

**MAPPING
ANTICORRUPTION
ENFORCEMENT
INSTRUMENTS**



CENTER FOR
THE STUDY OF
DEMOCRACY

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While the enforcement of anticorruption policies has been prioritised by international institutions and national governments, the tools for evaluating this enforcement have not been developed. The main reason for this underdevelopment is that corruption is measured and policies evaluated only at the societal level, while the level of actual corrupt transactions – the public institution – is rarely analysed. This paper outlines the conceptual justification for rethinking the focus of anticorruption monitoring, maps the corruption measurement and monitoring landscape and sketches a new instrument designed to serve a better targeted policy evaluation – Monitoring Anticorruption Policy Implementation (MACPI).

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LIST OF ABBREVIATIONS

BEEPS	Business Environment and Enterprise Performance Survey
BPI	Bribe Payers Index
CAPI	Computer Assisted Personal Interview
CMS	Corruption Monitoring System
CPI	Corruption Perceptions Index
EBRD	European Bank of Reconstruction and Development
EU	European Union
FDI	Foreign Direct Investment
GPP	General Population Poll
GRECO	Group of States Against Corruption
ICRG	International Country Risk Guide
IIAG	Ibrahim Index of African Governance
MACPI	Monitoring Anticorruption Policy Implementation
QRQ	Qualified Respondent's Questionnaire
RLI	Rule of Law Index
SELDI	Southeast Europe Leadership for Development and Integrity
OECD	Organisation for Economic Co-operation and Development
TI	Transparency International
WJP	World Justice Project
WGI	Worldwide Governance Indicators

FOREWORD

Over the past decade or so, the global political preoccupation with corruption has been matched by extensive research and the design of various ways of measuring its level in society. The resulting abundance of measurement and monitoring instruments have allowed a better understanding of its dynamics and have informed the design of some anticorruption policies. The current stage of anticorruption thinking, therefore, opens the opportunity of at least two additional paths of exploration – a **critical review of the measurement and monitoring tools** in existence and an examination of possible gaps in these tools.

Driven by these considerations, this report provides a conceptual map of the available ways to measure corruption and monitor anticorruption policies. The mapping results, presented below, have informed the design of a *Monitoring Anticorruption Policy Implementation* (MACPI) tool which is intended to evaluate the anticorruption preparedness of public organisations by identifying areas of corruption vulnerability. The findings of this report indicate that while the enforcement of anticorruption policies has been prioritised by international institutions and national governments, the tools for evaluating this enforcement have not been developed. Two main reasons have caused this underdevelopment:

- corruption has been mostly considered as a general concept, with almost no effort to distinguish between its form and its content. The resulting policy designs have also been rather general, with emphasis on incrimination at the expense of incentivisation;
- to the (far from sufficient) extent to which anticorruption policies have been evaluated this has been only at the societal level, while the level of actual corrupt transactions – the public institution – has rarely been analysed.

Being effective at anticorruption requires an understanding of the incentives that drive actors at the micro level and the vulnerabilities experienced by the specific public institution. Differences between, say, a public hospital and a customs office are sufficiently significant to warrant that both anticorruption policies and the methods used to evaluate their enforcement be tailored to their needs. Ultimately, as all anticorruption policies are practically implemented at the level of public organisations, **assessing anticorruption policy effectiveness and enforcement is primarily possible at the organisational level.**

This report outlines the proposed solution to these needs – the MACPI tool. The conceptual justification of MACPI and the results of its pilot application in Bulgaria and Italy are further developed in a separate detailed report.¹

¹ Center for the Study of Democracy. (2015). *Monitoring Anti-Corruption in Europe: Bridging Policy Evaluation and Corruption Measurement*. Sofia: Center for the Study of Democracy.

SCOPE AND PURPOSE

Monitoring Anticorruption Policy Implementation (MACPI) is a specialised set of instruments for evaluating the **enforcement of anticorruption policies** and the dynamics in the prevalence of corruption. This tool is intended to contribute to the **development of EU methodology for monitoring anticorruption enforcement**. It will also further the application of public-private partnerships in the field of anticorruption in Europe.

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 methodology is expected to serve three main purposes:

- Analytically, it will combine the **mapping of extant monitoring tools** in Europe with the design of an **integrated approach** to monitoring of (anti)corruption;
- 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 targeting of MACPI:

- The **sector-based approach** focuses on anticorruption measures and the mechanisms for their enforcement in sectors highly vulnerable to corruption: law-enforcement, health-care, 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 informed by suitable criteria. The main assumption for 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 address the specific activities of specific employees is not viable. Corruption transactions “happen” at the level of employees of public organisations; anticorruption measures and policies, therefore, cannot be implementable without addressing concrete behaviour patterns of employees of public organisations.

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 research literature: 1) the variety of corruption definitions and approaches to corruption; 2) the variance 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.

Furthermore, there is a consensus that in the EU member states, for a number of reasons, 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 areas 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

At present, there are a several monitoring mechanisms looking at the transposition of various international commitments or recommendations into national legislation (e.g. monitoring of compliance with the OECD anti-bribery convention, by Council of Europe’s GRECO, etc.). Transposition of international standards is, of course, only the first step; the provisions also need to be enforced. The enforcement of certain measures could involve either criminal prosecution or a range of administrative procedures that check for compliance. A range of measures can only be effective if the outputs that result from the measure are subject to additional analysis.

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

LEVELS OF ANALYSIS OF CORRUPTION

Monitoring anticorruption policy enforcement could produce different solutions and tools. In order to properly assess their relative merits, 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 concepts 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. These problems 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.

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. There is no doubt that corruption is a micro level transaction, so the phenomenon exists at micro level.

Several reviews of accomplishments and weaknesses have been published in recent years.³ One key issue remaining to be resolved relates to the fact that 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 conceptual 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 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.

As noted in recent analyses, 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

³ See Norad. (2008). *Anti-Corruption Approaches. A Literature Review*. Oslo: Norad.

from favouritism to bribes. Some of its forms are criminalized, others not, but the defining characteristic at 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."⁴

Society level measurements of corruption typically capture different forms of bribery through experience or perception based indicators.⁵ It might be argued that experience based measures are superior and/or more accurate than perception based measures; or that bribery is socially perceived differently in various regions and cultures. However, as universally acknowledged, corruption is a multifaceted phenomenon that cannot and should not be reduced to bribery (though bribery is itself a complex phenomenon). Therefore, it would be logical to assume that **measurement should be based on an operationalised concept of corruption**; that a summary measure of corruption (at society level) should include the measures of all its elements, subcomponents and levels.

These observations form the starting point for defining the landscape of monitoring the enforcement of anticorruption policies. Corruption acts (irrespective 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 on the one hand and citizens and businesses on the other. These interactions are the primary target of anticorruption policies and therefore, the primary focus of anticorruption enforcement monitoring should be interactions between citizens and public organisations and not society as a whole.

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 rules and/or measures aimed to prevent or penalise corrupt behaviour, then the monitoring of anticorruption policies would need to start with a comprehensive list of these policies (list of rules and list of behaviours they target).
- In order to be monitored, corruption behaviour needs to be specified and localised in the overall space of social action. This means to list the specific actors and exchanges that form corruption in a given social system or subsystem.

The main assumption of the MACPI is that corrupt behaviour is located at the level of public organisations, defined as relatively autonomous collective actors with a principal-agent structure.

⁴ Mungiu-Pippidi, A., Mondo, B., & Kukutschka, R. (2013). *Global Comparative Trend Analysis Report*. Retrieved from <http://anticorruption.eu/publications/global-comparative-trend-analysis-report/>

⁵ 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 [Center for the Study of Democracy. (2006). *Monitoring of Anticorruption Reforms in Bulgaria*. Sofia: Center for the Study of Democracy].

THE PRINCIPAL-AGENT MODEL

Many variations of the classic definition of corruption of V. Tanzi – abuse of public power for private gain⁶ – have been published. For example, a more recent proposal that is slightly broader and contains the possibility to include corruption in the private sector has been formulated as the “illicit use of entrusted power for private gain.”⁷ 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).⁸

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 the specific abuses of power, macro level policies would and should rather target a political change of the governance regime. 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.⁹ 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**. 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.

⁶ Tanzi, V. (1998). *Corruption Around the World: Causes, Consequences, and Cures*. IMF Working Paper.

⁷ Matsheza, P., Timilsina, A., & Arutyunova, A. (Eds.). (2011). *Fighting Corruption in the Water Sector Methods, Tools and Good Practices*. New York: UNDP.

⁸ Mungiu-Pippidi, A. (Ed.). (2011). *Contextual Choices in Fighting Corruption: Lessons Learned*. Oslo: Norad., p. 15.

⁹ See Coleman, J. (1994). *Foundations of Social Theory*. Cambridge, New York, etc.: Harvard University Press.

