptibility for this type of pressure has been identified.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

Public procurement*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	28.6%	5-10
	Outside pressure associated with activity	0%	5-10
	Susceptibility to pressure from above	14.3%	5
	Susceptibility to pressure from outside	14.3%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

*   *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Officials report high aptitude of clients to evade regulations but no outside pressure. This is an ambivalent result and possible bias can be assumed. Susceptibility to pressure is moderate.

Coverage by anticorruption policies. Coverage is low (only general anticorruption measures apply).

*Administrative and information services**

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	50.0%	5-10
	Outside pressure associated with activity	62.5%	5-10
	Susceptibility to pressure from above	12.5%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

*   Total number of respondents for this activity is very low.

Conclusions:

Corruption interest associated with this activity is moderate.

Corruption pressure. Officials report high aptitude of clients to evade regulations and high level of outside pressure. Susceptibility to pressure is low.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

While the total number of respondents for this activity was too small, the result was interesting and unexpected – 1 respondent answered that there was low external pressure and 4 respondents considered it to be medium (). Only 3 respondents answered that there was no external pressure. Clearly further information is needed for this activity in order to understand the potential

corruption mechanisms and the exact nature of the reported external pressure. However, at least one conclusion could be made from these results: the **MACPI tool is clearly capable of exposing counterintuitive potential vulnerabilities even with very few respondents in small organisations**.

Public order, security, disaster protection*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	20%	5-10
	Outside pressure associated with activity	0%	5-10
	Susceptibility to pressure from above	20%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

* *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Officials report moderate aptitude of clients to evade regulations and no outside pressure. Susceptibility to pressure is low, but the likelihood to execute illegitimate orders from superiors is moderate.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

Legal and regulatory services; registration and control of commercial activities*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	44.4%	5-10
	Outside pressure associated with activity	25.0%	5-10
	Susceptibility to pressure from above	11.1%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

*   *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Officials report high aptitude of clients to evade regulations and high outside pressure. Susceptibility to outside pressure does not exist but the likelihood to execute illegitimate orders from superiors is moderate. Had the number of cases available for analysis been larger, this would have suggested that eventual corruption transactions are channelled by superiors.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

Management of municipal property and housing

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	0%	5-10
	Outside pressure associated with activity	0%	5-10
	Susceptibility to pressure from above	0%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

Only two respondents were available for analysis for this activity and therefore no valid conclusion can be made.

Education, culture, social activities and sports*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	0%	5-10
	Outside pressure associated with activity	20%	5-10
	Susceptibility to pressure from above	0%	5
	Susceptibility to pressure from outside	0%	5

	Indicator	Value	Reference value (ideal)
Coverage by anticorruption policies	Anticorruption measures targeting the activity	Estimated effectiveness of measure	Reference value (ideal)
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

*   Total number of respondents for this activity is very low.

Conclusions:

Corruption interest associated with this activity is moderate.

Corruption pressure. Officials report moderate-to-high outside pressure (from clients) and no susceptibility to any kind of pressure. Possible bias should be assumed.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

Financial and accounting services*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Absent	Absent
	Clientelism	Absent	Absent
Corruption pressure	Evasion of regulations	0%	5-10
	Outside pressure associated with activity	0%	5-10
	Susceptibility to pressure from above	0%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	Anticorruption measures targeting the activity	Estimated effectiveness of measure	Reference value (ideal)
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80

	Indicator	Value	Reference value (ideal)
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

* *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest associated with this activity is low.

Corruption pressure. No pressure has been reported and thus no susceptibility.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

Civil engineering, urban development and ecology*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	25.0%	5-10
	Outside pressure associated with activity	37.5%	5-10
	Susceptibility to pressure from above	25.0%	5
	Susceptibility to pressure from outside	0%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7	80
	Internal labour regulations	85.7	80
	Access control	82.9	80

* *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Officials report high aptitude of clients to evade regulations and high outside pressure. Susceptibility to outside pressure does not exist but likelihood to execute illegitimate orders is high. Had the number of cases available for analysis been larger, this would have suggested that eventual corruption transactions are channelled by superiors.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

City planning, cadastre and regulation of construction*

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	33.3%	5-10
	Outside pressure associated with activity	33.3%	5-10
	Susceptibility to pressure from above	33.3%	5
	Susceptibility to pressure from outside	16.7%	5
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of measure**	**Reference value (ideal)**
	Internal public procurement rules	95.7%	80
	Internal rules for receiving and processing citizens' corruption complaints	90.5%	80
	Instructions and rules for the organisation of information and administrative activities and the handling of documents	89.7%	80
	Internal labour regulations	85.7%	80
	Access control	82.9%	80

*   Total number of respondents for this activity is very low.

Conclusions:

Corruption interest associated with this activity is high.

Corruption pressure. Officials report high aptitude of clients to evade regulations and high outside pressure. Susceptibility to outside pressure is moderate and

the likelihood to execute to illegitimate orders is high. Had the number of cases available for analysis been larger, this would have suggested that eventual corruption transactions are channelled by superiors.

Coverage by anticorruption policies. Coverage is low (only general measures apply).

2.5.3. Assessment of anticorruption policies

There are 5 anticorruption policy measures in Slatina Municipality which build upon the wider anticorruption framework of Sofia Municipality:

1. Internal rules for receiving and processing citizens' corruption complaints.
2. Internal public procurement rules.
3. Internal labour regulations.
4. Access control.
5. Instructions and rules for the organisation of information and administrative activities and the handling of documents.

Table 13. Coverage of Slatina Municipality activities by general and specific anticorruption measures

	Human resources	Public procurement	Administrative and information services	Public order, security, disaster protection	Legal and regulatory services; registration and control of commercial activities	Management of the municipal property and housing	Education, culture, social activities and sports	Financial and accounting services	Civil engineering, urban development and ecology	City planning, cadastre and regulation of construction
General anticorruption measures										
Internal rules for receiving and processing citizens' corruption complaints	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Internal public procurement rules		✓								
Internal labour regulations	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Access control		✓	✓	✓	✓	✓	✓	✓	✓	✓
Instructions and rules for the organisation of information and administrative activities and the handling of documents		✓	✓	✓	✓	✓	✓	✓	✓	✓

These are all general measures and there were no specific anticorruption measures in Slatina Municipality addressing particular corruption mechanisms in particular activities. The exact corruption mechanisms were not revealed at the preliminary interviews although the general vulnerability to corruption was well recognised. The only measure which could be considered more or less specific were the internal rules for public procurement which seemed to be one of the most vulnerable activities in a Bulgarian municipality. Public procurement, however, is highly intertwined with the rest of the municipality activities.

Internal rules for receiving and processing citizens' corruption complaints

	Indicator*	Value	Reference value (ideal)
Implementability	Ease of implementation	95.2%	90
	Difficult to evade	75.0%	90
Implementation	Awareness	100.0%	90
	Strict implementation	95.2%	90
	Strict control	42.9%	90
	Strict application of sanctions	52.4%	90
Effectiveness	Estimated potential effectiveness	100.0%	90
	Estimated actual effectiveness	90.5%	80

*   *For a description of the indicators please see Table 10.*

Conclusions:

Implementability. The design of this anticorruption measure most probably needs improvement as it can be evaded.

Implementation. Formal compliance with the policy (strict implementation) is close to the reference value. Control and sanction mechanisms, however, are not consistently implemented which indicates an implementation gap.

Effectiveness. Values for effectiveness are the highest possible and thus bias can be assumed.

Overall evaluation. The measure appears to have a fair design and inconsistent implementation.

Internal public procurement rules

Internal public procurement rules build upon the general Bulgarian public procurement law as well as the more general procurement rules of Sofia Municipality.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	82.6%	90
	Difficult to evade	91.3%	90
Implementation	Awareness	91.3%	90
	Strict implementation	91.3%	90
	Strict control	43.5%	90
	Strict application of sanctions	56.5%	90
Effectiveness	Estimated potential effectiveness	100.0%	90
	Estimated actual effectiveness	95.7%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure. The values of the assessment indicators are close to the reference values.

Implementation. Formal compliance with the policy (awareness and strict implementation) matches the theoretical maximum (reference value). Actual compliance indicators (sanctions and control) are almost at half those values. This refers to control and sanctions, for which compliance is relatively far away from reference values, suggesting a gap in implementation.

Effectiveness. The values of the effectiveness indicators are the highest possible and thus bias can be assumed.

Overall evaluation. The policy appears fairly well designed but inconsistently implemented. The values of are too high to exclude response bias.

Internal labour regulations

Internal labour regulations are common for all Bulgarian institutions; those of Slatina Municipality include measures which could be considered to have some anticorruption effects. However, it should be noted that these regulations are not targeted anticorruption policy tools.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	97.1%	90
	Difficult to evade	74.3%	90
Implementation	Awareness	88.2%	90
	Strict implementation	85.3%	90
	Strict control	47.1%	90

	Indicator	Value	Reference value (ideal)
	Strict application of sanctions	61.8%	90
Effectiveness	Estimated potential effectiveness	94.1%	90
	Estimated actual effectiveness	85.7%	80

Conclusions:

Implementability. Regulations are well-designed but not difficult to evade.

Implementation. Formal compliance (awareness and strict implementation) is close to the reference value. Control and sanctions procedures are not implemented consistently and suggest an implementation gap.

Effectiveness. The values of the effectiveness indicators are high but bias cannot be ruled out.

Overall evaluation. The regulations appear fairly well designed but inconsistently implemented.

Access control

Similar to the internal labour regulations, access control is common for many public organisations in Bulgaria and probably has only an indirect effect on corruption reduction.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	94.3%	90
	Difficult to evade	69.7%	90
Implementation	Awareness	97.1%	90
	Strict implementation	94.3%	90
	Strict control	51.4%	90
	Strict application of sanctions	44.1%	90
Effectiveness	Estimated potential effectiveness	85.3%	90
	Estimated real effectiveness	82.9%	80

Conclusions:

Implementability. This is a well-designed anticorruption measure but cases when it is evaded are probably not rare.

Implementation. Formal compliance with the policy (strict implementation) is close to the established reference value. Control and sanctions procedures

are not implemented consistently, which in many cases probably compromises implementation.

Effectiveness. Values for effectiveness indicators high and practically overlap with the expected maximum values.

Overall evaluation. The policy appears fairly well designed but inconsistently implemented.

Instructions and rules for the organisation of information and administrative activities and document handling

Instructions on how to handle documents and the organisation of information and administrative activities constitute an internal anticorruption policy tool, which is specific for Slatina Municipality and is considered to have general security and corruption reduction effects on all activities.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	100.0%	90
	Difficult to evade	79.3%	90
Implementation	Awareness	93.8%	90
	Strict implementation	93.8%	90
	Strict control	53.3%	90
	Strict application of sanctions	62.5%	90
Effectiveness	Estimated potential effectiveness	93.1%	90
	Estimated real effectiveness	89.7%	80

Conclusions:

Implementability. This is a well-designed anticorruption policy, but cases in which it is evaded are probably not rare.

Implementation. Formal compliance with the policy (awareness and strict implementation) is close to the reference value. Control and sanctions procedures are inconsistently implemented.

Effectiveness. The values of the effectiveness indicators reach the theoretical maximum.

Overall evaluation. The policy appears fairly well designed but inconsistently implemented.

2.5.4. Summary conclusions

The study of Slatina Municipality has shown that the MACPI online instrument – with exceptions for some indicators – is applicable in smaller organisations. In such settings, however, the issue of response bias becomes more evident. Due to the insufficient number of observations for specific indicators, follow up IDIs with experts and meetings with the management are recommended as they would help verify findings and better formulate policy recommendations.

Overall, based on the MACPI diagnostics Slatina Municipality would need to make a detailed review of several policies and activities which have high levels of vulnerability and no coverage by specific anticorruption measures.

The main problems identified by the MACPI diagnostics are similar to those in Border Police:

- Many activities with high levels of corruption vulnerability are not addressed by specific anticorruption measures.
- For most policies an implementation gap (discrepancy between formal compliance elements and control and sanctions procedures) has been identified.
- In view of the implementation gap, the potential effectiveness of policies – as estimated by officials – seems illogical. Most probably the high values of the effectiveness indicators are due to response bias.

2.6. PILOT IMPLEMENTATION RESULTS: HEALTH SERVICE OF TRENTO, ITALY

The Health Service of Trento is part of the Autonomous Province of Trento. Its core activity is the management of health services for the whole province. In 2013, (year of the latest survey) the number of employees was 8,156 (5,419 female and 2,737 male).

The *Regulations for the Prevention and the Repression of Corruption and Illegal Activities in the Public Administration (*Law no. 190/2012) identify the officials in charge of drawing up an Anti-Corruption Plan, and of mapping systemic corruption vulnerabilities in the institutions. The key figures are the Head of Corruption Prevention (Responsabile per la prevenzione della corruzione) and the Head of Transparency (Responsabile per la trasparenza).

The application of the MACPI tool to the Health Service of Trento started with a series of meetings with the Head of Corruption Prevention and the Head of Transparency.[32] The survey instrument was organised as follows: i) general information about the respondents was first collected; ii) respondents were then asked about their job and the activities involved; iii) questions about corruption risk were asked with regard to the various activities/functions. Participants in the

---

[32] The authors would like to acknowledge the people who made it possible to administer the MACPI within the Health Service of Trento: Tullio Ferrari, Agnese Morelli and Manuel Quaglia.

survey were requested to answer only about activities/functions they are familiar with (i.e. activities which are part of their job). In cases where there were less than 20 respondents for a given question (e.g. in activities such as consultancy contracts, contributions/reimbursement to customers and board evaluation of acts for the concession of benefits/services), the results have been interpreted with caution.

A list with the institutional activities of the Health Service of Trento and a list of the corresponding anticorruption policies (developed on the basis of the 3-year Anticorruption Plan) were compiled and discussed with the experts. The survey in the Health Service of Trento covered 10 activities and 4 main anticorruption policies. All the anticorruption policies were general: i.e. they covered corruption risks for all or most of the activities. The online survey was conducted on a random sample of 250 employees (the actual respondents were 127), selected by the organisation itself so that all working positions had been included.

Does your job involve this activity/activities:	Number of respondents	Share (%)
Public procurement	34	27
Service provision	75	59
Security and surveillance	48	38
Certifications/authorisations	37	29
Human resources	32	25
Consultancy contracts	10*	8
Intramural activities	22	17
Tender content specifications	18	14
Contributions/reimbursement to customers	12*	9
Board evaluation of acts for the concession of benefits/services	9*	7
Total	127	100

*   The number of respondents is too small.

Level in the hierarchy	Count	Share (%)
Director of service/operative unit	41	32
Staff with management functions	20	16
Staff member without management functions	31	24
Administrative/technical units	30	24
Other or no answer	5	4
Total	127	100

Responsibility with regard to corruption reduction	Count	Share (%)
Corruption reduction is my only function/responsibility	1	0,8
Corruption reduction is a major part of my function/responsibilities	49	38,6
Corruption reduction is a minor part of my function/responsibilities	45	35,4
Corruption reduction is not an explicit part of my responsibilities	32	25,2
Total	127	100

2.6.1. Mapping corruption interest

The first phase of the MACPI application in the Health Service of Trento defined the activities and the applicable anticorruption measures. Two lists (activities and measures) were compiled through discussions with the two key experts and were used for the second phase.

Corruption interest was mapped in the context of the following brief descriptions of the activities:

Public procurement is the procurement of goods and services on behalf of a public authority, such as the Ministry of Health. **Service provision** is the direct provision of health services to the citizens. **Security and surveillance** is related to the degree of resistance to, or protection from harm. It applies to any vulnerable and valuable asset of the Health Service of Trento. Issuing **certifications/authorisations** refers to the procedures for granting certifications or authorisations to third parties. **Human resources** involves the internal/external recruitment, dismissal and promotion of staff. **Consultancy contracts** is the activity which specifies the terms of engagement between the Health Service and a consultant. Such a contract should specify the services provided, the terms of the agreement, and any payment due. The **intramural activities** (or "intra-moenia") are those services provided by doctors outside the standard opening hours. The facilities of the hospital are used by these doctors for a fee paid by the patient. The **tender content specifications** refers to the activity of developing the tender calls. The **contributions/reimbursement to customers** is the activity that assigns contributions or reimbursements for ordinary health services. The **Board evaluation of acts for the concession of benefits/services** refers to the granting of benefits/services to third parties.

The Head of Corruption Prevention and the Head of Transparency were interviewed about possible corruption vulnerability and respective corruption transaction mechanisms. These interviews provided information about the main corruption vulnerabilities that have been identified in the Health Service of Trento; the most important vulnerability was public procurement. It is related to one of the main functions of the Health Service and there are very specific policies that attempt to cover it. According to the interviewed experts, corruption vulnerabilities at the procurement level are possible, and there are attempts to overcome these corruption vulnerabilities with specific, focused policies. However, hidden (i.e. not recognised and discussed) corruption vulnerabilities may exist in relation to the other activities. Such corruption risks are addressed by general anticorruption measures such as the conflict of interest declarations.

2.6.2. Corruption vulnerability of activities

Public procurement

	Indicator*	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	20.6%	5-10%
	Outside pressure associated with activity	61.8%	5-10%
	Susceptibility to pressure from above	21.2%	5%
	Susceptibility to pressure from outside	29.4%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

*   For a description of the indicators please see Table 8.

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. The value for susceptibility to pressure from outside and for the evasion of regulations and susceptibility to pressure from above are high. This shows that officials are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. A considerable share of experts evaluate the anticorruption measures as moderately effective in addressing corruption vulnerabilities. This makes policy coverage satisfactory as it matches the level of corruption vulnerability for this activity, although not at the ideal point.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage is satisfactory, although it can still be improved.

The regulation of public procurement requires further analysis to identify the adequate model of improvement.

Service provision

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	22.7%	5-10%
	Outside pressure associated with activity	60%	5-10%
	Susceptibility to pressure from above	17.6%	5%
	Susceptibility to pressure from outside	13.3%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to all types of corruption: abuse of power, abuse of property, nepotism and clientelism.

Corruption pressure. Values for most indicators are high. Officials are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. The anticorruption measures are evaluated as moderately effective in addressing corruption vulnerabilities. This makes policy coverage satisfactory as it matches the level of corruption vulnerability for this activity, although not at the ideal point.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage can be improved. The regulation of service provision requires further analysis to identify the adequate model of improvement.

Security and surveillance

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	12.5%	5-10%
	Outside pressure associated with activity	66.7%	5-10%
	Susceptibility to pressure from above	21.3%	5%
	Susceptibility to pressure from outside	18.8%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. Values for all indicators are high. Officials are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. A considerable share of experts evaluate the anticorruption measures as moderately effective in addressing corruption vulnerabilities. This makes policy coverage satisfactory as it matches the level of corruption vulnerability for this activity.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage can still be improved. The regulation of security and surveillance requires further analysis to identify the adequate model of improvement.

Certifications/authorisations

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	27%	5-10%
	Outside pressure associated with activity	51.4%	5-10%
	Susceptibility to pressure from above	33.3%	5%
	Susceptibility to pressure from outside	24.3%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare of conflict of interest	72.2%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to all types of corruption: abuse of power, abuse of property, nepotism and clientelism.

