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About the Greece-OECD Project

The Greek government is prioritising the fight against corruption and bribery and, with the assistance of the European institutions, is committed to taking immediate action. Under the responsibility of the General Secretariat Against Corruption, Greece’s National Anti-Corruption Action Plan (NACAP) identifies key areas of reform and provides for a detailed action plan towards strengthening integrity and fighting corruption and bribery. The OECD, together with Greece and the European Commission, has developed support activities for implementing the NACAP. This project is scheduled for completion in 2018 and is co-funded by the European Commission and Greece. For further information, please see the project webpage.
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Executive summary

Introduction

The purpose of these guidelines is to support the Greek government by providing a practical tool to assist in drafting, implementing and monitoring risk-based anti-corruption sectoral strategies and action plans. They address the following priorities from a sectoral anti-corruption approach:

- key considerations for drafting a sectoral anti-corruption strategy
- how to undertake a sectoral anti-corruption risk assessment
- how to build a sectoral anti-corruption strategy and action plan
- how to implement and monitor a sectoral anti-corruption action plan
- how to raise awareness about the sectoral anti-corruption strategy.

The overall objective of the guidelines is also to promote a culture of transparency, accountability, and integrity and to encourage Greek public sector stakeholders to take actions to help prevent corruption.

Background

In efforts to improve governance and tackle corruption, many countries have undertaken institutional and legislative reforms such as adopting anti-corruption laws, instruments, and national strategies and setting up anti-corruption institutions. While these national efforts provide an enabling framework, they are not necessarily sufficient. Today there is a growing awareness among anti-corruption practitioners that putting better governance into practice requires adapting generic anti-corruption efforts to address sector-specific challenges.

This is a complex exercise since there are no one-size-fits-all solutions when it comes to the design and implementation of sectoral anti-corruption strategies. Experience has shown that the effectiveness of an anti-corruption sectoral strategy will depend to a great extent on whether it has been designed taking into consideration the sector’s context and its specific corruption challenges. Furthermore, political will and coordination with other ongoing efforts to fight corruption and improve governance in the country are essential. In addition, sectoral anti-corruption strategies need to include robust monitoring and evaluation indicators to measure progress and impact.

To address corruption in high-risk policy areas in Greece, the National Anti-Corruption Action Plan (NACAP) has identified tax and customs, health, public procurement, local
administration, defence, and public and private investment as key areas of reform. To this end, the Greece-OECD Technical Assistance project supports Greece in assessing the progress made on already existing anti-corruption sectoral strategies and action plans in three areas: in tax and customs, public procurement and health. In addition, the OECD is assisting Greece in drafting anti-corruption strategies for defence procurement, local government entities and public and private investment that take into account the unique challenges faced in these areas.

Key considerations

Based on the research undertaken to produce these guidelines as well as on the review and evaluation of progress made on existing Greek sectoral anti-corruption strategies and policies, the following considerations need to be taken into account as key factors for future sectoral anti-corruption strategies in Greece.

It is important to mention that these are general considerations and that the designers of future sectoral anti-corruption strategies in Greece will need to make choices based on a thorough analysis of each sector-particular context, as well as the resources available to produce and implement the sectoral strategy.

Key sector-specific considerations

No one-size-fits-all solution. The first principle for designing and implementing sectoral anti-corruption strategies is that there is no one-size-fits-all solution. Sectoral anti-corruption strategies need to be tailored to individual sector circumstances through an assessment of the nature, extent and impact of the sector’s corruption problems that may obstruct the implementation of anti-corruption reforms.

The “value chain” approach. One analytical tool that has proved to be useful for analysing corruption risks at the sectoral level is the “value chain” approach. Looking at how decisions and actual resources flow from the political decision down to where services are delivered to the end-user allows strategy drafters to identify “corruption vulnerability points” within a sector’s decision-making chain. It is important to stress that when following this approach, the designers of the strategy need to clearly define the respective roles, functions, and reporting requirements of the sectoral regulators, authorities, service providers, staff and others. Complex and bureaucratic value chains are a risk for corruption. In past years, Greece has taken steps towards eliminating structural barriers and administrative burdens within the value chain of the public sector. There is still a need, however, for further structural reforms to simplify these processes.

Sectoral anti-corruption actions need to be mainstreamed. Sectoral anti-corruption strategies cannot work in silos; they need to be mainstreamed into human resources, and regulatory and performance management systems and practices. They should also be embedded in the public administration’s broader anti-corruption efforts and be aligned with the national anti-corruption strategy or policies. Further, mainstreaming activities to combat corruption need to be implemented by a range of actors, both within the target sector and in other sectors. This requires high-level political support and commitment. In practice, however, such efforts have often failed in Greece due to
the dispersion of actors and interests, insufficient political will as well as lack of awareness, capacity, incentives, and effective co-ordination and monitoring of mainstreamed processes. One solution to this might be an autonomous and multidisciplinary working group representing key sectoral stakeholders with the specific mandate and political backing to mainstream anti-corruption measures in the sector processes. Ideally, the group should be composed of individuals who have the technical skills and expertise to review project design, risk rating, anti-corruption actions plans and reports throughout the strategy cycle. It should be also noted that the existence of different legal entities established under sectoral line ministries (e.g. the health sector) represents a potential vulnerability to a broader anti-corruption action across Greek sectors. Some of these entities might not be funded fully by the public sector and may instead be based on private law, which exempts them from rules providing transparency, accountability and objectivity in the public sector, thus opening the door for corruption. To avoid this risk, sectoral strategies need to foresee putting these entities under the general public laws and redefining their internal rules and processes.

When undertaking to design a sectoral strategy, it is important to reach a clear consensus on which behaviours constitute corruption in a particular sector. When reaching this consensus with the sectoral stakeholders it is important to identify not only direct examples of corruption by law (e.g. bribery or trading in influence) but also other practices that, even if they are legal from a descriptive approach, might compromise the sector’s capacity to perform its public service function in an impartial, transparent and accountable manner. This is an important consideration for the designers of sectoral strategies in Greece since the Greek legislation does not provide a clear definition of corruption but limits the scope to criminalise specific forms of bribery, including passive and active bribery, abuse of office and money laundering. New sectoral strategies should not limit their focus to this narrow description of corruption, but also take into account other types of accepted behaviour within a particular sector that might go against the public interest, such as unfair treatment, obstructionism and abuse of power.

Most sectoral strategies follow a three-pronged approach based on deterrence (i.e. investigate corruption and prosecute the offenders), prevention (i.e. examine the systems and procedures in a particular sector to identify the corruption opportunities and make recommendations to avoid them) and education (i.e. educate public servants and citizens about the evil of corruption). Although the three prongs are equally important, the drafters of the sectoral strategy might want to prioritise one over the other based on the context of the particular sector under scrutiny. For example, if they believe the sector is highly prone to corruption and the corrupt officials are powerful, a strategy that prioritises prevention and education might fail. To succeed in this scenario, a strategy must start with effective enforcement to get rid of the obstacles and demonstrate to the public the political will to fight corruption. In a different scenario, strategies focused on prevention and education would be preferable as a way to ensure sustainability. Current sectoral anti-corruption strategies in Greece (e.g. tax and customs) have adopted a holistic anti-corruption approach by establishing different workflows connected to prevention, deterrence or education. Greece’s decision in 2015 to adopt International Public Sector Accounting Standards (IPSAS) is another significant step towards the prevention of corruption in public sector processes. However, further
efforts are needed inside sectoral institutions to develop more detailed action plans and co-ordination and monitoring mechanisms for the effective implementation of these anti-corruption reforms.

**Witness accounts offer invaluable insights into corruption** and any potential mismanagement within the value chain of a particular sector. However, in some contexts, blowing the whistle can carry a high personal risk, particularly when there is little legal protection or clear internal reporting channels. Besides, in some settings, whistleblowing carries connotations of betrayal rather than being seen as a beneficial for the public good. When drafting a sectoral anti-corruption strategy, it is important to include tools to protect and encourage both civil servants and citizens to speak out. Even if Greece has taken steps towards protecting whistleblowers, its legislation does not include yet a distinct legal framework, but a number of legal provisions scattered in different pieces of legislation. Future steps to be considered include introducing more comprehensive whistleblower legislation at the national level, as well as mechanisms for internal reporting at the sectoral level, together with public education initiatives that de-stigmatise whistleblowers. Other future steps would be to introduce user-friendly mechanisms for reporting and filing complaints, such as telephone hotlines; the establishment of council integrity committees, ethics and discipline councils in departments; the dissemination of lists of workers found to be involved in acts of corruption; and use of ICT tools, which can protect the anonymity of informants involved in documentation of corruption cases.

Sectoral specific anti-corruption approaches complement general national anti-corruption strategies. Well-designed approaches allow for the generation of tangible results for citizens in concrete service delivery sectors and the corresponding line ministries.

It may be beneficial for sectoral efforts to be **co-ordinated on a national level** to ensure that they are linked with the national anti-corruption plan. As previously mentioned, sectors, even if they operate in a particular context, do not function in silos. The implementation of a sectoral anti-corruption strategy will imply to some extent collaboration with a number of different agencies and processes. An option is to establish a focal point that is assigned overall responsibility for ensuring co-ordination of national and sectoral anti-corruption efforts. This focal point role can be assigned to the national anti-corruption agency or to an interagency co-ordinating body.

Due to the fact that sectoral anti-corruption strategies are multi-stakeholder processes, they need strong **political commitment** at both sectoral and central government levels. Without high-level political support and without the sense throughout every level of government that the senior leadership backs the strategy and its drafters, a sectoral anti-corruption strategy is unlikely to be effective. A method to help obtain “buy-in” is to ensure the appropriate participation in the strategy drafting phase of representatives of any government agency affected by any part of the anti-corruption strategy. The consultations should extend not only to the political leadership of the various implementing agencies but also to the technical staff or career civil servants who will play a key role in implementing the strategy’s recommendations. This interaction in the drafting process may also facilitate co-operation in the implementation, monitoring and evaluation phases of the sectoral strategy.
Caution should be exercised when opting for self-evaluations of a sectoral anti-corruption strategy. Experience shows that sectoral institutions are often in a conflict of interest to report positively about the implementation of their own strategies, and overly optimistic when assessing how well they are progressing. However, resource and technical capacity constraints often mean that there will be no alternative but to assign each implementing sector primary responsibility for monitoring its own implementation performance. The existing Greek anti-corruption sectoral strategies seem to advocate for self-evaluation. For example, the Tax and Customs Strategy states that “the principle of self-evaluation obliges all the competent authorities of the tax and customs administration to regularly monitor the implementation of the action plan.” If this is the case, it is advisable that, to the extent possible, there is some independent evaluation of the implementation of the strategy, perhaps by a co-ordinating unit, another government department or an external monitor such as a civil society group or outside consultant. Among other advantages, doing so might help the implementing agencies understand how they can better assess their own performance.