A descriptive model that enhances the analysis of corruption behaviour (though not the only one) is the so-called **principal-agent model**. It includes several assumptions:

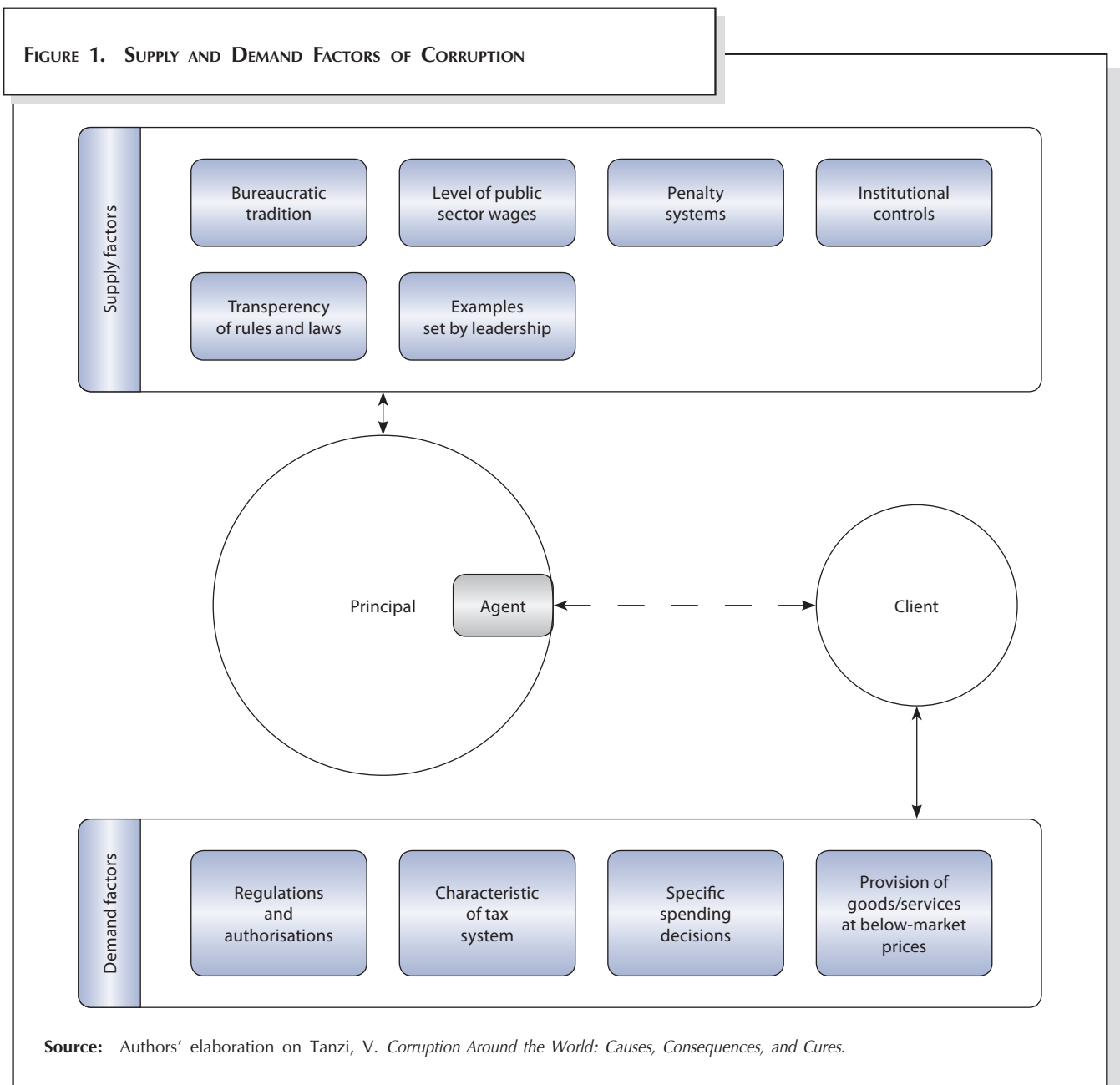
- i. Corruption occurs in the interactions (exchanges) between two actors: public organisations and citizens/ businesses. At least one on the actors is a collective unit (the public organisation), which consists of at least two individual actors: principal and agent. Every public organisation is created 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.
- ii. Due behaviour of public officials (the agents) is prescribed by the rules (laws, norms, prescriptions, etc.) of the public organisation. Corruption in this context is defined as noncompliance with rules (violation), which is aimed at and/or results in private benefits for the official. As the behaviour of officials is essentially the use of 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.
- iii. Corruption acts have two principal characteristics which make them difficult to observe and categorise: they are hidden and involve mimicry.¹⁰ 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.
- iv. The public sphere is composed of hierarchies of organisations (central government, local government, agencies, departments, etc.). Except for the highest levels of government, public organisations are in turn agents of the highest level – the President, Prime Minister, etc., which appears as “superior principal.” 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. The breach of trust in such a scheme is not with the formal principal (the higher level of government) but rather against the public interest. 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.¹¹ Very often it is possible to present and interpret noncompliance with rules that guard or define the public interest (high

¹⁰ 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.

¹¹ 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://anticorr.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.

level political corruption) as beneficial for society or as something unavoidable.

- v. 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 subordinates 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, etc. Such relations could be established both within one public organisation and between subordinated organisations.



- vi. 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 deliberate noncompliance with rules by the official. Depending on the rules, client benefits could be various: 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, superiors). 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 factors¹² are summarised in Figure 1.

¹² See Tanzi, V. *Corruption Around the World: Causes, Consequences, and Cures*.

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 (rather than as exchange of specific resources), 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.¹³ 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. 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.¹⁴

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

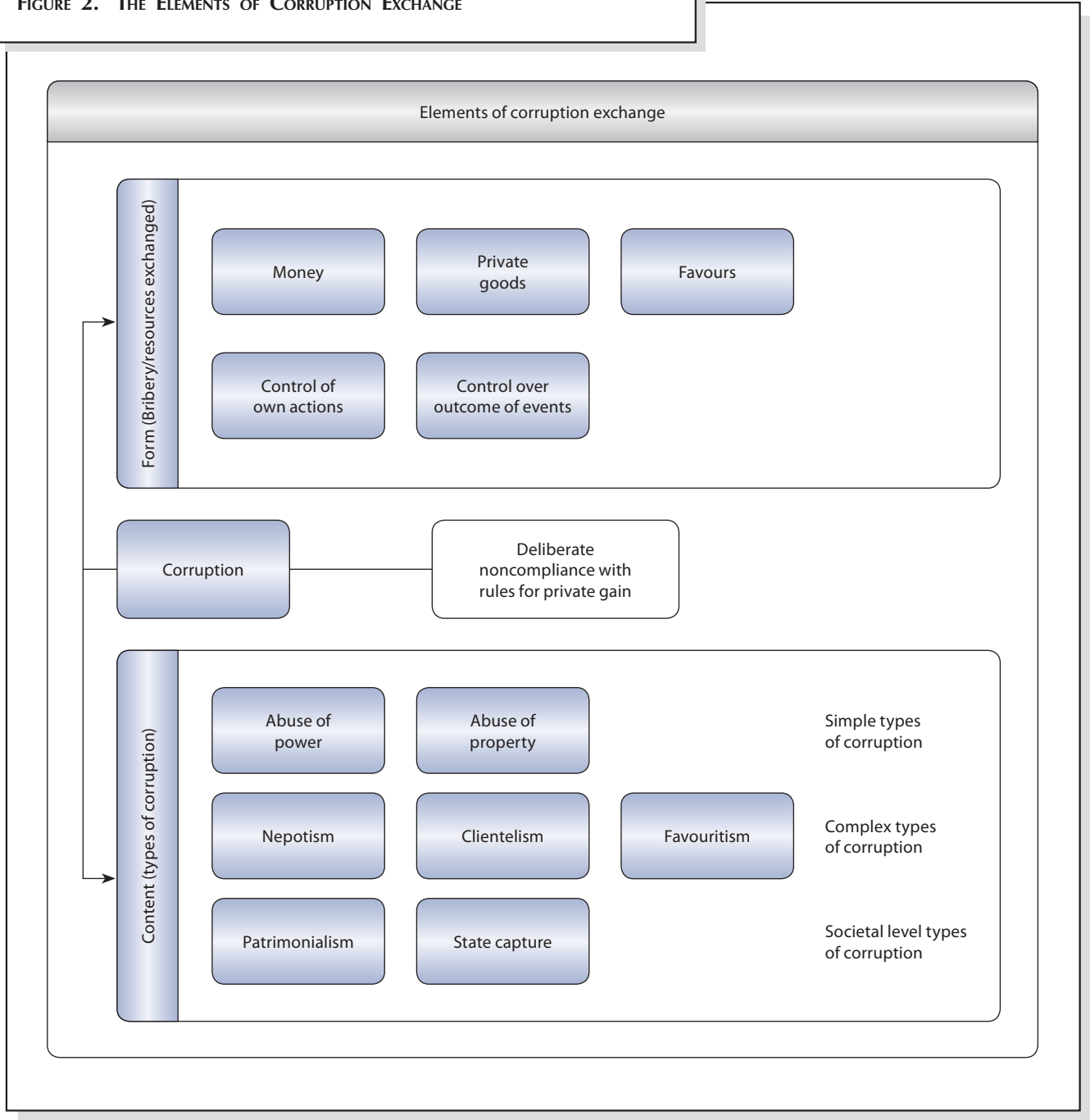
Figure 2 illustrates the idea about the structure of corruption being resolved into its main aspects – form and content – and their respective breakdown into specific sub-elements.

