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Monitoring Anti-Corruption in Europe: Bridging Policy Evaluation and Corruption Measurement

Monitoring Anti-Corruption Policy Implementation (MACPI) in Italy: Health Service of Trento and Municipality of Riva del Garda

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The institutions under analysis

1. Health Service of the Trento Province (APSS Trentino)

2. Municipality of Riva del Garda

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Section 1
Testing MACPI: what we have done

Implementing the MACPI (1)

Phase 1

- List of activities
- List of AC policies

Phase 2

- Survey among employees

Implementing the MACPI (2)

1. Preliminarily **taking contact** with the institutions (letter)

2. Identifying and classifying the **institutional activities** to be analyzed (via in-depth interviews with officers in charge of anti-corruption within each institution)

3. Identifying and classifying the **anti-corruption policies** to be analyzed (via in-depth interviews with officers in charge of anti-corruption within each institution)

4. Survey to assess the **enforcement** of **anti-corruption policies**:
   i. Quality of anti-corruption policies
   ii. Level of implementation
   iii. Formal compliance/substantial compliance
   iv. Effectiveness/efficiency (goal/result)

Institutional Activities to be assessed in terms of:

- Likelihood of corruption transactions associated with **specific activities** in a given public institution;

- The MACPI examines the **internal/external pressure** for corruption transactions in carrying out specific activities.

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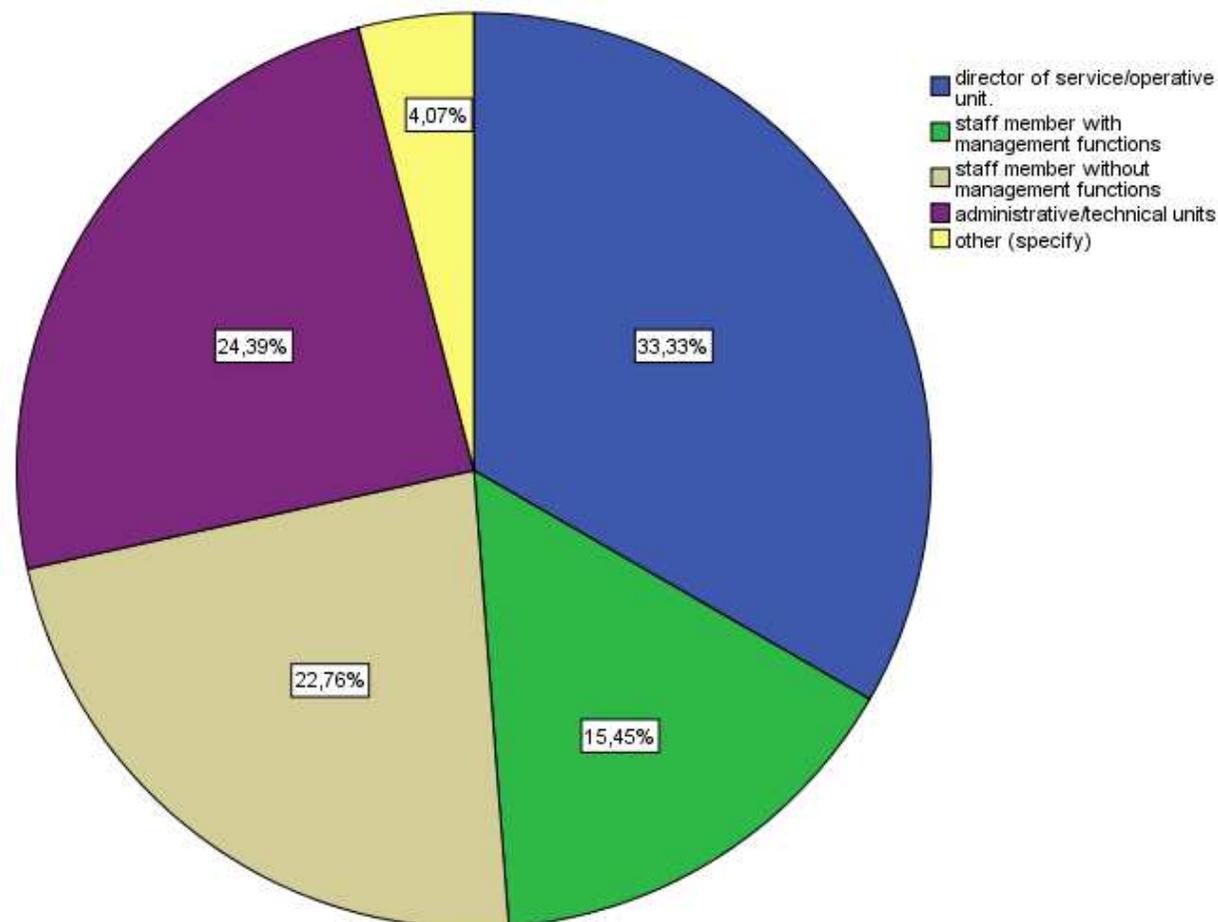
Section 2
Pilot results