Awareness campaigns need to be tailored to sectoral context and audience. Public awareness is important to increase enthusiasm and support. While the aim of a national strategy awareness-raising campaign may, for example, be to reach the whole population about the costs of corruption for the country and people, and what people can do about it, a sectoral strategy awareness campaign needs to be more focused to the sectoral context (e.g. customs, health, education) and target its particular audience, both internal (i.e. civil servants working in the sector) and external (i.e. contractors and citizens who benefit from the specific services provided by the particular sector). New e-government initiatives taken by the Greek public administration could be used as means to improve communication with citizens and encourage their participation in sectoral anti-corruption initiatives. New platforms such as the Greek “Open Government Initiative” (OpenGov) could be used for electronic deliberation of sectoral strategies prior to their submission for approval where citizens and civil society organisations can post their comments and suggestions.

Publicly accessible information on sector targets, plans, budgets, contracts, operations, and performance provides a basis for transparent social accountability. Information and communication technologies (ICTs) are mechanisms that facilitate public access to sector information in a user-friendly way are crucial enablers of social accountability. Examples of ICT transparency initiatives taken by the Greek government include the “Diavgeia” (Transparency) Programme, which requires government institutions to upload their acts and decisions on the Internet, the “Opengov” portal, which opens up draft legislation or policy initiatives documents to public consultation; and the “Ermis” platform that informs citizens and businesses about their transactions with the public administration. These important steps, together with open data policies concerning state activities, should be further supported and enhanced in order to achieve better results in sectoral anti-corruption strategies.

In some sectors or areas, such as local government, corruption may result from a culture of clientelism and patronage as well as informal networks of local public officials, civil servants, community leaders and local business elite. It may also result from a hasty decentralisation process carried out without proper assessment of the capacity of the local economy and of the human, technical and administrative capabilities of
subnational authorities to absorb new responsibilities and large inflows of resource revenues. This might have been the case in Greece, where the decentralisation deployed in the last two decades via two local government reforms has changed the operation of local governments and established new conditions for the role of local actors in regional planning.

Finally, **sectoral anti-corruption strategies are not aspirational policy documents**. They must offer realistic and implementable recommendations and actions. For that, they need to be disaggregated into action plans with discrete steps to achieve each of their objectives. Even in the seemingly simple case of whether a new code of conduct has to be put in place, breaking the process into a series of steps (e.g. drafting of the code, submission for approval, approval and dissemination) could be helpful. This will also help in monitoring the implementation of the strategy, which would then consist of regular updates on which steps have been accomplished, how long it took to clear each step in the process, and how long a measure has been pending at a particular stage. In this regard, it is not advised to use indicators of medium- or long-term impact of an activity that is hard to measure. The concern should be more about the status and immediate effects of the implementation of an activity (e.g. increase ethics awareness in public servants through training) rather than the debatable impact of the measure (e.g. reduction of corruption). Current sectoral strategies in Greece (e.g. tax and customs) are rather vague and broad in setting up objectives with no clear breakdown of steps or indicators to measure success. New sectoral strategies and updates of existing ones in Greece should take this into consideration by disaggregating their objectives into more tangible, easy-to-understand action plans.

**Key considerations applicable to both national and sectoral anti-corruption strategies**

The government needs to “walk the talk” through sustained actions such as an effective communication campaign led by the chief executive and reinforced regularly by other members of the political establishment, thereby giving political visibility to reforms. The political leadership must also be prepared to provide an appropriate legal and regulatory framework to carry forward the reform and to appoint persons of proven integrity and ability to key positions; make adequate funds available to meet the projected costs over the entire reform period; establish regular monitoring to remove bottlenecks impeding reforms and to smooth the way forward; support the institutions, such as independent regulators, set up to further reforms; and facilitate law enforcement even when the offenders are politically influential. The commitment of senior political leaders and sectoral managers to rooting out corruption is critical for success.

**Anti-corruption strategies must be short and concise.** Voluminous and complex sectoral anti-corruption strategies are likely to become unmanageable, difficult to understand, and could prevent resources from being concentrated on priority areas. Instead, short, committed and realistic strategies followed by a separate action plan with clear objectives and activities, will be more credible and understandable for both the sectoral officials and the general public.

**Strategies need to acknowledge the importance of a public service ethos** in which officials refrain from corruption not because of the risk of getting caught and the
severity of the punishment, but because it would be a violation of their own perception of their role as a public servant. Such measures can be expected to have powerful effects on promoting anti-corruption, and are as important as conventional measures designed to detect and address corrupt behaviour. Greece has a recently updated Code for Civil Servants that establishes rules governing the hiring and status of civil administrative servants, on the basis of the principles of meritocracy and social solidarity. The new code also reflects Law 4254/2014 for public interest witnesses, going a step beyond to prohibit retaliation against them. This is a good tool to promote a public service ethos as long as it is properly implemented and communicated and civil servants are properly trained and educated on it. The Greek National Centre for Public Administration and Local Government (EKDDA), through its National School of Public Administration and Local Government (ESDDA) and the Institute of Training (INEP), could be considered as key partners in certifying tailored anti-corruption and integrity educational programmes within the public entities of a particular sector under study.

Setting up an anti-corruption knowledge management system helps in collecting and disseminating documentation of sectoral anti-corruption good practices. Sector stakeholders and government actors need to build their anti-corruption skills and knowledge to ensure the credibility of their efforts as well as maximise the impact of their anti-corruption operations. It is important that they be able to demonstrate which interventions are more likely to succeed. However, in the Greek public sector, there is currently no specific government-wide knowledge management infrastructure. At the same time, the Greek public administration has taken important steps towards building an integrated e-government infrastructure to help connect the different government administrations. Examples like the National Public Administration Network (SYZEFXIS) aiming at the development and updating of the public sector’s telecom infrastructure are steps in this direction, and they could be explored as platforms to share what different sectors are doing in anti-corruption.

Anti-corruption strategies must follow a whole-of-society approach. Experience shows that strategies that adopt a whole-of-society approach to mobilise all sectors to fight corruption together are more likely to succeed. The recent OECD Recommendation on Public Integrity has recognised this approach by providing recommendations on promoting a public integrity system in partnership with the private sector, civil society and individuals.

In connection with the above, anti-corruption strategies cannot underestimate the importance of promoting greater private sector integrity as part of their overall anti-corruption strategy. This is especially relevant in the aftermath of the recent financial and economic crisis, which has undermined faith in markets. Government may promote greater private sector integrity by encouraging companies to adopt stronger internal controls, ethics and anti-corruption compliance; to put in place robust corporate governance systems; to ensure multinational enterprises carry out their business dealings responsibly and transparently; to ensure due diligence; to be aware of risks; and, in dealing with the government, to compete fairly and openly.

Strategies don’t implement by decree. For a strategy to succeed, it needs to be supported by and adhered to by the relevant sectoral and government institutions. This is necessary for its design and implementation, and also to ensure awareness and
capacity for identifying needs and measuring progress, as for regular co-ordination and monitoring by stakeholders. The Greek sectoral strategy documents in effect as of the start of 2017 had little in the way of discussion or analysis of the co-ordination and implementation aspects. Simply formulating a strategy that calls on sectoral agencies to adopt new rules and policies to fight corruption is not sufficient. A successful strategy must also provide an action plan, and take into account the need for co-ordinated implementation of the concrete actions. Further, it cannot be assumed that high-level government support will suffice to ensure effective and co-ordinated implementation of the strategy. Although high-level support is necessary, it is not sufficient over the long term.

**Monitoring results should be public.** Monitoring of progress should be systematic and meaningful reports should be produced and made available to the public. This encourages accountability for implementation and may also encourage fruitful competition among agencies. Regular communication of the strategy, the measures implemented, the consequences of corruption, and the achievements of the reform are key elements of any change management process and can help overcome awareness, knowledge and capacity gaps and may influence people’s attitudes towards corruption and what can be done about it.

Finally, **anti-corruption strategies need to be reviewed, updated, and strengthened periodically.** Strategy drafters should keep in mind that it is unlikely that the measures included in the anti-corruption strategy will be implemented exactly as set forth. The strategy is part of a process, one that is about building and sustaining political momentum to address corruption, as well as charting an initial course of action. This means that strategies must be periodically revised and updated as circumstances change and new information arises.
1. Introduction

Purpose

The objective of these guidelines is to assist the Greek government by providing a practical tool to assist in designing, implementing and monitoring risk-based anti-corruption sectoral strategies and action plans. Its scope includes the following priorities:

- key considerations for drafting a sectoral anti-corruption strategy
- how to undertake a sectoral anti-corruption risk assessment
- how to build a sectoral anti-corruption strategy and action plan
- how to implement and monitor a sectoral anti-corruption action plan
- how to raise awareness about the sectoral anti-corruption strategy.

The overall aim of these guidelines is to promote a culture of transparency, accountability, and integrity and to encourage sectoral stakeholders to take action to help prevent corruption.

Background

The Greek government is prioritising the fight against corruption and, with the assistance of the European institutions, is committed to taking immediate action. Under the responsibility of the General Secretariat Against Corruption (GSAC), Greece’s National Anti-Corruption Action Plan (NACAP) has identified key areas of reform and provides for a detailed action plan towards strengthening integrity and fighting corruption and bribery.

Linked to these efforts, the Greece-OECD Technical Support on Anti-Corruption project assists the Greek anti-corruption authorities, and the government as a whole, with technical empowerment for the implementation of the NACAP. The NACAP identifies key areas of reform and provides for a detailed action plan towards strengthening integrity and fighting corruption and bribery. This action plan implies better integrating anti-corruption and integrity in the government’s reform agendas and private sector’s business models and raising public awareness on anti-corruption efforts. It also focuses on developing the know-how for the effective implementation of the work done as well as advancing the evidence base of what works and why. For this, there is no one-size-fits-all solution, and an approach based on corruption risks needs to be developed especially for specific high-risk sectors. These key areas represent pivotal interventions in the public and private sectors, which if managed and implemented properly, could lead to reduced levels of corruption and higher levels of trust. To this end, the Greece-OECD project has developed these guidelines, to advance tailor-made anti-corruption approaches in high-risk policy areas.
2. How to build a risk-based sectoral anti-corruption strategy

Introduction

In addition to being policy documents, sectoral anti-corruption strategies and action plans are mainly management tools in the sense that they need to define objectives, measures, timelines, responsibilities, and indicators of success. To be able to do that, an effective sectoral anti-corruption strategy and action plan should be based on an accurate diagnosis of the challenges that the particular sector faces in combating corruption.

To achieve the above, most sectoral anti-corruption strategies undertake, to some extent, the steps below:

- risk assessment
- strategy design
- action plan design
- strategy for implementation and monitoring
- awareness raising.

Figure 2.1. Building a sectoral anti-corruption strategy
Risk assessment

Combating corruption efficiently in a particular sector requires an understanding of the types of corruption the sector faces, how widespread it is, what parts of the sector are the most affected, in what agencies or departments it is most prevalent as well as the effectiveness of the existing measures (if any). Two other important goals of a sector risk assessment are to obtain organisational buy-in for the anti-corruption programme and to educate decision makers within the sector about the cost of corruption.