The common denominator of these types of social action is the 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 has to be present (deliberate noncompliance for private gain). 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

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

¹⁴ 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.

FIGURE 2. THE ELEMENTS OF CORRUPTION EXCHANGE



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 is always a violation (noncompliance) of rules. In this respect definitions of rules are crucial for defining the specific content characteristics of corruption acts. Another dimension of analysing violation of rules are the existing approaches to violations:

- 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 in terms of content and scope corruption is not an absolutely defined concept. Rather the dimensions of its form and content are relative to the social context examined; as societies evolve, the scope of corruption exchanges also evolves to reflect new definitions of the public good.

CORRUPTION EXCHANGES AND ANTICORRUPTION POLICIES

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 vulnerability 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 vulnerability. Such mechanisms would be irrelevant when transactions between officials and citizens have 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 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 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 this proposal 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 registered as corruption per se.

Areas of anticorruption policies

The principal 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 compliance of agents with the established rules. Most often compliance is monitored by superiors or by the principal. Noncompliance could be a result of a multitude of factors (incompetence, low qualification, etc.). In the context of corruption analysis the important division of noncompliance is differentiating 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 added: **in an organisational context corruption could be defined as 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.

Assessment of the enforcement of anticorruption policies

Monitoring policy enforcement is an assessment/evaluation task which includes several main components grouped into two subcomponents: **definition** and **evaluation** of anticorruption policies.

i. 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.

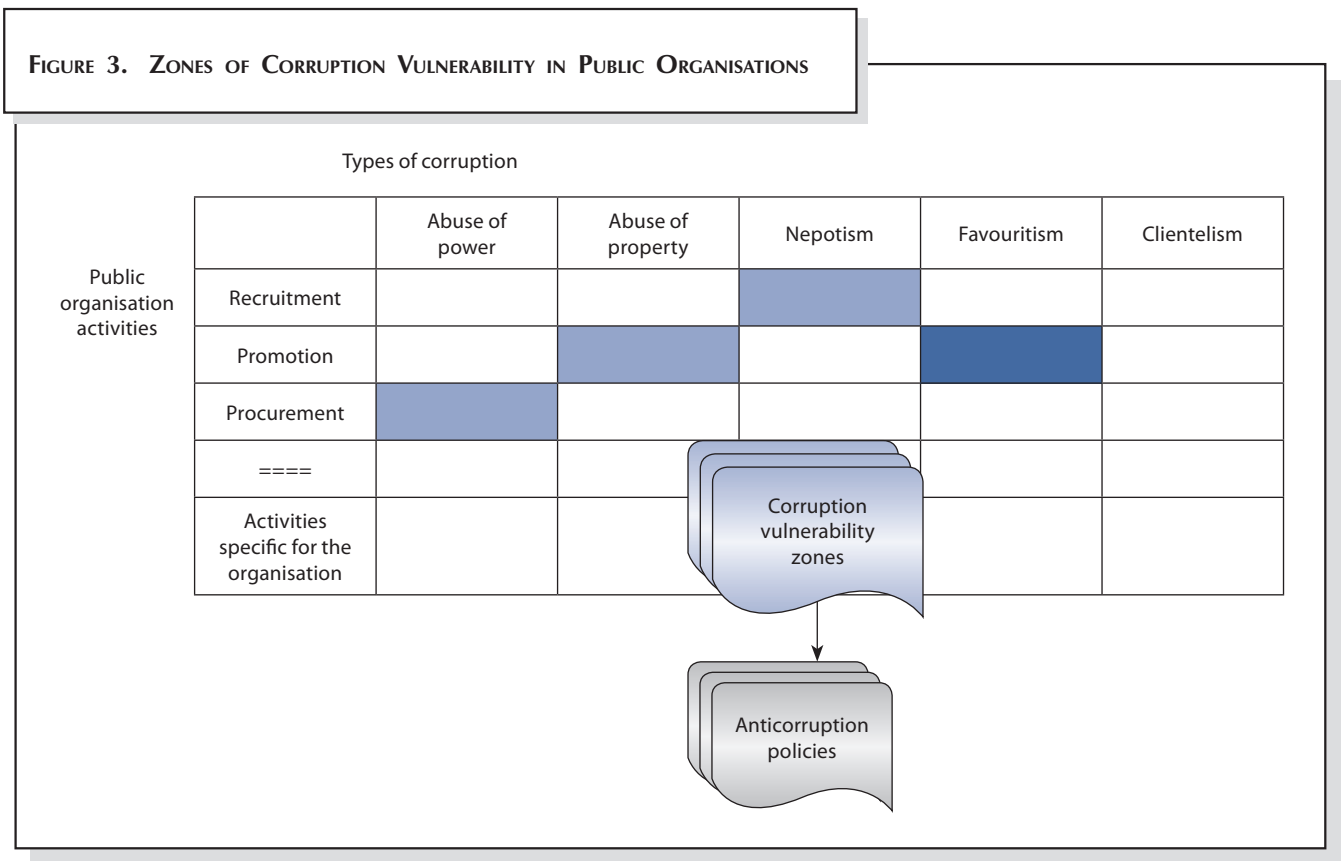
First, public organisations are defined as relatively independent units of government authority aimed at providing for a specific public function. Relative autonomy is an important criterion as it allows the identification of a concrete principal and the definition of his functions with regard to the 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 (by statute) in order to serve its public function;
- Evaluate the potential corruption vulnerability for each activity;
- Identify the existing anticorruption policies;
- Link existing policies to the corruption vulnerability they are targeting.

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

A key element in implementing this methodology is the concept of corruption vulnerability. Based on the already made assumptions corruption vulnerability could be defined as the **presence of interest for corruption exchanges of any type by agents or clients of a public organisation**. Corruption vulnerability 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).

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 existence of a proposal to initiate a corruption act. In more complex types of 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” (superiors, 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 activities in the 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.

Information about the concrete parameters of corruption vulnerability associated with each activity could be obtained in several ways:

- Expert analysis of the activities and the potential for corruption related interest, given the existing set of rules, governing the organisation, the structure of the organisation and the external context. This analysis would be best performed by experienced organisation insiders and researchers from the assessment team;
- Reports/accounts for the prevalence of corruption pressure experienced by officials;
- Reports/accounts of corruption pressure experienced by clients of the organisation.

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

Organisational level anticorruption policies could be divided into two main types: a) policies that apply to most (all) kinds of corruption vulnerability (e.g. declaration of assets, declarations for conflict of interest, codes of ethics, etc.); b) policies which address specific vulnerabilities and types/forms of corruption (e.g. video monitoring of specific activities, rotation of personnel at certain positions, etc.).

Overall, the definition aspect of the assessment is a kind of anticorruption audit of the public organisation and is a precondition for assessing and monitoring anticorruption policy implementation.

ii. The **evaluation** of anticorruption policies includes:

- evaluating the level of implementation of policies;
- evaluating effectiveness of policies (goal/result);
- evaluating efficiency (cost/result).

Anticorruption policies in a public organisation could be considered effective if they mitigate existing corruption vulnerabilities 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. 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.

The measure of enforceability of a policy is in essence an evaluation of its bureaucratic quality.

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. Arguably the most important function of an anticorruption policy is its contribution for mitigating specific corruption vulnerabilities and/or reducing instances of corrupt behaviour. In general, there would be two ways to evaluate effectiveness: evaluation of the policy by organisation officials and evaluation by clients of the public organisation.

The elements of the MACPI described above combined with assumptions about the structure of corruption behaviour make it possible to design the concrete assessment methodology and specific indicators, data and methods to be used. The design of the Tool also draws on accumulated experience in measuring different aspects of corruption and anticorruption, which are reviewed in greater detail in the next section.

CORRUPTION MONITORING AND MEASUREMENT METHODOLOGIES

The review of methods and methodologies used to measure and monitor corruption is always incomplete, because various institutions quite often produce new measurement methodologies for policy or other objectives. Despite similarities, different methodologies manifest the variety in the corruption research field, including the variety of corruption concepts that are currently available.

Methods and methodologies have been summarised in two groups: 1) methodologies used to measure corruption at the international (and European) level; and 2) methodologies used for comparative evaluations of anticorruption policies at the international (and European) level.

Instruments and methodologies are presented in summary tables where the following aspects are considered and analysed:

- Description: characteristics and aims of the measuring instrument;
- Level of analysis: level for which a given instrument accounts for corruption (national, sub-national, sectoral, etc.) and coverage – country/countries in which the instrument is being implemented;
- Year: the reference period of the measurement;
- Definition of corruption (concept of corruption adopted);
- Dimensions of corruption: analytical properties of the concept of corruption considered;
- Methodology: methods used to gather data on corruption and elaborate synthetic indexes;
- Research tools: instruments used to collect data on corruption;
- Expected results: level/types/ranking of corruption regarding the countries included.

Due to the existence of several instruments for measuring corruption at the international/ European level, analysis is focused on the most representative instruments which focus primarily on corruption. In a few cases, instruments measuring corruption as a dimension of a more complex concept (e.g. governance, opacity) are included since they contain significant indicators of the phenomenon.

