

3. IMPLEMENTATION AND POLICY IMPLICATIONS

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

3.1. PURPOSE AND FIELD OF APPLICATION OF THE TOOL

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

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

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

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

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

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

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

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

3.2. METHODOLOGICAL CONSIDERATIONS FOR THE APPLICATION OF MACPI

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

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

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

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

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

- (1) **Initial contact with the public organisation.** While it is relatively easy to identify sectors or organisations where potentially high corruption risk exists, establishing contact with a concrete organisation is not always unproblematic. The working solution adopted in the piloting of MACPI was to approach first an organisation at a higher level of the hierarchy and obtain a formal recommendation to contact the specific public organisation to be monitored. Higher levels of the hierarchy most often do not have direct contacts with clients in the respective sector, but have (at least potentially) a strong interest in anticorruption policies. It would rather be an exception to find a public organisation (in our case central government agency or municipality) that would volunteer participation if approached directly.
- (2) The right **balance between desk research and IDIs** needs to be found. In the piloting of MACPI in Italy and Bulgaria, the initially envisaged stronger role of IDIs was reduced because experts were more inclined to confirm or reject propositions formulated by researchers instead of coming up with their own original ideas. Two factors contributed to this: a) the corruption imagination of experts was rather insufficient, especially if they needed to use MACPI concepts; b) there was reluctance to discuss too much corruption in their own organisation.
- (3) **Design and implementation of the online instrument.** Several issues need to be mentioned here:
 - Wording of questions. In the piloting of MACPI, alternative designs of some questions were used simultaneously in order to test the adequate wording which would minimise non response.³⁸
 - Some types of information that originally had to be collected through IDIs (e.g. corruption pressure, effectiveness, etc.) was transferred to the online questionnaire due to the difficulties encountered when attempting to assess these indicators through IDIs (mostly related to the reluctance of experts to give concrete assessments and their bias). The anonymous survey has proved a much better instrument in this respect.
 - The shares of indefinite answers (don't know, no answer) are normal, i.e. relatively low. The main reason for this has been the extensive use of filter questions. These "compile" the set of questions a concrete official is competent to answer and filter out activities and type of corruption that are not relevant for his/her respective job position. Because of this, time for

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

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

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

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

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

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

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

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

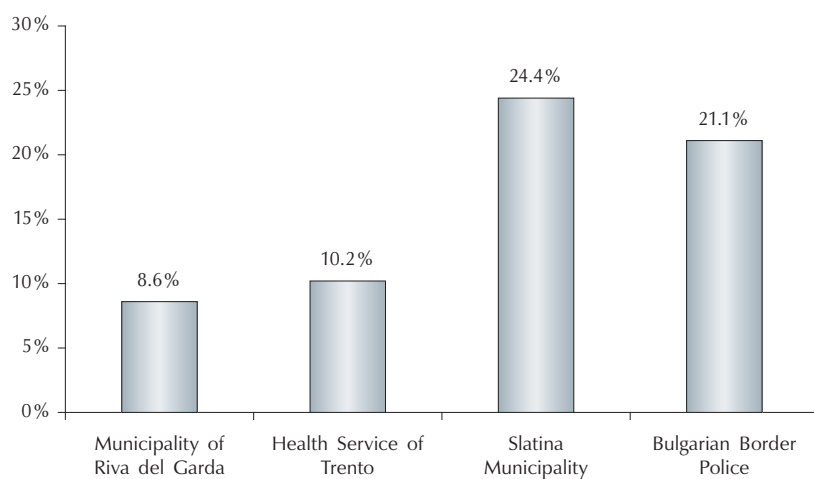
would largely depend on commitment to measurement accuracy and large scale implementation.