The more information the strategy drafters have about the answers to these questions, the greater their ability to set priorities, allocate resources and align the strategy with the problems that negatively impact the sector’s ability to achieve its objectives, and based on that, determine what can be done to mitigate them or reduce them to a level that is acceptable.

It is important to understand that effective anti-corruption risk assessments should not be isolated, one-time events but rather, they need to be updated periodically with regard to those interactions that may increase or generate new risks.

A structured approach to conduct an anti-corruption risk assessment is outlined in Table 2.1. Since every sector has a different exposure to corruption risks, strategy drafters should note that the risk assessment exercise will be unique, depending on the sector’s context and its own characteristics.

<table>
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<th>Table 2.1. Risk assessment steps</th>
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<tr>
<td>Anti-corruption risk assessment</td>
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<tr>
<td>Step 1</td>
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<tr>
<td>Establish the process</td>
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</table>

Regardless of the approach taken, at the conclusion of the assessment the strategy designers should have a working understanding of the following variables:

- the forms corruption takes, including the institutional settings or type of transactions subject to corruption
- the characteristics of the legal frameworks to address corruption and other relevant laws, key legal gaps, and information on their enforcement/application
- the demographic characteristics of citizens most likely to be victims of corrupt behaviour
- performance of existing institutions relevant to preventing or prosecuting corruption, or providing oversight and accountability
- the strength and engagement of non-public actors such as business, the media, and other elements of civil society, and the status of enabling factors such as transparency, media laws, and whistleblower protection
• the existence, or lack thereof, of previous attempts to address corruption, and their outcomes
• the interest of the sector’s leadership in fighting corruption.

**Step 1: Establish the process**

The goal of this planning stage is to raise stakeholder awareness and understanding of the different corruption risks and schemes that a sector might be facing. In so doing, the strategy drafters will try to find answers to the following questions:

• Who owns (and will undertake) the process, and who will be the key stakeholders?
• How much time will be invested in the process?
• What type of information should be collected, and how?
• What internal and external resources are needed?
• What framework will be used to document, measure, and manage the corruption risks?

Experience shows that it is desirable to have a variety of individuals involved in the assessment process, including those who have different perspectives based on their background and understanding of the way the sector works (e.g. auditors, legal and compliance specialists, managers, accountants, controllers).

**Step 2: Defining corruption**

The second step of a corruption risk assessment is to define what is needed to be considered corruption or misconduct in a particular sector. This is important as corruption is not easy to define.

OECD defines corruption as “the abuse of a public or private office for personal gain. The active or passive misuse of the powers of public officials (appointed or elected) for private financial or other benefits.”

In Greek legislation, a clear definition of corruption or misconduct does not exist. However, there are a number of legal provisions that serve the same purpose scattered in different pieces of legislation. Under this legislation, corruption might include active and passive bribery, trading in influence, embezzlement, abuse of functions and illicit enrichment.

It is important that strategy drafters avoid a purely descriptive approach when assessing corruption risks in a particular sector, for example stipulating that corruption simply constitutes the breaking of rules against bribery and similar offences. This approach will fail to address situations where the rules themselves might favour certain forms of corrupt behaviour.

Therefore, in the context of conducting a corruption risk assessment, it is advisable to identify not only direct examples of corruption (see Table 2.2) but also specific practices
that, even if they are legal, pose an obstacle to performing the sectoral public service function in an impartial, transparent and accountable manner.

Table 2.2. Examples of corruption

<table>
<thead>
<tr>
<th>Direct examples of corruption</th>
<th>Illicit financial flows: A relatively newer concept involving the transfer of financial capital out of a country in contravention of national or international laws. Illicit financial flows generally involve the following practices: money laundering, bribery by international companies and tax evasion, or trade mispricing.</th>
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<tr>
<td><strong>Active bribery:</strong> The promising, offering or giving by any person, directly or indirectly, of any undue advantage for himself or herself or for anyone else, for him or her to act or refrain from acting in the exercise of his or her functions.</td>
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<td><strong>Passive bribery:</strong> The request or receipt by any person, directly or indirectly, of any undue advantage, for himself or herself or for anyone else, or the acceptance of an offer or a promise of such an advantage, to act or refrain from acting in the exercise of his or her functions.</td>
<td>Missappropriation or embezzlement: Misuse of public resources (funds, personnel, or equipment) for private benefit.</td>
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<td>It is important to note that &quot;active bribery&quot; does not always mean that the briber has taken the initiative. In fact, often the reverse is true. The individual who receives the bribe often requested it in the first place.</td>
<td>Money laundering: Concealing the source of illegally obtained money; money laundering is not corruption per se but is often found in conjunction with corruption and included in anti-corruption conventions.</td>
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<td><strong>Collusion:</strong> Secret agreement or co-operation especially for an illegal or deceitful purpose.</td>
<td>Patronage or nepotism: Hiring personal connections for government jobs regardless of qualifications or due to a familial relationship.</td>
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<tr>
<td><strong>Cronyism:</strong> Appointment of friends and associates to positions of authority, without proper regard for their qualifications.</td>
<td>Self-dealing: Hiring one’s own private firm or a firm closely associated with one’s own interests; a form of conflict of interest.</td>
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<td><strong>Extortion:</strong> Threat of use of public force, authority, or other intimidation to extract payments.</td>
<td>Trafficking in influence: Illegitimately promising or selling one’s real or claimed influence over a public official.</td>
</tr>
<tr>
<td><strong>Illicit enrichment:</strong> An undue increase in wealth unexplained by legitimate sources; may be linked to false income or asset disclosure statements.</td>
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<tr>
<td>Other practices related to corruption</td>
<td></td>
</tr>
<tr>
<td>Unfair or unequal treatment</td>
<td>Irresponsible, negligent, careless or unethical performance of duties</td>
</tr>
<tr>
<td>Obstructionism</td>
<td>Revolving door</td>
</tr>
<tr>
<td>Failure to follow particular requirements of law or other legal norms/procedures, etc.</td>
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</tr>
</tbody>
</table>

Source: Adapted from Council of Europe, “Criminal Law Convention on Corruption”; US Department of State, “Guide to Anti-corruption Policy and Programming”.

**Step 3: Gather information**

The third step of the corruption risk assessment is gathering relevant information. Corruption risk assessments do not need to be too resource-intensive. Much of the data required for risk assessments can be collected from existing sources, although some additional primary sources may be needed for the specific system or process under analysis.
There are two main kinds of information on which corruption assessments can be based:

- **Statistical information**: Statistics on corruption, misconduct or the length of administrative procedures; accounts of experienced corruption made by media, ombudsmen, citizens, officials, non-governmental organisations (NGOs) and others.
- **Analytical information**: Attitudes, perceptions, experiences with and knowledge about corruption, as reported by citizens, experts, the private sector, civil society and others.

When deciding which method will be followed, it is important to acknowledge that gathering information on the nature and extent of a sector’s corruption problem is challenging. Many of the available techniques are time- and resource-intensive. This is why it is advisable that the drafters of the strategy formulate a realistic plan for gathering information based on available resources, time and context.

Further, information sources have their strengths and weaknesses. Drafters need to keep this in mind as well and use a diverse range of materials to develop at least a preliminary assessment of the main sectoral corruption problems. The sources of information listed below may prove useful in conducting this preliminary assessment, although, as noted, each has its limitations.

**Desk review**

This is an analysis based on the sector’s legal framework as well as previous reports or assessments on the prevalence of corruption by academics, civil society, international organisations, media and others. The quality and coverage of information are, however, somewhat left to chance, depending on what is available. Examples of internal sources might include:

- internal reports from the internal audit department on compliance risks, non-compliance cases, and common corruption risks
- former corruption cases and the allegations from the whistleblower hotline (if any), which could identify types of risks
- background checks of third parties such as suppliers and agents
- due diligence reports of acquisitions, and evaluations of tendering reports.

Examples of external sources might include:

- information gathered and studies done by civil society, professional associations and academics with an interest in the sector under study.

**Interviews**

Holding interviews with a wide range of sector stakeholders is a good way to get an overview of how a sector and its institutions function and what problems may exist. Interviews may be conducted one on one or in small groups, as long as individual insights will not be excluded due to dominant personalities or group dynamics.
If time and resources allow, it is advisable to hold interviews with representatives of various corporate staff functions (such as compliance, legal, risk management, internal audit, human resources, procurement, security, and any investigations unit) to have insights at a high level.

Working-level professionals who are dealing with operational risks on a day-to-day basis can also provide additional insights arising from geographic and operational experience. The owners of certain processes may be able to identify process-specific issues. For example, the head of procurement can present a walk-through of the tendering process.

Finally, the views of external stakeholders (such as business people, civil society, officials, politicians, sector experts, law enforcement officials, judges and even journalists) should also be considered.

Key factors for obtaining useful data from interviews are:

- select unbiased interviewees
- avoid leading questions (i.e. questions that encourage certain answers)
- always combine structured interviews or questionnaires with an opportunity to speak outside of certain constraints.

Experience shows that where possible, it is better to use less “moral” terminology and to avoid the word “corruption”. For example, questions designed to yield information on bribery might be better phrased as questions about “considerations” or “gifts” provided to public servants rather than “bribes.”

Interviews with key sectoral stakeholders are recommended not only as a method to obtain information but also as a way to create a greater awareness of the inappropriateness of conduct that does not serve the public interest. In other words, the aim should be not only to obtain information, but also to develop an ethos that employees in the public service are able to endorse, and serve as a guide on how they should act, what their professional responsibilities are, and what is appropriate for others to expect of them.

Annex A provides an example of an interview questionnaire.

Focus groups discussions

This method of gathering information consists of holding in-depth discussion sessions with targeted interest groups related to the sector in order to produce assessments on the forms and avenues of corruption.

A workshop could cover multiple steps in the anti-corruption risk-assessment process. It could begin, for instance, in a “risk room” format, taking the participants through the stage of defining and discussing risks, evaluating probability and potential impact, and resulting in an agreed-upon risk profile tailored to the sector. One way of identifying potential corruption risks could be to ask each participant the question, “If you were to try to be corrupt, which method would you use and how would you do so?”
One has to keep in mind, though, that focus group discussions are a means of inspiring a mutual exchange, whereas the more confidential setting of bilateral interviews can encourage the voicing of dissenting opinions by individual participants.

As previously mentioned, another way to explore the sector’s corruption risk exposure at the level of an individual process is to first map the internal value-chain processes (e.g. procurement, service delivery) in detail, then walk through them with a team of experts and look for opportunities to breach the process. In so doing, participants may identify red flags, potential corruption risks or schemes, and controls to mitigate them.