The summary tables also include the two main existing evaluation methods of anticorruption policies Group of States Against Corruption (GRECO) and OECD Working Group on Bribery. These instruments are the most comprehensive available at the international and European levels. These methods are analysed using slightly different criteria as:

- methodology (methods applied to evaluate anticorruption policies);
- strengths and weaknesses (assessment of instrument's reliability and

- transferability);
- evaluation tools (instruments used to evaluate anticorruption policies).

TABLE 1. CORRUPTION MONITORING SYSTEM

Organisation	Center for the Study of Democracy (CSD)
Description	The Corruption Monitoring System (CMS) is an analytical instrument for monitoring and measuring the incidence and dynamics of corruption.
Level of analysis	National – Bulgaria; Southeast Europe through the Southeast Europe Leadership for Development and Integrity (SELDI) ¹⁵
Year	In the period 1998 – 2003 on a quarterly basis and since 2003 on an annual basis.
Definition of corruption	The abuse of power (economic, political, or administrative) for group or personal gain, in violation of the law and the legitimate interests of individuals, a specific community or society as a whole.
Dimensions of corruption	Corruption is broken down into four dimensions with related indexes: <ul style="list-style-type: none"> • Attitudes toward corruption (action prerequisite): identification of corruption as a societal phenomenon, assessment of its normative (value) permissibility and the degree of willingness to override the norms of legitimate social behaviour. • Corrupt practices (action interaction): activity of the actors, related to the creation of a situation for corrupt practices (the exercising of pressure) and the actual act of corrupt behaviour. • Assessments of corruption victimisation: assessment of the level of involvement of public officials in different forms of corrupt behaviour as well as the assessment of the levels of transformation of corruption into a behavioural norm (into a socially effective instrument for solving personal problems). • Assessment of the prospects of (anti)corruption (expectations): assessments of the capabilities of society (its potential) to fight corruption.
Methodology	The CMS includes several types of quantitative and qualitative surveys conducted with different periodicity: <ul style="list-style-type: none"> • Survey 1: Quantitative national representative survey of the population; • Survey 2: Quantitative survey of public officials; • Survey 3: Focus groups discussions with experts; • Survey 4: Focus group discussions with public officials and in-depth interviews with policy makers; • Survey 5: Media monitoring.

¹⁵ The latest CMS based reports include: Shentov, O., Stefanov, R., & Todorov, B. (Eds.). (2014). *Anti-Corruption Reloaded. Assessment of Southeast Europe*. Sofia.; *Anti-corruption against State Capture*. (2014). Sofia: Center for the Study of Democracy.

TABLE 1. CORRUPTION MONITORING SYSTEM (CONTINUED)

Organisation	Center for the Study of Democracy (CSD)
Methodology	<p>On the basis of the surveys, an annual Corruption Assessment Report is produced, which summarises the results of the surveys carried out in the preceding year and assesses the effectiveness of anticorruption policies.</p> <p>Qualitative studies included in the Corruption Monitoring Panel (Survey 3, Survey 4, Survey 5) are used to improve and refine CMS design and methodology.</p> <p>Corruption Indices are derived from the quantitative surveys included in the CMS (Survey 1, Survey 2, and Survey 6). Their function is to inform the assessment of the dynamics of public attitudes and actions characterising different aspects of corruption-related phenomena, and to provide feedback on the effectiveness of the anticorruption initiatives in Bulgaria.</p>
Research tools	Questionnaires, focus groups, in-depth interviews
Expected results	Level of corrupt practices at different societal levels.
Sources	CLEAN FUTURE. Anti-Corruption Action Plan for Bulgaria. Monitoring. Corruption Assessment Indices., Coalition 2000 CSD Policy Brief No 43: Corruption and Anti-corruption in Bulgaria (2012 – 2013)

TABLE 2. SPECIAL EUROBAROMETER NO. 374 – CORRUPTION

Organisation	European Commission, Directorate-General Home Affairs
Description	Eurobarometer 2012 was a survey carried out to measure European people's perception about corruption both in their own country and within European institutions.
Level of analysis	European Union (27 member states)
Year	2012
Definition of corruption	UN definition of corruption as "the abuse of power for private gain" which covers both private and public corruption.
Dimensions of corruption	<p>Special Eurobarometer No. 374 (2012) survey covered the general population's perceptions of:</p> <ul style="list-style-type: none"> • extent of corruption in EU member states; • levels of government (national, regional, local and EU institutions) facing the biggest problem with corruption; • corruption as part of business culture; • how corruption had changed in the preceding 3 years; • awareness of corruption related problems at the national and EU levels;

TABLE 2. SPECIAL EUROBAROMETER NO. 374 – CORRUPTION (CONTINUED)

Organisation	European Commission, Directorate-General Home Affairs
Dimensions of corruption	<ul style="list-style-type: none"> • services/sectors of society perceived as facing the biggest corruption problems; • direct experiences with corruption; • causes of corruption; • strengths and weaknesses in the fight against corruption at the national level; • links between corruption and organised crime; • institutions that should fight corruption.
Methodology	<p>Eurobarometer No. 374 was based on a survey that covered the population residing in each member state and aged 15 years and over. A multi-stage, random sample design was applied in all states:</p> <ul style="list-style-type: none"> • in each country, several sampling points were drawn with probability proportional to population size and to population density; • the sampling points were stratified by individual unit and type of area; • the sampling points were drawn systematically from each of the “administrative regional units,” so that they represent the whole territory of the countries surveyed according to Eurostat NUTS II and to the distribution of the resident population of the respective nationalities regarding metropolitan, urban and rural areas. <p>The sample size was about 1000 interviews.</p> <p>As for the method of interview, in each point, first a random address was drawn; further addresses were chosen through standard “random route” procedures from the initial address.</p> <p>In each household, the respondent was randomly chosen using the “closest birthday rule”. All interviews were face-to-face conducted in people's homes and in the appropriate national language. CAPI (Computer Assisted Personal Interview) was used in those countries where possible.</p>
Research tools	Ad hoc questionnaire
Expected results	European people’s perception about corruption both in their own country and within European institutions.
Sources	TNS Opinion & Social at the request of Directorate-General Home Affairs (2012), Special Eurobarometer No. 374 Corruption, Report

TABLE 3. SPECIAL EUROBAROMETER NO. 325 – ATTITUDES OF EUROPEANS TOWARDS CORRUPTION

Organisation	European Commission, Directorate-General Home Affairs
Description	Eurobarometer 2009 was a survey carried out to measure European people's perception about corruption both in their own country and within European institutions and people's personal experience with corruption.
Level of analysis	European Union (27 member states)
Year	2009
Definition of corruption	UN definition of corruption as "the abuse of power for private gain" which covers both private and public corruption.
Dimensions of corruption	<p>Special Eurobarometer No. 325 (2009) survey dealt with:</p> <ul style="list-style-type: none"> • respondents' perceptions of corruption in their country; • which levels of government had the biggest problem with corruption; • whether respondents believed there was corruption within EU institutions; • whether the punishments given were sufficient to deter corruption; • which services/sectors of society were perceived to have the most widespread problem with corruption; • causes of corruption; • whether respondents had personally been victims of corruption; • who respondents felt should be responsible for fighting corruption; • who respondents trusted to resolve corruption issues.
Methodology	<p>Eurobarometer No. 325 was based on a survey that covered the population residing in each member state and aged 15 years and over. A multi-stage, random sample design was applied in all states:</p> <ul style="list-style-type: none"> • in each country, several sampling points were drawn with probability proportional to population size and to population density; • the sampling points were stratified by individual unit and type of area; • the sampling points were drawn systematically from each of the "administrative regional units", so that they represented the whole territory of the countries surveyed according to Eurostat NUTS II and to the distribution of the resident population of the respective nationalities regarding metropolitan, urban and rural areas. <p>The sample size was about 1000 interviews.</p> <p>As for the method of interview, in each point first a random address was drawn; further addresses were chosen through standard "random route" procedures from the initial address.</p> <p>In each household, the respondent was randomly chosen using the "closest birthday rule". All interviews were face-to-face conducted in people's homes and in the appropriate national language. CAPI (Computer Assisted Personal Interview) was used in countries where possible.</p>
Research tools	Ad hoc questionnaire
Expected results	People's views about corruption in their country, about corruption within local, national and EU institutions and their experience of corruption in the preceding year.
Sources	TNS Opinion & Social at the request of Directorate General for Justice, Freedom and Security (2009), Special Eurobarometer No. 325 Attitudes of Europeans towards Corruption, Full report

