2,400 public employees from Bulgaria, Italy, Spain and Romania to identify the strengths and weaknesses against corruption of the public bodies they work for

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- *Nine public bodies have collaborated with SceMaps to implement the MACPI (Monitoring Anti-Corruption Policy Implementation) tool, which allows them to assess the effectiveness of their anti-corruption measures.*

- *The institutions analysed exercise regulatory, supervisory, procurement or inspection functions in the construction, fuel wholesale or pharmaceutical wholesale sectors in Bulgaria, Spain, Italy and Romania.*

2021/04/29 SceMaps has implemented the MACPI (Monitoring Anti-Corruption Policy Implementation) tool in nine institutions in Bulgaria, Spain, Italy and Romania, which allows institutions to assess the functioning and effectiveness of the anti-corruption measures in place and thus detect their strengths and weaknesses as a way to prevent potential risks. The aim is for institutions to assess and reinforce those areas of greatest vulnerability in a preventive manner.

A total of **2,467 public employees** from these four European countries participated in this initiative and were invited to rate, based on their experience, the anti-corruption areas and policies of the bodies they work for. The size of the samples took into account the size of their staff in order to define appropriate participation thresholds to ensure the quality of the statistics. Thus, 1,095 people from the **Emilia-Romagna Region** (Italy) participated compared to 31 from the **Valencian Anti-Fraud Agency** of the Valencian Community (Spain). However, in the latter case, this figure represents almost the totality of its staff and its study was complemented by the participation of 15 external experts. The other seven collaborating bodies were: the **National Revenue Agency** (565 employees) and the **National Construction Control Directorate** (151) in Bulgaria; the **Autonomous Community of the Region of Murcia** (498) in Spain; the **Chamber of Commerce of Trento** (54) in Italy; and, in Romania, the **National Integrity Agency** (46), the **Competition Council** (15) and the **Municipality of Sinaia** (12).

The MACPI results show a good anti-corruption structure in most of the organisations assessed. This is not surprising, as organisations that agree to cooperate in independent external assessments tend to have robust systems of anti-corruption measures with good coverage of potential risks. As such, two of the highest ranked anti-corruption policies relate **to the recruitment of new staff**. The "Requirements and procedure for the selection of the director" of the Valencian Anti-Fraud Agency in Spain is ranked as the most difficult

procedure to circumvent and, at the same time, the most strictly implemented and controlled by the organisation. The "exclusion of those convicted (even without a final judgement) for crimes against public administration" in the Italian region of Emilia-Romagna ranks first in both ease of implementation and difficulty of evasion.

Another highly rated type of anti-corruption policy concerns the control procedures of key processes for the organisation. The "ex ante and ex post control and audit of expenditure by the Intervención General" of the Region of Murcia (Spain) **is ranked as the most difficult to circumvent, the most strictly implemented and controlled and the most effective anti-corruption policy of all the organisation's policies**. Another example in this group is the "Control of asset declarations" implemented in the Bulgarian National Directorate for Construction Control. This policy receives a relatively low rating in terms of difficulty to circumvent, but it is the most strictly implemented policy and receives the highest score in terms of strict control and estimated effectiveness. **Asset declarations** are a very common anti-corruption measure, however, they require strict follow-up procedures on the actual verification of declared circumstances to ensure their effective implementation. Therefore, additional procedures for verifying asset declarations are needed for this policy to have the desired anti-corruption effect.

E-services are generally considered effective in reducing the risks of administrative corruption. **When combined with transparency efforts**, this results in a policy that is easy to monitor and relatively effective in practice. These results are valid for the policy "Existence and possibility to consult the Transparent Administration section on the institutional website" of the Chamber of Commerce of Trento, Italy.

On the opposite side are anti-corruption policies **that score very low both in actual implementation and in monitoring and effectiveness**. These are less effective policies, as they are easy to circumvent and/or difficult to implement. Examples are "Declaring goods received free of charge on the occasion of protocol actions" at the Romanian Competition Council, "Procedures for former employees wishing to exercise a professional activity in the private sector" at the Romanian National Integrity Agency, "Code of ethics and client charter" and "Conducting regular meetings and information campaigns with companies" at the Bulgarian National Revenue Agency. In addition, documents and trainings that add recommendations and explanations to existing national laws are perceived as actions **that remain just only "on paper"** and often have little impact on actual corruption levels.