**Surveys and self-assessments**

One widely used method of seeking information on corruption is conducting surveys among users of public services, the officials that provide them, or the public in general. Key factors for obtaining useful data are:

- Defining the objectives of the survey clearly: What do we want to find out?
  - attitudes (e.g. tolerance of corrupt practices, willingness to ask for a bribe, to participate in reforms or to report corruption)
  - perceptions (e.g. how the public perceives the actual behaviour of public officials and/or how public officials in a particular sector perceive their own behaviour)
  - experience (e.g. actual experience of corruption such as bribery)
  - knowledge (e.g. where and how to report corruption complaints).

- Identifying and reaching the right respondents:
  - general population or population directly affected by the sector’s service
  - public officials within a sector (e.g. department, rank, etc.)
  - inclusion of people with specific experience in the target sector
  - a representative sampling of the target population.

- Guaranteeing anonymity and confidentiality:
  - corrupt officials and bribe givers may fear sanctions
  - victims and vulnerable participants in corruption may fear retaliation.

Depending on the mode of delivery, surveys can be relatively inexpensive to administer. Telephone or online surveys provide information with low deployment costs. Questions can be standardised to allow for uniformity, which aids the measurement and interpretation of results. However, surveys do not allow for more in-depth information on the functioning of the institutions and sector’s processes under scrutiny, as would be the case with interviews with focus groups.
Direct observation

In general, the very nature of corruption means that it can rarely be observed directly for research purposes. However, in at least two cases corruption may be directly observed:

- Actual corruption proceedings (prosecutions and convictions) related to the sector under study.
- Direct experience of corruption, for example by sending a member of the risk assessment team to apply for a service, establish a business, etc. While potentially yielding useful information, such exercises are clearly controversial (involving “entrapment”).

There are instances in which practices that subvert the capacity of an organisation to fulfil its public service responsibilities are legal, for example where bribery is not adequately criminalised, where appointments procedures contain no restrictions to prevent nepotism or similar practices, and so on. This may result in some instances of corruption being conducted openly. Moreover, any formal set of criteria for corruption (e.g. provisions of the criminal law or other prohibitions) will fall short of fully identifying the expectation of probity. There is a difference between what the rules say, and what the spirit of the rules require, and insofar as we are concerned with changing a culture of corruption to one of integrity, the spirit of the rules is a crucial component.

Use of proxies

Another way to obtain indications of corruption is through observing phenomena that are assumed to be proxies or near proxies of corruption. For example, it may be possible to compare the difference between customs revenue on imported items and domestic sales figures for the same items or to observe the length of time taken to secure certain decisions or rights (such as a license or a permit).

Also, using the informed opinions of those closely involved in the process under analysis can serve as a useful proxy for such data. It is important to recognise that the selection of stakeholders who are consulted as part of the assessment will have an important bearing on which risks are identified and prioritised. For example, an informant working for a government agency may well have a very different perspective on which risks are most prevalent as compared to a civil society or community representative.

Step 4: Analyse information

Once the information is available, the next step is to analyse it. Analysing information involves answering questions such as: 1) who provided the data; 2) what question was the provided data responding to; and 3) what data is still missing.

Regarding the individuals who provided the data, when assessing the validity and reliability of their responses, one should consider:

- the real level of knowledge that the respondents have about the specific forms of corruption in the sector under study.
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- the interest respondents may have in overstating or understating the problem (public officials may have an interest in understating the problem while representatives from civil society may have an interest in overstating it)
- whether fear of prosecution, reprisals or shame distort the answers of the respondents
- whether the respondents, in the narrow sense, are losers or winners from corruption.

It is important that the designers of the strategy assess to which extent the data obtained covers most forms of potential corruption problems within the particular sector. This can be done for example by looking at which relevant divisions, units or departments did not provide information.

**Step 5: Identify the corruption risks and risks factors**

As previously mentioned, experience shows that the development of sectoral strategies needs to be focused on the specific characteristics of the sector. To do that, the strategy designers must identify the types of corruption risks the sector might be facing, the facilitating risk factors as well as its incidence and seriousness. They need to assess the frequency, the size and the importance of the processes that are corrupted.

**The value chain approach**

One analytical approach that has been found useful for analysing corruption risks at the sectoral level is breaking down the sector’s “value chain”. Sectors are, in some ways, like corporations or businesses since they produce goods and services, though generally with a public good aspect. For example, the health sector is tasked with delivering basic clinical care and regulating the pharmaceutical industry; the power sector is responsible for providing electricity to businesses and private households and for regulating its generation, transmission, and distribution; the defence sector is assigned to providing citizens with security; and the local governance sector is responsible for providing basic services to the inhabitants of a city.

The value chain consists in laying out a sequence of activities, called stages or phases, that a sector performs in order to deliver a service to the public. It includes activities from policy making and regulation to planning and budgeting, management, programme design, tendering and procurement, construction, maintenance and payment for services.

Looking at how resource allocation decisions and actual resources flow from the political decision points down to where services are delivered to the end-user allows for the identification of “corruption vulnerability points” within the decision-making chain. These vulnerability points serve to identify where corrupt decisions and activities are most likely to occur and amongst which sets of actors these transactions might take place (e.g. public officials, public and private sector actors, public officials, or consumers/households).
Even if each sector is different, they share some common activities under their value chain. These activities include primary activities and support activities. As indicated in Figure 2.2, primary activities include:

- service concept design
- physical resources procurement
- human resources and management
- service creation and delivery
- customer care and recovery.

On the other hand, support activities include:

- strategic planning
- financial management
- brand management
- ICT development
- accounting and management control.

Figure 2.2. Public sector service value chain model


The main objective of risk analysis is to point out areas within the above-mentioned value chain’s primary and support activities where corruption might potentially arise. Designers will need to identify under each of those activities where the key decision points are and whether their respective decision-making processes suffer from monopoly, discretion, lack of transparency or lack of accountability.
Each stage in the chain is potentially susceptible to some form of corruption. However, experience shows that the following primary activities need to be further scrutinised when designing an anti-corruption strategy:

- **Physical resources and procurement**: Public procurement refers to the purchase by governments and state-owned enterprises of goods, services and works. It is basically the sequence of activities starting with the assessment of needs, awards of contracts, contract management and final payment. Due to the size of the financial flows involved, public procurement remains the government activity most vulnerable to waste, fraud and corruption. Strategy designers should look into functions such as:
  - inventory management
  - purchasing
  - public bidding contests
  - technical analysis of offers
  - the proper allocation of resources
  - payments
  - receipt of goods purchased
  - quality control checks.

If the designers of the strategy find that procurement in the sector is poorly documented and processed, they have to flag it as a risk for corruption. The best protection against this risk is generally competitive procurement since it maximises competition and minimises opportunities for personal discretion in the selection of suppliers. Competitive procurement requires at least having an open bidding process and clear criteria for the selection and processing of winning bids. Procurement procedures must be transparent, follow formal written procedures throughout the process and use explicit criteria to award contracts, to reduce the risk of corruption.

The OECD 2015 Recommendation of the Council on Public Procurement, composed of 12 integrated principles (including transparency and integrity) provides a useful tool for strategy designers to address sectoral procurement corruption risks by offering a set of specific measures that can be implemented to ensure integrity in public procurement systems and to fight corruption related to procurement processes.

- **Human resources management**: Poor human resources management processes turn into oversized and under-qualified civil services with distorted incentive structures and poor work ethics that ultimately undermine the goal of an efficient and accountable public sector. Corruption, particularly in the form of favouritism, nepotism and abuse of authority, can affect all human resources management processes, including the management of recruitments and promotions, compensation, conditions of services and personal records.
Preventing corruption in human resources management involves merit-based human resources and recruitment policies, transparent pay packages and internal controls, as well as integrity management systems, including the implementation of codes of ethics, ethics training, and whistleblowing mechanisms.

- **Financial management**: Public financial management (PFM) is concerned with aspects of resource mobilisation and expenditure management in the sector. The budget is the key instrument that any sector has for planning the scope and structure of its service delivery. In budget and expenditure management, corruption might manifest in budget preparation, the use of funds and financial control.

Sectoral anti-corruption strategy designers need to check whether the sectoral internal and external monitoring and audit bodies are not well developed. In particular, they have to look into:

- whether the sector has established a clear legal framework that clearly spells out how decisions must be taken in each of the budgeting processes and whether it determines clear roles and responsibilities for the different actors involved
- whether these decisions – from budget planning to adoption – are taken in an open and transparent manner and whether and how civil society participation is encouraged.

- **Accounting and management control**: This activity of the public value chain relates to the careful recording and verification of all transactions undertaken by the sector departments and agencies. Whenever possible, it is advisable that the strategy designers look into the accounting and management control architecture of the sector under study.

Strategy designers need to determine whether the particular sector’s accounting and management controls provide reasonable assurance regarding the:

- effectiveness and efficiency of operations
- reliability of financial reporting
- compliance with applicable laws and regulations.

Experience shows that the success of an internal control system is profoundly affected not only by the attitudes of elected officials, management, and employees but also by the establishment of safeguards. To this end, introducing a strong, independent internal audit function within each line ministry throughout the Greek government is a critical component to support a decentralised internal control system. Greece’s decision to adopt International Public Sector Accounting Standards (IPSAS) is a significant step in this direction.

Within the context of the OECD-Greece Project on Technical Support on Anti-Corruption, OECD has produced an audit manual to help standardise and modernise audit practices.
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across all ministries within the Greek central public service with internal audit functions. In addition, this manual provides hands-on-tools to assist ministry internal audit (IA) units in becoming effective; prepare risk-based audit plans (RBAPs) and assist ministry programmes and services in becoming “audit ready”. Sectoral anti-corruption designers could benefit from consulting this manual.

**Corruption risk factors and corruption risks**

It is important that when analysing the value chain of a particular sector, strategy designers differentiate between “corruption risk factors” and “corruption risks”.

A *corruption risk factor* is any attribute, characteristic or exposure of an individual, institution or process that increases the likelihood of corrupt behaviour, breach of integrity, unethical behaviour or other conduct that can have a negative effect on objectives and goals of a public sector institution (its mandate, duties or processes).

They can be “external” (e.g. public procurement law is not clear), “organisational” (e.g. no internal regulation/instruction exists on how to proceed in case of conflict of interest), “individual” (e.g. employees complain about low salaries) and/or “working” (e.g. procurement commissions are not obliged to keep minutes on decision making).

After risk factors in every process, function or other area under assessment have been identified, it is essential to foresee *eventual wrongdoings* (i.e. corrupt behaviour, integrity breaches, other unethical breaches, etc.) that can derive from them. One example of potential wrongdoing stemming from the external risk factors mentioned above is “members of procurement commission accepting bribes to favour a certain bidder.” Based on the potential wrongdoings identified, the strategy designers can then define specific corruption and integrity risks the particular sector might be facing.