TABLE 4. SPECIAL EUROBAROMETER NO. 291 – THE ATTITUDES OF EUROPEANS TOWARD CORRUPTION

Organisation	European Commission, Directorate-General Home Affairs
Description	Eurobarometer 2008 was a survey carried out to analyse the opinion of European Union citizens about corruption.
Level of analysis	National. Coverage: European Union (27 member states)
Year	2008
Definition of corruption	UN definition of corruption as “the abuse of power for private gain” which covers both private and public corruption.
Dimensions of corruption	<p>Special Eurobarometer No. 291 (2008) survey dealt with:</p> <ul style="list-style-type: none"> • corruption as a major national problem; • national institutions in which corruption exists; • categories of people likely to be corrupted; • respondents been confronted with corruption; • presence of successful prosecutions to deter corruption; • corruption and organised crime; • presence of corruption in the institutions of the European Union; • institutions responsible for preventing/fighting corruption.
Methodology	<p>Eurobarometer No. 291 was based on a survey that covered the population residing in each member state and aged 15 years and over. A multi-stage, random sample design was applied in all states:</p> <ul style="list-style-type: none"> • in each country, several sampling points were drawn with probability proportional to population size and to population density; • the sampling points were stratified by individual unit and type of area; • the sampling points were drawn systematically from each of the “administrative regional units”, so that they represent the whole territory of the countries surveyed according to Eurostat NUTS II and to the distribution of the resident population of the respective nationalities regarding metropolitan, urban and rural areas. <p>The sample size was about 1000 interviews.</p> <p>As for the method of interview, in each point first a random address was drawn; further addresses were chosen through standard “random route” procedures, from the initial address.</p> <p>In each household, the respondent is randomly chosen using the “closest birthday rule”. All interviews are face-to-face conducted in people's homes and in the appropriate national language. CAPI (Computer Assisted Personal Interview) is used in countries where possible.</p>
Research tools	Ad hoc questionnaire
Expected results	European citizens’ opinion and perception about corruption both in their own country and within European institutions.
Sources	TNS Opinion & Social at the request of Directorate General for Justice, Freedom and Security (2008), Special Eurobarometer No. 291 Attitudes of Europeans towards Corruption, Report

TABLE 5. SPECIAL EUROBAROMETER NO. 245 – OPINION ON ORGANISED, CROSS-BORDER CRIME AND CORRUPTION

Organisation	European Commission, Directorate-General Home Affairs
Description	Eurobarometer 2006 was a survey carried out to analyse the opinion of European Union citizens about corruption.
Level of analysis	European Union (25 member states)
Year	2006
Definition of corruption	UN definition of corruption as “the abuse of power for private gain” which covers both private and public corruption.
Dimensions of corruption	<p>Special Eurobarometer No. 245 (2006) survey dealt with:</p> <ul style="list-style-type: none"> • corruption as a major national problem; • national institutions in which corruption exists; • categories of people likely to be corrupted; • personal experience of corruption; • presence of enough successful prosecutions to deter corruption; • the links between corruption and organised crime.
Methodology	<p>Eurobarometer No. 245 was based on a survey that covered the population residing in each member state and aged 15 years and over. A multi-stage, random sample design was applied in all states:</p> <ul style="list-style-type: none"> • in each country, several sampling points were drawn with probability proportional to population size and to population density; • the sampling points were stratified by individual unit and type of area; • the sampling points were drawn systematically from each of the “administrative regional units”, so that they represent the whole territory of the countries surveyed according to Eurostat NUTS II and to the distribution of the resident population of the respective nationalities regarding metropolitan, urban and rural areas. <p>The sample size was about 1000 interviews.</p> <p>As for the method of interview, in each point first a random address was drawn; further addresses were chosen through standard “random route” procedures, from the initial address.</p> <p>In each household, the respondent was randomly chosen using the “closest birthday rule”. All interviews were face-to-face conducted in people's homes and in the appropriate national language. CAPI (Computer Assisted Personal Interview) was used in countries where possible.</p>
Research tools	Ad hoc questionnaire
Expected results	Respondents’ views about corruption in their country, respondents’ views about corruption within local, national and EU institutions, respondents’ personal experience of corruption in the past year.
Sources	TNS Opinion & Social at the request of Directorate General for Justice, Freedom and Security (2006), Special Eurobarometer No. 245 Opinions on organised, cross-border crime and corruption, Report

TABLE 6. CORRUPTION PERCEPTIONS INDEX

Organisation	Transparency International (TI)
Description	The Corruption Perceptions Index (CPI) scores and ranks countries/territories based on how corrupt a country's public sector is perceived to be. It is a composite index, a combination of surveys and assessments of corruption collected by a variety of reputable institutions.
Level of analysis	National, currently covers 176 countries ¹⁶
Year	2013 (since 1995 on an annual basis)
Definition of corruption	<p>"The abuse of entrusted power for private gain" classified as follows:</p> <ul style="list-style-type: none"> • grand corruption, acts committed at a high level of government that distort policies or the central functioning of the state, enabling leaders to benefit at the expense of the public good; • petty corruption, everyday abuse of entrusted power by low and mid-level public officials in their interactions with ordinary citizens, who often are trying to access basic goods or services in places like hospitals, schools, police departments and other agencies; • political corruption, manipulation of policies, institutions and rules of procedure in the allocation of resources and financing by political decision makers, who abuse their position to sustain their power, status and wealth.
Dimensions of corruption	Not specified
Methodology	<p>The Corruption Perceptions Index (CPI) is a composite index that aggregates data from surveys and qualitative assessments collected by accountable institutions which are selected on the basis of the following five criteria:</p> <ul style="list-style-type: none"> • the surveys or assessments should address the perception of corruption in public sector; • each source should originate from a professional institution that clearly documents its methods for data collection, the methodology followed should be clear and accountable; • the scales used by the data sources must provide a sufficient degree of differentiation in the data (a four-point scale at least); • the source data must also be comparable between countries and not be country specific, the source should measure the same thing in each country scored, on the same scale; • sources that measures the perception of corruption for a single point in time, but are not designed to be repeated over time are excluded.
Research tools	<p>Pre-existing indicators, indexes, ratings and surveys such as:</p> <p>African Development Bank Governance Ratings (2012) Bertelsmann Foundation Sustainable Governance Indicators (2014) Bertelsmann Foundation Transformation Index (2014)</p>

¹⁶ For a complete list of countries see the "Corruption Perceptions Index 2012" at http://cpi.transparency.org/cpi2012/in_detail/

TABLE 6. CORRUPTION PERCEPTIONS INDEX (CONTINUED)

Organisation	Transparency International (TI)
Research tools	Economist Intelligence Unit Country Risk Ratings Freedom House Nations in Transit (2013) Global Insight Country Risk Ratings IMD World Competitiveness Yearbook (2013) Political and Economic Risk Consultancy Asian Intelligence (2013) Political Risk Services International Country Risk Guide Transparency International Bribe Payers Survey (2011) World Bank – Country Policy and Institutional Assessment (2012) World Economic Forum Executive Opinion Survey (EOS) (2013) World Justice Project Rule of Law Index (2013)
Expected results	Perception of corruption in the public sector in each country considered.
Sources	http://cpi.transparency.org/cpi2012/in_detail/

TABLE 7. BRIBE PAYERS INDEX

Organisation	Transparency International (TI)
Description	The Bribe Payers Index (BPI) is a tool capturing the supply side of international bribery, specifically focusing on bribes paid by the private sectors. The 2011 Bribe Payers Index was the fifth edition of the index, ranking 28 of the world's largest economies according to the likelihood of firms from these countries to bribe when doing business abroad.
Level of analysis	National, currently covers 28 countries. ¹⁷
Year	2011
Definition of bribery/ corruption	Offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages. The index is focused on bribes paid by the private sector.
Dimensions of corruption	<ul style="list-style-type: none"> • Executives' business dealings in their country with foreign firms. • Economic sectors with which business executives have business relationships in their country or abroad.
Methodology	The BPI was based on Bribe Payers Survey carried out by Ipsos Mori for TI in 2011 on the basis of the questionnaire elaborated by TI's secretariat. Countries are selected applying four criteria: 1. Their trade openness (measured by Foreign Direct Investment outflows plus exports); 2. Whether or not they

¹⁷ For a complete list of countries see the "Bribe Payers Index" at http://bpi.transparency.org/bpi2011/in_detail/

TABLE 7. BRIBE PAYERS INDEX (CONTINUED)

Organisation	Transparency International (TI)
Methodology	<p>were ranked in 2008 (to enable comparison of performance over time); 3. G20 membership; 4. Trade significance within region and/or continent.</p> <p>The countries include the largest economies in terms of outward trade and investment and together represent 78 per cent of global foreign direct investment (FDI) outflows and exports. They cover all countries ranked in the 2008 Bribe Payers Index, all G20 countries and other key regional economic trading powers.</p> <p>The questionnaire is administered to 3,016 business executives worldwide, a minimum of 100 people were surveyed in each country, except in China where 82 interviews were achieved during the survey.</p> <p>Telephone or face-to-face interviews in each country and on-line interviews in the United States, drawing on a network of partners institutes.</p>
Research tools	Ad hoc questionnaire
Expected results	Perceptions by the business executives of 28 major economies of the likelihood that companies from countries they have business with engage in bribery when doing business in the interviewed executive's country.
Sources	TI website

TABLE 8. GLOBAL CORRUPTION BAROMETER

Organisation	Transparency International (TI)
Description	The Global Corruption Barometer represents the largest world-wide public opinion survey on corruption. It addresses people's direct experiences with bribery and details their views on corruption in the main institutions in their countries, also providing insights into how willing and ready people are to act to stop corruption.
Level of analysis	National, currently covers 107 countries. ¹⁸
Year	2013 (since 2003 on an annual basis)
Definition of corruption/ bribery	<p>"The abuse of entrusted power for private gain" classified as follows:</p> <ul style="list-style-type: none"> grand corruption, acts committed at a high level of government that distort policies or the central functioning of the state, enabling leaders to benefit at the expense of the public good;