Data

Health Service
of the Trento Province

- 2 in-depth interviews with Head of Corruption Prevention and Head of Transparency within the institution

- 123 completed questionnaires

Municipality
of Riva del Garda

- 1 in-depth interview with the Head of Corruption Prevention within the institution

- 54 completed questionnaires

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Health Service of the Trento Province:
Position of the survey's respondents

Municipality of Riva del Garda:
Position of the survey's respondents
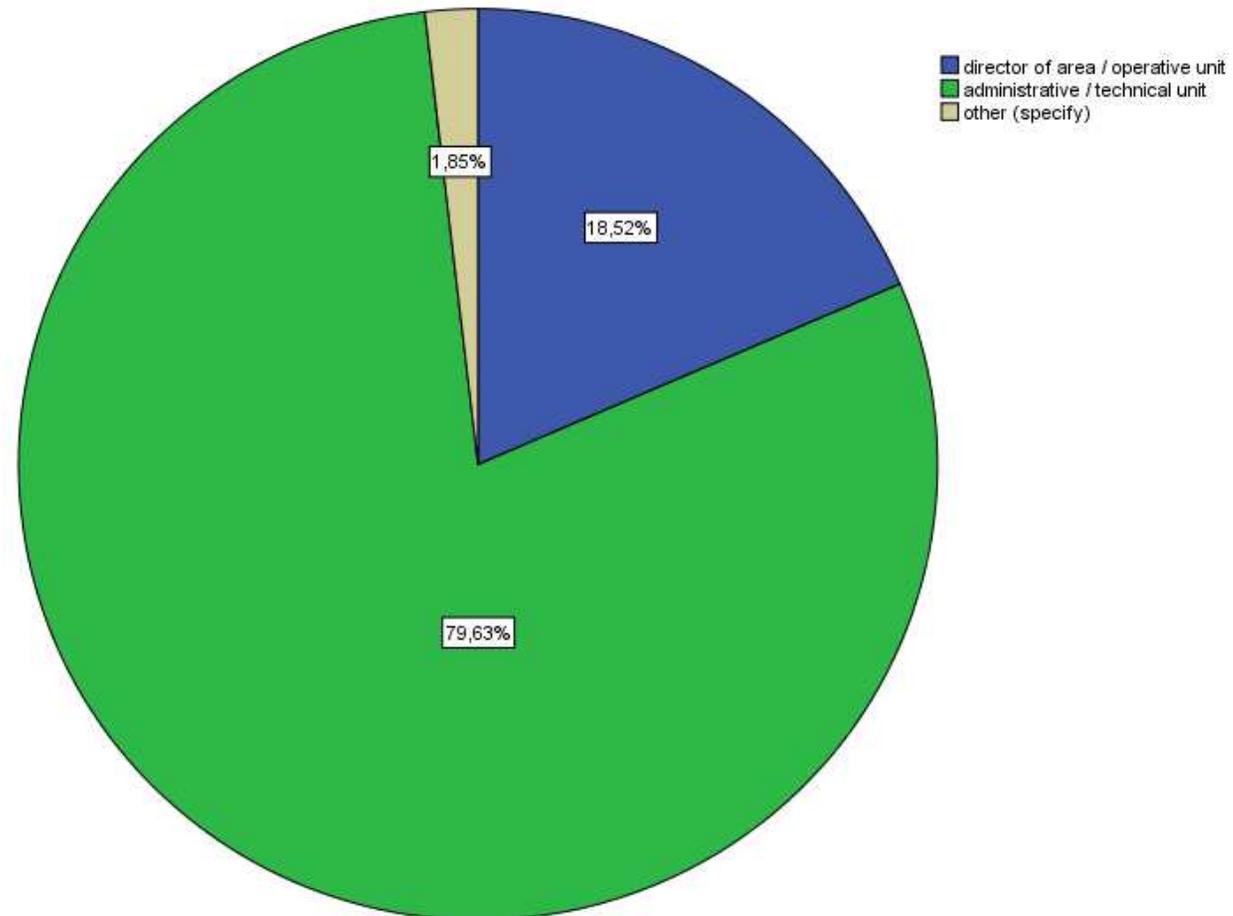
Institutional activities selected for analysis

Health Service
of the Trento Province

1. Procurement
2. Service provision
3. Security and surveillance
4. Release of certifications/authorizations
5. Hiring and management of personnel
6. Consultancy contracts
7. Intramural activities
8. Tender content specifications
9. Contributions/reimbursement to customers
10. Board evaluation of acts for the concession of benefits/services