**Corruption and integrity risks** are perceived as “the risks to the objectives, mission and tasks of a public sector institution arising from external, internal, individual or working process factors.” Often, more combined corruption risk factors fuel certain corruption or integrity risk. The most serious (and common) corruption and integrity risks that can occur in every public sector institution, process, sector or project include:

- risk of public official taking or demanding a bribe
- risk of abuse of power or position for private interests
- risk of abuse of public funds for private interests
- risk of illegal or unethical external influence or pressure on public official
- risk of conflicts of interest.

Corruption may take the simple form of cash bribes, but may also encompass a wide range of other direct and indirect advantages, involving networks of relationships and exchanges that are more entrenched. It is also important to determine whether corruption is voluntary, on the one hand, or is embedded in a wider context of intimidation or coercion, on the other hand. An example of the latter is where officials are instructed from above to collect bribes and risk their jobs or opportunities for promotion if they refuse or fail to do so. Even more serious is the presence of a culture of intimidation in which officials pre-emptively behave corruptly in order to prevent
sanctions being taken against them, without any explicit instruction to take bribes even being given. Such practices are deeply corrosive and unfortunately very difficult to identify.

Figure 2.3. Identification of risks of corruption

Table 2.3 sets out an example of the process of identification of corruption risks in public procurement.

Table 2.3. Example of identification of corruption risks in public procurement

<table>
<thead>
<tr>
<th>Identification of risk factors</th>
<th>Potential wrongdoings</th>
<th>Identified risk</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>External and systemic risk factors</strong>&lt;br&gt;Public procurement law is not clear on whether any transparency is needed in public tenders of minor value&lt;br&gt;Public procurement law does not include penalties for splitting purchases</td>
<td>Member(s) of procurement commission or superior can take, demand or accept bribe to favour certain bidder&lt;br&gt;Member(s) of procurement commission or superior can favour certain bidder based on personal or business connections</td>
<td>Bribery (on the level of superior and members of procurement commission)</td>
</tr>
<tr>
<td><strong>Organisational risk factors</strong>&lt;br&gt;No internal regulation prescribes due dealing with bids before they are publicly or officially opened&lt;br&gt;No procedure on how members of procurement commissions are appointed&lt;br&gt;No internal regulation/instruction exist on how to proceed in case of conflict of interest&lt;br&gt;Internal regulation allows superior to choose contractor other than the one proposed by procurement commission</td>
<td>Member(s) of procurement commission, or superior can manipulate the public procurement procedure or decision in favour of one bidder based on his/her generous behaviour during the procedure (gifts, hospitality, etc.)</td>
<td>Abuse of power or position for private interests (especially on the level of superior)</td>
</tr>
<tr>
<td><strong>Individual risk factors</strong>&lt;br&gt;Employees complain about low salaries</td>
<td>Member(s) of procurement commission or superior can manipulate the public procurement procedure or decision based on their personal proneness to certain product (e.g. certain brand of product)</td>
<td>Illegal lobbying or trading in influence (on the level of superior and members of procurement commission)</td>
</tr>
<tr>
<td><strong>Working processes risk factors</strong>&lt;br&gt;Procurement Commission is not obliged to keep minutes on decision making&lt;br&gt;Superior is not obliged to document his/her final decision on contractor</td>
<td></td>
<td>Conflict of interest (on the level of superior and members of procurement commission)</td>
</tr>
</tbody>
</table>

Source: Adapted from General Cooperation Council, “Corruption Risk Assessment in Public Institutions in South East Europe: Comparative Research and Methodology”.

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Annex B provides a list of examples of most common corruption and integrity risks that might be identified across the value chain of a public sector, their associated risk factors and some potential measures to combat them.

**Step 6: Identify and rate mitigating controls**

Once the corruption risks have been identified, the strategy designers should consider mapping existing controls and mitigating activities to each risk. This is important because the controls should match the probability and potential outcomes of misconduct. Annex B outlines potential measures for mitigating corruption risks.

It is important to bear in mind that not all of the various corruption scenarios identified by the strategy designers will be equally risky. Therefore, it is important to assign relative risk values to each scenario and see which is riskier than others. This helps make clear which risk areas should be under close scrutiny. This is also helpful in cases where designers have scarce resources for the implementation of the strategy.

If the designers have the time and resources, a good practice is to document the results of the risk assessment using detailed spreadsheets or database templates such as a risk register. Each risk factor and risk can be documented individually in a risk register. After the risk areas are ranked, evaluated and all possible scenarios are outlined, it is advised to propose recommendations and remedial measures to prevent, or at least limit, the risk of corruption. This register can also be used to document the ratings for each risk as well as for the programmes and controls that mitigate each risk. An example of a risk register template is found in Table 2.4.

<table>
<thead>
<tr>
<th>Corruption risk factor</th>
<th>Corruption risk</th>
<th>Corruption scheme</th>
<th>Probability</th>
<th>Potential Impact</th>
<th>Anti-corruption controls</th>
<th>Control risk rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local business climate</td>
<td>Bribery of a government official</td>
<td>Potential improper payments to government officials in order to obtain permits</td>
<td>Medium</td>
<td>High</td>
<td>Anti-corruption procedures and regulations, including specific content on payments to government officials</td>
<td>Effective</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Anti-corruption training for civil servants that is tailored to select regions and key functions</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Annual anti-corruption audits on payments to government officials</td>
<td></td>
</tr>
</tbody>
</table>

**Design of the sectoral strategy**

Having identified the major corruption risks in a particular sector, the next step is to define a strategy with the guiding principles to address them. The strategy will later be translated into an action plan that will guide senior managers to take appropriate measures for proper implementation.

It is important to understand that, as previously mentioned, in addition to being policy documents, anti-corruption-strategies are mainly management tools, namely methodologies used by sectoral institutions to be able to cope with corruption
problems. This is why they need to be short and concise rather than lengthy, vague documents, and they should provide answers to the following basic questions:

- What are the vulnerabilities of the sector?
- What are the priorities/objectives?
- What are the recommendations to address the priorities?
- Who will be responsible for its implementation?

It is most probable that the risk assessment will indicate that the pressure for corruption in the sector under study comes from different sources and therefore no simple solutions are likely to be available to deal with the problem. If this is the case, only a multi-dimensional strategy will work.

Most multi-dimensional sectoral strategies follow a three-pronged approach based on deterrence (e.g. investigate corruption and prosecution of offenders), prevention (e.g. examining the systems and procedures in a particular sector to identify the corruption opportunities and to make recommendations to avoid them), and education (e.g. educate the public servants and citizens on what they can do to fight corruption).

The three prongs are equally important. However, the drafters of the sectoral strategy might want to prioritise one over the other based on the context of the particular sector under scrutiny. For example, if they believe the sector is prone to corruption and the corrupt officials are powerful, a strategy that prioritises prevention and education might fail. In this scenario, a successful strategy must start with effective enforcement to get rid of the obstacles and demonstrate to the public the political will to fight corruption. If different scenarios, strategies focused on prevention and education may be preferable as a way to ensure sustainability. In Greece, sectoral anti-corruption strategies (e.g. tax and customs) have adopted a holistic anti-corruption approach by establishing different workflows and assigning them objectives classifiable under prevention, deterrence or education. This approach is suggested for future sectoral anti-corruption strategies.

Table 2.5 sets out an example of the vision, goal, and objectives of a sectoral anti-corruption strategy.

### Table 2.5. Vision, goal, and objectives of a sectoral anti-corruption strategy

<table>
<thead>
<tr>
<th>Vision</th>
<th>Goal</th>
<th>Objective 1</th>
<th>Objective 2</th>
<th>Objective 3</th>
<th>Objective 4</th>
<th>Objective 5</th>
<th>Objective 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sectoral services are delivered in an efficient, effective and transparent manner</td>
<td>Reduce corruption in the sector</td>
<td>Policy, legislation, regulations and other legal instruments ensure transparency, accountability</td>
<td>Improved planning and budgeting reduce corruption risks</td>
<td>Financing mechanisms and resource allocation and use is free of corruption</td>
<td>Management and procurement mechanisms minimised (human resources, assets, infrastructure and services)</td>
<td>Effective and efficient monitoring systems and procedures provide early identification of corruption risks</td>
<td>Comprehensive, efficient and transparent reporting systems provide access to information and enable corrective action</td>
</tr>
</tbody>
</table>

Source: Adapted from U4 PRACTICE INSIGHT, December 2014, No 2.
Establishing objectives

An anti-corruption strategy typically has an overarching goal and several objectives to achieve this goal. The goal and objectives reflect the change the strategy wants to induce. A strategy could, for example, have the goal to reduce corruption in the sector, and an objective to promote merit-based recruitment in a public administration unit. The first step of the strategy drafting process is to identify the goal and objectives. Objectives ideally provide the who, when, what and where of a goal. To achieve objectives, activities are planned to deliver specific outputs (e.g. products, goods, or services) that lead to measurable results, in line with the desired long-term outcome or purpose.

Experience shows that in defining the objectives of an anti-corruption strategy, the following good practices should be taken into account:

- **Avoid objectives that are vague.** Objectives are not as tangible and detailed as concrete deliverables; however, they need to be as clear and focused as possible. For example “reducing corruption” could have multiple meanings. It would need to be dissected into concrete, measurable objectives, such as, for example, “increase ethical awareness of public officials” or “improve internal audit controls” or “increase the number of cases prosecuted” or “increase citizen satisfaction”.

- **Create a “menu” of potential reform options**, with priorities assigned to them. The goal is to determine what is feasible. In setting priorities, it is important to consider the following three factors:
  - the **significance of the problem** targeted (i.e. the amount of harm it does to the sector in particular and to society in general)
  - the **likely effectiveness** of the proposed policy reforms in reducing the problem
  - the **expected cost** of the proposed reform, including not only budgetary or economic costs but also the amount of “political capital” or technical capacity or attention that must be expended to implement the reform effectively.

- **Be aware of any mismatch between expectations and the real situation on the ground.** One common mistake of anti-corruption strategies is to assume that they will have good management structures, information technology (IT), well-established processes, staffing, and time and money when in reality, such resources are often lacking. Experience underlines the importance of avoiding these “design-reality gaps”; that is, in establishing the objectives the sectoral strategy designers need to match expectations with the implementation capacity, the time needed and available resources of the particular sector. It is better to consider modest objectives that can be realistically achieved in the short and medium term with clearer and simple action plans and indicators that...
Drafting and adoption

There are some general principles that may be worth following when setting up a process for drafting a sectoral anti-corruption strategy. The United Nations Office on Drugs and Crime has developed principles that are worth taking into consideration at this stage of the process. Some of them are listed below:

- Assign responsibility for drafting the strategy to a small, semi-autonomous group. Experience shows that a relatively small committee or organisation should have primary responsibility for drafting the strategy document and should have a reasonable degree of autonomy in developing the draft. Ideally, the drafting body should be chaired by an individual with sufficient stature, legitimacy and political influence to act as an effective “champion” for the drafting body, and ultimately for the strategy itself.