Corruption pressure. Values for two indicators (evasion of regulations and susceptibility to pressure from above) are above the ideal. The value for susceptibility to pressure from outside is also high. A significant share of the personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Anticorruption policy coverage of activity. A considerable share of experts evaluate the anticorruption measures as moderately effective. This makes policy coverage satisfactory as it matches the level of corruption vulnerability for this activity.

Overall conclusion. Corruption pressure and opportunities for corrupt transactions inside the organisation require particular attention. The anticorruption policy coverage is satisfactory, although it can still be improved. The regulation of the issuing of certifications/authorisations requires further analysis to identify the adequate model of improvement.

Human resources

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	15.6%	5-10%
	Outside pressure associated with activity	59.4%	5-10%
	Susceptibility to pressure from above	15.6%	5%
	Susceptibility to pressure from outside	15.6%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. Values for most indicators (evasion of regulations, susceptibility to pressure from above and susceptibility to pressure from outside) are high. The majority of experts believe that the personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. A considerable share of experts evaluate the anticorruption measures as moderately effective in addressing corruption vulnerabilities.

Overall conclusion. Corruption pressure requires particular attention. The anti-corruption policy coverage is satisfactory, although it can be still improved. The regulation of human resources requires further analysis to identify the adequate model of improvement.

Consultancy contracts

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	30%	5-10%
	Outside pressure associated with activity	60%	5-10%
	Susceptibility to pressure from above	50%	5%
	Susceptibility to pressure from outside	50%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

*   *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. Values for most indicators are high. Personnel seem to be at a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Anticorruption policy coverage of activity. Anticorruption measures are assessed as moderately effective in addressing corruption vulnerabilities.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage can be improved.

Intramural activities

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	4.5%	5-10%
	Outside pressure associated with activity	40.9%	5-10%
	Susceptibility to pressure from above	9.1%	5%
	Susceptibility to pressure from outside	9.1%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to all types of corruption: abuse of power, abuse of property, nepotism and clientelism.

Corruption pressure. The value for evasion of regulations is low, while the values for susceptibility to pressure from above and susceptibility to pressure from outside are moderate. Values for the "outside pressure for corruption" indicator are high.

Coverage by anticorruption policies. A considerable share of experts evaluate the anticorruption measures as moderately effective in addressing corruption vulnerabilities. This makes policy coverage satisfactory as it matches the level of corruption vulnerability for this activity.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage is satisfactory, although it can still be improved.

Tender content specifications

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	16.7%	5-10%
	Outside pressure associated with activity	55.6%	5-10%
	Susceptibility to pressure from above	11.1%	5%
	Susceptibility to pressure from outside	27.8%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

*   *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to: abuse of power, nepotism and clientelism.

Corruption pressure. Susceptibility to pressure from outside, the evasion of regulations and susceptibility to pressure from above are high. The majority of experts believe that personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. The anticorruption measures are estimated as moderately effective in addressing corruption vulnerabilities.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage can be improved.

Contributions/reimbursement to customers

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Absent	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	9.1%	5-10%
	Outside pressure associated with activity	50%	5-10%
	Susceptibility to pressure from above	16.7%	5%
	Susceptibility to pressure from outside	8.3%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

* *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to abuse of power, abuse of property and clientelism.

Corruption pressure. The value for evasion of regulations is relatively low, while susceptibility to pressure from above (16.7%) and susceptibility to pressure from outside (8.3%) are high. The personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. As regards the four identified anticorruption policies, according to a high percentage of respondents (which ranges from 62.1% to 72.2%, depending on the policy) these are moderately effective in addressing corruption vulnerabilities.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage can be improved. The regulation on contributions/

reimbursements to customers requires further analysis to identify the adequate model of improvement.

Board evaluation of acts for the concession of benefits/services

Public procurement	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	12.5%	5-10%
	Outside pressure associated with activity	55.6%	5-10%
	Susceptibility to pressure from above	11.1%	5%
	Susceptibility to pressure from outside	0%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	70.0%	80%
	Rules of access to the premises for external stakeholders	65.7%	80%
	Prohibition of participation in events sponsored by external companies	62.1%	80%
	Obligation to declare cases of conflict of interest	72.2%	80%

*   *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to abuse of power, abuse of property, nepotism and clientelism.

Corruption pressure. The value for susceptibility to pressure from outside is zero, so within the ideal reference value. The values for evasion of regulations (12.5%) and susceptibility to pressure from above (11.1%) are moderately high. According to a relevant percentage of respondents (55.6%), the personnel are subject to a high risk of outside pressure for corruption.

Coverage by anticorruption policies. The policy coverage is satisfactory as it matches the level of corruption vulnerability for this activity, although not at the ideal point.

Overall conclusion. Evasion of regulations, susceptibility to pressure from above and outside pressure require particular attention. The anticorruption policy coverage can be improved. A detailed review of the way Board evaluation of acts for the concession of benefits/services are organised is necessary to identify the adequate model of improvement.

2.6.3. Assessment of anticorruption policies

The updated **Anticorruption Plan 2014 – 2016** was drawn up by the Health Service of Trento in agreement with the guidelines provided by the National Anticorruption Plan.[33] It contains the analysis of the level of risk of corruption of the activities performed by the Health Service of Trento and the policies, procedures and controls to prevent situations that may hamper the transparency and integrity of the actions and the performances of internal staff.

The Health Service of Trento has four general anticorruption policy measures focused on overall corruption reduction:

1. Code of conduct.
2. Rules of access to the premises for external stakeholders.
3. Prohibition of participation in events sponsored by external companies.
4. Obligation to declare conflict of interest.

	Public procurement	Service Provision	Security and Surveillance	Certifications/ authorisation	Human resources	Consultancy contracts	Contributions/ reimbursement to public-private stakeholders
General anti-corruption measures							
Code of conduct	✓	✓	✓	✓	✓	✓	✓
Rules of access to the premises for external stakeholders	✓	✓	✓	✓	✓	✓	✓
Prohibition of participation in events sponsored by external companies	✓	✓	✓	✓	✓	✓	✓
Obligation to declare cases of conflict of interest	✓	✓	✓	✓	✓	✓	✓

---

[33] The National Anticorruption Plan is produced on a yearly basis, pursuant to Law 190/2012. In 2013, it was developed by the Department of Public Administration and then approved by the National Anticorruption Authority; since 2014, the latter has been entrusted with the responsibility of developing the plan. Its goals can be summarised as follows: i. reduction of the risk of corruption; ii. increase of the institutional ability to detect cases of corruption; iii. creation of an environment hostile to corruption. The Plan lists the institutions charged with preventing and deterring corruption among its employees, via the development of their own three-year anticorruption plans. These plans assess the corruption risk for each institutional activity while developing targeted anticorruption measures.

The following tables provide the results for the MACPI assessment of the implementability, implementation and effectiveness of the anticorruption policies for the Health Service of Trento. These results are based on the responses of the employees of the institution to the survey, and therefore reflect their subjective perceptions.

Code of conduct

The **code of conduct** is a set of rules outlining the social norms and rules and responsibilities of, or proper practices for, an individual, party or institution.

	Indicator*	Value	Reference value (ideal)
Implementability	Ease of implementation	77.5%	90%
	Difficult to evade	59.5%	90%
Implementation	Awareness	68.8%	90%
	Strict implementation	62.7%	90%
	Strict control	18.2%	90%
	Strict application of sanctions	31.8%	90%
Effectiveness	Estimated actual effectiveness	70.0%	90%
	Estimated potential effectiveness	80.2%	80%

* For a description of the indicators please see Table 10.

Conclusions:

Implementability. The policy is of moderately good design and moderately easy to implement (the value of the assessment indicator, which is 77.5%, is close to the ideal point) and not very difficult to avoid (59.5%).

Implementation. Formal compliance with the policy (strict implementation) is moderate. The value for awareness (how much is the policy known among the employees) is moderately high. According to the respondents, however, the effective compliance with the policy needs still to be improved. This refers to strict control (18.2%) and strictly applied sanctions (value 31.8%), for which the assessed values are far from reference values. The implementation of this policy also needs to be improved. This means that a number of undetected violations may occur. The reason for this lack of control and sanctions provided by the respondents is that in some parts the policy may require improvements to ensure adequate control, essential for an effective compliance.

Effectiveness. Values for effectiveness are pretty close to the ideal point, with high percentages of respondents who believe that this policy "reduces the corruption risk" (value 70%) and who think that the implementation of this policy "could reduce the cases of corruption" (value 80.2%).

Overall evaluation. The policy is of moderately good design, but there seem to be problems in terms of actual compliance. It can be hypothesised that there are compromises and inconsistencies in the implementation of control and sanction mechanisms.

Rules of access to the premises for external stakeholders

Rules of access to the premises for external stakeholders is a set of rules about access. "External stakeholders" means all the persons who are not employees of the Health Service of Trento and who need to enter the structures in order to carry out pre-agreed activities there.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	76.8%	90%
	Difficult to evade	42.0%	90%
Implementation	Awareness	68.1%	90%
	Strict implementation	60.0%	90%
	Strict control	10.0%	90%
	Strict application of sanctions	42.6%	90%
Effectiveness	Estimated actual effectiveness	65.7%	90%
	Estimated potential effectiveness	75.7%	80%

Conclusions:

Implementability. The policy is of moderately good design. It is relatively easy to implement, but not so difficult to evade (42%). This is an issue that poses a potential problem in the design of this policy.

Implementation. Formal compliance with the policy (strict implementation) is moderately high. The value for awareness (how much is the policy known among the employees) is also moderately high. According to the respondents, however, the effective (real) compliance with the policy needs still to be improved. This especially refers to strict control (10%) and strictly applied sanctions (42.6%), for which the assessed values are far from reference values.

Effectiveness. Values for effectiveness are moderately high.

Overall conclusion. The policy is of moderately good design, but there seem to be problems in terms of actual compliance. It can be hypothesised that there are compromises and inconsistencies in the implementation of control and sanction mechanisms.

Prohibition of participation in events sponsored by external companies

Prohibition of participation in events sponsored by external companies has the objective to avoid unauthorised contacts between external companies and the employees of the Health Service.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	86.3%	90%
	Difficult to evade	37.2%	90%
Implementation	Awareness	81.9%	90%
	Strict implementation	60.6%	90%
	Strict control	24.2%	90%
	Strict application of sanctions	36.2%	90%
Effectiveness	Estimated actual effectiveness	71.6%	90%
	Estimated potential effectiveness	62.1%	80%

Conclusions:

Implementability. The policy is of moderately good design. It is easily implementable (the value of the assessment indicator, which is 86.3%, is close to the ideal point) but not so difficult to evade (37.2%). This is an issue that poses a potential problem in the design of this policy.

Implementation. Formal compliance with the policy (strict implementation) is moderately high. The value for awareness (how much is the policy known among the employees) is close to the ideal point (81.9%) According to the respondents, however, the effective (real) compliance with the policy needs still to be improved. This refers to strict control (24.2%) and strictly applied sanctions (36.2%), for which the assessed values are far from the reference values. The implementation of this policy also needs to be improved. This means that a number of undetected violations can occur. The reason provided by the respondents for this lack of control and sanctions is that in some parts the policy may require improvements to ensure an adequate control, essential for effective compliance.

Effectiveness. Values for effectiveness are pretty close to the ideal point, with high percentages of respondents who believe that this policy "reduces corruption risk" (71.6%) and who think that the implementation of this policy "could reduce the cases of corruption" (62.1%).

Overall evaluation. The policy is of moderately good design; however there seem to be problems in terms of actual compliance. It can be hypothesised that there are compromises and inconsistencies in the implementation of control and sanction mechanisms.

Obligation to declare conflict of interest

Officials are required to submit conflict of interest declarations and abstain from making decisions in cases of such conflict.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	84.6%	90%
	Difficult to evade	56.0%	90%
Implementation	Awareness	81.1%	90%
	Strict implementation	65.2%	90%
	Strict control	22.2%	90%
	Strict application of sanctions	43.2%	90%
Effectiveness	Estimated actual effectiveness	72.2%	90%
	Estimated potential effectiveness	81.3%	80%

Conclusions:

Implementability. The policy is of moderately good design. It is easily implementable (the value of the assessment indicator, which is 84.6%, is close to the ideal point), but not very difficult to evade (56.0%).

Implementation. Formal compliance with the policy (strict implementation) is moderaly high. The value for awareness (how much is the policy known among the employees) is close to the ideal point (81.1%) According to the respondents, however, the effective (real) compliance with the policy needs still to be improved. This refers to strict control (22.2%) and strictly applied sanctions (43.2%), for which the assessed values are far away from reference values. This means that a number of undetected violations can occur. The reason provided by the respondents for this lack of control and sanctions is that in some parts the policy may require improvements to ensure an adequate control, essential for an effective compliance.

Effectiveness. Values for effectiveness are pretty close to the ideal point, with high percentages of respondents who think that this policy "reduces corruption risk" (72.2%) and who think that the implementation of this policy "could reduce the cases of corruption" (value 81.3%).

Overall conclusion. The policy is of moderately good design but there seem to be problems in terms of actual compliance. It can be hypothesised that there are compromises and inconsistencies in the implementation of control and sanction mechanisms.

2.6.4. Summary conclusions

The pilot evaluation of the Health Service of Trento study involved an open discussion of corruption risks and there was strong will of the management to reduce them. This public organisation has a rather well-developed anticorruption policy, in compliance with the 2014 – 2016 Anti-Corruption Plan.

The main problems identified by the MACPI diagnostics are:

- the specific anticorruption policies show a moderate level of coverage;
- the activities which are most vulnerable to corruption pressure (at least 3 indicators with values over 15%) are: public procurement; service provision; security and surveillance; certifications/authorisations; human resources; consultancy contracts and tender content specifications.
- all the analysed policies have an implementation gap (discrepancy between formal compliance on one side, and control and sanctions procedures on the other);
- there is a discrepancy between the perceived implementation of the anticorruption policies and the perceived effectiveness of the policies themselves (that is assessed to be moderately high). The values of effectiveness indicators could be partly due to response bias.

2.7. PILOT IMPLEMENTATION RESULTS: MUNICIPALITY OF RIVA DEL GARDA, ITALY

Riva del Garda is a small municipality with a population of 16,054 in the Northern Italian province of Trento, located in the Trentino-Alto Adige/South Tyrol Autonomous Region. The size of the municipality makes the connection between the population and the local government institutions very strong. The main function of the municipality is to carry out public works by means of outsourcing, and to select contractors through public tenders. Other activities include the provision of public transportation, welfare (e.g. assistance to elderly people, nursery schools, and public housing), and utilities (water, electricity, and gas).

The pilot application of the MACPI diagnostics to the Municipality of Riva del Garda started with a series of meetings with the Head of Corruption Prevention[34] at the municipality.[35] The survey instrument was organised as follows: i) general information about the respondents was first collected; ii) the experts were then asked about their job and the activities involved; iii) questions about corruption risk were asked with regard to different activities. Participants in the survey were requested to answer only about activities they

---

[34] See the beginning of section 2.6. above for more details on this position.

[35] The authors would like to acknowledge the people who made it possible to administer the MACPI within the Municipality of Riva del Garda: Lorenza Moresco and Walter Merler (for the Municipality of Riva del Garda).

are familiar with (i.e. activities which are part of their job). In cases where there were less than 20 respondents for a given question (e.g. in activities such as security and surveillance, human resources, consultancy contracts, contributions/reimbursement to public-private stakeholders), the results have been interpreted with caution.

A list with the institutional activities of the municipality of Riva del Garda and a list of the corresponding anticorruption policies (developed on the basis of the 3-year Anticorruption Plan) were compiled and discussed with the experts. The survey in the municipality covered 7 activities and 4 anticorruption measures. All anticorruption measures were general: i.e. they covered corruption risks for all or most of the activities. All of the 83 employees were contacted for the online survey and 58 of them completed the survey.

Does your job involve this activity/activities:	Number of respondents	Share (%)
Public procurement	26	44.8
Service provision	22	37.9
Security and surveillance	11*	19.0
Certifications/authorisation	25	43.1
Human resources	6*	10.3
Consultancy contracts	6*	10.3
Contributions/reimbursement to public-private stakeholders	8*	13.8
Total	58	100.0

* *The number of respondents is too small.*

Level in the hierarchy	Count	Share (%)
Director of area/operative unit	10	17.2
Administrative/technical unit	47	81.0
Other or no answer	1	1.7
Total	58	100.0

Responsibility with regard to corruption reduction	Count	Share (%)
Corruption reduction is my only function/responsibility	1	1.7
Corruption reduction is a major part of my function/responsibilities	13	22.4
Corruption reduction is a minor part of my function/responsibilities	18	31.0
Corruption reduction is not an explicit part of my responsibilities	26	44.8
Total	58	100.0

2.7.1. Mapping corruption interest

The first phase of the MACPI application in the Municipality of Riva del Garda defined the activities and the corresponding anticorruption measures. Two lists (activities and measures) were compiled through discussions with the experts and were used for the second phase.

Corruption interest was mapped in the context of the following brief descriptions of the activities:

Public procurement is the procurement of goods and services on behalf of a public authority, such as the municipality of Riva del Garda. **Service provision** refers to the services provided to citizens. **Security and surveillance** is related to the degree of resistance to, or protection from harm. It applies to any vulnerable and valuable asset of the municipality. The **issuing of certifications/authorisations** relates to the procedures for granting certifications or authorisations to third parties. **Human resources** involves internal/external recruitment, dismissal and promotion. **Consultancy contracts** is the activity which specifies the terms of engagement between the municipality and a consultant. Such an agreement should specify the services provided, the term of the agreement, and any payment due. The **contributions/reimbursement to public-private stakeholders** is the activity that assigns contributions or reimbursements for services provided by public or private stakeholders.

The Head of Corruption Prevention was interviewed about possible corruption vulnerability and respective corruption transaction mechanisms. These interviews provided information about the main corruption vulnerabilities that have been identified in the Municipality of Riva del Garda. The most important vulnerability in the municipality is public procurement. Since it is related to one of the main municipal functions, there are specific policies that attempt to cover it. Still, hidden corruption vulnerabilities (not recognised and discussed) can exist in relation to other activities as well. Such corruption risks are addressed by general anticorruption policies such as the conflict of interest declarations.

2.7.2. Corruption vulnerability of activities

The following tables assess the level of vulnerability to corruption of the 7 main activities of the Municipality of Riva del Garda.

Public procurement

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent

	Indicator	Value	Reference value (ideal)
Corruption pressure	Evasion of regulations	3.8%	5-10%
	Outside pressure associated with activity	38.5%	5-10%
	Susceptibility to pressure from above	3.8%	5%
	Susceptibility to pressure from outside	3.8%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	66.0%	80%
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80%
	Reporting of all reasonable suspicions of corruption	67.6%	80%
	Conflict of interest declarations	69.4%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. Values for most indicators are low. However, personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. As regards the four anticorruption measures, these are moderately effective in addressing corruption vulnerabilities. This makes policy coverage satisfactory as it matches the level of corruption vulnerability for this activity.

