

MONITORING ANTICORRUPTION POLICY IMPLEMENTATION AT INSTITUTIONAL LEVEL

Corruption and measures to counteract it have been subject to so much research and political attention that it would seem that their every aspect must have been explored. Yet corruption proves bafflingly resilient, always finding new conduits for spreading; squeezed temporarily out of one public sector, it reappears in another.

In response to this need the Center for the Study of Democracy, **SCE**MAPS coordinator, published the [Monitoring Anticorruption Policy Implementation \(MACPI\) at Institutional Level](#) methodology and its pilot results in 2015. MACPI provides the anticorruption community with a precision-guided tool, which gives exhaustive feedback on the enforcement of anti-corruption policies inside key public institutions.

Key steps and outputs of MACPI methodology



Anonymous online survey among employees of the assessed public body

A large enough representative sample (e.g. 400 employees) or an exhaustive survey among all employees.

INDICATORS OBTAINED

corruption interest · corruption pressure
coverage with anti-corruption policies
implementability & implementation of anti-corruption policies · effectiveness of anti-corruption policies

OPTIONAL: survey among a random sample of experts and/or clients of the organization (at least 50, if available).

ADDITIONAL ANALYSIS

discrepancies analysis · victimisation-based corruption pressure



Design and implementation of new/adjusted policies

Desktop research and interviews with public officials



To analyse the possible risks of corruption in the activities carried out by public bodies and observe what anti-corruption measures exist.

KEY ISSUES DISCUSSED

corruption interest · theoretical likelihood corruption to occur · most likely mechanisms of such a transactions · real-life cases of corruption to verify the existence of corruption outside pressure (by a citizen or client) and inside pressure (by an official)

OUTPUTS

1. **List of activities**
2. **Matrix of activities and corresponding forms of corruption**
3. **List of anti-corruption policies associated with each risk zone**

STEP
01

Preparing the ground

STEP
02

Field work

STEP
03

Data analysis

Calculation and analysis of the results / rankings



- **Activities:** ranking by corruption pressure
- **Anti-corruption policies:** ranking by implementability, implementation and effectiveness
- **Vulnerability zones:** finding gaps in the anti-corruption policies coverage of key risk activities
- **Discrepancies analysis (if applicable):** comparisons between different groups – employees with and without management functions, external experts, clients, etc.
- **Assessment of possible systematic deviations/discrepancies** compromising the whole anti-corruption setup in the public organization

STEP
04

Policy enhancement & corrective actions

MACPI implementation example: Bulgarian Traffic & Border Police

List of main activities

- Human Resources
- Public procurement
- Traffic control & organisation
- Administrative and punitive activities
- Piloting and escort
- Processing violations registered by automated systems
- Cross-border information exchange
- Registration and technical control of vehicles
- Registration and control of drivers
- Reporting and analysing road accidents
- Prevention activities

General policies/measures

- Asset declarations
- Conflict of interest declarations
- Awareness campaigns
- Civic control mechanisms like mailboxes for reporting corruption cases, websites for collecting feedback by users and citizens, complaint procedures, etc.
- Anti-corruption training
- Specific testing of job applicants

Organisation-specific policies/measures

- Rotations
- Speed cameras with fiscal memory
- Unannounced visits
- Video surveillance
- Workstations for remote access, GPS-location, central monitoring and control
- Use of automated information systems

Source:
MACPI pilot implementation at the Bulgarian Traffic Police and the Bulgarian Border Police.

In its early stages of development **SCE**MAPS will implement this MACPI methodology in eight institutions in the four participating countries with competencies in the regulation, control and supervision of the wholesale of fuels (solid, liquid and gas), wholesale of pharmaceuticals and construction sectors.

CORRUPTION VULNERABILITY ZONES AND ANTI-CORRUPTION POLICIES

		Types of corruption					
		ABUSE OF POWER	ABUSE OF PROPERTY	NEPOTISM	FAVOURITISM	CLIENTELISM	OTHER
Public organisation activities	RECRUITMENT			⚠			
	PROMOTION		⚠		⚠		
	PROCUREMENT	⚠					
	SPECIFIC ACTIVITIES OF AN ADMINISTRATION						
	OTHER						

SETTING UP OF INDICATORS TO BE ANALYSED/METHODS TO BE USED

	MACPI DESK RESEARCH	MACPI IN-DEPTH INTERVIEW	MACPI OFFICIALS MACPI EXPERTS	MACPI CLIENTS / CORRUPTION MONITORING SYSTEM (CMS)
CORRUPTION INTEREST	X	X	X	
CORRUPTION PRESSURE			X	X
INVOLVEMENT IN CORRUPTION				X
CORRUPTION ATTITUDES				X
CORRUPTION REPUTATION OF SECTORS / OFFICIALS				X
IMPLEMENTABILITY OF ANTI-CORRUPTION POLICIES			X	
IMPLEMENTATION OF ANTI-CORRUPTION POLICIES			X	
ESTIMATED EFFECTIVENESS OF ANTI-CORRUPTION POLICIES			X	

MACPI methodology will identify areas of risk and vulnerability to help participating institutions (re)define their anti-corruption strategies.

More information and practical examples: Center for the Study of Democracy (2015), *Monitoring Anti-Corruption in Europe. Bridging Policy Evaluation and Corruption Measurement*. Available at: <https://csd.bg/publications/publication/monitoring-anti-corruption-in-europe-bridging-policy-evaluation-and-corruption-measurement/>

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