- Ensure the continued support and involvement of senior political leaders. A sectoral anti-corruption strategy is, by its nature, a “top-down” mechanism that relies on the efforts of a range of government ministries, agencies and institutions for its success. Without high-level political support and without the sense throughout every level of government that the senior leadership backs the strategy and its drafters, the anti-corruption strategy is unlikely to be effective. This support can be demonstrated in a variety of ways, including speeches on the importance of having a specific anti-corruption strategy in a particular high-risk sector. It is also helpful if senior political leaders are kept informed and involved throughout the development of the strategy, perhaps sometimes attending meetings of the drafting team.

- Finally, once the drafting process is complete, a formal, legal endorsement of the final strategy document may be required. The form of this endorsement will depend on the nation’s legal and political traditions. Even where formal endorsement is not necessary, it can be a useful way to cement support for the strategy.

- Consult regularly with stakeholders, including government agencies and ministries that will be affected by the sectoral strategy. The strategy-drafting process should ensure the appropriate participation of representatives of any government agency responsible for carrying out any part of the strategy. This is important for various reasons. Most obviously, representatives of different agencies have different kinds of expertise that may improve the quality of the strategy, for example by identifying problems and challenges that the lead drafters may have missed (or misunderstood) and by suggesting creative solutions. It is also vital that at least some participants in the drafting process can provide accurate financial and budgetary information, as these considerations
will be critical to effective implementation. But perhaps even more importantly, different agencies will typically have responsibilities when it comes to implementing the strategy, and their acceptance and active support will be critical for the strategy to succeed. Participation in the drafting process will give them more ownership of the strategy.

However, there is always a risk that representatives of government agencies will be overly resistant to reforms. Their views should be respected but not considered binding. Experience shows that on balance, it is better to involve representatives of all relevant government departments in the process early and to have a chance to address their concerns, rather than to present them with a strategy that they were not involved in developing and thus may resist. Partly for that reason, the consultations should extend not only to the political leadership of the various implementing agencies but also to the technical staff or career civil servants who will play a key role in implementing the strategy’s recommendations. Another advantage of involving multiple agencies in the strategy-drafting process is that it can improve these agencies’ ability to co-ordinate and co-operate on anti-corruption issues; their interaction in the drafting process may facilitate co-operation in implementation, monitoring and evaluation—all of which are critical to the strategy’s success.

- **Engage other sectors of society in the drafting process.** The strategy drafters should find appropriate ways to engage broadly with civil society organisations, the business community, the media, academics, the general public and other stakeholders. The reasons are straightforward: first, such stakeholders may have valuable information and useful recommendations for crafting a more effective strategy that is better tailored to the sector’s particular needs and circumstances; second, inclusion of a broad range of voices in the drafting process may help build a common vision and increase the legitimacy of the strategy, and hence political support for it, in the wider society.

However too much emphasis on achieving consensus or trying to reflect the input of all stakeholders can result in a watered-down strategy, one full of generalities and aspirations but short on concrete choices among competing priorities and approaches.

The public can be involved in the designing of anti-corruption policies in various ways:

- Representatives can be members of anti-corruption councils in charge of drafting or advising policies.
- Governments send out drafts for comments by civil society organisations.
- Governments send out drafts to the public at large.
- Draft policies can be published on websites with the possibility of providing comments.
- Policies can be subject to public hearings or comments.
Whichever mechanisms for involving civil society are chosen, it is essential to ensure a real and not just *pro forma* dialogue between the public sector and civil society. In addition, both organised and unorganised representatives of civil society should have a chance to participate in a meaningful manner. Civil society organisations have pointed out the need for sufficiently long consultation periods to be able to provide well-grounded feedback.

New initiatives taken by the Greek public administration can be considered as means to improve communication with citizens and encourage their participation. For example, the Greek “Open Government Initiative” (OpenGov) could be considered as a platform for electronic deliberation of anti-corruption strategies. This could be posted in a blog-like platform prior to their submission for approval. Citizens and organisations could post their comments, suggestions and criticisms.

- **Emphasise communication, transparency and outreach throughout the drafting process.** In addition to the consultations with stakeholders, the drafters of the anti-corruption strategy should endeavour to be transparent about the process to the extent possible (though of course sometimes confidentiality might be required, for example in the case of consultations with other government departments on sensitive internal matters).

- **Allocate time and resources to drafting the strategy.** How long it will take to draft the strategy will depend on several factors: does the strategy follow on from an earlier one? How much background research has already been done? How easy will it be to obtain information from different agencies about their activities? Another important consideration will be the time required to consult with different stakeholders. How difficult will it be to hold meetings across the sector? How long will it take to schedule them?

- **Finally, it is a good practice for sectoral efforts to be co-ordinated on a national level.** A central body needs to explain to ministries their particular strategic roles and responsibilities. It will not be enough for booklets on policies to be sent around while putting them into practice is left to self-initiative and judgement.

**Design of the action plan**

An action plan translates the objectives of the strategy into concrete actions that are assigned to responsible institutions within a concrete time period. As such, action plans are more detailed documents than strategies. They break down the strategic objectives into specific objectives with outputs and results, and a set of meaningful indicators to be updated on a regular basis in order to track progress, adopt necessary corrective measures and sustain support for reforms. Roles, responsibilities and timeframes for implementing, co-ordinating and monitoring the strategy should also be clearly identified in the action plan.

Since action plans are implementation documents, the wording used should normally be very concrete and simple, leaving as little room for interpretation as possible. If the action plan is presented in a table, each line should follow a specific structure, which...
enables all readers to identify at first glance answers to key questions, such as “what”, “who”, “when”, “if” and “how”:

**What**: What are the concrete selected measures and to which objective of the strategy are they linked?

**Who**: Which institution is responsible?

**When**: What is the timeframe?

**If**: What are the risks threatening implementation?

**How**: What are the indicators for successful implementation?

It is a good practice for actions included in the action plan to be cross-linked with what is planned in other policy documents such as the national anti-corruption strategy or other strategies for administrative reform.

A general guide like this one cannot specify what particular measures a particular sector’s strategy should contain. However, **Annex D** provides a useful point of departure for sectoral anti-corruption strategy drafters who are in the process of developing the content of an action plan.

**Annex D provides a template for an action plan.**

**Indicators for measuring success**

An action plan needs indicators for monitoring, evaluating and reporting on the implementation process and results of specific actions. Output indicators (process) show that proposed activities or measures such as the drafting of laws, training of staff, etc. are being carried out efficiently. Intermediate indicators (results) allow for monitoring and evaluation of the effectiveness of the action in the short to medium term, in line with the intended long-term outcome (purpose) of the action. Without indicators, action plans are only declarations of intent.

When formulating indicators, the designers of the strategy must answer the following question:

**How are we going to verify that what has been planned under the action plan is taking place?**

There are three types of indicators or ways of answering the above question:

- **Output indicators (process)**: These are indicators that measure the progress made on the completion of an activity or task under the action plan. For example, new ethics training for local civil servants has been designed and delivered in 100 LGEs.

- **Intermediate indicators (results)**: These are indicators that measure the short-to-medium-term results (if any) in line with the long-term purpose of the actions. For example: after having received ethics training the local civil servants in 100 LGEs are now more knowledgeable of the civil servant’s expected public behaviour, and over 80% have applied this knowledge.
• **Outcome indicators (impact):** These are indicators that measure the long-term change generated after the implementation of the strategy. For example: after the implementation of the anti-corruption strategy and action plan, corruption has been reduced in the selected 100 LGEs. Impact indicators refer to large and long-term changes. They refer to the final goals of the strategy, which are often written as broad statements of desired change.

Experience shows it is preferable for sectoral strategy designers not to try to measure the long-term impact of a strategy and focus more on the outputs and immediate or mid-term results. The reason for this is threefold: 1) the main function of an anti-corruption action plan is to manage the status of the implementation of the activities contained in the plan (e.g. providing proper training that will increase ethics awareness in public servants) rather than detail in advance the effects that that activity might have in the long term, e.g. prevention of corruption); 2) long-term impact indicators are hard to find; and 3) measuring the overall success of a strategy is not only difficult but also expensive and time-consuming. Strategy designers need to be realistic and avoid ambitious methods of measuring progress that will probably fail when attempted.

**Sequencing**

Given the fact that anti-corruption reforms need time for implementation and showing results, anti-corruption strategies and their action plans might explore the option of covering a time span between four to five years. This allows strategies to foresee short-term (one year) and mid-term (two to five years) objectives. Further, given the variation in the time needed to implement various anti-corruption measures, proposed policy reforms and objectives could be categorised by timeframe within the strategy document, with reform objectives sorted by those that are short-term (for example, those that can be implemented within the next 6 to 18 months) and medium-term (within two to five years).

**Financial impact**

Once an institution sets about implementing a particular measure, it may discover that resources are needed to implement activities such as training, equipping offices, or even obtaining additional human resources or expertise. A lack of resources is often a key reason for the slow, or non-implementation of particular measures.

This poses the question whether action plans should make an estimation of the resources needed (either from the state budget or from external sources such as donors). So far, the estimation of costs in policy documents has not been a frequent and expanded exercise, probably mainly because of the additional effort and information required. However, some experts recommend estimating the cost of undertaking specific measures, if not in the initial draft of an action plan, then in later versions, as part of regular updates to the action plan.

It is however not clear what the added value of such an estimate would be. The costs of the measures will have to be covered as much as possible whether they are estimated in advance or not. Furthermore, it seems to be increasing if not partly wasting efforts that seem to be better utilised once actual implementation is approaching; this might take years in the timeframe of a five-year strategy. That said, an indication as to whether measures will need additional funding from the budget has the potential to alert the body responsible for adopting the action plan about the funds necessary for its implementation.
3. Implementation

Simply formulating a strategy and an action plan that calls on sectoral agencies and departments to adopt new regulations and policies to fight corruption is not enough. A successful sectoral anti-corruption strategy and action plan must not only lay out a comprehensive set of substantive reforms but also indicate the means for ensuring co-ordinated implementation.

How to co-ordinate the implementation of a sectoral anti-corruption strategy and action plan will depend upon a variety of sector-specific factors, but experience, as well as studies of public sector management, offers lessons that strategy drafters should observe. In this regard, the United Nations Office on Drugs and Crime in its “Practical Guide for Development and Implementation of National Anti-Corruption Strategies” has listed some principles for good implementation. The most relevant to sectoral anti-corruption strategies are provided below:

- **Put a single, high-level entity in charge of co-ordination and implementation.**
  
  A particular body or agency could be put in charge of co-ordinating implementation and monitoring compliance with the anti-corruption strategy’s policies and objectives. There are several options:
  
  - A specialised anti-corruption agency (GSAC in the case of Greece), could be seen as a natural candidate for this role. However, GSAC may not have sufficient resources or adequate power to compel other departments and agencies to follow its direction.
  
  - One alternative is entrusting this responsibility to a centrally staffed unit or designated ministry that reports to a senior figure in government.
  
  - Another alternative is to create a commission chaired by senior officials and comprising representatives from key sectoral ministries to co-ordinate implementation.