Overall conclusion. Outside pressure requires particular attention. Evasion of regulations and susceptibility to pressure from outside are low. The anticorruption policy coverage can be improved.

Service provision

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent

	Indicator	Value	Reference value (ideal)
Corruption pressure	Evasion of regulations	9.1%	5-10%
	Outside pressure associated with activity	36.4%	5-10%
	Susceptibility to pressure from above	9.1%	5%
	Susceptibility to pressure from outside	4.5%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	66.0%	80
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80
	Reporting of all reasonable suspicions of corruption	67.6%	80
	Conflict of interest declarations	69.4%	80

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to all types of corruption: abuse of power, abuse of property, nepotism and clientelism. This is probably due to the fact that service provision is the activity that involves the highest level of interaction between the municipality and the citizens.

Corruption pressure. Values for most indicators are low. However, there is a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. These are moderately effective in addressing corruption vulnerabilities.

Overall conclusion. Outside pressure requires particular attention. Evasion of regulations and susceptibility to pressure from outside are relatively low. The anticorruption policy coverage is satisfactory.

Security and surveillance

Public procurement	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent

Public procurement	Indicator	Value	Reference value (ideal)
Corruption pressure	Evasion of regulations	18.2%	5-10%
	Outside pressure associated with activity	45.5%	5-10%
	Susceptibility to pressure from above	18.2%	5%
	Susceptibility to pressure from outside	18.2%	5%
Coverage by anticorruption policies	Anticorruption measures targeting the activity	Estimated effectiveness of policy	Reference value (ideal)
	Code of conduct	66.0%	80%
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80%
	Reporting of all reasonable suspicions of corruption	67.6%	80%
	Conflict of interest declarations	69.4%	80%

*   Total number of respondents for this activity is very low.

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. Values for most indicators are high. There is also a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. These are moderately effective in addressing corruption vulnerabilities.

Overall evaluation. Corruption pressure is high and therefore anticorruption policy coverage should be improved.

Issuing of certifications/authorisations

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	20%	5-10%

	Indicator	Value	Reference value (ideal)
	Outside pressure associated with activity	45.8%	5-10%
	Susceptibility to pressure from above	12.5%	5%
	Susceptibility to pressure from outside	16.7%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	66.0%	80%
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80%
	Reporting of all reasonable suspicions of corruption	67.6%	80%
	Conflict of interest declarations	69.4%	80%

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to all types of corruption: abuse of power, abuse of property, nepotism and clientelism.

Corruption pressure. Values for most indicators are high. Almost half of respondents believe personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. Anticorruption policies are assessed as moderately effective in addressing corruption vulnerabilities, i.e. policy coverage can be improved.

Overall conclusion. Corruption pressure and moderately effective policies require a review of the anti-corruption policy coverage.

Human resources

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	16.7%	5-10%
	Outside pressure associated with activity	50.0%	5-10%

	Indicator	Value	Reference value (ideal)
	Susceptibility to pressure from above	33.3%	5%
	Susceptibility to pressure from outside	0%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	66.0%	80%
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80%
	Reporting of all reasonable suspicions of corruption	67.6%	80%
	Conflict of interest declarations	69.4%	80%

* *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest. The overall level of vulnerability to corruption interest of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. The values for most pressure indicators (except outside pressure) is high and a considerable number of clients show aptitude to violate regulations. The value for susceptibility to pressure from above is also high.

Coverage by anticorruption policies. Anticorruption measures are given moderate assessments of their effectiveness.

Overall conclusion. Evasion of regulations, outside pressure and susceptibility to pressure from above require particular attention. The regulations on human resources require further analysis to identify the adequate model of improvement.

Consultancy contracts

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Absent	Absent
	Nepotism	Present	Absent
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	16.7%	5-10%
	Outside pressure associated with activity	33.3%	5-10%

	Indicator	Value	Reference value (ideal)
	Susceptibility to pressure from above	16.7%	5%
	Susceptibility to pressure from outside	16.7%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	66.0%	80%
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80%
	Reporting of all reasonable suspicions of corruption	67.6%	80%
	Conflict of interest declarations	69.4%	80%

*   Total number of respondents for this activity is very low.

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to abuse of power, nepotism and clientelism.

Corruption pressure. Values for most indicators are high. According to a relevant percentage of respondents, personnel are subject to a high risk of outside pressure for corruption, and a considerable number of clients show aptitude to violate regulations.

Coverage by anticorruption policies. As regards the four identified anticorruption policies, according to a high percentage of respondents (which ranges from 63.6% to 69.4%, depending on the policy) these are moderately effective in addressing corruption vulnerabilities.

Overall conclusion. Corruption pressure requires particular attention. The anticorruption policy coverage is satisfactory, although it can still be improved. The regulation of consultancy contracts may need further analysis to identify the adequate model of improvement.

Contributions/reimbursement to public-private stakeholders

	Indicator	Value	Reference value (ideal)
Corruption interest	Abuse of power	Present	Absent
	Abuse of property	Present	Absent
	Nepotism	Present	Absent

	Indicator	Value	Reference value (ideal)
	Clientelism	Present	Absent
Corruption pressure	Evasion of regulations	25%	5-10%
	Outside pressure associated with activity	25%	5-10%
	Susceptibility to pressure from above	25%	5%
	Susceptibility to pressure from outside	25%	5%
Coverage by anticorruption policies	**Anticorruption measures targeting the activity**	**Estimated effectiveness of policy**	**Reference value (ideal)**
	Code of conduct	66.0%	80%
	Formal procedures for the payment of invoices and control of tax revenues	63.6%	80%
	Reporting of all reasonable suspicions of corruption	67.6%	80%
	Conflict of interest declarations	69.4%	80%

*   *Total number of respondents for this activity is very low.*

Conclusions:

Corruption interest. The overall level of vulnerability to corruption of this activity is high, since it can potentially be subject to all types of corruption: abuse of power, abuse of property, nepotism and clientelism.

Corruption pressure. Values for all indicators are high.

Coverage by anticorruption policies. As regards the four anticorruption policies, according to a high percentage of respondents (which ranges from 63.6% to 69.4%, depending on the policy) these are moderately effective.

Overall conclusion. Corruption pressure needs to be matched/countered by and improved set anti-corruption policies/measures.

2.7.3. Assessment of anticorruption policies

The 2015 – 2017 Anticorruption Plan was approved by the Municipality in January 2015 pursuant to the guidelines provided by the National Anticorruption Plan. It contains the analysis of the level of risk of corruption of the activities performed by the municipality; the policies, procedures and controls to reduce factors that can hamper the transparency and integrity of the actions and the performances of officials.

The Municipality of Riva del Garda has four general anticorruption policy measures focused on the overall reduction of corruption:

1. Code of conduct.
2. Formalisation of the procedures for the payment of invoices and control of tax revenues.
3. Reporting of all reasonable suspicions of corruption.
4. Conflict of interest declarations.

	Public procurement	Service Provision	Security and Surveillance	Certifications/ authorisation	Human resources	Consultancy contracts	Contributions/ reimbursement to public- private stakeholders
General anticorruption measures							
Code of conduct	✓	✓	✓	✓	✓	✓	✓
Formal procedures for the payment of invoices and control of tax revenues	✓	✓	✓	✓	✓	✓	✓
Reporting of all reasonable suspicions of corruption	✓	✓	✓	✓	✓	✓	✓
Conflict of interest declarations	✓	✓	✓	✓	✓	✓	✓

The following tables provide the results for the MACPI assessment of the implementability, implementation and effectiveness of the anticorruption policies for the Municipality of Riva del Garda.

Code of conduct

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	91.5%	90%
	Difficult to avoid	45.7%	90%
Implementation	Awareness	73.9%	90%
	Strict implementation	63.8%	90%
	Strict control	17.8%	90%
	Strict application of sanctions	30.4%	90%
Effectiveness	Estimated actual effectiveness	66.0%	90%
	Estimated potential effectiveness	74.4%	80%

Conclusions:

Implementability. According to the respondents, this is a well-designed anticorruption policy. The policy is easily implementable (the value of the assessment indicator – 91.5% – exceeds the reference value) but is not so difficult to evade. This is an issue that poses a potential problem in the design of this policy.

Implementation. Formal compliance with the policy (strict implementation) is moderate. The value for awareness (how much the policy is known among the employees) is also moderately high. Actual compliance with the policy needs to be improved. This refers to strict control and strictly applied sanctions, for which the assessed values are low. According to the respondents, the implementation of this policy still needs to be improved. The reason for this lack of control and sanctions provided by the respondents is that in some parts the policy may require improvements to ensure an adequate control, essential for effective compliance.

Effectiveness. Values for effectiveness are moderately high.

Overall conclusion. For this policy there is room for improvement in both design and implementation. Critical issues here might be compromises and inconsistencies in the implementation of control and sanction mechanisms.

Formal procedures for the payment of invoices and control of tax revenues

The formalisation of the procedures for the payment of invoices and the control of the municipal tax revenues is intended to standardise the rules for these activities/functions.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	69.7%	90%
	Difficult to evade	59.4%	90%
Implementation	Awareness	75.8%	90%
	Strict implementation	62.5%	90%
	Strict control	21.2%	90%
	Strict application of sanctions	45.5%	90%
Effectiveness	Estimated actual effectiveness	63.6%	90%
	Estimated potential effectiveness	72.8%	80%

Conclusions:

Implementability. According to the respondents, this policy is of moderately good quality but is not very easily implementable and not very difficult to evade.

Implementation. Formal compliance with the policy (strict implementation) is moderate. The value for awareness (how much is the policy known among the

employees) is also moderate. According to the respondents, however, the effective compliance with the policy needs to be improved. This refers to strict control for which the assessed value is low, meaning that a number of undetected violations can occur.

Effectiveness. Values for effectiveness are moderately high.

Overall conclusion. The policy is of moderately good quality and appears to show problems in terms of actual compliance. Critical issues are most probably related to compromises and inconsistencies in the implementation of control and sanction mechanisms.

Reporting of all reasonable suspicions of corruption

This obligation refers to all reasonable suspicions of corruption and requires the active collaboration by employees in exposing corruption cases.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	76.3%	90%
	Difficult to evade	42.1%	90%
Implementation	Awareness	76.3%	90%
	Strict implementation	48.6%	90%
	Strict control	5.3%	90%
	Strict application of sanctions	26.3%	90%
Effectiveness	Estimated actual effectiveness	67.6%	90%
	Estimated potential effectiveness	78.9%	80%

Conclusions:

Implementability. This is a policy of moderately good quality. The policy is relatively easily to implement and not especially difficult to evade.

Implementation. Formal compliance with the policy (strict implementation) is relatively low. The value for awareness (how much the policy is known among the employees) is moderate. Real compliance indicators have fairly low values. This refers to strict control and strictly applied sanction. This means that a number of undetected violations can occur. The policy may require substantial improvements to ensure adequate control.

Effectiveness. Values for effectiveness are moderate to high.

Overall conclusion. The policy is of moderately good quality but has problems in terms of actual compliance. Some modifications are probably necessary.

Conflict of interest declarations

Conflict of interest declarations is related to the obligation for officials to abstain from participating in decision-making in case of conflict of interest.

	Indicator	Value	Reference value (ideal)
Implementability	Ease of implementation	87.8%	90%
	Difficult to evade	60.4%	90%
Implementation	Awareness	78.7%	90%
	Strict implementation	60.9%	90%
	Strict control	17.0%	90%
	Strict application of sanctions	36.2%	90%
Effectiveness	Estimated actual effectiveness	69.4%	90%
	Estimated potential effectiveness	77.5%	80%

Conclusions:

Implementability. According to respondents, this is a well-designed anticorruption policy. Values of assessment indicators are relatively close to the ideal point. The policy is easily implementable but not very difficult to evade.

Implementation. Formal compliance with the policy (strict implementation) is moderately high. The value for awareness is high but compliance with the policy needs to be improved. This refers to control and sanctions, which have low values, indicating an implementation gap.

Effectiveness. Values for effectiveness are moderately high.

Overall conclusion. The policy is, in the perception of the respondents, fairly well designed, but appears to have problems in implementation. Most probably some amendments are necessary.

2.7.4. Summary conclusions

The management of the municipality was very motivated to facilitate the discussion of corruption risks and ways to reduce them. The institution has in place a rather well-developed anticorruption policy, in compliance with the 2015 – 2017 Anti-Corruption Plan approved in January 2015. The main conclusions of the MACPI diagnostics are:

• the specific anticorruption policies show a moderate level of coverage;
• the activities which are most vulnerable to corruption pressure (at least 3 indicators with values over 15%) are as follows: Security and surveillance; certifications/authorisations; Human resources; Consultancy Contracts; contribu-

tions/reimbursement to public-private stakeholders;

- all the analysed policies show an implementation gap (discrepancy between formal compliance on one side, and control and sanctions procedures, on the other);
- there is a discrepancy between the perceived implementation of the anti-corruption policies (with some critical areas highlighted) and the perceived effectiveness of the policies themselves (that is assessed to be high). High values of effectiveness indicators could be partly due to response bias.

3. IMPLEMENTATION AND POLICY IMPLICATIONS

Given the innovative nature of MACPI – both in terms of its design and its field of application – a number of factors related to the process of its implementation and the policy relevance of its findings need to be clarified.

3.1. PURPOSE AND FIELD OF APPLICATION OF THE TOOL

Anticorruption policies can and should be implemented, monitored, and improved at the **level of public organisations**. Even national level policies are ultimately implemented at the micro level of individual organisations. This is so because policies set the rules that public officials need to adhere to, while deliberate noncompliance with these rules is the basis of corruption transactions. If national level policies are not adequately translated into organisational instructions and mechanisms, corruption transactions would be labelled as morally deplorable, but legally acceptable.

For a multitude of reasons corruption transactions are most often associated with **bribery**, i.e. the form of private gain received for deliberate noncompliance with rules. This focus is convenient because bribery is a very good proxy that can be used to measure prevalence of corruption transactions (other related proxies are bribery proposals, i.e. corruption pressure). This choice of proxy, however, **blurs several aspects of corruption transactions** that are important for both analysis and policy design:

- The content of corruption transactions is largely ignored.
- Anticorruption policies target the "gain" and fail to properly address "noncompliance".
- The way policy responses to corruption are interpreted is modified. The measure of the prevalence of bribery in national surveys is often interpreted as indicator of the "level of corruption in society". As noted in chapter I, however, at macro (societal) level the prevalence of bribery does not characterise the level of graft and greed, but rather the nature of the governance model or the method of definition of the public good in the policy making process. In this respect, a **national level anticorruption policy is the one that targets the system of governance and the policy process rather than bribery and noncompliance with rules**.

At the micro level (public organisations) corruption has a different interpretation. In order to better understand it, the focus should be shifted from the form to the **content of corruption transactions** (labelled above as **types of corruption**). The difference between form and content of corruption transactions is fundamental.

Form represents gain; from the point of view of form, the answer to the question is usually sought in the motivation of officials or their moral integrity. However, if the question is how corruption transactions are possible, then the answers most often address organisational structure and rules and other micro and macro level factors.

In order to address the corruption transaction problem at the micro level, it is necessary to analyse the structure of the public organisation and to identify the activities/functions in which corruption transactions would have practical sense for public officials and clients.[36] This is exactly what MACPI provides, including a review of the intersections between functions of the organisation and types of corruption. It also identifies **corruption vulnerability zones,** in other words the **mechanisms of noncompliance** that make it possible for public officials to demand some form of gain from clients (citizens, businesses). At the macro level, the approach would be different: it would be necessary to identify governance mechanisms that allow policy particularism which privileges some social actors over others and thus compromises the public good.

In this context, the MACPI tool serves the assessment of anticorruption policies by being capable of:

- identifying corruption vulnerability zones, i.e. the intersections of activities/ functions of the public organisation and the types of corruption;
- identifying anticorruption policies designed to address vulnerabilities in these zones;
- evaluating these policies and their corresponding procedures;
- evaluating organisational activities from the point of view of corruption vulnerability and anticorruption policy coverage.

3.2. METHODOLOGICAL CONSIDERATIONS FOR THE APPLICATION OF MACPI

The principal problem anticorruption monitoring needs to address is its **source of information**. Discussing corruption at a concrete level in individual public organisations requires that officials discuss how they themselves and their colleagues violate laws and regulations. Difficulties in this respect are valid to both MACPI target groups: officials in public organisations and stakeholders (citizens, businesses).[37] Monitoring experience has shown that hesitation to be more open increases if admitting involvement in corruption transactions is not too specific, i.e. when questions like how, who, what, etc., are not discussed in detail. Despite that, for both target groups a certain level of bias could be expected. Most often bias is not random but unidirectional: corruption phenomena are most often played down when personal or collegial involvement is addressed. In this respect, MACPI results can be expected to be more positive than the actual state of affairs.

---

[36] A more in-depth analysis in this respect would require a full scale audit of organisational protocols. Such analysis is outside the scope of MACPI as it requires a different set of analytical tools.

[37] In this respect the implementation of MACPI instruments is part of an organisational policy.

Potential bias and reservation about corruption are addressed in MACPI by asking more general questions about specific elements of corruption, specific forms of violations and by discussing the behaviour of the opposite side (clients or officials) of the corruption transaction.

The MACPI tool is a combination of four methods: desk research, in-depth interviews (IDIs) with experts, survey of officials and survey of stakeholders (the general public and/or clients of the public organisation). In applying the tool a number of issues need to be taken into consideration:

(1) **Initial contact with the public organisation**. While it is relatively easy to identify sectors or organisations where potentially high corruption risk exists, establishing contact with a concrete organisation is not always unproblematic. The working solution adopted in the piloting of MACPI was to approach first an organisation at a higher level of the hierarchy and obtain a formal recommendation to contact the specific public organisation to be monitored. Higher levels of the hierarchy most often do not have direct contacts with clients in the respective sector, but have (at least potentially) a strong interest in anticorruption policies. It would rather be an exception to find a public organisation (in our case central government agency or municipality) that would volunteer participation if approached directly.

(2) The right **balance between desk research and IDIs** needs to be found. In the piloting of MACPI in Italy and Bulgaria, the initially envisaged stronger role of IDIs was reduced because experts were more inclined to confirm or reject propositions formulated by researchers instead of coming up with their own original ideas. Two factors contributed to this: a) the corruption imagination of experts was rather insufficient, especially if they needed to use MACPI concepts; b) there was reluctance to discuss too much corruption in their own organisation.

(3) **Design and implementation of the online instrument**. Several issues need to be mentioned here:

- Wording of questions. In the piolting of MACPI, alternative designs of some questions were used simultaneously in order to test the adequate wording which would minimise non response.[38]
- Some types of information that originally had to be collected through IDIs (e.g. corruption pressure, effectiveness, etc.) was transferred to the online questionnaire due to the difficulties encountered when attempting to assess these indicators through IDIs (mostly related to the reluctance of experts to give concrete assessments and their bias). The anonymous survey has proved a much better instrument in this respect.
- The shares of indefinite answers (don't know, no answer) are normal, i.e. relatively low. The main reason for this has been the extensive use of filter questions. These "compile" the set of questions a concrete official is competent to answer and filter out activities and type of corruption that are not relevant for his/her respective job position. Because of this, time for

---

[38] The wording of questions used in the piloting can be found in Appendix 1.

completing the survey has been relatively low – around 15-20 minutes for most respondents.