¹⁸ For a complete list of countries see the "Global Corruption Barometer 2013" at http://issuu.com/transparencyinternational/docs/2013_globalcorruptionbarometer_en/29

TABLE 8. GLOBAL CORRUPTION BAROMETER (CONTINUED)

Organisation	Transparency International (TI)
Definition of corruption/ bribery	<ul style="list-style-type: none"> • petty corruption, everyday abuse of entrusted power by low- and mid-level public officials in their interactions with ordinary citizens, who often are trying to access basic goods or services in places like hospitals, schools, police departments and other agencies; • political corruption, manipulation of policies, institutions and rules of procedure in the allocation of resources and financing by political decision makers, who abuse their position to sustain their power, status and wealth. <p>Bribery is defined as “the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donation, etc.).</p>
Dimensions of corruption	Not specified
Methodology	<p>Worldwide public opinion survey comprising countries’ selection procedure, population sampling, face to face/telephone (CATI) and online interviews.</p> <p>As to the sample, 114,270 people were surveyed in 107 countries in 2013, compared to a total of 100 countries in the combined 2010 and 2011 series, and 69 countries in 2009. Approximately 1,000 people from each of the 107 countries were surveyed, but only 500 people in countries with a population of less than 1,000,000. In 6 countries, the sample was only urban.</p> <p>Global results are the un-weighted average across the 107 countries.</p>
Research tools	Face to face, telephone (CATI) and online interviews, and ad hoc questionnaire
Expected results	People’s view of corruption and experience of bribery in their country, opinions about the effectiveness of fighting corruption, and willingness to be involved personally in anticorruption action.
Sources	Transparency International (2013), Global Corruption Barometer 2013 Full Report

TABLE 9. THE BUSINESS ENVIRONMENT AND ENTERPRISE PERFORMANCE SURVEY (BEEPS) 2008 – 2009

Organisation	European Bank for Reconstruction and Development (EBRD) and World Bank Group (World Bank)
Description	<p>The Business Environment and Enterprise Performance Survey (BEEPS) is a joint initiative of the European Bank for Reconstruction and Development (EBRD) and the World Bank Group (World Bank).</p> <p>The survey examines the quality of the business environment as determined by a wide range of interactions between firms and the state, and facilitates research and serves as an input into policy dialogue with countries in Central and Eastern Europe. In particular, it is aimed at obtaining feedback from enterprises in EBRD countries of operation on the state of the private sector as well as to help in building a panel of enterprise data that allow to track changes in the business environment over time.</p>
Level of analysis	30 countries ¹⁹
Year	2009 ²⁰
Methodology	<p>The BEEPS is administered to business owners and top managers.</p> <p>The size of the sample change in connection with the size of the economy of each state. Establishment is the primary sampling unit of the survey, which is defined as “a physical location where business is carried out and where industrial operations take place or services are provided.”²¹ A firm may be composed of one or more establishments.</p> <p>The survey universe is composed by commercial, service or industrial business establishments with at least five full-time employees.</p> <p>The criteria used to assess the available sampling frame, in descending priority, are: coverage; up-to-datedness; availability of detailed stratification variables; location identifiers-address, phone number, email; electronic format availability; contact name(s).</p> <p>In the BEEPS 2009, two sample frames for most of the countries are used: the first is often an official frame of establishments supplied by the national statistical office of each country and the second consists of establishments that participated in the BEEPS 2005, except for Albania where the survey conducted in 2007/2008 showed that a suitable frame did not exist for the country, so the design returned to a blocks enumeration methodology.</p>

¹⁹ For a complete list of countries see “The Business Environment and Enterprise Performance Survey (BEEPS) 2008 – 2009” at http://www.ebrd.com/downloads/research/economics/micro-data/beeps_report_ebrd_april10.pdf

²⁰ The BEEPS was first launched in 1999/2000, the second round was carried out in 2002, the third in 2005 and the fifth started in 2012.

²¹ For the purposes of the survey the establishment must: make its own financial decisions, have its own financial statements separate from those of the firm, have its own management and control over its payroll.

TABLE 9. THE BUSINESS ENVIRONMENT AND ENTERPRISE PERFORMANCE SURVEY (BEEPS) 2008 – 2009 (CONTINUED)

Organisation	European Bank for Reconstruction and Development (EBRD) and World Bank Group (World Bank)
Methodology	Three different versions of the questionnaire are used. The Core Module is the basic questionnaire, includes all common questions asked to all establishments from all sectors. The Manufacturing Questionnaire (an expanded version of the previous one) which contains some specific questions relevant to the sector. The Services Module, a second expanded version of the Core Module with the addition of questions relevant to either retail or IT.
Methodology	<p>The implementation of the survey consists of two stages: in the first the Screener questionnaire is applied via phone in order to determine the eligibility of firms and to collect some additional information in addition to contact information; in the second stage one of the two versions of the questionnaire (manufacturing and services) is applied according to the type of the firm determined in the previous stage.</p> <p>The BEEPS 2005 had changed significantly in respect to the previous three rounds in order to allow comparison of transition countries (EBRD countries of operation) with other developing countries where the World Bank was conducting BEEPS. Most surveys conducted after 2006 used stratified sampling and contained weights based on this information. Prior surveys did not contain any information regarding weights, as quota sampling was used.</p>
Research tools	Ad hoc questionnaires
Expected results	Level of the quality of business environment and its changes over time.
Sources	BEEPS website EBRD website World Bank Group, Enterprise surveys website

TABLE 10. WORLDWIDE GOVERNANCE INDICATORS (WGI)

Organisation	World Bank
Description	The Worldwide Governance Indicators (WGI) are a research dataset summarising the views on the quality of governance provided by a large number of enterprise, citizen and expert survey respondents in industrial and developing countries. These data are gathered from a number of survey institutes, think tanks, non-governmental organisations, international organisations and private sector firms.
Level of analysis	National. Coverage: 215 countries and territories. ²²
Years	From 1996 to 2011

²² For a complete list of countries and territories see the "Worldwide Governance Indicators" at <http://info.worldbank.org/governance/wgi/index.aspx#countryReports>.

TABLE 10. WORLDWIDE GOVERNANCE INDICATORS (WGI) (CONTINUED)

Organisation	World Bank
Definition of corruption	Corruption is seen as a dimension of governance ²³ and is defined as the exercise of public power for private gain, including both petty and grand forms of corruption, as well as the use of the state by elites and private interests.
Dimensions of governance	Identification of six dimensions of governance, among which corruption (named “Control of Corruption”) corresponds to the measurement of perceptions of the extent to which public power is exercised for private gain.
Methodology	<p>The Worldwide Governance Indicators are based exclusively on subjective – or perceptions-based – measures of governance for three reasons:</p> <ul style="list-style-type: none"> • perception is important because people base their action on their perceptions and impressions; • in many areas of governance there are few alternatives to perception data, which is particularly true in the case of corruption; • often the objectives data capture the “law in the books” view and not the “law in action” view. <p>Each of the six aggregate indicators is constructed by averaging together data from the selected sources associated to the dimension of governance being measured. For each dimension a statistical methodology known as an Unobserved Components Model is used to:</p> <ul style="list-style-type: none"> • standardise the data from these very different sources into comparable units; • construct an aggregate indicator of governance as a weighted average of the variables derived from the selected source; • create margins of error that reflect the unavoidable imprecision in measuring governance.
Research tools	<p>Existing data sources of different kinds:</p> <ul style="list-style-type: none"> • surveys of households and firms (9 data sources including the Afrobarometer surveys, Gallup World Poll, and Global Competitiveness Report survey); • commercial business information providers (4 data sources including the Economist Intelligence Unit, Global Insight, Political Risk Services); • non-governmental organisations (9 data sources including Global Integrity, Freedom House, Reporters Without Borders); • public sector organisations (8 data sources including the CPIA assessments of World Bank and regional development banks, the EBRD Transition Report, French Ministry of Finance Institutional Profiles Database).
Expected results	Views of a large number of enterprises, citizens and experts in industrial and developing countries on the quality of governance.
Sources	Worldbank website

²³ In the definition of the World Bank governance “consists of the traditions and institutions by which authority in a country is exercised. This includes the process by which governments are selected, monitored and replaced; the capacity of the government to effectively formulate and implement sound policies; and the respect of citizens and the state for the institutions that govern economic and social interactions among them.”