Municipality
of Riva del Garda

1. Procurement
2. Service provision
3. Security and surveillance
4. Release of certifications/authorization
5. Hiring and management of personnel
6. Consultancy contracts
7. Contributions/reimbursement to public-private stakeholders

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Section 2.1
Pilot results: Health Service of Trento

Corruption Vulnerability of Activities – Health Service of Trento

Institutional Activities	Corruption interest	Corruption pressure			
	Types of corruption possible (0 - 100%)	Evasion of regulations (0 - 100%)	Outside pressure (0 - 100%)	Susceptibility to pressure form above (0 - 100%)	Susceptibility to pressure form outside (0 - 100%)
1. Public Procurement	75	20.6	61.8	21.2	29.4
2. Service Provision	100	22.7	60.0	17.6	13.3
3. Security and Surveillance	75	12.5	66.7	21.3	18.8
4. Release of certifications/authorisations	100	27.0	51.4	33.3	24.3
5. Human resources – Recruitment, Dismissal, Promotion	75	15.6	59.4	15.6	15.6
6. Consultancy contracts	75	30.0	60.0	50.0	50.0
7. Intramural activities	100	4.5	40.9	9.1	9.1
8. Tender content specification	75	16.7	55.6	11.1	27.8
9. Contributions/reimbursement to customers	75	9.1	50.0	16.7	8.3
10. Board evaluation of acts for the concession of benefits/services	75	12.5	55.6	11.1	0

Anti-Corruption policy coverage of activities - Average corruption pressure and coverage with specific and general anticorruption policies (ACP)

Institutional Activities	Average Pressure	GEN ACP 1 Code of conduct	GEN ACP 2 Rules of access to the premises for external stakeholders	GEN ACP 3 Prohibition of participation in events sponsored by external companies	GEN ACP 4 Obligation to declare conflict of interest
1. Public Procurement	33.2%	Y	Y	Y	Y
2. Service Provision	28.4%	Y	Y	Y	Y
3. Security and Surveillance	29,8%	Y	Y	Y	Y
4. Release of certifications/authorisations	34%	Y	Y	Y	Y
5. Human resources – Recruitment, Dismissal, Promotion	26.,5%	Y	Y	Y	Y
6. Consultancy contracts	47.5%	Y	Y	Y	Y
7. Intramural activities	15,9%	Y	Y	Y	Y
8. Tender content Specifications	27.8%	Y	Y	Y	Y
9. Contributions/reimbursement to customers	21.0%	Y	Y	Y	Y
10. Board evaluation of acts for the concession of benefits/services	19.8%	Y	Y	Y	Y

AC policy assessment (policy implementability and effectiveness) - Health Service of Trento

AC policies	Implementability		Effectiveness	
	Ease of implementation (%)	Difficult to evade (%)	Estimated potential effectiveness (%)	Estimated actual effectiveness (%)
1. Code of conduct	77.5	59.5	70.0	80.2
2. Rules of access to the premises for external stakeholders	76.8	42.0	75.7	65.7
3. Prohibition of participation in events sponsored by external companies	86.3	37.2	62.1	71.6
4. Conflict of interest declarations	84.6	56.0	81.3	72.2

AC policy assessment (policy implementation) - Health Service of Trento

AC policies	Implementation			
	Formal compliance		Real compliance	
	Awareness (%)	Strict implementation (%)	Strict control (%)	Strict application of sanctions (%)
1. Code of conduct	68.8	62.7	18.2	31.8
2. Rules of access to the premises for external stakeholders	68.1	60.0	10.0	42.6
3. Prohibition of participation in events sponsored by external companies	81.9	60.6	24.2	36.2
4. Abstention from decision making and obligation to report it in cases of conflict of interest	81.1	65.2	22.2	43.2

Assessment of AC policies in the Health Service of Trento: Results

- According to the respondents' perceptions, the specific anticorruption policies show a satisfactory level of coverage, although still not at the ideal point;

- According to the respondents' perceptions, the activities which are most vulnerable to corruption pressure (at least 3 indicators with values over 15%) are as follows:
  - Public Procurement
  - Service Provision
  - Security and Surveillance
  - Release of certifications/authorisations
  - Human resources – Recruitment, Dismissal, Promotion
  - Consultancy contracts
  - Evaluations of contracting subjects proposals

- All the analysed policies display, in the respondents' perceptions, an implementation gap (discrepancy between formal compliance on one side, and control and sanctions procedures on the other);

- There is a discrepancy between the perceived implementation of the anti-corruption policies (with some criticalities highlighted) and the perceived effectiveness of the policies themselves (that is assessed to be high). High values of effectiveness indicators could be partly due to response bias.