- Simple random sampling has been relatively easy to implement. It has been done by officials based on concrete and easy to follow steps. It has not been possible for the research team to directly participate in the sampling process because of issues of confidentiality. The advantage of this procedure has been the additional guarantee for anonymity it has ensured.

(4) **Size of the monitored organisation** is an important consideration. Despite the fact that smaller organisations have been surveyed exhaustively, the final number of cases available for analysis (40-50) was too low for a more in-depth statistical analysis. This might also be a problem for comparative analyses in case MACPI is used multiple times. Small absolute numbers of respondents for some indicators might cause excessive variation, as the weight of a single respondent in the final score is too big. Furthermore, in smaller organisations anonymity is a more serious problem: it leads to bias and "patriotic" consolidation (more on this below) in an effort to both present one's own organisation and work matching prescribed standards and rules.

(5) **General public vs. stakeholder survey**. Both instruments are useful for the implementation of MACPI in different ways. The general public instrument is used to characterise the general corruption situation in the country and to measure average levels of indicators like involvement in corruption, corruption pressure, susceptibility to corruption, etc. The usefulness of the stakeholder survey is that it cross-checks assessments of officials with the experience of clients. As noted, this option has not been tested due to logistical difficulties in ensuring a representative sample of the clients of a specific public organisation (Border Police in Bulgaria). Another, probably more important aspect of the stakeholder survey is that it can be used to measure a limited set of MACPI indicators (table below):

MACPI indicators	Survey of officials	Survey of stakeholders
Corruption pressure	X	X
Susceptibility to corruption	X	X
Implementability of anticorruption policies	X	-
Implementation of anticorruption policies	X	-
Effectiveness of anticorruption policies	X	-

The main reason for this difference is that stakeholders do not have direct experience and knowledge of procedures and anticorruption policies in the organisation. Rather they could be a relevant source of information about the prevalence of corruption pressure and involvement in corruption transactions. In this respect they would be important in the evaluation of the result of anticorruption policies.

Another aspect of the stakeholder survey as a MACPI instrument is cost, especially in larger scale implementation of the tool. Decisions in this respect

would largely depend on commitment to measurement accuracy and large scale implementation.

3.3. ENSURING THE RELIABILITY OF FINDINGS

One of the issues facing the evaluation process of anticorruption policies in a public organisation is potential positive response bias – a kind of institutional "patriotism" – which stems from the tendency of some employees to give exclusively positive answers to all questions about the organisation. While it was hypothetically possible that there was no pressure or corruption risk whatsoever in all activities of the organisation and all policies were extremely effective tools in fighting corruption, given the overall pattern of answers (including the actual incidence rates of corruption pressure for the year before the survey) it was certainly doubtful that this was the case for the organisations monitored during the piloting of MACPI.

"Patriots" were defined operationally as respondents who gave only positive answers to 7 of the key questions which define the main indicators (three of the activity indicators and 4 of the policy indicators). The share of institutional patriots varies substantially between the Bulgarian and the Italian organisations.

Figure 11. Share of institutional patriots in the monitored organisations
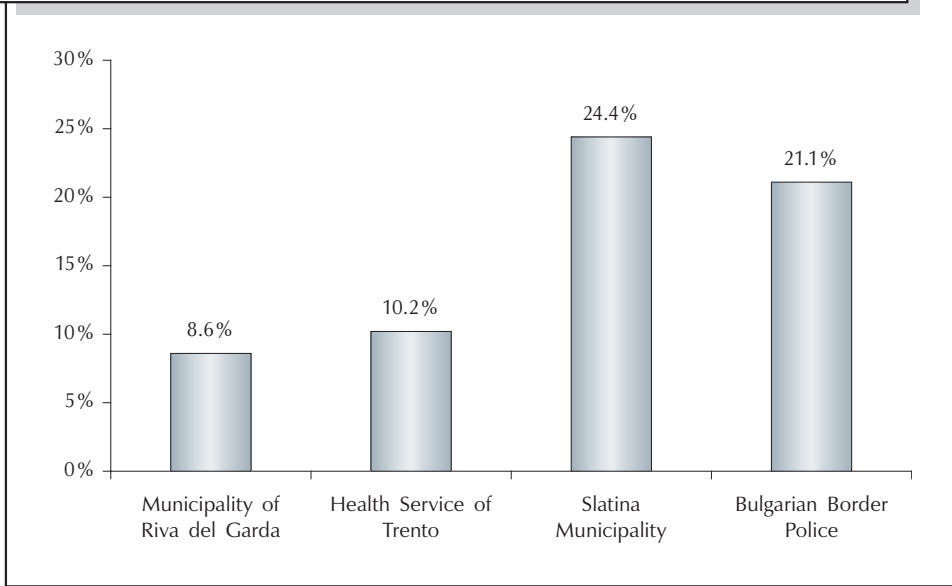
A different analysis shows that patriots are much less likely to report being offered a bribe – a difference which is particularly relevant to the Bulgarian Border Police (the difference in percentages for Slatina Municipality is even higher, however, the small number of respondents there requires more careful interpretations of the data).

Figure 12. Share of officials who reported being offered a bribe at least in some cases in the preceding year
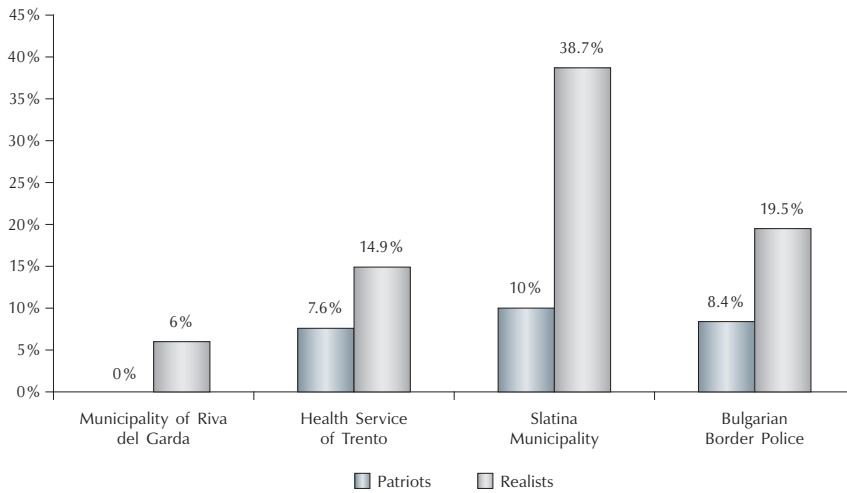
If institutional patriots are excluded from the analyses, the adjusted data show an interesting pattern – the difference between the original percentages (totals) and the percentages based only on the realists' answers are more negative for the less effective policies – i.e. the answers of the institutional patriots don't so much change the overall estimates, but they could reduce the sensitivity of the tool.

Figure 13. Estimated actual effectiveness of measures in the Bulgarian Border Police
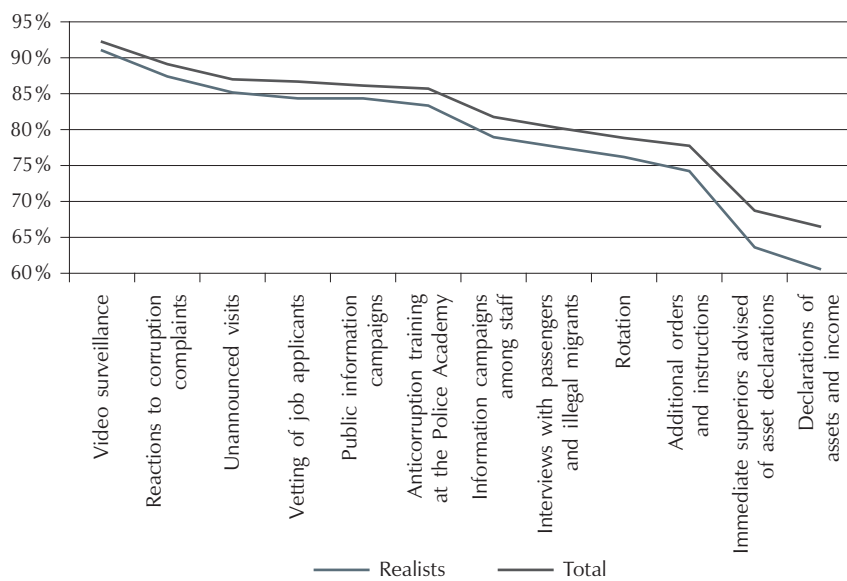
The profile of the institutional patriots shows that they are more common among the staff without management functions. Also, the realists are generally more experienced employees than the patriots – mean years of experience for the realists is 13 and for the patriots – 10 years of experience on average.[39]

In conclusion, the share of institutional patriots can be a useful additional dimension in the monitoring of an organisation. When there are large discrepancies between the share of respondents giving only positive answers and the overall picture (for example, rates of citizens offering bribes) this could be interpreted as a sign that the employees of the organisation avoid facing reality. Such a proxy could be helpful in estimating the will in an organisation and its employees to face its problems with corruption.

3.4. COMPARATIVE VALUES OF MACPI INDICATORS

MACPI has the potential to become the basis for benchmarking of similar public organisations across countries or of the same organisation over time. From this point of view, it is useful to consider the findings of the pilot implementation in a comparative perspective. A common aspect of the findings for the organisations Bulgaria and Italy, for example, is that general anticorruption policies prevail. They are concentrated in several areas: anticorruption training, modelling behaviour of officials (codes of conduct, etc.) and creating channels for citizen feedback. Specific polices targeting concrete activities and types of corruption are relatively rare.

The values of MACPI indicators for the monitored public organisations in Bulgaria and Italy are presented by anticorruption measures and by activities/functions in tables 14 – 16. From the point of view of methodology several aspects of the distributions obtained are of interest:

- similarities between organisations in the two countries;
- similarities and differences between countries;
- specific patterns of anticorruption policy indicators;
- specific patterns in the evaluation of anticorruption policy coverage of activities.

Anticorruption measures. The pattern of values of MACPI indicators is that most policies are evaluated as having relatively high **design quality** (easy to implement, difficult to evade). The values of the **formal compliance** indicators (awareness, strict implementation) are also high. However, **actual compliance** (sanctions and controls) has substantially lower values, which is a clear indication of an existing implementation gap. The values of the effectiveness indicators are high. For many measures they reach the level defined as the hypothetical maximum. In comparative terms, the average values of effectiveness of anticorruption measures in Italy are lower than the effectiveness in Bulgarian public organisations. This

---

[39] A logistic regression with patriotism as a dependent variable and years of experience and level in the hierarchy as independent variables shows that both factors have statistically significant effect. Therefore, it is not simply the case that more experienced employees are higher in the hierarchy.

most probably reflects the difference in organisational culture in both countries and also the fact that organisational bias is substantially lower in Italy.

A more general issue in this respect is how to interpret the high value of the effectiveness indicators against the background of high corruption vulnerability:

(a) A set of measures could in itself be assessed as effective. However, its impact on corruption vulnerability could vary depending on the practices it targets, e.g. effectiveness could be high but the relevance of the measure (the activities it targets) could be limited. In this respect, it is important to consider whether all aspects of a given activity/function are comprehensively covered (targeted) by adequate anticorruption measures – both general and, more importantly, by specific measures. In this respect it is possible to have a lot of effective tools which miss the target or cover only some parts of the target.

(b) The ultimate criterion for effectiveness is whether a measure **reduces corruption vulnerability**. High levels of vulnerability typically mean that the effectiveness of the anticorruption measure is poor or does not exist at all. In this respect, the first application of MACPI diagnostics can be considered the benchmark for the monitored organisation. If sincere commitment to anticorruption exists, MACPI diagnostics should be followed up by policy interventions and a follow up round of MACPI diagnostics. The **comparative analysis of the dynamics of MACPI indicators** is the only way to track and evaluate progress.

(c) **Activities/functions**. The pattern of values of the indicators evaluating the activities in Bulgarian public organisations shows that corruption interest and pressure are high. Coverage, in terms of number of measures is also high but general measures predominate. In most cases, activities are associated only with general polices and no specific anticorruption policies have been designed. This finding shows that organisational design of anticorruption policies and protocols is far from complete or comprehensive.

The average values of the estimated actual and potential effectiveness of all anticorruption measures targeting a specific activity is high. Comparison with the high levels of corruption pressure and interest shows that the policy coverage of activities is inadequate (does not manage to reduce corruption vulnerability).

It could be expected that MACPI implementation in other EU member states would register similar levels of indicators which would accurately reflect the anticorruption preparedness of organisations. Difference could be expected with respect to the more general corruption landscape in the countries.

Reference (ideal) values of MACPI indicators. The rationale for including such values in the analysis of MACPI results is to provide a theoretically constructed reference point that would enable definite conclusions about results at the test stage of MACPI implementation. The information obtained at the stage of the pilot implementation showed that these values have some relevance, at least until MACPI has been implemented in more organisations. However, it should be noted

that the basic data analysis approach to be used with MACPI is comparative analysis of values over time. This, of course, presumes that the organisation is making efforts to improve the implementation of its anticorruption policies and/or to introduce new policies.

Table 14. Comparative evaluation of general anticorruption measures in four public organisations

Anticorruption policies	Implementability		Implementation				Effectiveness	
	Ease of implementa-tion (%)	Difficult to evade (%)	Aware-ness (%)	Strict implementa-tion (%)	Strict control (%)	Strict application of sanc-tions (%)	Estimated potential effective-ness (%)	Estimated actual effective-ness (%)
Border Police, Bulgaria								
Annual submission of declarations of assets and income	95.1	71.3	93.9	91.1	63.1	59.3	73.1	66.5
Direct superiors read and sign asset declarations	93.6	72.9	91.2	88.8	59.8	51.2	73.1	68.7
Immediate reactions to corrupt complaints	88.3	82.8	93.5	87.3	61.9	63.9	92.5	89.1
Information campaigns among staff	94.8	69.7	90.6	82.2	49.8	45.1	86.6	81.8
Information campaigns among the public	92.1	74.2	93.0	79.0	51.3	43.8	89.9	86.1
Additional orders and instructions	79.8	59.9	89.7	76.8	49.0	49.3	83.0	77.7
Anticorruption training at the Police Academy	91.5	67.3	89.8	80.8	48.2	50.7	90.4	85.7
Slatina Municipality, Bulgaria								
Access control	94.3	69.7	97.1	94.3	51.4	44.1	85.3	82.9
Instructions for the information and administrative activities and the handling of documents	100.0	79.3	93.8	93.8	53.3	62.5	93.1	89.7
Internal labour regulations	97.1	74.3	88.2	85.3	47.1	61.8	94.1	85.7
Internal public procurement rules	82.6	91.3	91.3	91.3	43.5	56.5	100.0	95.7
Internal rules for processing corruption complaints	95.2	75.0	100.0	95.2	42.9	52.4	100.0	90.5

Table 14.   Comparative evaluation of general anticorruption measures in four public organisations (continued)

Anticorruption policies	Implementability		Implementation				Effectiveness	
	Ease of implementa-tion (%)	Difficult to evade (%)	Aware-ness (%)	Strict implementa-tion (%)	Strict control (%)	Strict application of sanc-tions (%)	Estimated potential effective-ness (%)	Estimated actual effective-ness (%)
Health Service of Trento, Italy								
Obligation to report conflict of interest	84.6	56.0	81.1	65.2	22.2	43.2	81.3	72.2
Code of conduct	77.5	59.5	68.8	62.7	18.2	31.8	80.2	70.0
Prohibition of participation in events sponsored by external companies	86.3	37.2	81.9	60.6	24.2	36.2	71.6	62.1
Rules of access to the premises for external stakeholders	76.8	42.0	68.1	60.0	10.0	42.6	75.7	65.7
Municipality of Riva del Garda, Italy								
Obligation to report conflict of interest	87.8	60.4	78.7	60.9	17.0	36.2	77.5	69.4
Code of conduct	91.5	45.7	73.9	63.8	17.8	30.4	74.4	66
Formal procedures for the payment of invoices and control of tax revenues	69.7	59.4	75.8	62.5	21.2	45.5	72.8	63.6
Obligation to collaborate in the prevention of corruption	76.3	42.1	76.3	48.6	5.3	26.3	78.9	67.6

Table 15. Comparative evaluation of specific anticorruption measures in four public organisations

Anticorruption policies	Implementability		Implementation				Effectiveness	
	Ease of implementa-tion (%)	Difficult to evade (%)	Aware-ness (%)	Strict imple-mentation (%)	Strict control (%)	Strict application of sanc-tions (%)	Estimated potential effective-ness (%)	Estimated actual effective-ness (%)
Border Police, Bulgaria								
Video surveillance	87.8	73.6	88.9	88.4	50.2	55.6	92.2	92.2
Rotation	80.8	75.8	92.7	88.8	53.9	49.8	85.0	78.8
Unannounced visits	88.9	81.5	90.7	86.4	54.8	50.0	88.5	87.0
Interviews with passengers and illegal immigrants	82.4	67.7	91.0	83.1	52.0	47.3	89.2	80.2
Vetting of job applicants to the Ministry of Interior	80.9	72.6	88.1	79.4	44.0	46.6	88.8	86.7

Table 16. Comparative evaluation of corruption vulnerability and anticorruption policy coverage of activities in four public organisations

Public organisation activities/functions	Corruption interest	Corruption pressure				Effectiveness of associated anticorruption policies (average %)		
	Types of corruption possible (%, base=4)	Evasion of regu-lations (%)	Outside pressure associated with activity (%)	Suscep-tible to pressure from above (%)	Suscep-tible to pressure from outside (%)	Number of associated anticorrup-tion policies	Estimated potential effective-ness (average %)	Estimated actual effective-ness (average %)
Border Police, Bulgaria								
Administrative and punitive	75.0	33.3	53.8	19.2	23.1	7.0	84.1	79.4
Border checkpoints	50.0	20.8	40.7	6.5	15.3	11.0	85.8	81.3
Green border security	75.0	27.3	33.3	9.1	10.3	9.0	85.2	80.3
Human resources	75.0	13.0	40.9	9.1	0	8.0	84.7	80.3
Information activities	25.0	24.7	32.5	18.8	16.5	7.0	84.1	79.4
Investigations carried out by investigating officers	75.0	40.0	50.0	0	25.0	7.0	84.1	79.4

Table 16.   Comparative evaluation of corruption vulnerability
and anticorruption policy coverage of activities
in four public organisations (continued)