TABLE 11. RULE OF LAW INDEX (RLI)

Organisation	World Justice Project (WJP)
Description	The Rule of Law Index (RLI) is a quantitative tool that offers a detailed and comprehensive picture of the extent to which countries adhere to the rule of law ²⁴ in practice, from the perspective of ordinary people who are directly affected by the degree of the rule of law in their country. It provides data regarding a variety of dimensions of the rule of law, enabling the assessment of a nation's adherence to the rule of law in practice, identify a nation's strengths and weaknesses in comparison to similarly situated countries, and track changes over time.
Level of analysis	97 countries ²⁵
Years	2012 – 2013
Definition of corruption	The use of public power for private gain.
Dimension of corruption	Extent to which countries adhere to the rule of law in practice.
Methodology	<p>The elaboration of the RLI follows ten steps:</p> <ol style="list-style-type: none"> 1. Development by the WJP of the conceptual framework summarised in the Index's 9 factors and 48 sub-factors, in consultation with academics, practitioners, and community leaders from around the world. 2. Development by the Index team of a set of five questionnaires based on the Index's conceptual framework, to be administered to experts and the general public. Questionnaires are translated into several languages and adapted to reflect commonly used terms and expressions. 3. Identification by the team of more than 300 potential local experts per country to respond to the qualified respondents' questionnaires, and engaged the services of leading local polling companies. 4. Polling companies conduct pre-test pilot surveys of the general public in consultation with the Index team, and launch the final survey. 5. Sending of the questionnaires to local experts by the team who engage in continual interaction with them. 6. Collection and mapping of the data onto the 48 sub-factors. 7. Construction of the final scores using a five-step process: <ul style="list-style-type: none"> • codification of the questionnaire items as numeric values; • production of raw country scores by aggregating the responses from several individuals (experts/general public);

²⁴ The working definition of the "rule of law" is based on four principles: 1. The government and its officials and agents as well as individuals and private entities are accountable under the law. 2. The laws are clear, publicised, stable, and just; are applied evenly; and protect fundamental rights, including the security of persons and property. 3. The process by which the laws are enacted, administered and enforced is accessible, fair and efficient. 4. Justice is delivered timely by competent, ethical and independent representatives and neutral who are of sufficient numbers, have adequate resources and reflect the makeup of the community they serve.

²⁵ For a complete list of countries see the "Rule of Law Index" at http://worldjusticeproject.org/sites/default/files/WJP_Index_Report_2012.pdf

TABLE 11. RULE OF LAW INDEX (RLI) (CONTINUED)

Organisation	World Justice Project (WJP)
Methodology	<ul style="list-style-type: none"> • normalisation of the raw scores; • aggregation of the normalised scores into sub-factors and factors using simple averages; • production of the final rankings using the normalised scores. <p>8. Data subjected to a series of tests to identify possible biases and errors. For example, the Index team cross-checked all sub-factors against more than 60 third-party sources, including quantitative data and qualitative assessments drawn from local and international organisations.</p> <p>9. Sensitive analysis conducted by the Econometrics and Applied Statistics Unit of the European Commission's Joint Research Centre, in collaboration with the Index team, to assess the statistical reliability of results.</p> <p>10. Organisation of data into country reports, tables, figures to facilitate their presentation and interpretation.</p>
Research tools	<ul style="list-style-type: none"> • General population poll (GPP) • Four qualified respondent's questionnaires (QRQ)
Expected results	Extent to which the principles of the rule of law are applied in practice.
Sources	World Justice Project website

TABLE 12. EXECUTIVE OPINION SURVEY

Organisation	World Economic Forum
Description	The Executive Opinion Survey is the major component of the Global Competitiveness Report and captures valuable information on a broad range of factors that are critical for a country's competitiveness and sustainable development, and for which data sources are scarce or non-existent on a global scale. It is available in 41 languages.
Level of analysis	148 economies ²⁶
Year	2013
Definition of corruption	Not applicable
Dimensions of corruption	Not applicable

²⁶ For a complete list of countries see chapter 1.3 of "The Global Competitiveness Report 2013-2014" at <http://reports.weforum.org/the-global-competitiveness-report-2013-2014/>

TABLE 12. EXECUTIVE OPINION SURVEY (CONTINUED)

Organisation	World Economic Forum
Methodology	<p>The survey is carried out with the help of partner institutes which include recognised research or academic institutes, business organisations, national competitiveness councils, or other renowned professional entities and survey consultancies, selected on the basis of their capacity to reach out to the business community, their reputation, and their commitment to the issue of competitiveness.</p> <p>Detailed sampling guidelines are given to the partner institutes in order to ensure that the sample is the most representative and comparable across the world and in a specific timeframe.</p> <p>In particular, partner institutes carry out the following steps:</p> <ul style="list-style-type: none"> • prepare a sample frame, consisting of a large list of potential respondents, which includes firms representative of the main sectors of the economy (agriculture, manufacturing industry, non-manufacturing industry, and services); • divide the frame into two lists: one including only large firms, and a second list including all other firms (both lists representing the various economic sectors); • based on these lists, and in order to reduce survey bias, choose a random selection of these firms from both lists to receive the survey. <p>The sampling guidelines underline that the partner institute should aim to collect both random respondents and some repeat respondents for further comparative analysis. Partner institutes have to collect between 80 and 100 surveys, but generally accepted practice in sampling as well as recommendations of Gallup has led to a cut-off of a minimum of 30 surveys per country.</p> <p>The interviews are conducted in various forms including face-to-face interviews with business executives and mailed or telephone interviews, with an online survey option in alternative.</p>
Research tools	Ad hoc questionnaire available only for the survey carried out in 2009
Expected results	Information on a broad range of factors critical for a country's competitiveness and sustainable development.
Sources	Schwab K., Sala-i-Martin X. (Eds) (2013), Global Competitiveness report 2013 – 2014, Geneva: World Economic Forum Porter M., Schwab K. (Eds) (2009) Global Competitiveness Report 2009 – 2010, Geneva: World Economic Forum

TABLE 13. NATIONS IN TRANSIT

Organisation	Freedom House
Description	Nations in Transit 2012 is a rating tool provided on the basis of experts' opinions. It measures progress and setbacks that countries from Central Europe to Central Asia encounter in the democratisation process.
Level of analysis	29 countries from Central Europe to Central Asia ²⁷
Year	2012 (since 1995 on an annual basis)
Definition of corruption	Not applicable
Dimensions of democracy	Identification of seven categories, including corruption, the latter measuring people's perceptions of corruption, the business interests of top policy makers, laws on financial disclosure and conflict of interest, and the efficacy of anticorruption initiatives.
Methodology	<p>Elaboration of country reports that follow an essay format allowing the report authors to provide a broad analysis of the progress of democratic change in their country of expertise.</p> <p>Freedom House provides experts with guidelines for ratings and a checklist of questions covering the seven categories of democracy.</p> <p>Starting with the 2005 edition, Freedom House introduced separate analysis and ratings for national democratic governance and local democratic governance to provide readers with more detailed and nuanced analysis of these two important subjects. Previous editions included only one governance category.</p>
Research tools	Ad hoc questionnaires for each category
Expected results	People's perceptions of corruption and the efficacy of anticorruption initiatives.
Sources	Freedom House website

²⁷ For a complete list of countries see "Nations in Transit 2012" at <http://www.freedomhouse.org/sites/default/files/2012%20%20NIT%20Tables.pdf>

TABLE 14. OPACITY INDEX

Organisation	Milken Institute
Description	The Opacity Index is an aggregate index that aims to measure opacity defined as the degree to which global companies lack clear, accurate, easily discernible and widely accepted practices governing the relationships among businesses, investors and governments, which form the basis of most small scale, high frequency risks. ²⁸
Level of analysis	48 countries ²⁹
Year	2009 (first launched in 2000 and updated through a standard procedure) ³⁰
Definition of corruption	Not applicable
Dimensions of opacity	Identification of five categories of small scale, high frequency risks that are at the basis of opacity. One of these is represented by corruption.
Methodology	The Opacity Index aggregates 65 objective variables from different publicly available sources selected by Milken Institute researchers.
Research tools	Existing publicly international databases, reports and indexes such as: <ul style="list-style-type: none"> • The Global Competitiveness Report • International Country Risk Guide • Index of Economic Freedom • World Bank Doing Business Database • Transparency International Index
Expected results	Level of opacity in the countries considered.
Sources	Milken Institute website

²⁸ Global companies face two kinds of risk in their business: large-scale, low-frequency risks (e.g. earthquakes, wars, major acts of terrorism) and small-scale, high-frequency risks (e.g. fraudulent transactions, bribery, legal and regulatory complexity and unenforceable contracts). The second type of risk, in particular, represents the real costs to business.

²⁹ For a complete list of countries see "Nations in Transit 2012" at <http://www.freedomhouse.org/sites/default/files/2012%20%20NIT%20Tables.pdf>

³⁰ The Opacity Index is updated through the following procedure: 1. Every five years, a complete update of all countries' data is carried out (70 variable inputs per country); 2. Each year a light update is conducted in order to measure only data that change quickly, capturing approximately ten to twenty changes per country.