3.3. ENSURING THE RELIABILITY OF FINDINGS

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

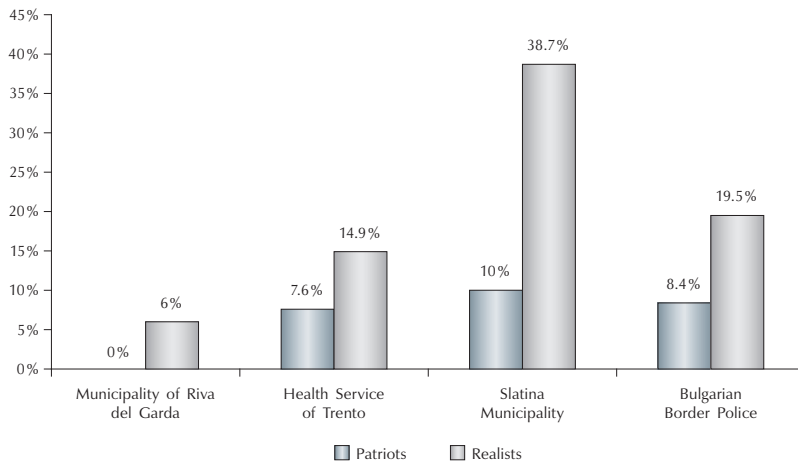
“Patriots” were defined operationally as respondents who gave only positive answers to 7 of the key questions which define the main indicators (three of the activity indicators and 4 of the policy indicators). The share of institutional patriots varies substantially between the Bulgarian and the Italian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

Figure 11. Share of institutional patriots in the monitored organisations



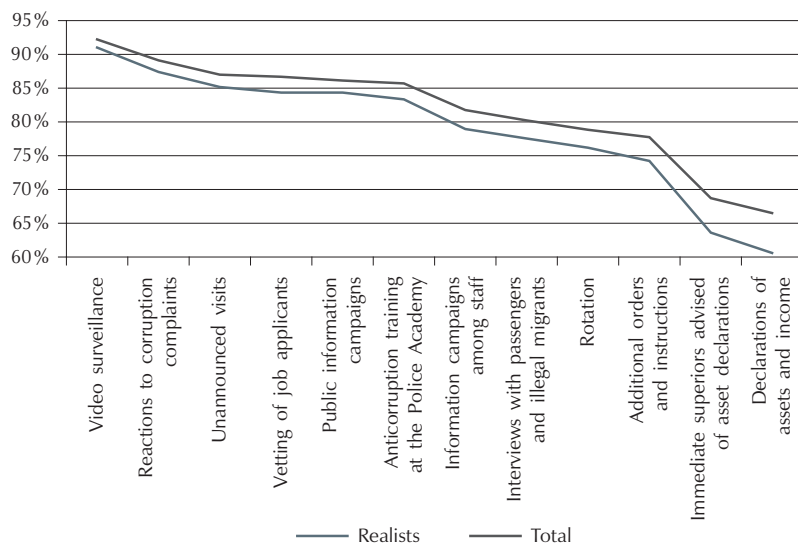
A different analysis shows that patriots are much less likely to report being offered a bribe – a difference which is particularly relevant to the Bulgarian Border Police (the difference in percentages for Slatina Municipality is even higher, however, the small number of respondents there requires more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

Figure 12. Share of officials who reported being offered a bribe at least in some cases in the preceding year



If institutional patriots are excluded from the analyses, the adjusted data show an interesting pattern – the difference between the original percentages (totals) and the percentages based only on the realists’ answers are more negative for the less effective policies – i.e. the answers of the institutional patriots don’t so much change the overall estimates, but they could reduce the sensitivity of the tool.

