

2. PILOT IMPLEMENTATION OF MACPI DIAGNOSTICS

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

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

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

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

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

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

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

2.1. ACCEPTANCE OF THE INSTRUMENT

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

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

Another factor which facilitated the pilot implementation of MACPI were the research credentials of the implementing institutes³⁰ and also assurance that results would not be used for political or other evaluations of the management of surveyed public organisations. In this respect, it is possible that in EU member states where corruption is not on the political agenda, the attitude to implementation of the MACPI could be reserved or even negative.

2.2. SOCIETY LEVEL SUMMARY MEASUREMENTS OF CORRUPTION VULNERABILITY

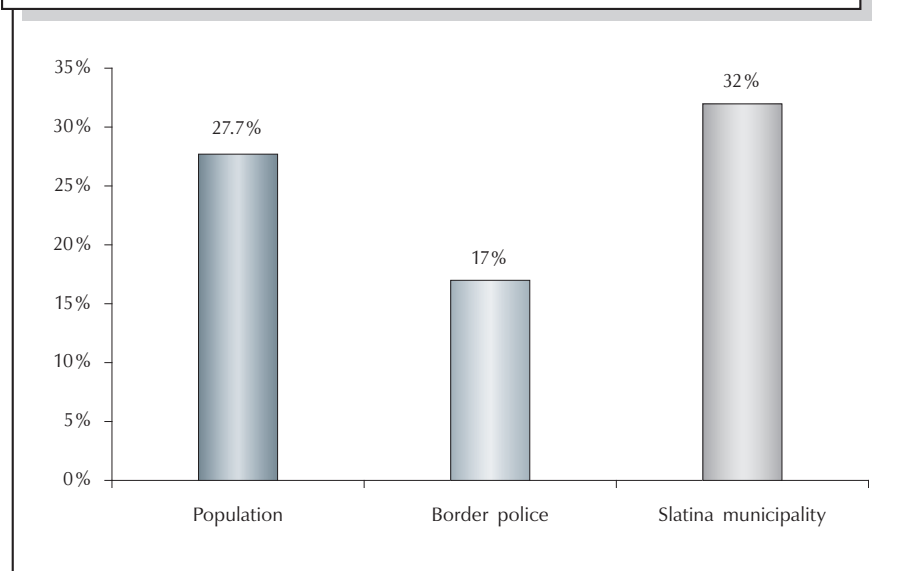
Research has shown that corruption transaction patterns easily spill over from one sector to another and that high levels of corruption in one sector of society are usually not unique to that sector. This is specifically valid for governance regimes that score low on neutrality (particularism vs. ethical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

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

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

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

Figure 5. Share of Border Police and Slatina Municipality officials having experience with corruption pressure from citizens



Source: MACPI online and MACPI general population instruments (2015).

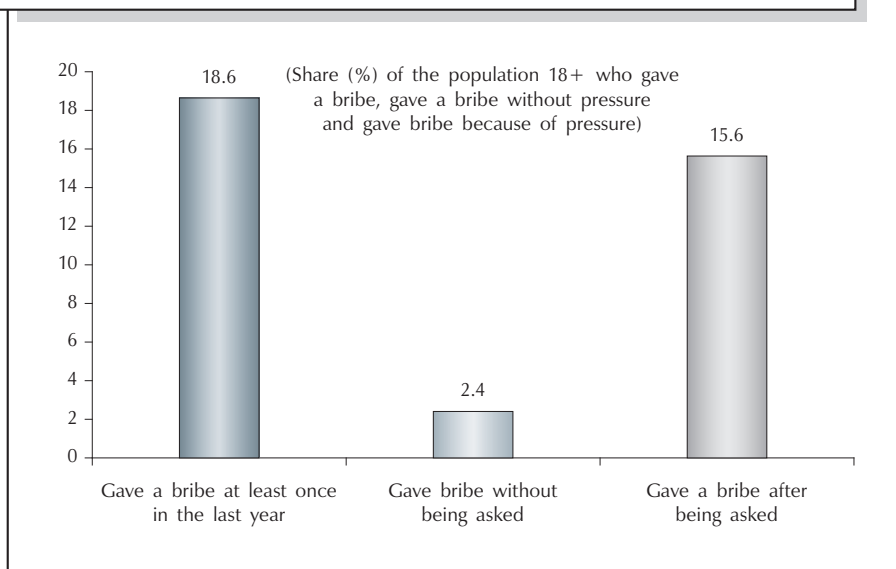
Corruption pressure. About 21% of Bulgarians report to have experienced corruption pressure (at least in one case) when dealing with public officials. On the other hand, officials in the public organisations surveyed in the pilot application of MACPI also reported receiving corruption proposals (much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

