



Integrity Plan as a Form of a Consistent Integrity Framework

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The integrity plan = risk management plan

- Strategic tool for enhancement of integrity
- Risk assessment as being part of it represents the systematic analysis of vulnerabilities in the institution
- Combines the system of effectiveness of rules and regulations in practice (e.g. RIA model) and the system of quality
- One of the fundamentals of the Slovenian national AC strategy on building integrity
- The Prevention of the Corruption Act in the Republic of Slovenia (PCA, 2004) defines the integrity plan as *"measures of legal and practical nature, which eliminate and prevent the possibilities for the occurrence and development of corruption in an institution."*
- Public and local community bodies (*public agencies, public institutions, and public funds – future PIA*) adopt the integrity plan and mould the plans within the time limits, defined with the guidelines from the the PCA, and inform the Commission about it.



Content of the integrity plan

- Information on responsible person(s) for the integrity plan
- Decision making process and working process description with the vulnerability assessment and risks for integrity (incl. corruption)
- Integrity improvement recommendations
- Measures for prevention, due time detection and elimination of corruption risks (reporting corruption, protection of whistleblowers,..)



Phases of the integrity plan

- preparation phase,
- assessment phase: identification of existing vulnerable activities and areas as well as of the existing preventive measures,
- prioritisation phase: evaluation of vulnerable activities and areas,
- concluding phase: development of a final report and of an action plan for responding to recommendations resulting from the vulnerability assessment (introduction of new measures and controls).



Project groups as focal points of institutions*

The project/working group consists of:

- 5 to 7 people depending on the size of institution or its part;
- Individuals from different sectors, with different functions and levels employed within the institution;
- Leader of the working group is responsible for the integrity plan, has in-depth knowledge of the institution's assets and operations, and enjoys trust of the leadership and other employees;
- Institution's leadership nominates the working group, approves the implementation plan, informs all employees, completely explains purpose and objectives of the integrity plan
- Institution sends the decision on implementation and nomination of the working group to the CPC
- Leadership ensures training of the working group members, organised by CPC



How to start ?

The preparation phase

- The leadership of institution formally accepts the decision on the implementation of the integrity plan
- It nominates the working group and sends notification in writing to the Commission for the Prevention of Corruption (CPC); leader of the group coordinates activities with the CPC
- The project group develops the action plan (covers legal background, assessment objectives and methodology based on the guidelines CPC designed), specifying key tasks and their carriers, a timetable and deadlines for tasks' execution
- The project group collects all necessary documentation (information about the legal framework of the organisation, about organisational structure and functions, about the work processes, list of functions, job descriptions, and members of staff, business plans, audit reports...)



Identification of existing vulnerable activities and areas as well as of the existing preventive measures

The assessment phase:

- Working group evaluates the laws and internal rules and procedures related to the vulnerable activities and working areas
- Assessment of human resources (employment, promotions, responsibilities, education)
- Filling out the questionnaires (carefully designed) - analysis
- Conducting interviews – analysis



Prioritisation

The prioritisation phase:

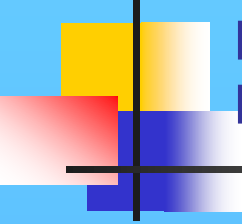
- Setting up of the severity and probability levels for all threats and vulnerabilities ('risk index')
- Preparation of the final report on vulnerability assessment



Development of a final report and of an action plan for responding to recommendations resulting from the vulnerability assessment phase (introduction of new measures and controls)

The concluding phase:

- Improvement recommendations
- Improvement priorities, deadlines and assignment of the responsibility for the implementation of the recommendation, maintenance requirements
- Management adopts the integrity plan, dissolves the working group and establishes the monitoring system (inclusion of performance indicators for the measures efficiency)
- Institution sends the final report to the CPC



Further Quantitative steps as part of the Integrity plans in RS*

- Commission for the Prevention of Corruption monitors the implementation of the previously approved improvement recommendations and creates a progress monitoring (does integrity plan contribute to achieving outcomes ?).
- CPC establishes benchmarking system and identification of reoccurring same and/or similar vulnerabilities (quantitative assessment of institutional risks in Slovenia).
- Once this is achieved, CPC publishes the register of risks and vulnerabilities and report on the general integrity level in the Republic of Slovenia.



*Frequent areas of vulnerabilities in Slovenia**

- issuing of different licences, permits,
- public procurement procedures (constructions!!!),
- business subsidies,
- public administration employment,
- privatisation of the state property,
- state property sale,
- lobbying (non defined rules of lobbying),
- financing of the political parties.



What has been achieved until now ?

In Slovenia:

- Integrity plans have been introduced in 500 public bodies and in 210 local communities' bodies,
- detailed Guidelines on drafting of IPs were published by the CPC
- 330 persons (trainers) from 216 institutions were trained

In other countries:

- Following excellent results in Slovenia and in their pilot institutions integrity plans became legal obligation in Moldova and Serbia, preparations are on the way in Croatia, FYROM, BiH,...

Methodology has been published in the 'EU Catalogue on Best practices in the field of integrity, anti corruption and

administrative measures against organised crime' in 2008.



Thank you for your attention!

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