TABLE 15. IBRAHIM INDEX OF AFRICAN GOVERNANCE (IIAG)

Organisation	Mo Ibrahim Foundation
Description	The Ibrahim Index of African Governance (IIAG) represents the most comprehensive collection of quantitative data on governance in Africa. Compiled in partnership with experts from a number of the continent's institutions, it provides an annual assessment of governance in every African country. The IIAG offers a framework for citizens, governments, institutions and business to assess the delivery of public goods and services and policy outcomes across Africa.
Level of analysis	52 African countries ³¹
Year	2013 (since 2007 on an annual basis)
Definition of corruption	Not applicable
Dimensions of governance ³²	<p>The concept of governance is divided into four dimensions with 14 sub-categories of related indicators:</p> <ul style="list-style-type: none"> • Safety and rule of law; • Participation and human rights; • Sustainable economic opportunity; • Human development. <p>Corruption indicators are identified within the category "Safety and Rule of Law" and pertain to the sub-category "Accountability".</p>
Methodology	<p>Indicators that are compatible with the Foundation's definition of governance are identified as proxy measurements. They cover at least two thirds of the countries on the continent and provide at least two years' worth of data between 2000 and 2012. The latest available data should not be more than three years old and new data releases should be regular (at least every three years).</p> <p>A simple statistical method of data aggregation is applied to combine the normalised indicators into sub-categories, the sub-categories into categories and the categories into the overall IIAG.</p>
Research tools	Existing national and international databases, reports and indexes.
Expected results	Quality of governance performance in African countries, its progress over time and across countries.
Sources	Mo Ibrahim Foundation website

³¹ For a complete list of countries see "The Ibrahim Index of African Governance" at <http://www.moibrahimfoundation.org/iiag/>

³² Governance is defined as "the provision of the political, social and economic public goods and services that a citizen has the right to expect from his or her state, and that a state has the responsibility to deliver to its citizens."

TABLE 16. INTERNATIONAL COUNTRY RISK GUIDE (ICRG)

Organisation	The PRS Group
Description	The International Country Risk Guide (ICRG) monitors 140 developed, emerging and frontiers markets, rating a range of risks to international businesses and financial institutions.
Level of analysis	140 countries ³³
Year	2013 (since 1980 on an annual basis)
Definition of corruption	Actual or potential corruption in the form of excessive patronage, nepotism, job reservations, "favour-for-favours," secret party funding, and suspiciously close ties between politics and business.
Dimensions of corruption	Identification of three subcategories of risk: political, financial and economic. Corruption is a component of the Political Risk Rating and refers to: <ul style="list-style-type: none"> • Financial corruption; • Actual and potential corruption.
Methodology	<p>The International Country Risk Guide (ICRG) rating comprises 22 variables in three subcategories of risk: political, financial, and economic. A separate index is created for each of the subcategories. The political risk index is based on 100 points, financial risk on 50 points, and economic risk on 50 points. The total points from the three indices are divided by two to produce the weights for inclusion in the composite country risk score. The composite scores, ranging from zero to 100, are then broken into categories from very low risk (80 to 100 points) to very high risk (zero to 49.9 points).</p> <p>The political risk rating includes 12 weighted variables covering both political and social attributes. ICRG advises users on means of adapting both the data and the weights in order to focus the rating on the needs of the particular investing firm.</p> <p>Country analyses in ICRG include descriptive assessments and economic data. ICRG provides ratings for 140 countries on a monthly basis, and for an additional 26 countries on an annual basis under a different title.</p>
Research tools	Not applicable
Expected results	Risk ratings for the countries covered related to political, financial and economic dimensions.

³³ For a complete list of countries see "The International Country Risk Guide" at http://www.prsgroup.com/ICRG_CountriesMonitored.aspx

TABLE 17. GROUP OF STATES AGAINST CORRUPTION (GRECO)

Organisation	Council of Europe
Description	<p>The Group of States Against Corruption (GRECO) is an international anticorruption institution, whose aim is to improve the capacity of its members to fight against corruption by monitoring their compliance with the Council of Europe anticorruption standards, through a dynamic process of mutual evaluation.</p> <p>All member states participate in the mutual evaluation and compliance procedures and submit themselves to it. For this purpose, each member state needs to appoint up to two representatives who participate in GRECO plenary meetings with the right to vote and provides GRECO with a list of experts available for taking part in GRECO's evaluations.</p>
Level of analysis	49 member states ³⁴
Years	Four evaluation rounds launched on the 1st January of the years 2000, 2003, 2007, and 2012.
Methodology	<p>A team of experts is appointed for the evaluation of a particular member state. A questionnaire is sent to every member state, and the analysis of the situation of the country is based on the written replies given to the questions provided.</p> <p>All the information is gathered in meetings with public officials and representatives of civil society during a following on-site visit to the country.</p> <p>After the on-site visit, the team of experts elaborates an evaluation report which is communicated to the country under scrutiny (which can express comments and observations). Subsequently, the evaluation report is submitted to the Group of States Against Corruption (GRECO). The conclusions of the evaluation reports state whether the national legislation and practice comply with the anticorruption standards provisions. Recommendations are then addressed by GRECO to the member state under scrutiny, which must take action within 18 months.</p> <p>The monitoring procedure regards the following consecutive phases: 1. a "horizontal" evaluation procedure (all member states are evaluated within an evaluation round) leading to recommendations aimed at furthering the necessary legislative, institutional and practical reforms; 2. a compliance procedure designed to assess the measures taken by its members to implement the recommendations.</p>
Strengths	<ul style="list-style-type: none"> • Helps identifying deficiencies in national anticorruption policies, prompting the necessary legislative, institutional and practical reforms; • Provides a platform for sharing of best practice in the prevention of corruption among the member states;

³⁴ For a complete list of countries see the "Group of States against corruption" at http://www.coe.int/t/dghl/monitoring/greco/general/members_en.asp

TABLE 17. GROUP OF STATES AGAINST CORRUPTION (GRECO) (CONTINUED)

Organisation	Council of Europe
Strengths	<ul style="list-style-type: none"> Contains a monitoring system where the implementation of recommendations is examined through a compliance procedure.³⁵
Weaknesses	<ul style="list-style-type: none"> Difference among member states' juridical terminology; In some cases national laws do not reflect the exact terminology of the Criminal Law Convention on Corruption (ETS No. 173; No. 191); Not every state has ratified the Criminal Law Convention on Corruption (ETS No. 173) and others have made reservations on specific provisions.
Evaluation tools	<ul style="list-style-type: none"> Ad hoc questionnaire. One-site country visits (to solicit further information by the evaluation teams during high-level discussions with national authorities and experts). Evaluation reports.
Sources	Council of Europe website

TABLE 18. OECD WORKING GROUP ON BRIBERY

Organisation	Organisation for Economic Co-operation and Development (OECD)
Description	Established in 1994, the OECD Working Group on Bribery in International Business Transactions is responsible for monitoring the implementation and enforcement of the OECD Anti-Bribery Convention, ³⁶ the 2009 Recommendation on Further Combating Bribery of Foreign Bribery in International Business Transactions (2009 Anti-Bribery Recommendation) and related instruments.
Level of analysis	40 State Parties to the Convention: 34 OECD member countries ³⁷ and six non-member countries (Argentina, Brazil, Bulgaria, Colombia, the Russian Federation, and South Africa).
Years	From 1999 to 2013 depending on participating countries.

³⁵ The compliance procedure is based on a situation report, accompanied by supporting documents (submitted by the member state under scrutiny) 18 months after the adoption of the evaluation report. If not every recommendations has been complied with, GRECO re-examines outstanding recommendations within another 18 months. The compliance reports also contain a general conclusion on the implementation of all the recommendations addressed to the member state, whose purpose is to decide whether to terminate the compliance procedure in respect of a particular member state.

³⁶ The OECD Anti-Bribery Convention establishes legally binding standards to criminalise bribery of foreign public officials in international business transactions and provides for a host of related measures that make this effective. It is the first and only international anticorruption instrument focused on the supply side of the bribery transaction.

³⁷ For a complete list of the State Parties see the "Country Reports on the implementation of the OECD Anti-bribery Convention" at <http://www.oecd.org/investment/anti-bribery/anti-briberyconvention/countryreportsonteimplementationoftheoecdanti-briberyconvention.htm>

TABLE 18. OECD WORKING GROUP ON BRIBERY (CONTINUED)

Organisation	Organisation for Economic Co-operation and Development (OECD)
Methodology	<p>The monitoring procedure is composed of three phases.</p> <ul style="list-style-type: none"> Phase 1 evaluates the adequacy of a country's legislation in the implementation of the Anti-Bribery Convention, in order to evaluate whether the national laws, adopted to implement the OECD Anti-Bribery Convention, meet its standards.³⁸ Phase 2 examines the structures developed to enforce the laws and rules implementing the OECD Anti-Bribery Convention and assesses their application in practice. A questionnaire is sent to the country under scrutiny (the questions take into account the results of the Phase 1 evaluation of that country) followed by an on-site visit. During the evaluation, any difficult issues are discussed in the Working Group on Bribery and subsequently the Group adopts a report which includes recommendations on the performance of the country examined. In Phase 3 the enforcement of the Anti-Bribery Convention and the recommendations addressed to the country in Phase 2 are assessed. The efforts are concentrated on three elements: 1. progress made by Parties to the Convention on weaknesses identified in Phase 2; 2. issues raised by changes in the domestic legislation or institutional framework of the Parties after the adoption of the Phase 2 report; 3. enforcement efforts and results.
Strengths	The wide geographical coverage.
Weaknesses	The evaluation process takes into account only the bribery of foreign public officials which represents only a specific part of the large problem of corruption.
Evaluation tools	Questionnaires On-site visits Evaluation Reports
Sources	OECD website

³⁸ It is specified that the approach is "vertical" (based on examinations country-by-country) when a country has to be examined, two other countries are chosen to lead the examination: the country under scrutiny needs to reply to a questionnaire. Then, the Working Group adopts an evaluation report on the country's performance.

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