Figure 13. Estimated actual effectiveness of measures in the Bulgarian Border Police



The profile of the institutional patriots shows that they are more common among the staff without management functions. Also, the realists are generally more experienced employees than the patriots – mean years of experience for the realists is 13 and for the patriots – 10 years of experience on average.³⁹

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

3.4. COMPARATIVE VALUES OF MACPI INDICATORS

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

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

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

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

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

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

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

- (a) A set of measures could in itself be assessed as effective. However, its impact on corruption vulnerability could vary depending on the practices it targets, e.g. effectiveness could be high but the relevance of the measure (the activities it targets) could be limited. In this respect, it is important to consider whether all aspects of a given activity/function are comprehensively covered (targeted) by adequate anticorruption measures – both general and, more importantly, by specific measures. In this respect it is possible to have a lot of effective tools which miss the target or cover only some parts of the target.
- (b) The ultimate criterion for effectiveness is whether a measure **reduces corruption vulnerability**. High levels of vulnerability typically mean that the effectiveness of the anticorruption measure is poor or does not exist at all. In this respect, the first application of MACPI diagnostics can be considered the benchmark for the monitored organisation. If sincere commitment to anticorruption exists, MACPI diagnostics should be followed up by policy interventions and a follow up round of MACPI diagnostics. The **comparative analysis of the dynamics of MACPI indicators** is the only way to track and evaluate progress.
- (c) **Activities/functions**. The pattern of values of the indicators evaluating the activities in Bulgarian public organisations shows that corruption interest and pressure are high. Coverage, in terms of number of measures is also high but general measures predominate. In most cases, activities are associated only with general policies and no specific anticorruption policies have been designed. This finding shows that organisational design of anticorruption policies and protocols is far from complete or comprehensive.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3.5. MACPI IMPLEMENTATION CYCLE

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

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

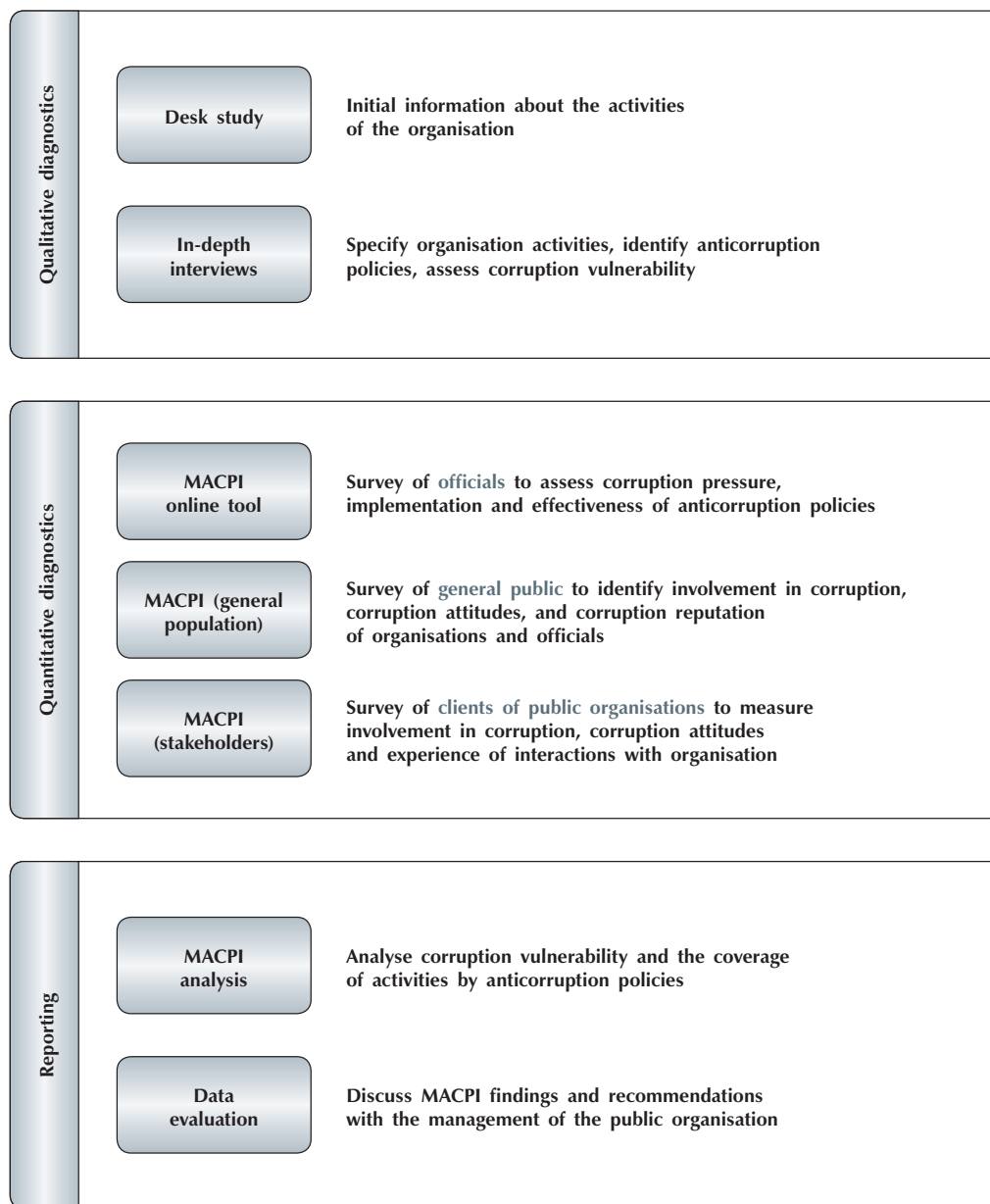
The actual evaluation process is carried out in three stages, each having consecutively implemented elements (Figure 14).