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Section 2.2

Pilot results: Municipality of Riva del Garda

Corruption Vulnerability of Activities – Municipality of Riva del Garda

Institutional Activities	Corruption interest	Corruption pressure			
	Types of corruption possible (0 - 100%)	Evasion of regulations (0 - 100%)	Outside pressure (0 - 100%)	Susceptibility to pressure form above (0 - 100%)	Susceptibility to pressure form outside (0 - 100%)
Public Procurement	75	3.8	38.5	3.8	3.8
Service Provision	100	9.1	36.4	9.1	4.5
Security and Surveillance	75	18.2	45.5	18.2	18.2
Release of certifications/authorisations	100	20.0	45.8	12.5	16.7
Human resources – Recruitment, Dismissal, Promotion	75	16.7	50.0	33.3	0
Consultancy contracts	75	16.7	33.3	16.7	16.7
Contributions/reimbursement to public-private stakeholders	100	25.0	25.0	25.0	25.0

Anti-Corruption policy coverage of activities - Average corruption pressure and coverage with specific and general anticorruption policies (ACP)

Institutional Activities	Average Pressure	GEN ACP 1 Code of conduct	GEN ACP 2 Formal procedure for the payment of invoices and control of tax revenues	GEN ACP 3 Reporting of all reasonable suspicious of corruption	GEN ACP 4 Conflict of interest declarations
1. Public Procurement	12.5%	Y	Y	Y	Y
2. Service Provision	14.7%	Y	Y	Y	Y
3. Security and Surveillance	25.0%	Y	Y	Y	Y
4. Release of certifications/authorisations	23,7%	Y	Y	Y	Y
5. Human resources – Recruitment, Dismissal, Promotion	25,0%	Y	Y	Y	Y
6. Consultancy contracts	20,8%	Y	Y	Y	Y
7. Contributions/reimbursement to public-private stakeholders	25.0%	Y	Y	Y	Y

AC policy assessment– Municipality of Riva del Garda

AC policies	Implementability		Effectiveness	
	Ease of implementation (%)	Difficult to evade (%)	Estimated potential effectiveness (%)	Estimated actual effectiveness (%)
1. Code of conduct	91.5	45.7	74.4	66.0
2. Formalisation of the procedures for the invoices payment and the control of the tax revenues	69.7	59.4	72.8	63.6
3. Reporting obligation to all reasonable suspicions of corruption	76.3	42.1	78.9	67.6
4. Conflict of interest declarations	87.8	60.4	77.5	69.4

AC policy assessment– Municipality of Riva del Garda

AC policies	Implementation			
	Formal compliance		Real compliance	
	Awareness (%)	Strict implementation (%)	Strict control (%)	Strict application of sanctions (%)
1. Code of conduct	73.9	63.8	17.8	30.4
2. Formalisation of the procedures for the invoices payment and the control of the tax revenues	75.8	62.5	21.2	45.5
3. Reporting obligation to all reasonable suspicions of corruption	76.3	48.6	5.3	26.3
4. Conflict of interest declarations	78.7	60.9	17.0	36.2

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Assessment of AC policies in the Municipality of Riva del Garda: Results

- According to the respondents' perceptions, the specific anticorruption policies show a satisfactory level of coverage, although still not at the ideal point;

- According to the respondents' perceptions, the activities which are most vulnerable to corruption pressure (at least 3 indicators with values over 15%) are as follows:
  - Security and Surveillance
  - Release of certifications/authorisations
  - Human resources – Recruitment, Dismissal, Promotion
  - Consultancy Contracts
  - Contribution/reimbursement to public-private stakeholders

- All the analysed policies display, in the respondents' perceptions, an implementation gap (discrepancy between formal compliance on one side, and control and sanctions procedures on the other);

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Section 3
Strenghts and weaknesses

The MACPI pilot in Italy: main results

Strenghts

- First assessment of the quality of anti-corruption policies;

- Assessment of the implementation level;

- Assessment of the effectiveness/efficiency (goal/result);

- The list of activities has been compiled based on the *Three-year Anticorruption Plan* (2013-2015) for both institutions;

- If repeated over time, MACPI can aid the institution in individuating possible vulnerabilities and to improve their anti-corruption setup.

Weaknesses

- Discretion in the identification of the policies/activities assessed;

- Number of respondents still low;

- Some activities are very specific and required to turn back to the definition level;

- Progressive stratification of the national legislation over time which makes the understanding of policies difficult in some cases;

- Need for making reference to the national legislation in order to better scope and understand certain activities;

- Problem of «response set» in compiling the questionnaire;

- «Corporate patriotism» in some institutions may hamper the comparative analyisis.

Recommendations for future developments

- Ideally, comparisons should be made between <u>very similar organisations;</u>

- The lists of activities and anticorruption policies should be harmonized;

- Another level of analysis should include client surveys;

- Comparisons also would allow to spot gaps in AC policy coverage

- AC policies which are effective in one organization could hint for implementation problems .

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