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

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

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

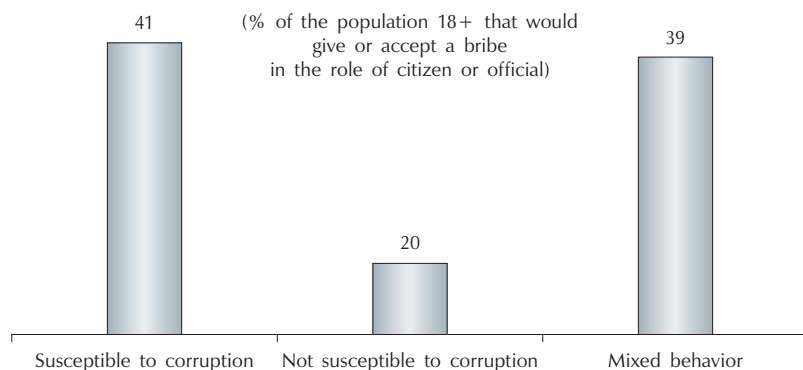
Figure 6. Overall involvement in corruption transactions in Bulgaria



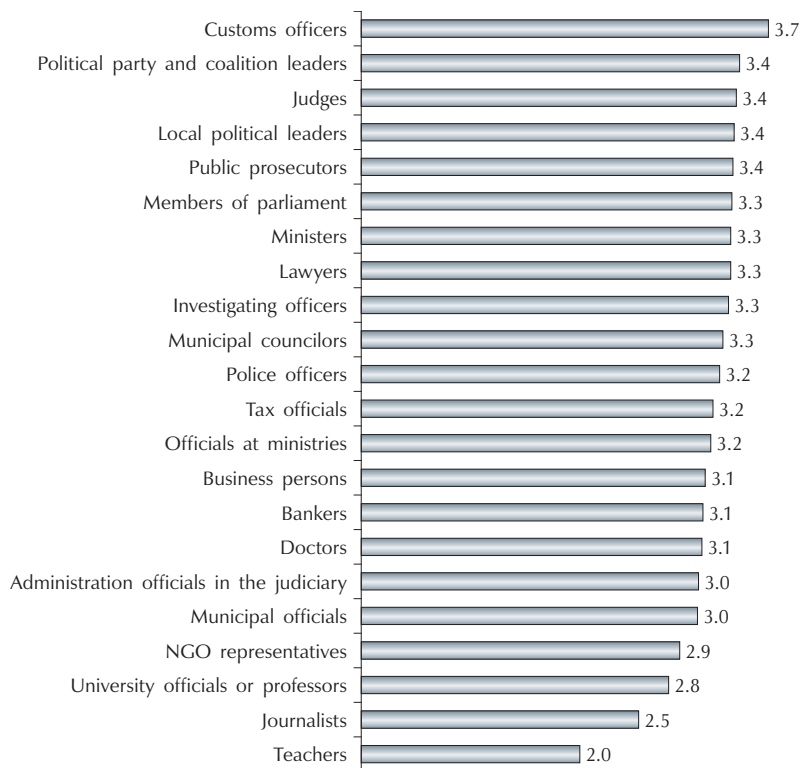
Source: MACPI online and MACPI general population instruments (2015).

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

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

Figure 7. Susceptibility to corruption in Bulgaria

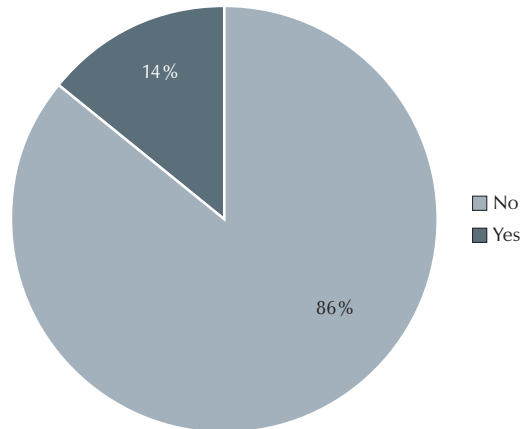
Source: MACPI general population instrument (2015).