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

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

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

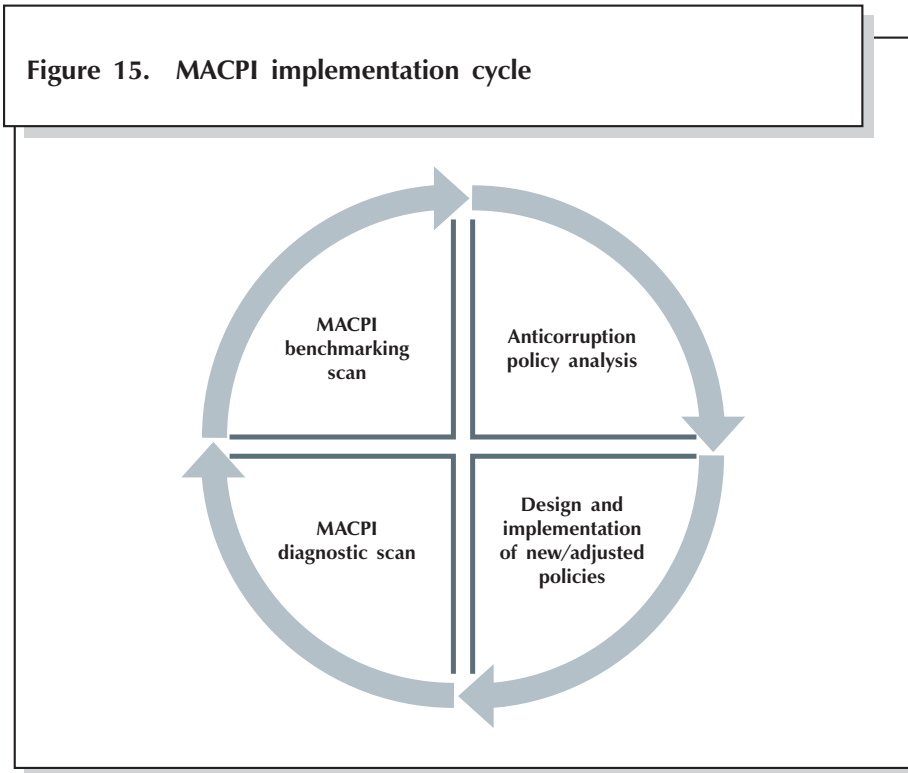
Figure 14. The architecture of MACPI diagnostics



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

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

Figure 15. MACPI implementation cycle



3.6. IMPLICATIONS FOR POLICY MAKERS

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

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

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

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

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

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

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