- **Provide the co-ordination and implementation body with sufficient authority.**

  The co-ordinating entity should have a clear mandate, in the form of a regulation or decree setting out its responsibilities and powers, and senior officials need to make it clear they fully support that mandate and expects all other government departments and sectoral agencies to co-operate with it.

- **Foster co-operation between the co-ordination body and the implementing agencies.**

  The co-ordinating unit must also cultivate the respect of the sectoral implementing agencies or departments within the particular sector to further
voluntary compliance. For example, it is important to remember the need for the co-ordinating unit to maintain the support and respect of not only the senior officials at the implementing agencies but also the mid-level agency staff who are critical to the success of the implementation of the sectoral anti-corruption strategy. In this regard it is also important for the co-ordination unit to have the capacity to evaluate agency reports; the more skill it displays in evaluating agency reports, the more respect it will engender from agency professionals, strengthening its authority and lessening the chance of agencies ignoring its directions. There are a variety of other ways to foster inter-agency co-operation, for example:

- seconding employees of one agency to another
- holding joint training sessions
- engaging in an ongoing dialogue about the implementation of the strategy.

**Have each sectoral agency agree to an implementation, monitoring and evaluation schedule.**

The inclusion of sectoral senior representatives from each agency and department within the sector that will be responsible for implementing elements of the anti-corruption strategy in the drafting process increases the chances that those agencies and departments will support and work to implement the strategy.

In addition to including those agencies in the deliberations, it is often advisable for the strategy drafters to reach explicit agreements with each agency on what measures that agency will take to implement the strategy, and how and when each agency’s implementation performance will be evaluated. This helps ensure that those responsible for overseeing the co-ordinated implementation of the strategy will receive ongoing feedback on the strategy’s progress, including any delays or bottlenecks.

Further, when implementing a sectoral anti-corruption strategy, the actions cannot work in a silo. They need to be mainstreamed into the sector’s human resources, regulatory, and performance management systems, tools, and practices. They should also be embedded in broader public administration’s anti-corruption efforts and aligned (when possible) with a national anti-corruption strategy, where one exists. Also, mainstreaming activities to combat corruption need to be implemented by a range of actors, both within the target sector and in other sectors. This requires high-level political support and commitment.

In relation to this, a common vulnerability across Greek sectors to consider is the existence of different legal entities established under a given sectoral line ministry (e.g. health). Some of these entities might not be funded fully by the public sector and be based on private law, which exempts them from rules providing transparency, accountability and objectivity in the public sector, making them potential vehicles for corruption. If this is the case, to avoid these risks, future sectoral strategies in Greece need to foresee putting these entities under the general public laws and redefining their internal rules and processes.
4. Monitoring, evaluation and reporting

Regular monitoring, evaluation and reporting are crucial for a sectoral anti-corruption strategy to succeed. A monitoring, evaluation and reporting system ensures that anti-corruption strategies follow an evidence-based strategic approach, enabling continuous learning. It has three core purposes:

- judging the results of public actions in order to check their conformity with the set of objectives set out in the strategy
- learning to improve the effectiveness of the interventions, by learning from what has worked under which conditions
- accountability to programme stakeholders and taxpayers for the use of public resources.

**Monitoring, evaluation and reporting**

- **Monitoring** refers to the process of collecting and analysing information on the implementation of a strategy’s deliverables (outputs) and intermediate indicators (results) to ensure they are on track and on schedule:
  
  **Direct outputs** are concrete deliverables in the sphere immediately affected by the sectoral strategy (e.g. public officials were trained on the new code of conduct). In some cases, outputs of a sectoral strategy are self-evident to the degree that monitoring them becomes redundant. More information might then be obtained by monitoring the intermediate results.

  **Intermediate results** of the sectoral strategy do not automatically result from the strategy but are likely to occur if the policy is implemented as intended.

  Monitoring enables the relevant actors to maintain the focus on achieving the strategic goal and objectives throughout each step of implementation. Monitoring also feeds back information from the implementation level to the strategy drafters and the planning and oversight units and thus enables effective steering, informed decision making, and improved strategy design.

  In monitoring anti-corruption strategies and action plans, the use of good indicators for success play a vital role since they are the benchmark against which one can track progress. As previously mentioned, setting indicators is part of the drafting of the strategy (see the section on “Indicators for measuring success” in Chapter 2).

- **Evaluation** refers to analysing the implementation in terms of deliverables (outputs) and short- to medium-term results, or if it is an **impact evaluation**,
analysing a strategy’s longer-term results (outcomes). Outcomes are the indirect results of a strategy in the final sphere of the desired impact. They are indirect since these outcomes are affected not only by the sectoral strategy but also by a range of other variables outside the control of the implementation process. They tend to capture the effect of a strategy on social, economic or organisational variables. Due to the multiple factors impacting on the desired outcome variable, the causal link between the specific strategy and the observed outcome is usually not straightforward. While monitoring is often a continuous function, evaluation occurs at specific points in time, generally after a year or more. Impact evaluation is a measurement endeavour specifically set up to investigate a certain strategy’s effect with a causal attribution.

- **Reporting** refers to the communication of monitoring and evaluation findings. Reporting helps maintain support for the strategy, not only by keeping stakeholders and citizens abreast of progress but also by disclosing obstacles and explaining what is being done to overcome them. Periodic reporting helps citizens hold government accountable for strategy results and provide opportunities for citizen input into strategy execution.

**Monitoring and evaluation of implementation vs. impact**

For sectoral anti-corruption strategies, it is possible to monitor and evaluate the implementation of the actions (outputs and results), and more difficult, to evaluate their long-term impact (outcomes). To illustrate the distinction between these, let’s consider the example of a strategy with the following three objectives:

- reduce delays in prosecuting corruption complaints
- streamline procedures to obtain a business licence
- enhance access to public information about the activities of public entities.

Monitoring and evaluating the implementation will focus on whether and how effectively the measures required to achieve these three objectives have been carried out while impact evaluation will focus on what effect these policy changes have achieved (e.g. whether these measures have contributed to a reduction in corruption).

Table 4.1 provides examples of leading questions that monitoring and evaluation teams might take into consideration depending on whether they focus on the implementation of the strategy, its impact, or both.

<table>
<thead>
<tr>
<th>Specific objective</th>
<th>Implementation</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Delays in answering complaints must be reduced</td>
<td>Are delay-reduction measures being introduced?</td>
<td>Are corruption cases being resolved faster?</td>
</tr>
<tr>
<td>Procedures to obtain a business licence must be streamlined</td>
<td>Have rules streamlining the licensing procedure been written and promulgated?</td>
<td>Are business licences being issued with less red tape?</td>
</tr>
<tr>
<td>Agencies must increase access to information about their activities</td>
<td>Have measures enforcing transparency been established?</td>
<td>Is more information about government in the hands of citizens?</td>
</tr>
</tbody>
</table>
Box 4.1 presents another example of potential objectives, specific objectives and indicators of a sectoral anti-corruption strategy that includes the production of an integrity code. The table in the box presents a general objective, specific objectives and indicators on both output (implementation) and outcome (results) levels.

Box 4.1. Example for measuring outputs, purpose and impact of an integrity code policy

Consider the example of a sectoral anti-corruption strategy that calls for “high standards of conduct for public officials of a particular sector” to be set through “including integrity standards in the organisational policies (such as codes of conduct or codes of ethics) to clarify expectations and serve as a basis for disciplinary, administrative, civil and/or criminal investigation and sanctions, as appropriate.”

Within the strategy, one action toward this principle is the “introduction of an Integrity Code for public officials.” This table presents some potential measures at the output and outcome levels:

<table>
<thead>
<tr>
<th>Objective</th>
<th>Output</th>
<th>Intermediate results</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existence of a useful integrity code</td>
<td>Establish an integrity code</td>
<td>Establish integrity as an organisational value</td>
<td></td>
</tr>
<tr>
<td>Integrity code:</td>
<td>Public officials:</td>
<td>Public administration staff change their behaviour and make decisions based on the rules and principles of the integrity code</td>
<td></td>
</tr>
<tr>
<td>✓ exists</td>
<td>✓ know the integrity code and have been trained in using it</td>
<td>✓ Integrity measured in staff survey</td>
<td></td>
</tr>
<tr>
<td>✓ covers all relevant topics</td>
<td>✓ are initiating discussions on grey areas and ethical dilemmas</td>
<td>✓ ...</td>
<td></td>
</tr>
<tr>
<td>✓ is feasible</td>
<td>✓ suggest solutions</td>
<td>✓ ...</td>
<td></td>
</tr>
<tr>
<td>Example indicators</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>✓ Identified risk areas are covered by the code</td>
<td>✓ Number of integrity-related suggested improvements</td>
<td></td>
<td></td>
</tr>
<tr>
<td>✓ Staff from all managerial levels have participated in focus groups to develop the integrity code</td>
<td>✓ Share of staff working in risk areas who have received risk-specific integrity training</td>
<td></td>
<td></td>
</tr>
<tr>
<td>✓ ...</td>
<td>✓ All applicants for a vacant position receive the integrity code to take note of before proceeding in the selection process</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

As discussed previously (see the section on “Indicators for measuring success” in Chapter 2), experience shows that it is difficult and costly to evaluate the long-term impact of anti-corruption strategies. For this reason, it is advisable that strategy drafters be realistic about their capacity to monitor and evaluate the strategy’s effectiveness in achieving its ultimate goals.

Risks related to monitoring and evaluation

While the benefits of monitoring and evaluation are obvious, they also imply risks. It needs to be accepted that the information obtained will never capture the whole of an anti-corruption strategy. Failing to acknowledge this could misguide efforts towards specific strategies while disregarding others and thus misinform the design of the anti-corruption strategy. Box 4.2 provides an overview of these risks and some ideas to mitigate them.

Box 4.2. Risks related to monitoring and evaluation

By creating a lopsided picture based only on easily accessible and measurable information, monitoring and evaluation could distort decisions in a potentially unfavourable way. To prevent this, the source of any assessment and the quality of operationalisation of the respective strategy indicators should be made as transparent as possible. In particular, where data is indirectly operationalised or vulnerable to manipulation, decisions should not be too closely tied to monitoring results and should also be informed by qualitative assessments from other sources.

If commitment and dedication to making a policy succeed are lacking, a policy’s goal can go unmet despite the fulfilment of all indicators and objectives. Thus, the communication about the policy and its implementation on all levels should centrally feature the goal and objectives, rather than the indicators or targets.

Monitoring can give the impression of surveillance among those subject to it. This can generate a culture of distrust and unfair judgement, which will, in turn, make cheating appear morally justifiable. To prevent this, it is of utmost importance to communicate the monitoring strategy openly, explain its rationale, and create ownership of the process. There is a danger of consciously or sub-consciously distorting efforts and attention from unmeasured aspects towards aspects that are reflected in measurements; this can be countered by regular acknowledgement and rewarding of good performance beyond the measured dimensions, as well as within them.