Figure 8. Corruptness of public officials in Bulgaria*

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

Source: MACPI general population instrument (2015).

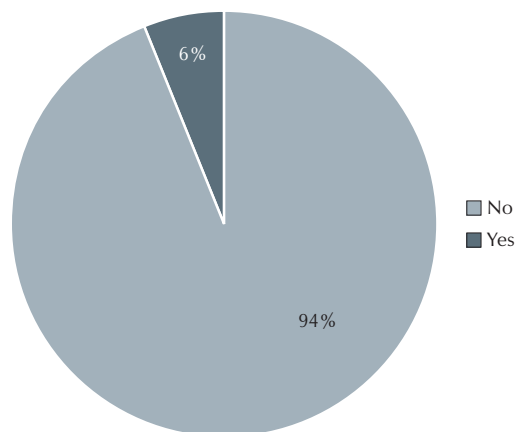
Figure 9. Employees of the Health Service of Trento (Italy) who have been offered a bribe at least in some cases (%)



Source: MACPI online instrument (2015).

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

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



Source: MACPI online instrument (2015).

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

2.3. INTERPRETATION OF MACPI INDICATORS

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

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

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

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

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

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

2.4. PILOT IMPLEMENTATION RESULTS: BORDER POLICE, BULGARIA

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

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

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

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

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

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

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

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

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

2.4.1. Mapping corruption interest

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

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

Table 7. Corruption vulnerability zones in the Bulgarian Border Police

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

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

2.4.2. Corruption vulnerability of activities

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

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

Abuse of power	Reflects the principle interest and practical feasibility/sense of such type of corruption transactions, given the situation in the country and the organisation.
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Table 8. Indicators for the assessment of the corruption vulnerability of activities (continued)

Evasion of regulations	Share of respondents (officials) who gave above average score on how many individuals/companies (clients) try to circumvent the rules in this activity.
Outside pressure associated with activity	Share of those who answered that there is some level of outside corruption pressure in this activity.
Susceptibility to pressure from above	Share of respondents who consider it likely that employees would perform illegitimate activities if ordered by a superior.
Susceptibility to pressure from outside	Share of respondents who consider it likely that employees would accept or ask for a bribe associated with activity.

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

Human resources (recruitment, dismissal, promotion)

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

Conclusions:

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

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

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

Public procurement

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

Conclusions:

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

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

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

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

Preventive investigation

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

Conclusions:

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

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

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

Green border security

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

Conclusions:

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

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

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

*Investigations carried out by investigating officers**

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

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

Conclusions:

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

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

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

Information activities

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

Conclusions:

Corruption interest associated with this activity is low.

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

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

Border checkpoints

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

Conclusions:

Corruption interest associated with this activity is moderate.

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

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

Administrative and punitive

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

2.4.3. Assessment of anticorruption policies

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

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

The general anticorruption measures include:

General transparency and supervision measures

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

Civic control measures

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

Awareness measures

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

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

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

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

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

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

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

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

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

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

Table 10. Indicators for the assessment of anticorruption policy measures

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

Rotation

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

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

Conclusions:

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

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

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

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

Video surveillance

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

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

Conclusions:

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

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

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

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

Interviews with passengers and illegal immigrants

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

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

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

Conclusions:

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

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

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

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

Unannounced visits

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

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

Conclusions:

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

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

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

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

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

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

Conclusions:

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

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

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

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

Annual submission of declarations of assets and income

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

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

Conclusions:

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

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

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

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

Advise immediate superiors about employees' asset declarations

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

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

Conclusions:

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

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

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

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

Additional internal regulations and instructions

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

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

Conclusions:

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

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

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

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

Immediate reaction to each corruption complaint

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

Conclusions:

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

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

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

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

Anticorruption training at the Police Academy

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

Conclusions:

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

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

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

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

Information campaigns among employees

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

Conclusions:

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

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

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

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

Information campaigns among the general public

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

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

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

2.4.4. Summary conclusions

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

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

2.5. PILOT IMPLEMENTATION RESULTS: SLATINA MUNICIPALITY, BULGARIA

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

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

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

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

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

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

* The number of respondents is too small.

2.5.1. Mapping of corruption interest

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

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

Table 12. Corruption vulnerability zones in Slatina Municipality

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

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

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

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

2.5.2. Corruption vulnerability of activities

*Human resources**

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

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

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

*Public procurement**

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

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

*Administrative and information services**

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

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

Conclusions:

Corruption interest associated with this activity is moderate.