Public organisation activities/functions	Corruption interest	Corruption pressure				Effectiveness of associated anticorruption policies (average %)		
	Types of corruption possible (%, base=4)	Evasion of regu-lations (%)	Outside pressure associated with activity (%)	Suscep-tible to pressure from above (%)	Suscep-tible to pressure from outside (%)	Number of associated anticorrup-tion policies	Estimated potential effective-ness (average %)	Estimated actual effective-ness (average %)
Preventive investigation	50	26.7	51.7	10.2	13.8	7	84.1	79.4
Public procurement	75	30.0	55.2	27.6	20.7	7	84.1	79.4
Slatina Municipality, Bulgaria								
Administrative and information services	50	50.0	62.5	12.5	0	4	93.1	87.2
City planning, cadastre and regulation of construction	75	33.3	33.3	33.3	16.7	4	93.1	87.2
Education, culture, social activities and sports	50	0	20.0	0	0	4	93.1	87.2
Financial and accounting services	25	0	0	0	0	4	93.1	87.2
Human resources	75	0	50.0	0	0	2	97.1	88.1
Civil engineering, urban development and ecology	75	25	37.5	25.0	0	4	93.1	87.2
Legal and regulatory services; registration and control of commercial activities	75	44.4	25.0	11.1	0	4	93.1	87.2
Management of the municipal property and housing	50	0	0	0	0	4	93.1	87.2
Public order, security, disaster protection	75	20.0	0	20.0	0	4	93.1	87.2
Public procurement	75	28.6	0	14.3	14.3	5	94.5	88.9
Health Service of Trento, Italy								
Board evaluation of acts for the concession of benefits/services		12.5	55.6	11.1	0	4	77.2	67.5
Consultancy contracts		30.0	60.0	50.0	50.0	4	77.2	67.5

Table 16. Comparative evaluation of corruption vulnerability and anticorruption policy coverage of activities in four public organisations (continued)

| Public organisation activities/functions | Corruption interest | Corruption pressure | | | | Effectiveness of associated anticorruption policies (average %) | | |
	Types of corruption possible (%, base=4)	Evasion of regu-lations (%)	Outside pressure associated with activity (%)	Suscep-tible to pressure from above (%)	Suscep-tible to pressure from outside (%)	Number of associated anticorrup-tion policies	Estimated potential effective-ness (average %)	Estimated actual effective-ness (average %)
Contributions/ reimbursement to customers		9.1	50.0	16.7	8.3	4	77.2	67.5
Tender content specification		16.7	55.6	11.1	27.8	4	77.2	67.5
Human resources		15.6	59.4	15.6	15.6	4	77.2	67.5
Intramural activities		4.5	40.9	9.1	9.1	4	77.2	67.5
Public procurement		20.6	61.8	21.2	29.4	4	77.2	67.5
Certifications/ authorisations		27.0	51.4	33.3	24.3	4	77.2	67.5
Security and surveillance		12.5	66.7	21.3	18.8	4	77.2	67.5
Service provision		22.7	60.0	17.6	13.3	4	77.2	67.5
Municipality of Riva del Garda, Italy								
Consultancy contracts		16.7	33.3	16.7	16.7	4	75.9	66.6
Contributions/ reimbursement to public-private stakeholders		25.0	25.0	25.0	25.0	4	75.9	66.6
Human resources		16.7	50.0	33.3	0	4	75.9	66.6
Public procurement		3.8	38.5	3.8	3.8	4	75.9	66.6
Certifications/ authorisations		20.0	45.8	12.5	16.7	4	75.9	66.6
Security and surveillance		18.2	45.5	18.2	18.2	4	75.9	66.6
Service provision		9.1	36.4	9.1	4.5	4	75.9	66.6

3.5. MACPI IMPLEMENTATION CYCLE

Given the sensitive nature of corruption, MACPI has a number of built-in implementation codes intended to ensure the reliability of its findings. In order to serve its purpose and to produce results usable in the anticorruption policy cycle, the application of the MACPI tool needs to conform to several requirements:

● The diagnostics should be carried out by an **independent team of evaluators**, in order to ensure the objectivity of the results. The team would present its findings to the management of the organisation and to its principal.
● The **involvement of the senior management** of the monitored organisation is required to secure the participation of the experts and to encourage them to provide candid assessments, thereby minimising the potential bias in their responses.
● The **degree of publicity** of the findings of the diagnostics – whether and to what extent the stakeholders and clients of the organisation would be informed of the results – should be agreed in advance. The full implementation of MACPI requires stakeholder involvement in ensuring that there is follow-up to the recommendations of the evaluation team.

The actual evaluation process is carried out in three stages, each having consecutively implemented elements (Figure 14).

The main task at the first, **qualitative diagnostics** stage is to review the structure of the organisation (activities and processes) and analyse (with the help of experts) the corruption interest at each intersection of corruption types and activities. While it is useful and important to assess the procedures and processes of the monitored organisation, such an analysis falls outside the main objective of MACPI: to assess anticorruption policies. At this stage all policies, perceived as set of measures or protocols, should be regarded as "given."

At the second, **quantitative stage** the main bulk of assessment data is collected. The use of an online tool for the survey of officials is effective and fast, and provides sufficient guarantees for the anonymity of respondents. Potential bias would be significantly reduced if employees believe that management is committed to anticorruption, that their frank assessment is valued, and that results will be used to improve organisational processes and protocols. It can also be taken into account when data is analysed.

Further in the quantitative stage, the general public and/or stakeholder surveys are an important part of MACPI diagnostics as they allow cross checking and verification of the information about corruption vulnerability indicators. Test implementation has shown that officials readily report corruption pressure incidents (as something they have to deal with on a daily basis). In this respect stakeholder information would most often be complementary, rather than decisive in evaluating corruption vulnerability. In would be indispensable in cases and environments where discussing corruption is a taboo or in smaller organisations in which organisational bias in combination with the tendency to deny any wrongdoing is high. At the **reporting stage**, management and the evaluation team discuss the findings and recommendations.

Figure 14. The architecture of MACPI diagnostics

Qualitative diagnostics		
Desk study	Initial information about the activities of the organisation	
In-depth interviews	Specify organisation activities, identify anticorruption policies, assess corruption vulnerability	

Quantitative diagnostics		
MACPI online tool	Survey of officials to assess corruption pressure, implementation and effectiveness of anticorruption policies	
MACPI (general population)	Survey of general public to identify involvement in corruption, corruption attitudes, and corruption reputation of organisations and officials	
MACPI (stakeholders)	Survey of clients of public organisations to measure involvement in corruption, corruption attitudes and experience of interactions with organisation	

Reporting		
MACPI analysis	Analyse corruption vulnerability and the coverage of activities by anticorruption policies	
Data evaluation	Discuss MACPI findings and recommendations with the management of the public organisation	

The above sequenced procedures encompass the diagnostics stage of MACPI which is intended to contribute to the policy cycle. The full MACPI cycle (Figure 15) consists of two circuits – the diagnostics effort and the policy revision effort, in which the findings of the first feed into the second. **The**

MACPI diagnostics is intended as a **first step of a policy process aimed at (re)designing and implementing effective anticorruption policies**. Involvement of the management at all stages of this process is therefore crucial for effective MACPI implementation.

Figure 15.   MACPI implementation cycle
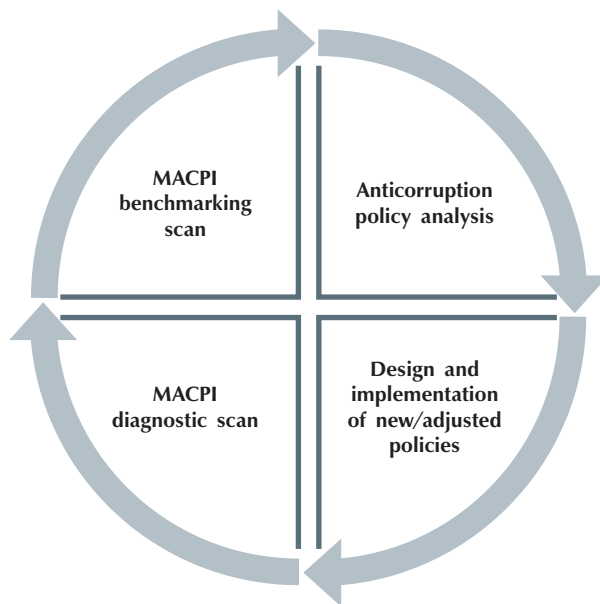
3.6. IMPLICATIONS FOR POLICY MAKERS

MACPI operationalises the need for monitoring the implementation of anticorruption policies and is therefore suitable as an input to policy design.

The development of MACPI benefited from a considerable international experience in researching corruption and monitoring anticorruption at the macro level, and was thus in a position to understand their limitations. It is not uncommon for national level policies to remain on paper with little feedback about their effect. The few international monitoring instruments that assess policies register their availability but do not venture to pronounce on their impact.[40] In this context, MACPI comes at a time of search of the reasons for the limited progress against corruption in many countries. It has, therefore, implications for policy making at the national and EU levels.

---

[40] See further a mapping report on the monitoring and measuring instruments: Center for the Study of Democracy. (2015). *Mapping Anticorruption Enforcement Instruments*. Center for the Study of Democracy

At the **national level**, an exclusive focus on catching bribery is often ineffective. It can be countered by income and asset checks, although such checks would identify not bribery but noncompliance with tax legislation. Attempts to catch perpetrators "in the bribe taking act" and prove it in court is spending considerable resources with questionable effect. It is both more effective and cost-efficient to prioritise the identification and prevention of deliberate noncompliance with rules. Any credible anticorruption effort needs to proceed from a cross referencing each corruption risk with the respective anticorruption policy. Since this can only be done at the public organisation level, national level policies should be MACPI tested before implementation; only after successful results (confirmed by MACPI), the policy should be recommended to be widely adopted. Anticorruption policies at the national level that do not have any organisational level implementability should be discouraged.

At the **EU level** MACPI is relevant to the work carried out in the wake of the *EU Anticorruption Report* which proceeds along several lines. Anticorruption policy has been mainstreamed in the programming of the European structural funds which means that there will be the need to evaluate the anticorruption preparedness of national public institutions. One of the thematic ex ante conditionalities of these funds relates to the institutional capacity and efficiency of the public administration. Given that anticorruption would feature in the non-binding guidelines being developed for member states on how to strengthen the functioning of public sector institutions and invest in administrative capacity, MACPI can be valuable in producing evaluation findings used to formulate specific, targeted solutions. The improvement of administrative capacity in the member states following European Semester recommendations can also benefit from the capacity of MACPI to overhaul integrity measures and procedures in the institutions of economic governance.

The significance of the adjustment of policies to specific circumstances has been recognised by the European Commission in the *EU Anticorruption Report*: "An effective policy response cannot be reduced to a standard set of measures; there is no 'one size fits all' solution… Comprehensive anti-corruption strategies were seen a decade ago as a universal recipe for putting corruption higher on the political agenda and to mustering political will and resources. Nevertheless, the results varied. While in some cases, the work on strategies was a catalyst for a genuine progress, in some others, impressive strategies had little or no impact on the situation on the ground."[41] It is precisely this "ground" that MACPI is designed to examine and provide policy recommendations for.

---

[41] European Commission. (2014). *Report from the Commission to the Council and the European Parliament: EU Anti-Corruption Report*, COM(2014) 38 final, Brussels, pp. 3, 41.

APPENDIX 1. MACPI ONLINE QUESTIONNAIRE

This appendix presents the MACPI online questionnaire. The policies and activities of Border Police diagnostics in Bulgaria have been used as an example. The appendix also includes information about the changes that have been made between the tested and the final version.

Changes between the pilot survey version and the final online questionnaire

The questions about specific and general policies were harmonised and collapsed in a single block of questions which can be asked to all types of general and specific policies. Therefore, of question pairs Q15/Q23, Q17/Q24, Q18/25, Q20/Q26, and Q22/Q27 only the second one remained in the final version of the questionnaire (the two questions in each pair are identical). Original question codes were kept in the final questionnaire in order to keep better track of the changes made to the questionnaire. The following questions were removed because raised problems with the anonymity of the respondents:

Q4. Your gender is:
1. Male
2. Female

Q5. How old are you at the moment:
_ _ years

The following questions that were removed because of methodological reasons (didn't measure adequately the intended theoretical construct):

Q11. In your opinion, to what degree the activities described below include cumbersome, long, bureaucratic procedures? (i.e., procedures for which citizens need to wait a long time, to submit/receive numerous documents, etc.)

Q14. Does this policy/policy tool affect some of the activities that you perform in the Border Police?

Q16. What part of your work time is dedicated to this policy/policy tool?

Q19.1. Have you ever been checked in connection with this policy?

Q21. Do you know of any cases when this policy/policy tool was not applied, although its application was required (its application was due)?

Q27D. If there are proven cases that the policy was not applied as it should have been, there are (would be) penalties for the responsible employees.

Q28. In your opinion, to what extent does this policy reduce the likelihood of corruption in any of the following activities:…

A8. Imagine that you are approached by someone offering cash, gift or favour to solve his/her problem. What would you do:…

Questions that were edited to make them more clear and understandable:

Q3. Added "…corruption reduction in [name of organisation]" to stress that we are not asking about corruption reduction in general, but about the respondents functions with regard to corruption reduction in their organisation.

Q6. Categories added instead of the exact number of years (to make it easier and to protect the anonymity of the respondents).

Q10. "If their superior orders it, how likely would it be for staff members to perform unauthorised activities or services in the following areas:" was changed to "How likely would it be for a superior to order his/her staff members to perform unauthorised activities or services in the following areas."

Q12. "In your opinion, what share of citizens (or companies) try to circumvent (evade) existing rules in the following areas" was changed to "In your opinion, how likely are citizens (or companies) to try to circumvent (evade) existing rules in the following areas." The scale was harmonised with the other 4-point Likert scales.

Q27C. "Control for the enforcement of this policy is not very strict" was changed to "There is strict control for the enforcement of this policy". The original statement was considered a little misleading and unclear.

Added questions

Q29. "Are there cases of violation of (or non-compliance with) the requirements of this policy?" was added to establish objective levels of control.

Q30. "In the cases when there were violations of (or non-compliance with) this policy, what were the consequences for the people responsible for the violations?" was added to replace the estimates of sanctioning (Q27D).

Q32. In your opinion, to which of the following activities is this policy applicable? Please check all that apply.

MACPI online instrument (questionnaire)

This is an anonymous survey, your individual answers will remain strictly confidential and will be used only for statistical analyses of collected data.

Part 1. General information

Q1. Are you a:

1. Head of department or higher management staff.
2. Staff member with management functions.
3. Staff member without management functions.

(If 1 or 2 in Q1, ask Q2, else go to Q3:)

Q2. Are you responsible for managing:?

1. Less than 5 people.
2. Between 5 and 50 people.
3. More than 50 people.

(Ask all)

Q3. Which of the following statements best represents your responsibility with regard to corruption reduction in [name of organisation]?

1. Corruption reduction is my only function/responsibility.
2. Corruption reduction is a major part of my functions/responsibilities.
3. Corruption reduction is a minor part of my functions/responsibilities.
4. Corruption reduction is not an explicit part of my responsibilities.

Q6. How many years of experience, do you have in [name of organisation]?

1. Less than 5 years.
2. Between 5 and 10 years.
3. Between 10 and 20 years.
4. More than 20 years.

Q7. Is your job in [name of organisation] related to one or more of the following activities?

(Please check all that apply)

Please fill in your organisation's activities. Please use a level of generalisation which produces no more than 10 activities (you can aggregate similar activities). Human resources and public procurement are common activities for most public organisations and usually should be left the same.

1. Human resources – recruitment, dismissal, promotion.
2. Public procurement.
3. Preventive investigation – prevention of illegal migration, smuggling and trafficking.
4. Border security – prevention of unauthorised passage of persons and vehicles.

5. Investigations carried out by investigating officers.
6. Information activities – risk analysis and information campaigns.
7. Border checkpoints – processing of documents of persons crossing the border legitimately and vehicles and preventing unauthorised passage of persons and vehicles through checkpoints.
8. Administrative and punitive – control and penalties for illegal immigrants; traffic control near airports and railway stations; issuing passes to employees of companies operating in the area of border crossing.

Part 2. Activities

(Asked for relevant activities checked in Q7)

Q8. Would you say that the external pressure for corruption transactions (bribes, lobbying, etc.) for the following activity/activities is: high, medium, low or no pressure at all? *External pressure means people outside the institution (regardless whether citizens, members of other institutions, etc.) offering bribes or/and asking for favours.*

	High	**Medium**	**Low**	**No pressure at all**
Activity 1	4	3	2	1
Activity 2	4	3	2	1
Activity 3	4	3	2	1
.....	4	3	2	1

Q9. Would you say staff members involved in carrying out the following activity/activities are likely to accept (or ask for) something in return, in order to do a particular service?

	Very likely	**Rather likely**	**Rather unlikely**	**Not likely at all**
Activity 1	4	3	2	1
Activity 2	4	3	2	1
Activity 3	4	3	2	1
.....	4	3	2	1

Q10. How likely would it be for a superior to order his/her staff members to perform <u>unauthorised</u> activities or services in the following areas?

	Very likely	**Rather likely**	**Rather unlikely**	**Not likely at all**
Activity 1	4	3	2	1
Activity 2	4	3	2	1
Activity 3	4	3	2	1
.....	4	3	2	1

Q12. In your opinion, how likely are citizens or companies to <u>try</u> to circumvent (evade) existing rules in the following areas *(for example, to try to evade due payments of tax or social security contributions; to try to receive special privileges during hiring/ promotions; to try to evade inspection/investigation/penalties, etc.)*

	Very likely	**Rather likely**	**Rather unlikely**	**Not likely at all**
Activity 1	4	3	2	1
Activity 2	4	3	2	1
Activity 3	4	3	2	1
.....	4	3	2	1

Part 3. Policies

You will see described several anticorruption policies or policy tools. Please answer several questions about each.

Q13. Are you familiar with each of the following anticorruption policies/policy tools?

(Please, for each of the following policies/policy tools choose the answer which best describes how familiar you are with the policy. One answer for each row.)

Random order of presentation of policies

	Yes, I know everything about it	**Yes, I am relatively familiar with it**	**I know that there is such a policy (policy tool), but I don't know any details**	**I have never heard of this anticorruption policy/policy tool**
Change of shift schedules and rotation of shifts at border checkpoints.	1	2	3	4
Constant video surveillance of workplaces at border checkpoints.	1	2	3	4
Interviews with passengers crossing the border and illegal immigrants, refugees, etc.	1	2	3	4
Unannounced visits (audits) by heads of units.	1	2	3	4
General anticorruption measures for vetting of job applicants to the Ministry of Interior.	1	2	3	4

	Yes, I know everything about it	Yes, I am relatively familiar with it	I know that there is such a policy (policy tool), but I don't know any details	I have never heard of this anticorruption policy/policy tool
Issuing additional orders and instructions as a reaction to certain offenses which are not regulated by any existing law or regulation.	1	2	3	4
Anticorruption training at the Police Academy.	1	2	3	4
Information campaigns – promoting positive examples, informing employees about quarterly reviews (corruption problems and the measures that are taken).	1	2	3	4
Annual submission of declarations of assets and income.	1	2	3	4
Direct supervisors are advised of employees' asset declarations. In order to guarantee they have really done so, direct supervisors are required to sign every declaration.	1	2	3	4
Immediate reactions to each corruption complaint – carrying out inspections/investigations, initiating disciplinary proceedings and informing the relevant departments.	1	2	3	4
Information campaigns among the general public to advertise phone numbers and internet addresses where people can report cases of corruption.	1	2	3	4

General anticorruption measures for vetting of job applicants to the Ministry of Interior.