The activities that are **exposed to the greatest corruption pressure** tend to be related to the control and inspections of clients (citizens and companies) and the management of public procurement. In most cases, the estimated corruption pressure is higher than the actual corruption pressure reported by those officials who have been offered a bribe in the past year. However, there are also the opposite cases, such as the activity of "Inspection, control, monitoring, surveillance, verification and sanctioning procedures" in the Region of Murcia (Spain), and "Tax collection" in the National Tax Agency in Bulgaria, where the estimated corruption pressure is lower than the actual corruption pressure. This indicates a possible vulnerability in the respective policy, as the actual corruption risk might not be perceived or might not even be reported by the organisation's employees.

While good protection with anti-corruption policies would ultimately lead to a decrease in corruption pressure, some activities are inherently subject to more pressure and interest in corruption than others. It is important that high-pressure activities are well covered with sufficient, highly effective, strictly enforced and targeted anti-corruption policies. When high-pressure corruption activities are covered only by low-ranking general policies, this can be considered a **potential vulnerability** in the anti-corruption set-up of the organisation.

However, it should be kept in mind that MACPI focuses primarily on **administrative corruption**, as well as on perceived pressures, both internal and external, on public employees to engage in irregular practices, so it is only one tool that covers one of several flanks from which state capture can happen.

MACPI: an innovative tool for assessing the effectiveness of anti-corruption strategies

The evaluation carried out in the nine institutions is based on the Monitoring Anti-Corruption Policy Implementation (MACPI), an instrument that assesses the implementability, execution, effectiveness and efficiency of anti-corruption measures and policies in each public institution analysed.

MACPI starts with the condensation of areas of activity of interest, on which possible corruption threats or risks are discussed from a theoretical perspective. In this phase it is mapped whether these potential risks are covered by pre-existing anti-corruption policies through a combination of **desk research and in-depth interviews** with executive level employees.

MACPI diagnostics cycle
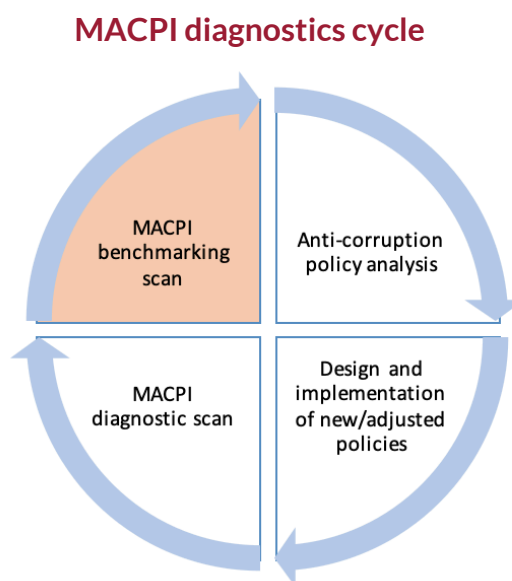
Source: Center for the Study of Democracy (CSD)

The next phase of MACPI consists of an **anonymous survey** of the organisation's officials (employees). Based on this survey, several indicators are calculated for each activity and each anti-corruption policy from the lists identified beforehand: (i) corruption pressure (both actual and estimated) for the different activities; (ii) implementation capacity of the anti-corruption policies; (iii) level of implementation of the anti-corruption policies; and (iv) effectiveness for the different anti-corruption policies.

The analysis includes an assessment of the different policies and their possible shortcomings, the assessment of corruption pressure in the different activities of the organisation and whether high corruption pressure activities are adequately covered by effective and well-implemented anti-corruption policies. Responses provided by different groups of officials (e.g. employees versus management) are critically juxtaposed to reveal possible biases in responses and attempts to hide vulnerabilities and corrupt practices.

More info:

- **Todor Galev**, Senior Researcher, Center for the Study of Democracy (Bulgaria): todor.galev@online.bg

- **Daniela Mineva**, Researcher, Center for the Study of Democracy (Bulgaria): daniela.mineva@online.bg