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

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

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

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

*Public order, security, disaster protection**

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

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

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

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

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

Management of municipal property and housing

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

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

*Education, culture, social activities and sports**

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

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

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

Conclusions:

Corruption interest associated with this activity is moderate.

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

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

*Financial and accounting services**

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

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

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

Conclusions:

Corruption interest associated with this activity is low.

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

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

*Civil engineering, urban development and ecology**

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

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

*City planning, cadastre and regulation of construction**

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

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

Conclusions:

Corruption interest associated with this activity is high.

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

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

Internal rules for receiving and processing citizens' corruption complaints

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

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

Conclusions:

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

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

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

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

Internal public procurement rules

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

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

Conclusions:

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

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

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

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

Internal labour regulations

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

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

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

Conclusions:

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

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

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

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

Access control

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

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

Conclusions:

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

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

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

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

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

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

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

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

Conclusions:

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

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

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

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

2.5.4. Summary conclusions

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

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

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

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

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

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

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

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

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

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

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

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

* The number of respondents is too small.

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

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

2.6.1. Mapping corruption interest

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

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

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

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

2.6.2. Corruption vulnerability of activities

Public procurement

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

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

Conclusions:

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

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

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

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

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

Service provision

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

Conclusions:

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

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

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

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

Security and surveillance

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

Conclusions:

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

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

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

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

Certifications/authorisations

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

Conclusions:

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

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

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

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

Human resources

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

Conclusions:

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

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

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

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

Consultancy contracts

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

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

Conclusions:

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

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

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

Overall conclusion. Corruption pressure requires particular attention. The anti-corruption policy coverage can be improved.

Intramural activities

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

Conclusions:

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

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

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

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

Tender content specifications

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

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

Conclusions:

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

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

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

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

Contributions/reimbursement to customers

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

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

Conclusions:

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

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

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

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

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

Board evaluation of acts for the concession of benefits/services

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

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

Conclusions:

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

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

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

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

2.6.3. Assessment of anticorruption policies

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

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

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

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

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

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

Code of conduct

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

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

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

Conclusions:

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

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

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

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

Rules of access to the premises for external stakeholders

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

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

Conclusions:

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

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

Effectiveness. Values for effectiveness are moderately high.

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

Prohibition of participation in events sponsored by external companies

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

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

Conclusions:

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

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

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

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

Obligation to declare conflict of interest

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

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

Conclusions:

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

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

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

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

2.6.4. Summary conclusions

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

The main problems identified by the MACPI diagnostics are:

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

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

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

The pilot application of the MACPI diagnostics to the Municipality of Riva del Garda started with a series of meetings with the Head of Corruption Prevention³⁴ at the municipality.³⁵ The survey instrument was organised as follows: i) general information about the respondents was first collected; ii) the experts were then asked about their job and the activities involved; iii) questions about corruption risk were asked with regard to different activities. Participants in the survey were requested to answer only about activities they

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

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

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

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

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

* The number of respondents is too small.

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

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

2.7.1. Mapping corruption interest

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

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

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

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

2.7.2. Corruption vulnerability of activities

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

Public procurement

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

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

Conclusions:

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

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

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

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

Service provision

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

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

Conclusions:

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

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

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

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

Security and surveillance

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

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

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

Conclusions:

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

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

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

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

Issuing of certifications/authorisations

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

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

Conclusions:

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

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

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

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

Human resources

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

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

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

Conclusions:

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

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

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

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

Consultancy contracts

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

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

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

Conclusions:

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

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

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

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

Contributions/reimbursement to public-private stakeholders

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

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

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

Conclusions:

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

Corruption pressure. Values for all indicators are high.

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

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

2.7.3. Assessment of anticorruption policies

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

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

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

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

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

Code of conduct

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

Conclusions:

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

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

Effectiveness. Values for effectiveness are moderately high.

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

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

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

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

Conclusions:

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

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

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

Effectiveness. Values for effectiveness are moderately high.

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

Reporting of all reasonable suspicions of corruption

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

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

Conclusions:

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

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

Effectiveness. Values for effectiveness are moderate to high.

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

Conflict of interest declarations

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

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

Conclusions:

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

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

Effectiveness. Values for effectiveness are moderately high.

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

2.7.4. Summary conclusions

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

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

tions/reimbursement to public-private stakeholders;

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