Q32.1. In your opinion, to which of the following activities is this policy applicable? Please check all that apply.

1. Activity 1
2. Activity 2
3. Activity 3
4. …

Q23.1. How would you rate this policy/policy tool on the following scale?

1. Very easily applicable.
2. Rather easily applicable.
3. Rather difficult to apply.
4. Impossible to apply.

Q24.1. In your opinion, could the implementation of this policy/policy tool reduce the cases of corruption in [name of organisation]?

1. Yes, it could greatly reduce them.
2. Yes, it could reduce them a little.
3. No, the number of corruption cases would remain the same, regardless of the implementation of the policy /policy tool.
4. The number of corruption cases would increase as a result of the implementation of the policy/policy tool.

Q25.1. Do you think that this policy/policy tool reduces the corruption risk in [name of organisation]?

1. Yes, reduces the corruption risk a lot.
2. Yes, reduces the corruption risk a little.
3. The corruption risk remains the same as without these measures.
4. No, the corruption risk increases a little because of this policy/policy tool.
5. No, the corruption risk increases a lot because of this policy/policy tool.

Q26.1. In your opinion, is it easy to circumvent (evade) this policy/policy tool – not to execute what the measure requires from the employees, with this having no consequences for them?

1. It is very easy to circumvent.
2. It is rather easy to circumvent.
3. It is rather difficult to circumvent.
4. It is very difficult to circumvent.

Q29.1. Are there cases of violation of (or non-compliance with) the requirements of this policy?

1. There are such cases.

2. There are no such cases.
3. I don't know if there are such cases or not.

(Ask Q30 only if Q29 = 1, else skip to Q27)

Q30.1. In the cases when there were violations of (or noncompliance with) this policy, what were the consequences for the people responsible for the violations?

1. In all cases the responsible people were sanctioned.
2. In some of the cases the responsible people were sanctioned.
3. I don't know of anyone who was actually sanctioned for violating (not complying with) this policy.

Q27.1. Do you agree or disagree with the following statements?

	Completely agree	Rather agree	Neither agree nor disagree	Rather disagree	Completely disagree
A. This policy/ policy tool is well-known to the employees whom it concerns.	5	4	3	2	1
B. This policy/ policy tool is applied strictly when it is applicable.	5	4	3	2	1
C. There is strict control for the enforcement of this policy.	5	4	3	2	1

Q31.1 In your opinion, will the number of corruption cases increase if this policy/ policy tool is removed?

1. The number of corruption cases will increase a lot.
2. The number of corruption cases will increase a little.
3. The number of corruption cases will remain the same.
4. The number of corruption cases will rather decrease.

Repeat Q23 to Q31 for each of the following policies

2. Regulating the activities of employees through additional orders and instructions as a reaction to certain offenses which are not regulated by any existing law or regulation (for example, Border Police employees are not allowed to ask citizens to buy goods for them).
3. Anticorruption training at the Police Academy.
4. Information campaigns – promoting positive examples, informing employees about quarterly reviews (corruption problems and the measures that have been taken).
5. Annual submission of declarations of assets and income.
6. Direct supervisors are advised about the asset declarations of employees. In order to certify that they have been advised done so, direct supervisors are required to sign every declaration.

7. Immediate reactions to each corruption complaint – carrying out inspections/investigations, initiating disciplinary proceedings and informing the relevant departments.
8. Information campaigns among the general public to advertise phone numbers and internet addresses where people can report cases of corruption.
9. Change of shift schedules and rotation of shifts at border checkpoints.
10. Constant video surveillance of work places at border checkpoints.
11. Interviews with passengers crossing the border and detained illegal immigrants, refugees, etc.
12. Unannounced visits (audits) by heads of units.

Part 4. General corruption pressure

| A12. | IN WORKING WITH CITIZENS OR EMPLOYEES OF OTHER INSTITUTIONS, HOW OFTEN <u>IN THE PRECEDING YEAR</u> HAVE THEY: |

One answer for each row.

1   In all cases

2   In most of the cases

3   In isolated cases

4   In no cases

A12A	<u>Directly offered</u> something to you (money, gift, favour) in return for you doing some service for them.	1	2	3	4	9
A12B	Not offered directly, but <u>showed that they would give</u> something (cash, gift or favour) in return for you doing some service for them.	1	2	3	4	9

APPENDIX 2. MACPI GENERAL POPULATION SURVEY

A1B.	IN YOUR OPINION, WHICH OF THE FOLLOWING ACTIONS ARE EXAMPLES OF "CORRUPTION"?			
One answer on each line				
		Yes	**No**	*DK/NA*
A	Giving a gift to a doctor so that he/she takes special care of you.	1	2	*9*
B	Giving money/doing a favour to an administration official in order to win a competition, concession or public procurement tender.	1	2	*9*
C	Using informal contacts to receive a particular public service that you are not entitled to.	1	2	*9*
D	Lobbying a public official to hire a relative (family, friend) of yours.	1	2	*9*
E	Contacting a municipal councillor personally in order to obtain a construction permit.	1	2	*9*
F	Giving money to a police officer so that your driver's license is not suspended.	1	2	*9*
G	Using someone's official position for doing private business.	1	2	*9*
H	Providing confidential information acquired in public office to acquaintances of yours for personal gain.	1	2	*9*
I	Administration officials accepting money for allowing tax evasion or tax reduction.	1	2	*9*
J	Pre-election donations to political parties.	1	2	*9*
K	Paying additional remuneration to a lawyer who assists a defendant to have a lawsuit against him/her dropped.	1	2	*9*

A2.	AS YOU SEE IT, HOW FAR IS CORRUPTION PROLIFERATED AMONG THE OFFICIALS IN THE PUBLIC SECTOR?
One answer only.	

    1   Almost all officials are involved

    2   Most officials are involved

    3   Few officials are involved

    4   Scarcely anyone of the officials is involved

    9   *Don't know/No answer*

| A3. | IN ORDER TO SUCCESSFULLY SOLVE ONE'S PROBLEM IS IT <u>LIKELY</u> OR IS IT <u>NOT LIKELY THAT HE/SHE WOULD</u>: |

One answer on each line.

1   Very likely

2   Rather likely

3   Rather unlikely

4   Not likely at all

9   Don't know/No answer

A3A	Give <u>cash</u> to an official	1	2	3	4	9
A3B	Give <u>a gift</u> to an official	1	2	3	4	9
A3C	Do <u>a favour</u> for an official	1	2	3	4	9

| A4. | IN YOUR OPINION, HOW FAR IS CORRUPTION PROLIFERATED AMONG THE FOLLOWING GROUPS: |

One answer on each line.

1   Almost everybody is involved

2   Most are involved

3   Few are involved

4   Scarcely anyone is involved

9   Don't know/No answer

A4A	Journalists	1	2	3	4	*9*
A4B	Teachers	1	2	3	4	*9*
A4C	University officials or professors	1	2	3	4	*9*
A4D	Officials at ministries	1	2	3	4	*9*
A4E	Municipal officials	1	2	3	4	*9*
A4F	Administration officials in the judicial system	1	2	3	4	*9*
A4G	Judges	1	2	3	4	9
A4H	Public prosecutors	1	2	3	4	*9*
A4I	Investigating officers	1	2	3	4	*9*
A4J	Lawyers	1	2	3	4	*9*
A4K	Police officers	1	2	3	4	*9*
A4L	Customs officers	1	2	3	4	*9*
A4M	Tax officials	1	2	3	4	*9*
A4N	Members of parliament	1	2	3	4	*9*
A4O	Ministers	1	2	3	4	*9*

A4P	Municipal councillors	1	2	3	4	*9*
A4Q	Business people	1	2	3	4	*9*
A4R	Doctors	1	2	3	4	*9*
A4S	Political party and coalition leaders	1	2	3	4	*9*
A4T	Local political leaders	1	2	3	4	*9*
A4U	Representatives of non-governmental organisations	1	2	3	4	*9*
A4V	Bankers	1	2	3	4	*9*

A8. IMAGINE YOURSELF IN AN OFFICIAL LOW-PAID POSITION AND APPROACHED BY SOMEONE OFFERING CASH, GIFT OR FAVOUR TO SOLVE HIS/HER PROBLEM. WHAT WOULD YOU DO:

One answer only.

1 I would accept – everyone does that.

2 I would accept, if I can solve his/her problem.

3 I would not accept, if the solution to the problem is related to evading the law.

4 I would not accept, I do not approve of such acts.

9 Don't know/No answer

A9. IN YOUR OPINION, ARE THE FOLLOWING ACTIVITIES ACCEPTABLE, IF PERFORMED BY MEMBERS OF PARLIAMENT OR THE GOVERNMENT?

One answer on each line.

1 Acceptable

2 Rather acceptable

3 Rather unacceptable

4 Unacceptable

9 Don't know/No answer

A9A	To accept an invitation for a <u>free lunch/dinner</u> to solve personal problems.	1	2	3	4	9
A9B	To resolve a personal problem and accept a favour in exchange.	1	2	3	4	9
A9C	To accept <u>gifts</u> for the solution of personal problems.	1	2	3	4	9
A9D	To accept <u>cash</u> for the solution of personal problems.	1	2	3	4	9

A10.	IN YOUR OPINION, ARE THE FOLLOWING ACTIVITIES ACCEPTABLE, IF PERFORMED BY OFFICIALS AT MINISTRIES, MUNICIPALITIES AND MAYORALTIES?

One answer on each line.

1   Acceptable

2   Rather acceptable

3   Rather unacceptable

4   Unacceptable

9   Don't know/No answer

A10A	To accept an invitation for a <u>free lunch/dinner</u> to solve personal problems.	1	2	3	4	9
A10B	To resolve a personal problem and accept a favour in exchange.	1	2	3	4	9
A10C	To accept <u>gifts</u> for the solution of personal problems.	1	2	3	4	9
A10D	To accept <u>cash</u> for the solution of personal problems.	1	2	3	4	9

A12.	WHENEVER YOU HAVE CONTACTED OFFICIALS IN THE PUBLIC SECTOR, HOW OFTEN <u>IN THE LAST YEAR</u> HAVE THEY:

One answer on each line.

1   In all cases

2   In most of the cases

3   In isolated cases

4   In no cases

8   No contact in the last year

9   Don't know/No answer

A12A	<u>Directly demanded</u> cash, gift or favour	1	2	3	4	8	9
A12B	Not demanded directly, but <u>showed that they expected</u> cash, gift or favour	1	2	3	4	8	9

IF A12 = 8 (no contact in the last year) go to A15. Otherwise continue with A13

A13.	WHENEVER YOU HAVE CONTACTED OFFICIALS IN THE PUBLIC SECTOR, HOW OFTEN <u>IN THE LAST YEAR</u> DID YOU HAVE TO:

One answer on each line.

1   In all cases

2   In most of the cases

3   In isolated cases

4   In no cases

9   Don't know/No answer

A13A	Give cash to an official	1	2	3	4	9
A13B	Give a gift to an official	1	2	3	4	9
A13C	Do an official a favour	1	2	3	4	9

A15. IF YOU HAVE <u>A MAJOR PROBLEM</u> AND AN OFFICIAL DIRECTLY DEMANDED CASH TO SOLVE IT, WHAT WOULD YOU DO?

One answer only.

1 I would pay by all means∧

2 I would pay if I can afford it.

3 I would not pay if I had another way to solve the problem.

4 I would not pay by any means.

9 Don't know/No answer

Demography

D1. GENDER

Mark without asking the respondent.

1 Male

2 Female

D2. HOW OLD ARE YOU?

Write down the age in years.

☐ ☐ years

99 Don't want to answer

D3. YOUR HIGHEST LEVEL OF <u>COMPLETED</u> EDUCATION?

One answer only.

1 No education

2 Primary

3 Lower secondary

4 Upper secondary

5 Semi-higher/college

6 University education – Bachelor's degree

7 University education – Master's degree

8 Doctoral degree

9 DK/NA

D3A.	HOW MANY YEARS OF EDUCATION HAVE YOU COMPLETED?

Write down the exact number. If the respondent doesn't know/cannot compute, help them compute.
Preschool is not included!

☐ ☐

00	Without official education	98	Don't know	99	Refused

D4.	WHAT IS YOUR MARITAL STATUS?

One answer only.

1   Single

2   Married or living with a partner

3   Divorced

4   Widow/widower

9   No answer

D6.	PLEASE LOOK AT THIS CARD AND POINT OUT WHICH DESCRIPTION BEST REFLECTS THE FINANCIAL SITUATION OF YOUR HOUSEHOLD.

One answer only.

1   We don't have enough money even for food.

2   We have enough money for food, but have difficulties in buying clothes.

3   We have enough money for food and clothes; we can also save a bit,
     but this is not enough to buy expensive goods (such as a refrigerator or a TV).

4   We can afford to buy some expensive goods (such as a refrigerator or a TV).

5   We can afford to buy whatever we want.

9   *DK/NA*

D7.	TO WHICH OF THE FOLLOWING SOCIAL GROUPS DO YOU BELONG?

One answer only.

	Social group	Typical representatives
	Employed	
1	High ranking government officials	Elected politicians, public prosecutors, magistrates, senior officers in the army and police
2	Directors of companies and administrative institutions	Directors of large state-owned enterprises and administrative institutions, bankers, managers in private companies

	Social group	Typical representatives
	Employed	
3	Humanitarian, economic professionals and freelance occupation with university education	Directors of cultural and educational institutions, directors of research teams, researchers; authors, artists, sculptors; doctors; priests; journalists, university lecturers
4	Specialists with mathematical, technical and natural-science occupations with university education	Directors of production, engineers, designers, agricultural and forestry specialists
5	Middle ranking technicians	Technical directors and specialists, supervisors of production, laboratory assistants, nurses
6	Administrative officials and middle ranking specialists	Inspectors, accountants, cashiers, teachers
7	Office personnel	Typist, secretary, administrator, deliverer of goods
8	Trade and service employees	Directors of stores, sales force, postmen, guards, hairdressers, waiters, cooks
9	Low ranking managers	Low ranking managers in all fields except agriculture and forestry
10	Skilled workers	Workers directly involved in the processing of raw materials: metal processor, mechanic, driver, plumber, electro-technician
11	Unskilled workers	Auxiliary workers: workers engaged in assistance, packing, loading, road construction
12	Unskilled workers in trade and services	Cleaner, janitor
13	Seasonal workers in agriculture, forestry and fishing	Seasonal workers in these fields
14	Farmers and fishermen	Owners of land, farms, fishing vessels
15	Entrepreneurs and businessman	Owners of companies, enterprises and (small, middle and large)
16	Other employed *(Please, specify)*:	....
	NOT WORKING	
17	Pensioners	Refers to all pensioners irrespectively of whether working or not
18	Students	Secondary school and university students
19	Disabled	
20	Housewives/maternity leave	
21	Unemployed	
22	Other not working (Please, specify):	....

If EMPLOYED (answers 1-16 to D7), continue with D30; otherwise skip to D10

D25.	COULD YOU TELL ME WHAT WAS THE GROSS INCOME OF YOUR HOUSEHOLD FOR THE LAST MONTH? PLEASE CONSIDER THE INCOMES OF ALL MEMBERS OF THE HOUSEHOLD (WAGES, PENSIONS, FELLOWSHIPS, ALLOWANCES, ETC.) FOR THE LAST MONTH BEFORE TAX DEDUCTIONS.

In D25A write down the exact income and choose the corresponding income group from D25B. Only if the respondent doesn't know or refuses to tell you the exact income of their household, then ask him to choose an income group from D25B.

D25A. ☐☐☐☐☐ local currency.

D25B. Income group:

01	05	09	13
02	06	10	97 No income
03	07	11	98 Don't know
04	08	12	99 Refusal

D26.	TYPE OF SETTLEMENT.

    1   (Capital of the country)

    2   City

    3   Town

    4   Rural region or village

APPENDIX 3. MACPI IN-DEPTH INTERVIEW GUIDE

Objective: To assess the corruption vulnerability of an organisation by evaluating the likelihood of corruption of all types in the activities of the organisation.

Method and process: The interviewed expert is presented with a draft list of activities of the organisation and a list of corruption types with their respective definitions. The interview is conducted in the following steps:

1. Review of the list of activities of the public organisation.
2. Introduction to the surveyed types of corruption (description and eventual clarifications by interviewer).
3. Evaluation of the likelihood of types of corruption for each activity.
4. Definition of anticorruption policy (introduction and explanations provided by interviewer).
In case the expert needs to consult colleagues and organisational documents the interview is interrupted and a second meeting is scheduled.
5. Identification of general anticorruption policies (address more than one activity).
6. Identification of specific anticorruption policies (address single activities).

Introduction

Interviewer: The objective of this research is to make a detailed assessment of the implementation of anticorruption policies in your organisation. Your input will help prepare the assessment by mapping the zones of corruption vulnerabilities (risks) of your organisation and identifying the currently applicable anticorruption policies. As this approach or some of its elements might be new or unfamiliar to you, I will provide you with some preliminary draft list of activities, definitions of different types of corruption and an empty corruption vulnerability map which we will jointly fill in.

Interviewer hands over background materials.

Note: in case previous assessments have been made it would be useful to provide also the already completed map of the corruption vulnerability zones, a list of activities and a list of anticorruption policies.

Interviewer: Corruption activities vary and include many different types of deliberate noncompliance with rules which are directly linked to benefits to officials. Different types of corruption are usually linked to specific activities. We would therefore need to:

- compile a list of activities the public organisation performs (by statute) in order to serve its public function;

- evaluate the potential corruption risk for each activity;
- identify existing anticorruption policies;
- link existing policies to the corruption risk they are targeting.

Review of the list of activities

Interviewer:

Please review the draft list of activities of your organisation we have prepared. It includes activities that are common to all public organisations and some other which are specific for your organisation.

Do you think that these activities properly reflect the structure of your organisation?

Would the activity titles we have used be understandable to all employees? Should some activities be split up or aggregated?

Are there specific departments in the organisation that control and supervise all other departments (e.g. internal affairs, inspectorate, etc.)?

Are hiring, career development and procurement conducted by separate departments or each department has a role in these processes?

Interviewer (at the end of the review): Would you agree that I send you the revised list of activities for final confirmation?

Introduction to types of corruption and corruption vulnerability zones

Interviewer:

We will now focus on the different types of corruption that might occur in your organisation. Let me first briefly introduce you to the definitions of the main types of corruption I gave you.

Interviewer reads and explains each type of corruption, and gives examples and answers questions by expert to ensure that all types of corruption are clearly understood.

Interviewer:

Now we will jointly review the likelihood of types of corruption to occur activity by activity. What I mean by "to occur" is that for a certain type of corruption we could say that:

– It has practical relevance/makes sense either for employees or clients of your organisation.
– Such a transaction contains a potential corruption interest – both sides would benefit by violating the law and the likelihood of being caught is low.
– Such cases have been identified in your organisation.

– Given the current situation in the country (city, organisation, etc.) one could not rule it out.

Interviewer:

Let us start with the first activity in the list (.....).

Do you believe that **abuse of power** is possible/could happen or happens for this activity?

Would you say it is very probable?

Do clients of your organisation hint or indicate to employees that they would have an interest in such a transaction?

What would you say is the most likely mechanism of such a transaction, if it happens?

Have such cases been identified?

Interviewer goes over the table cell by cell and asks the above questions as appropriate. Marks cells of corruption vulnerability and record corruptions transaction mechanisms described by expert.

Corruption vulnerability map (based on Border Police diagnostics)

	Abuse of power	**Abuse of property**	**Nepotism**	**Clientelism**
Human resources				
Procurement				
Preventive investigation				
Border security (green border)				
Investigation				
Provision of information				
Border crossing control				
Administrative and punitive activities				

Anticorruption policies

Interviewer:

Now we have completed the corruption vulnerability map of your organisation. There are some cells in the table that proved risky. We now need to draw a list of anticorruption policies that are currently implemented in your organisation. Most probably you will need to consult documents and/or colleagues before we

can complete this task. Before that I would like to introduce you to the topic and explain what we actually mean by anticorruption policies.

First, we divide these policies into two groups: general policies which apply to most activities in the organisation and specific policies which are designed to counter corruption in specific activities. Among the general ones – common to most public organisations in the country – we could list the following:

– Asset declarations of employees;
– Declarations for conflict of interest;
– Anticorruption training;
– Awareness campaigns, information days;
– Civic control mechanisms like corruption mailboxes, web sites that collect feedback from clients, complaint procedures, etc.

An additional comment is necessary before we discuss each of these policies.

We view anticorruption policies as additional control mechanisms which identify deliberate noncompliance for private gain. The measures employed by the policies verify, control and eventually sanction violation of rules. At the same time, rules in the organisation define and prescribe how procedures should be conducted, how things should be done. Sometimes rules themselves are good enough to prevent deliberate noncompliance and additional inspections seem unnecessary. In short, anticorruption policies provide a second layer of control which checks for noncompliance linked to private gain for employees.

In addition, in order for rules and organisational mechanisms to qualify as anticorruption policies, they need to meet some criteria:

– to be formally adopted by the organisation (written and endorsed by management);
– to specify responsibilities;
– to specify procedures of control;
– to specify sanctions in case violations are encountered.

Interviewer can interrupt the interview and a second meeting can be scheduled. Interviewer asks respondent to prepare and send the list of general and specific anticorruption policies.

Second stage interview

Interviewer:

Now we have a draft list of general and specific anticorruption policies implemented in your organisation. Let us review each one to ensure that they qualify as anticorruption policies.

Interviewer uses the list and starts with the first policy; asks all relevant questions; proceeds to the second policy and continues until the list is exhausted.

Interviewer:

What is the official name of each of these policies (how is it known in your organisation)?

Is this policy part of the ordinary organisational routine, or it is an additional mechanism of control adopted at a later stage?

Who is responsible for the implementation of this policy?

What happens if employees are caught violating this policy? Have there been such cases in the last 2-3 years?

Do your think most employees are aware of this policy?

Types of corruption (handout)

- *Nepotism:* the exploitation by a public official of his/her power and authority to procure jobs or other favours for relatives (family members and close friends), which can take place at all levels of government, from low-level bureaucratic offices to central government ministries.
- *Clientelism (patronage):* the informal relationship between people of different social and economic status (and not relatives): a 'patron' (boss) and his 'clients' (dependents, followers, protégés). The relationship includes a mutual but unequal exchange of corrupt favours.
- *Abuse of power by a public official* (not included in the previous cases): intentional abuse of functions or position, by performing or failing to perform an act in violation of law by a public official for the purpose of obtaining an undue advantage for himself/herself or for another person or entity.
- *Abuse of property by a public official (not included in the previous cases):* intentional misappropriation or other diversion of any property, public or private funds or securities or any other items of value entrusted to the public official by virtue of his/her position, by said public official for his/her benefit or for the benefit of another person or entity.

Sample list of activities (handout)

- Human resources – recruitment, dismissal, promotion;
- Public procurement;
- Preventive investigation – prevention of illegal migration, smuggling and trafficking;
- Border security – prevention of unauthorised passage of persons, vehicles and immigrants;
- Investigations carried out by investigating officers;
- Information activities – risk analysis and information campaigns;
- Border checkpoints – processing of documents of legitimate persons and vehicles and preventing unauthorised passage of people and vehicles through checkpoints;
- Administrative and punitive – control and penalties for illegal immigrants; traffic control near the airport, railway stations; issuing passes to employees of companies operating in the area of border crossing.

Sample list of anticorruption policies (handout)

General policies (Border Police)

- General anticorruption measures for vetting of job applicants for the Ministry of Interior.
- Regulating the activities of employees through additional orders and instructions as a reaction to certain offenses which are not regulated by any existing law or regulation (for example, Border Police employees are not allowed to ask citizens to buy goods for them).
- Anticorruption training at the Police Academy.
- Information campaigns – promoting positive examples, familiarising employees with quarterly reviews (corruption problems and the measures that have been taken).
- Annual submission of declarations of assets and income.
- Direct supervisors are advised of the asset declarations of employees. In order to guarantee they have really done so, direct supervisors are required to sign every declaration.
- Immediate reactions to corruption complaint – carrying out checks/investigations, initiating disciplinary proceedings and informing the relevant departments and others.
- Information campaigns among the general public to advertise phone numbers and internet addresses where citizens can report cases of corruption.

Specific policies (Border Police)

- Change of shift schedules and rotation of shifts at border checkpoints.
- Constant video surveillance of workplaces at border checkpoints.
- Interviews with passengers crossing the border and detained illegal immigrants, refugees, etc.
- Unannounced visits (audits) by heads units.

APPENDIX 4. MACPI DESK RESEARCH GUIDE

The objective of desk research is to develop the background knowledge about the surveyed public organisation that will be used in the in-depth interviews (IDIs) with experts. This includes three deliverables:

- List of activities of the public organisation. This includes list of departments, information of the number of staff and, if applicable, its eventual territorial allocation.
- List of anticorruption policies implemented in the organisation.
- List of documents which structure the public organisation, define hierarchy, responsibilities and subordination.

Sources of information include:

- statutes of the public organisation;
- organisational chart;
- laws, bylaws and other internal regulations.

In order to prepare a comprehensive list of activities of the institution, the list should satisfy the following criteria/assumptions:

- Include main types of internal activities. Typically, this includes hiring, firing, promotion, quality control and institutional restructuring.
- Include and categorise the external activities of the institution. These include exchanges between the institution and other institutions as well as the services that the institution provides for its clients (society in general, citizens, businesses). A major external activity is public procurement.
- The list is compiled according to a template which uses 4 levels of categorisation. The first and most general level is always the same – it includes a broad categorisation of activities, common for most institutions - such as "recruitment", "dismissal and control", "promotion", "public procurement", "services" (see the sample table below).
- The second to fourth levels are specific for the institution. The second level includes large, more generally defined categories for the main services that the institution performs (for example "Prevention/control of trafficking and smuggling" for Border police). The third level defines more detailed groups of activities, having in mind that these categories will be used to evaluate corruption vulnerability and risks (i.e. if it is known beforehand that a particular group of activities could give rise to a particular and common corruption risk via similar mechanisms, it is best that this group of activities is defined here as a single category in order to facilitate data collection).
- The fourth, most detailed sublevel plays a supportive function – it serves to clarify and illustrate the activities from the third or second level.

Sample hierarchy of activities (functions) in a public organisation (Bulgarian Border Police).

Level 1	Level 2	Level 3	Level 4
Services	Prevention of unauthorised passage	Prevention of unauthorised passage of persons	…
		Prevention of unauthorised passage of motor vehicles	…
	Prevention/control of trafficking and smuggling	Prevention of human trafficking	Prevention of human trafficking for sexual exploitation
			Human trafficking for other purposes
		Prevention of smuggling of excise goods	Prevention of trafficking of cigarettes and other tobacco products
			Prevention of trafficking of alcohol
		…	…
	Processing documents of legally passing persons and motor vehicles	…	…
…	…	…	…

APPENDIX 5. REFERENCE DATA TABLES FOR SURVEYED ORGANISATIONS

BORDER POLICE, BULGARIA

Outside pressure associated with activity

Assessment of the level of external pressure experienced by the employees of the various departments (activities)

Level of external pressure for corruption transactions in:	No pressure at all	Low, medium or high pressure	Total answers (base)
Public procurement	44.8%	55.1%	29
Administrative and punitive	46.2%	53.8%	26
Preventive investigation	48.3%	51.7%	58
Investigations carried out by investigating officers	50.0%	50.0%	4*
Human resources	59.1%	40.9%	22
Border checkpoints	59.3%	40.7%	123
Border security	66.7%	33.4%	231
Information activities	67.5%	32.5%	77

*   The number of respondents is too small.

Susceptibility to pressure from above

If their superior orders it, how likely would it be for staff members to perform unauthorised activities or services in the following areas:	Not likely	Likely	Total (base)
Public procurement	72.40%	27.60%	29
Administrative and punitive	80.70%	19.20%	26
Information activities	81.30%	18.80%	80
Preventive investigation	89.80%	10.20%	59
Human resources	90.90%	9.10%	22
Border security	91.00%	9.10%	232
Border checkpoints	93.50%	6.50%	123
Investigations carried out by investigating officers	100%	0%	4*

*   The number of respondents is too small.

Susceptibility to pressure from outside

Are staff members involved in the following activity/activities likely to accept a bribe:	Likely	Total (base)
Investigations carried out by investigating officers	25.00%	4*
Administrative and punitive	23.00%	26
Public procurement	20.70%	29
Information activities	16.40%	79
Border checkpoints	15.30%	124
Preventive investigation	13.80%	58
Border security	10.40%	232
Human resources	0%	22

* The number of respondents is too small.

Evasion of regulations

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	No one is trying	Some are trying (answers 2 to 7)	NA	Total (base)
Investigations carried out by investigating officers	0%	100%	0%	5*
Administrative and punitive	11.10%	85.10%	3.70%	27
Public procurement	6.70%	76.70%	16.70%	30
Human resources	8.70%	73.90%	17.40%	23
Preventive investigation	18.30%	70.10%	11.70%	60
Border security	19.90%	67.10%	13.00%	231
Border checkpoints	23.20%	66.40%	10.40%	125
Information activities	18.50%	64.10%	17.30%	81

* The number of respondents is too small.

Share of the Top 3 of respondents with above average scores to this question.*

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	Top 3 (% of people with above average score for the risk)	Total (base)
Investigations carried out by investigating officers	40.00%	5**
Administrative and punitive	33.30%	27
Public procurement	30.00%	30

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	Top 3 (% of people with above average score for the risk)	Total (base)
Border security	27.30%	231
Preventive investigation	26.70%	60
Information activities	24.70%	81
Border checkpoints	20.80%	125
Human resources	13.00%	23

*   The scale is from 1 to 7, top 3 includes answers 5, 6 and 7 (above average interest by the clients of the organisation to evade the rules).

** The number of respondents is too small.

Ease of implementation

Anticorruption policies	Not Implementable	Implementable	Total (base)
Declarations of assets and income	4.9%	95.1%	427
Information campaigns among staff	5.2%	94.8%	288
Direct superiors read and sign asset declarations	6.4%	93.6%	343
Information campaigns among the public	7.8%	92.2%	318
Anticorruption training at the Police Academy	8.5%	91.6%	284
Unannounced visits	11.2%	88.9%	324
Immediate reactions to corruption complaint	11.7%	88.3%	307
Video surveillance	12.2%	87.9%	296
Interviews with passengers and illegal immigrants	17.6%	82.5%	279
Measures for vetting of job applicants	19.2%	80.8%	235
Rotation	19.2%	80.7%	260
Additional orders and instructions	20.2%	79.8%	302

Difficult to evade

Anticorruption policy	Difficult to evade	Total (base)
Immediate reactions to each corruption complaint	82.8%	308
Unannounced visits	81.5%	324
Rotation	75.8%	260
Information campaigns among the public	74.2%	318
Video surveillance	73.6%	296
Direct superiors read and sign asset declarations	72.9%	343

Anticorruption policy	Difficult to evade	Total (base)
Measures for vetting of job applicants	72.6%	234
Declarations of assets and income	71.3%	429
Information campaigns among staff	69.7%	287
Interviews with passengers and illegal immigrants	67.7%	279
Anticorruption training in the Police Academy	67.3%	284
Additional orders and instructions	59.9%	302

Awareness of policy

Anticorruption policy	Well-known	Total (base)
Declarations of assets and income	93.9%	429
Immediate reactions to each corruption complaint	93.5%	307
Information campaigns among the public	93.0%	316
Rotation	92.7%	259
Direct superiors read and sign asset declaration	91.2%	340
Interviews with passengers and illegal immigrants	91.0%	278
Unannounced visits	90.7%	324
Information campaigns among staff	90.6%	287
Anticorruption training at the Police Academy	89.8%	283
Additional orders and instructions	89.7%	302
Video surveillance	88.9%	296
Measures for vetting of job applicants	88.1%	235

Strict implementation

Anticorruption policy	Strictly applied	Total (base)
Declarations of assets and income	91.1%	428
Direct superiors read and sign asset declarations	88.8%	340
Rotation	88.8%	259
Video surveillance	88.4%	293
Immediate reactions to each corruption complaint	87.3%	307
Unannounced visits	86.4%	323
Interviews with passengers and illegal immigrants	83.1%	278
Information campaigns among staff	82.2%	286
Anticorruption training at the Police Academy	80.8%	281
Measures for vetting of job applicants	79.4%	233

Anticorruption policy	Strictly applied	Total (base)
Information campaigns among the public	79.0%	315
Additional orders and instructions	76.8%	302

Strict control

Anticorruption policy	Strict control	Total (base)
Declarations of assets and income	63.1%	428
Immediate reactions to each corruption complaint	61.9%	307
Direct superiors read and sign asset declarations	59.8%	336
Unannounced visits	54.8%	323
Rotation	53.9%	258
Interviews with passengers and illegal immigrants	52.0%	277
Information campaigns among the public	51.3%	316
Video surveillance	50.2%	293
Information campaigns among staff	49.8%	287
Additional orders and instructions	49.0%	300
Anticorruption training at the Police Academy	48.2%	282
Measures for vetting of job applicants	44.0%	234

Strict application of sanctions

Anticorruption policy	Strict sanctions for non-compliance	Total (base)
Immediate reactions to each corruption complaint	63.9%	305
Declarations of assets and incomes	59.3%	428
Video surveillance	55.6%	293
Direct superiors read and sign asset declarations	51.2%	338
Anticorruption training at the Police Academy	50.7%	282
Unannounced visits	50.0%	322
Rotation	49.8%	259
Additional orders and instructions	49.3%	300
Interviews with passengers and illegal immigrants	47.3%	277
Measures for vetting of job applicants	46.6%	234
Information campaigns among staff	45.1%	286
Information campaigns among the public	43.8%	315

Estimated potential effectiveness of the policy to reduce cases of corruption

Anticorruption policy	Could reduce cases of corruption	Total (base)
Immediate reactions to each corruption complaint	92.5%	307
Video surveillance	92.2%	294
Anticorruption training at the Police Academy	90.4%	281
Information campaigns among the public	89.9%	316
Interviews with passengers and illegal immigrants	89.2%	279
Measures for vetting of job applicants	88.8%	232
Unannounced visits	88.5%	323
Information campaigns among staff	86.6%	284
Rotation	85.0%	260
Additional orders and instructions	83.0%	300
Declarations of assets and income	73.1%	428
Direct superiors read and sign asset declarations	73.1%	342

Estimated actual effectiveness of the policy in reducing corruption risk

Anticorruption policy	Reduces corruption risk	Total (base)
Video surveillance	92.2%	295
Immediate reactions to each corruption complaint	89.1%	303
Unannounced visits	87.0%	323
Measures for vetting of job applicants	86.7%	233
Information campaigns among the public	86.1%	317
Anticorruption training at the Police Academy	85.7%	280
Information campaigns among staff	81.8%	285
Interviews with passengers and illegal immigrants	80.2%	278
Rotation	78.8%	260
Additional orders and instructions	77.7%	301
Direct superiors read and sign asset declarations	68.7%	342
Declarations of assets and income	66.5%	427

SLATINA MUNICIPALITY, SOFIA, BULGARIA

Outside pressure associated with activity

Assessment of the level of external pressure experienced by the employees of the various departments (activities)

Level of external pressure for corruption transactions in:	No pressure at all	Low, medium or high pressure	Total answers (base)
Administrative and information services	38%	63%	8*
Human resources	50%	50%	4*
Civil engineering, urban development and ecology	63%	38%	8*
City planning, cadastre and regulation construction	67%	33%	6*
Legal and regulatory services; registration and control of commercial activities	75%	25%	8*
Education, culture, social activities and sports	80%	20%	5**
Public procurement	100%	0%	7*
Public order, security, disaster protection	100%	0%	5*
Management of the municipal property and housing	100%	0%	2*
Financial and accounting services	100%	0%	7*

*   *The number of respondents is too small.*

Susceptibility to pressure from above

If their superior orders it, how likely would it be for staff members to perform unauthorised activities or services in the following areas:	Not likely	Likely	Total (base)
City planning, cadastre and regulation and control of construction	67%	33%	6*
Civil engineering, urban development and ecology	75%	25%	8*
Public order, security, disaster protection	80%	20%	5*
Public procurement	86%	14%	7*
Administrative and information services	88%	13%	8*
Legal and regulatory services; registration and control of commercial activities	89%	11%	9*
Human resources	100%	0%	4*
Management of the municipal property and housing	100%	0%	2*
Education, culture, social activities and sports	100%	0%	5*
Financial and accounting services	100%	0%	7*

*   *The number of respondents is too small.*

Susceptibility to pressure from outside

Are staff members involved in the following activity/activities likely to accept a bribe:	Likely	Total (base)
City planning, cadastre and regulation and control of construction	17%	6[*]
Public procurement	14%	7[*]
Human resources	0%	4[*]
Administrative and information services	0%	8[*]
Public order, security, disaster protection	0%	5[*]
Legal and regulatory services; registration and control of commercial activities	0%	8[*]
Management of the municipal property and housing	0%	2[*]
Education, culture, social activities and sports	0%	5[*]
Financial and accounting services	0%	6[*]
Civil engineering, urban development and ecology	0%	8[*]

*   The number of respondents is too small.

Evasion of regulations

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	No one is trying	Some are trying (answers 2 to 7)	Not Applicable	Total (base)
Legal and regulatory services; registration and control of commercial activities	11%	89%	0%	9[*]
Administrative and information services	0%	88%	13%	8[*]
City planning, cadastre and regulation and control of construction	17%	83%	0%	6[*]
Public procurement	14%	71%	14%	7[*]
Financial and accounting services	29%	57%	14%	7[*]
Human resources	0%	50%	50%	4[*]
Management of the municipal property and housing	50%	50%	0%	2[*]
Civil engineering, urban development and ecology	38%	50%	13%	8[*]
Public order, security, disaster protection	20%	40%	40%	5[*]
Education, culture, social activities and sports	40%	40%	20%	5[*]

*   The number of respondents is too small.

Share of the Top 3 of respondents with above average scores to this question.*

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	Top 3 (% of people with above average score for the risk)	Total (base)
Administrative and information services	50%	8**
Legal and regulatory services; registration and control of commercial activities	44%	9**
City planning, cadastre and regulation and control of construction	33%	6**
Public procurement	29%	7**
Civil engineering, urban development and ecology	25%	8**
Public order, security, disaster protection	20%	5**
Human resources	0%	4**
Management of the municipal property and housing	0%	2**
Education, culture, social activities and sports	0%	5**
Financial and accounting services	0%	7**

*   *The scale is from 1 to 7, top 3 includes answers 5, 6 and 7 (above average interest by the clients of the organisation to evade the rules)*

** *The number of respondents is too small.*

Ease of implementation

Anticorruption policies	Not Implementable	Implementable	Total (base)
Instructions and rules for the organisation of information and administrative activities and the handling of documents	0%	100%	30
Internal labour regulations	2.90%	97.10%	35
Internal rules for receiving and processing corruption complaints	4.80%	95.30%	21
Access control	5.70%	94.30%	35
Internal public procurement rules	17.40%	82.60%	23

Difficult to evade

Anticorruption policy	Difficult to evade	Total (base)
Internal public procurement rules	91.30%	23
Instructions and rules for the organisation of information and administrative activities and the handling of documents	79.30%	29
Internal rules for receiving and processing corruption complaints	75.00%	20
Internal labour regulations	74.30%	35
Access control	69.70%	33

Awareness of policy

Anticorruption policy	Well-known	Total (base)
Internal rules for receiving and processing citizens' signals for corruption	100%	21
Access control	97.20%	35
Instructions and rules for the organization of Information and Administrative activities and the handling of documents	93.80%	32
Internal public procurement rules	91.30%	23
Internal labour regulations	88.30%	34

Strict implementation

Anticorruption policy	Strictly applied	Total (base)
Internal rules for receiving and processing citizens' signals for corruption	95.30%	21
Access control	94.30%	35
Instructions and rules for the organization of Information and Administrative activities and the handling of documents	93.80%	32
Internal public procurement rules	91.30%	23
Internal labour regulations	85.30%	34

Strict control

Anticorruption policy	Strict control	Total (base)
Instructions and rules for the organisation of information and administrative activities and the handling of documents	53.40%	30
Access control	51.40%	35
Internal labour regulations	47.00%	34
Internal public procurement rules	43.40%	23
Internal rules for receiving and processing corruption complaint	42.90%	21

Strict application of sanctions

Anticorruption policy	Strict sanctions for non-compliance	Total (base)
Instructions and rules for the organization of information and administrative activities and the handling of documents	62.5%	32
Internal labour regulations	61.8%	34
Internal public procurement rules	56.5%	23
Internal rules for receiving and processing corruption complaints	52.4%	21
Access control	44.1%	34

Estimated potential effectiveness of the policy to reduce cases of corruption

Anticorruption policy	Could reduce cases of corruption	Total (base)
Internal rules for receiving and processing corruption complaints	100%	21
Internal public procurement rules	100%	23
Internal labour regulations	94.1%	34
Instructions and rules for the organisation of information and administrative activities and the handling of documents	93.1%	29
Access control	85.3%	34

Estimated actual effectiveness of the policy in reducing corruption risk

Anticorruption policy	Could reduce corruption risk	Total (base)
Internal public procurement rules	95.7%	23
Internal rules for receiving and processing corruption complaints	90.5%	21
Instructions and rules for the organization of Information and Administrative Activities and the handling of documents	89.7%	29
Internal labour regulations	85.7%	35
Access control	82.9%	35

HEALTH SERVICE OF TRENTO, ITALY

Outside pressure associated with activity

Assessment of the level of external pressure experienced by the employees of the various departments (activities)

Level of external pressure for corruption transactions in:	No pressure at all	Low, medium or high pressure	Total answers (base)
Security and surveillance	33.3%	66.7%	48
Public procurement	38.2%	61.8%	34
Service provision	40.0%	60.0%	75
Consultancy contracts	40.0%	60.0%	10*
Human resources	40.6%	59.4%	32
Tender content specifications	44.4%	55.6%	18
Board evaluation of acts for the concession of benefits/services	44.4%	55.6%	9*
Certifications/authorisations	48.6%	51.4%	37
Contributions/reimbursement to customers	50.0%	50.0%	12*
Intramural activities	59.1%	40.9%	22

* *The number of respondents is too small.*

Susceptibility to pressure from above

If their superior orders it, how likely would it be for staff members to perform unauthorised activities or services in the following areas:	Not likely	Likely	Total (base)
Consultancy contracts	50.0%	50.0%	10*
Certifications/authorisations	66.7%	33.3%	36
Security and surveillance	78.7%	21.3%	47
Public procurement	78.8%	21.2%	33
Service provision	82.4%	17.6%	74
Contributions/reimbursement to customers	83.3%	16.7%	12*
Human resources	84.4%	15.6%	32
Tender content specifications	88.9%	11.1%	18
Board evaluation of acts for the concession of benefits/services	88.9%	11.1%	9*
Intramural activities	90.9%	9.1%	22

* The number of respondents is too small.

Susceptibility to pressure from outside

Are staff members involved in the following activity/activities likely to accept a bribe:	Likely	Total (base)
Consultancy contracts	50.0%	10*
Public procurement	29.4%	34
Tender content specifications	27.8%	18
Certifications/authorisations	24.3%	37
Security and surveillance	18.8%	48
Human resources	15.6%	32
Service provision	13.3%	75
Intramural activities	9.1%	22
Contributions/reimbursement to customers	8.3%	12*
Board evaluation of acts for the concession of benefits/services	0%	9*

* The number of respondents is too small.

Evasion of regulations

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	No one is trying	Some are trying (answers 2 to 7)	NA	Total (base)
Board evaluation of acts for the concession of benefits/services	12.5%	87.5%	0%	8*
Service provision	14.7%	82.7%	2.7%	75
Public procurement	11.8%	79.4%	8.8%	34
Contributions/reimbursement to customers	27.3%	72.7%	0%	11*
Tender content specifications	16.7%	72.2%	11.1%	18
Certifications/authorisations	24.3%	70.3%	5.4%	37
Security and surveillance	27.1%	68.8%	4.2%	48
Human resources	31.3%	65.6%	3.1%	32
Consultancy contracts	30.0%	60.0%	10.0%	10*
Intramural activities	45.5%	45.5%	9.1%	22

*   *The number of respondents is too small.*

Share of the Top 3 of respondents with above average scores to this question.*

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	Top 3 (% of people with above average score for the risk)	Total (base)
Consultancy contracts	30.0%	10**
Certifications/authorisations	27.0%	37
Service provision	22.7%	75
Public procurement	20.6%	34
Tender content specifications	16.7%	18
Human resources	15.6%	32
Security and surveillance	12.5%	48
Board evaluation of acts for the concession of benefits/services	12.5%	8*
Contributions/reimbursement to customers	9.1%	11*
Intramural activities	4.5%	22

*   *The scale is from 1 to 7, top 3 includes answers 5, 6 and 7 (above average interest by the clients of the organisation to evade the rules).*

**   *The number of respondents is too small.*

Ease of implementation

Anticorruption policy	Not Implementable	Implementable	Total (base)
Participation in events sponsored by external companies is prohibited	13.7%	86.3%	95
Obligation to declare cases of conflict of interest	15.4%	84.6%	91
Code of conduct	22.5%	77.5%	111
Rules of access to the premises for external stakeholders	23.2%	76.8%	69

Difficult to evade

Anticorruption policy	Difficult to evade	Total (base)
Code of conduct	59.5%	111
Obligation to declare cases of conflict of interest	56.0%	91
Rules of access to the premises for external stakeholders	42.0%	69
Participation in events sponsored by external companies is prohibited	37.2%	94

Awareness of policy

Anticorruption policy	Well-known	Total (base)
Participation in events sponsored by external companies is prohibited	81.9%	94
Obligation to declare cases of conflict of interest	81.1%	90
Code of conduct	68.8%	109
Rules of access to the premises for external stakeholders	68.1%	69

Strict implementation

Anticorruption policy	Strictly applied	Total (base)
Obligation to declare cases of conflict of interest	65.2%	89
Code of conduct	62.7%	110
Participation in events sponsored by external companies is prohibited	60.6%	94
Rules of access to the premises for external stakeholders	60.0%	70

Strict control

Anticorruption policy	Strict control	Total (base)
Participation in events sponsored by external companies is prohibited	24.2%	95
Obligation to declare cases of conflict of interest	22.2%	90
Code of conduct	18.2%	110
Rules of access to the premises for external stakeholders	10.0%	70

Strict application of sanctions

Anticorruption policy	Strict sanctions for non-compliance	Total (base)
Obligation to declare cases of conflict of interest	43.2%	88
Rules of access to the premises for external stakeholders	42.6%	68
Participation in events sponsored by external companies is prohibited	36.2%	94
Code of conduct	31.8%	110

Estimated potential effectiveness of the policy to reduce cases of corruption

Anticorruption policy	Could reduce cases of corruption	Total (base)
Obligation to declare cases of conflict of interest	81.3%	91
Code of conduct	80.2%	111
Rules of access to the premises for external stakeholders	75.7%	70
Participation in events sponsored by external companies is prohibited	71.6%	95

Estimated actual effectiveness of the policy in reducing corruption risk

Anticorruption policy	Could reduce corruption risk	Total (base)
Obligation to declare cases of conflict of interest	72.2%	90
Code of conduct	70.0%	110
Rules of access to the premises for external stakeholders	65.7%	70
Participation in events sponsored by external companies is prohibited	62.1%	95

MUNICIPALITY OF RIVA DEL GARDA, ITALY

Outside pressure associated with activity

Assessment of the level of external pressure experienced by the employees of the various departments (activities)

Level of external pressure for corruption transactions in:	No pressure at all	Low, medium or high pressure	Total answers (base)
Human resources	50.0%	50.0%	6*
Certifications/authorisations	54.2%	45.8%	24
Security and surveillance	54.5%	45.5%	11*
Public procurement	61.5%	38.5%	26
Service provision	63.6%	36.4%	22
Consultancy contracts	66.7%	33.3%	6*
Contributions/reimbursement to public-private stakeholders	75.0%	25.0%	8*

* *The number of respondents is too small.*

Susceptibility to pressure from above

If their superior orders it, how likely would it be for staff members to perform unauthorised activities or services in the following areas:	Not likely	Likely	Total (base)
Human resources	66.7%	33.3%	6*
Contributions/reimbursement to public-private stakeholders	75.0%	25.0%	8*
Security and surveillance	81.8%	18.2%	11*
Consultancy contracts	83.3%	16.7%	6*
Certifications/authorisations	87.5%	12.5%	24
Service provision	90.9%	9.1%	22
Public procurement	96.2%	3.8%	26

* *The number of respondents is too small.*

Susceptibility to pressure from outside

Are staff members involved in the following activity/activities likely to accept a bribe:	Likely	Total (base)
Contributions/reimbursement to public-private stakeholders	25.0%	8*
Security and surveillance	18.2%	11*
Certifications/authorisations	16.7%	24

Are staff members involved in the following activity/ activities likely to accept a bribe:	Likely	Total (base)
Consultancy contracts	16.7%	6*
Service provision	4.5%	22
Public procurement	3.8%	26
Human resources	0%	6*

* *The number of respondents is too small.*

Evasion of regulations

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	No one is trying	Some are trying (answers 2 to 7)	NA	Total (base)
Human resources	16.7%	83.3%	0%	6*
Certifications/authorisations	20.0%	76.0%	4%	25
Consultancy contracts	33.3%	66.7%	0%	6*
Security and surveillance	36.4%	63.6%	0%	11*
Contributions/reimbursement to public-private stakeholders	37.5%	62.5%	0%	8*
Public procurement	38.5%	61.5%	0%	26
Service provision	27.3%	59.1%	13.6%	22

* *The number of respondents is too small.*

Share of the Top 3 of respondents with above average scores to this question.*

In your opinion, what share of the citizens (or companies) try to circumvent (evade) existing rules in the following areas:	Top 3 (% of people with above average score for the risk)	Total (base)
Contributions/reimbursement to public-private stakeholders	25.0%	8**
Certifications/authorisations	20.0%	25
Security and surveillance	18.2%	11**
Human resources	16.7%	6**
Consultancy contracts	16.7%	6**
Service provision	9.1%	22
Public procurement	3.8%	26

*   *The scale is from 1 to 7, top 3 includes answers 5, 6 and 7 (above average interest by the clients of the organisation to evade the rules).*

** *The number of respondents is too small.*

Ease of implementation

Anticorruption policy	Not implementable	Implementable	Total (base)
Code of conduct	8.5%	91.5%	47
Obligation to declare cases of conflict of interest	12.2%	87.8%	49
Reporting of all reasonable suspicions of corruption	23.7%	76.3%	38
Formal procedures for the payment of invoices and control of tax revenues	30.3%	69.7%	33

Difficult to evade

Anticorruption policy	Difficult to evade	Total (base)
Obligation to declare cases of conflict of interest	60.4%	48
Formal procedures for the payment of invoices and control of tax revenues	59.4%	32
Code of conduct	45.7%	46
Reporting of all reasonable suspicions of corruption	42.1%	38

Awareness of policy

Anticorruption policy	Well-known	Total (base)
Obligation to declare cases of conflict of interest	78.7%	47
Reporting of all reasonable suspicions of corruption	76.3%	38
Formal procedures for the payment of invoices and control of tax revenues	75.8%	33
Code of conduct	73.9%	46

Strict implementation

Anticorruption policy	Strictly applied	Total (base)
Code of conduct	63.8%	47
Formal procedures for the payment of invoices and control of tax revenues	62.5%	32
Obligation to declare cases of conflict of interest	60.9%	46
Reporting of all reasonable suspicions of corruption	48.6%	37

Strict control

Anticorruption policy	Strict control	Total (base)
Formal procedures for the payment of invoices and control of tax revenues	21.2%	33
Code of conduct	17.8%	45
Obligation to declare cases of conflict of interest	17.0%	47
Reporting of all reasonable suspicions of corruption	5.3%	38

Strict application of sanctions

Anticorruption policy	Strict sanctions for non-compliance	Total (base)
Formal procedures for the payment of invoices and control of tax revenues	45.5%	33
Obligation to declare cases of conflict of interest	36.2%	47
Code of conduct	30.4%	46
Reporting of all reasonable suspicions of corruption	26.3%	38

Estimated potential effectiveness of the policy to reduce cases of corruption

Anticorruption policy	Could reduce cases of corruption	Total (base)
Reporting of all reasonable suspicions of corruption	78.9%	38
Obligation to declare cases of conflict of interest	77.5%	49
Code of conduct	74.4%	47
Formal procedures for the payment of invoices and control of tax revenues	72.8%	33

Estimated actual effectiveness of the policy in reducing corruption risk

Anticorruption policy	Could reduce corruption risk	Total (base)
Obligation to declare cases of conflict of interest	69.4%	49
Reporting of all reasonable suspicions of corruption	67.6%	37
Code of conduct	66.0%	47
Formal procedures for the payment of invoices and control of tax revenues	63.6%	33

CSD REPORTS/АНАЛИЗИ

1. Bulgaria's Participation in EU Structural Funds, Sofia, 1999.
   ISBN 954-477-050-8

2. Social Policy Aspects of Bulgaria's EU Accession, Sofia, 1999.
   ISBN 954-477-053-4

3. Preparing for EU Accession Negotiations, Sofia, 1999.
   ISBN 954-477-055-7

4. The Role of Political Parties in Accession to the EU, Sofia, 1999.
   ISBN 954-477-055-0

5. Bulgaria's Capital Markets in the Context of EU Accession: A Status Report, Sofia, 1999.
   ISBN 954-477-059-3

6. Corruption and Trafficking: Monitoring and Prevention, Sofia, 2000.
   ISBN 954-477-078-X

7. Establishing Corporate Governance in an Emerging Market: Bulgaria, Sofia, 2000.
   ISBN 954-477-084-4

9. Corruption and Illegal Trafficking: Monitoring and Prevention, Second, revised and amended edition, Sofia, 2000.
   ISBN 954-477-087-9

10. Smuggling in Southeast Europe, Sofia, 2002.
    ISBN 954-477-099-2

11. Corruption, Trafficking and Institutional Reform, Sofia, 2002.
    ISBN 954-477-101-8

12. The Drug Market in Bulgaria, Sofia, 2003.
    ISBN 954-477-111-5

13. Partners in Crime: The Risks of Symbiosis between the Security Sector and Organized Crime in Southeast Europe, Sofia, 2004.
    ISBN 954-477-115-8

14. Weapons under Scrutiny: Implementing Arms Export Controls and Combating Small Arms Proliferation in Bulgaria, Sofia, 2004.
    ISBN 954-477-117-470

15. Transportation, Smuggling and Organized Crime, Sofia, 2004.
    ISBN 954-477-119-0

16. Corruption and Tax Compliance. Challenges to Tax Policy and Administration, Sofia, 2005.
    ISBN 954-477-132-8

17. Police Stops and Ethnic Profiling in Bulgaria, Sofia, 2006.
    ISBN 10 954-477-142-5
    ISBN 13 978-954-477-142-3

18. Corruption in Public Procurement. Risks and Reform Policies, Sofia, 2006.
    ISBN 987-954-477-149-2

19. Corruption in the Healthcare Sector in Bulgaria, Sofia, 2006.
    ISBN 987-954-477-154-6

20. Organized Crime in Bulgaria: Markets and Trends, Sofia, 2007.
    ISBN 978-954-477-150-8

21. Civil Society in Bulgaria: Trends and Risks, Sofia, 2010.
    ISBN 978-954-477-164-5

22. Energy and Good Governance in Bulgaria: Trends and Policy Options, Sofia, 2011.
    ISBN 978-954-477-167-6

23. Penitentiary Policy and System in the Republic of Bulgaria, Sofia, 2011.
    ISBN 978-954-477-171-3

24. Green Energy Governance in Bulgaria at a Crossroads, Sofia, 2011.
    ISBN 987-954-477-174-4

25. The Hidden Economy in Bulgaria and the Global Economic Crisis, Sofia, 2011.
    ISBN 978-954-477-181-2

26. Countering Organised Crime in Bulgaria: Study on the Legal Framework, Sofia, 2012.
    ISBN 978-954-477-189-8

27. Assisting and Reintegrating Child Victims of Trafficking in Bulgaria: Legal, Institutional and Policy Framework, Sofia, 2013.
    ISBN 978-954-477-196-6

28. Countering Police Corruption: European Perspectives, Sofia, 2013.
    ISBN 978-954-477-202-4

29. Civil Society in Bulgaria: Between Social Entrepreneurship and State Capture, Sofia, 2013.
    ISBN 978-954-477-215-4

30. Energy Sector Governance and Energy (In)Security in Bulgaria, Sofia, 2014.
ISBN 978-954-477-214-7

31. Monitoring Anti-Corruption in Europe: Bridging Policy Evaluation and Corruption Measurement, Sofia, 2015.
ISBN 978-954-477-241-3

Reports Анализи