In particular, manipulation of monitoring results should be made as unattractive as possible through:

- reducing the opportunity (by choosing direct and objective indicators)
- increasing the external cost (for example, by making it inconvenient)
- increasing the internal cost (by making it morally unappealing to cheat)
- reducing the incentive (by strictly separating monitoring and performance assessment).

Moreover, measurement can in some cases provoke a strategic reaction from the observed individuals or units. So-called “gaming” occurs where indicators are deliberately skewed, or efforts are distorted from pursuing goals to pursuing indicators. This is a considerable threat to data quality and validity. Strategies to mitigate gaming problems include:

- “triangulation” - collecting data from several independent sources
- raising ownership of measurement and trust in the validity of the measurement system among those being measured
- using the information provided by indicators in a reflected way and alongside other forms of information
- validating the quality of indicator data
- using carefully crafted composite indicators.

Source: Adapted from OECD.
Monitoring implementation: Good practices

The following good practices for the monitoring and implementation of anti-corruption strategies are suggested for monitoring the implementation of a sectoral anti-corruption action plan. They are drawn from UNODC’s *Practical Guide for Development and Implementation of Anti-Corruption Strategies*:

- **Disaggregate policy reforms into discrete steps.** It will often be useful to break down the implementation of each activity into a series of steps and evaluate progress step by step. Even in the seemingly simple case of whether a new code of conduct has been put in place, breaking the process into a series of steps (for example, drafting the code, submitting it for approval, approving it and disseminating it) can be helpful. Implementation monitoring would then consist of regular updates on which steps have been accomplished, how long it took to clear each step in the process, and how long a measure has been pending at a particular stage.

  The evaluation would consist of determining whether there has been an inordinate delay at any step and if so, identifying the reason for that delay. This approach can help speed up implementation because those responsible for each step in the process will know that any tardiness in fulfilling their duty will be revealed.

Annex F provides an example of how to disaggregate the implementation of an anti-corruption local governance programme.

- **Select one or more indicators of progress.** The second step is to select an indicator or indicators that measure progress in putting each separate action or element into effect. Good indicators should be “SMART” (specific, measurable, achievable, relevant and time-bound).

- **Choose a baseline for each indicator.** A baseline is information about the value of the indicator prior to the monitoring period against which changes during the period of the strategy execution are measured. For the passage of a new code of conduct, the baseline will be zero. Baselines for quantitative indicators are sometimes less straightforward. The baseline for the indicator of the total number of civil servants completing ethics training might be zero, but if some civil servants had been trained before the strategy was initiated, it would not. If 3 000 had already been trained, then the baseline would be 3 000. The baseline for the number of investigations opened would be the number of investigations opened in the period before the strategy commences. This could be easy or difficult to determine, depending on the state of record-keeping at the relevant agency or agencies. When a baseline cannot be determined for a particular indicator, the indicator must be replaced by one for which a baseline can be ascertained.

- **Establish realistic targets for each implementation indicator.** Once an indicator has been selected and a baseline determined, an implementation target could be set. For the passage of new regulation, it would be the time required for
enactment. For an indicator on the number of investigations opened, the target might be a certain percentage increase each year. Targets should be ambitious but realistic, which requires attention to past performance and to the availability of resources. If the strategy calls for expanding the use of existing e-procurement methods to all sector departments and in the past, it has taken two years and significant resources to convert one department from a paper system to an e-procurement system, a target of converting three departments within the first 18 months of the strategy is unrealistic. Likewise, if the government budget is under pressure owing to a downturn in the economy or some other reason, it may be unrealistic to expect that the funding needed for the rapid conversion of a large number of departments will be forthcoming.

- **Watch for indicator manipulation.** When selecting indicators, and when evaluating progress using those indicators, the co-ordinating unit must be mindful of a common problem: when sectoral agencies or individuals know they will be evaluated according to certain metrics, they have incentives to behave in ways that improve performance on those metrics, but that might not actually represent meaningful, substantive improvement on the dimension of performance that the metric is supposed to measure.

The unit responsible for monitoring and evaluation must be aware of the problem of implementing agencies altering their behaviour in ways that improve their score on the indicators without improving the genuine implementation of the strategy.

- **Be cautious when using self-evaluations.** A sector’s own report on its progress in implementing a strategy component can be a useful indicator. It is inexpensive, based on direct observation, and can reduce the potential for friction or antagonism between the co-ordinating agency and the implementing agencies. Indeed, resource and technical capacity constraints mean that, in many cases, there will be no alternative but to assign each implementing agency primary responsibility for monitoring its own implementation performance. Experience shows, however, that agencies are often overly optimistic when assessing how well they are doing in implementing a programme, and many strategies have fallen short because of excessive reliance on the implementing agencies monitoring their own progress. The agency responsible for co-ordinating the implementation of the strategy should, therefore, ensure, to the extent possible, that there is some independent evaluation of progress toward implementing the strategy. In some cases, it may be advisable to request that an agency conduct a preliminary self-evaluation and then compare the results to an independent evaluation or audit (perhaps by the co-ordinating unit, another government department or an external monitor such as a civil society group or outside consultant). Among other advantages, doing so might help the implementing agencies understand how they can better assess their own performance.

- **Utilise evaluations to adjust implementation targets and objectives.** Monitoring data alone will show only whether the different elements of the strategy are being implemented on time. It is the analysis of the data (the “evaluation”) that
identifies the reasons why the implementation of a particular element is behind schedule or over budget and that will allow for suggestions on ways to address delays and cost overruns. Evaluations serve other purposes as well. Where implementation is proceeding smoothly, or an agency has devised an innovative solution to a problem, the evaluation can lead to lessons that will be applicable in other contexts. What is critical is that the evaluations are used to make adjustments to the implementation process and even to strategy design. It is simply not possible for the strategy drafters to get all the details of implementation and design correctly at the outset. This is one reason why it is important that policy makers be provided with clear, easy-to-read reports on the evaluations. They cannot act on the evaluations, or push for action on them if they are not aware of or do not understand them.

- **Allocate sufficient time and adequate resources for evaluation.** The time, cost and technical skills required to conduct an evaluation will vary depending on what is being evaluated and what the monitoring reveals. An indicator for enhancing corruption prevention might be the number of corruption vulnerability assessments conducted every six months. If the monitoring data reveal a sharp decline in assessments during the previous reporting period, the evaluation might require no more than a phone call to the agency responsible for vulnerability assessments to determine the reason for the drop. If, on the other hand, an evaluation is undertaken to determine why fewer corruption complaints were filed in the current year than the previous one, more in-depth research will be needed. That research could include an examination of the overall trends in corruption in the country, changes in the incentives to report, and other issues that might have affected reporting levels.
5. Communications and public awareness

Communications

In a context of low trust in government such as the one that prevails in Greece due to the economic crisis, communication is critical to overcoming resistance to reform. Aside from measuring the benefits of the sectoral anti-corruption strategy, it is important to also communicate the reform to the wider public and, particularly, to the main stakeholders.

Communication of the sectoral anti-corruption strategy and action plan with both internal and external stakeholders enables accountability, increases the credibility of integrity efforts and stimulates future anti-corruption action.

However, the importance of reporting to the public, although critical, is often ignored. Sharing the results with the public may have an educational effect on the strategy and the challenges in implementing it. This will both keep up public pressure for full implementation and will also increase their support for the strategy when it faces political barriers.

One important consideration when it comes to communicating about sectoral anti-corruption strategies is to provide the relevant information together with an explanatory context. Consider an example in which the number of reported fraud cases increases drastically from one year to another. Isolated, the number might give the impression that corruption is on the rise. Contextual information could clarify that increased awareness from anti-fraud training might cause increased reporting. Presented together, measurement results and the explanation of what might be driving them, allow the implementing units as well as external stakeholders to reasonably judge the implications of the results of a monitoring and evaluation exercise.

All communications about the strategy should distinguish between facts and interpretation to remain objective. For example, an output indicator (e.g. the number of staff having received integrity training) does not inform about an outcome (e.g. the unit’s integrity). Avoiding such misconceptions is a key goal of transparent communication.

Experience shows that communication also carries a risk. The publication of the widespread breach of a social norm, for example, might induce further norm breaches. Solution-oriented communication can prevent inducing demotivation or misguidance. Indicators should be designed and communicated to celebrate progress and identify failure accurately and fairly. Negative results are a call to action that should not be whitewashed. Yet, this call for action should not result in shaming. Benchmarking is
motivating as long as fair comparisons can be made. Focussing on the goals rather than objectives or indicators in management communication could reduce this risk.

A well-articulated communications strategy keeps stakeholders informed about progress, garnering the support necessary to sustain the effort over time and avoid reform fatigue. It is also important to establish mechanisms to communicate the results of reform within government. This helps raise awareness among public officials about the importance of the reform and lets them see the results of their efforts.

The OECD Guiding Principles for Open and Inclusive Policy Making recommends that governments inform and engage citizens actively, not merely as subjects, but as partners. These relationships are defined by the OECD as follows:

- **Information is a one-way relationship** in which government produces and delivers information to be used by citizens. It covers both “passive” access to information upon citizens’ demands and “active” measures by the government to disseminate information reaching them. Examples are access to public records, official gazettes and government websites.

- **Consultation is a two-way relationship** in which government asks for and receives citizens’ feedback on policy making. In order to receive feedback, the government defines whose views are sought on what issue during policy making. Receiving citizens’ feedback also requires that government provide information to citizens beforehand. Consultation thus creates a limited two-way relationship between government and citizens. Examples are comments on draft legislation, and public opinion and experience surveys.

- **Active participation** is a relationship based on a partnership with government in which citizens actively engage in decision making and policy making. Active participation means that citizens themselves take a role in the exchange on policy making, for instance by proposing policy options. At the same time, the responsibility for policy formulation and the final decision rests with the government. Engaging citizens in policy making is an advanced two-way relationship between government and citizens based on the principle of partnership. Examples are open working groups, laypersons’ panels and dialogue processes.

**Public awareness**

Public awareness is important to increase enthusiasm and support, stimulate self-mobilisation and action. While the aim of a national strategy awareness-raising campaign is to reach the whole population about corruption and what people can do about it, a sectoral strategy awareness campaign needs to be focused to the sectoral context (e.g. customs, health, education) and target its particular audience, both internal (i.e. civil servants working in the particular sector) and external (i.e. contractors and the population who benefits from the specific services provided by the particular sector).

Publicity of the anti-corruption strategy will make the sector personnel and the population aware of their own roles and what they can expect for themselves from its implementation. Furthermore, publicity raises the public’s awareness of the need for
action and can initiate involvement and commitment by society. The main tools of achieving public awareness are the Internet and new media, television and radio, internal bulletins, conferences, and media releases. The following tools could also be considered:

- **Schools, universities, libraries**: Anti-corruption strategies are the subject of discussion in schools, universities or even the subject of awareness-raising events in other government buildings, such as libraries.

- **Advertising**: Advertising campaigns can be an important tool in order to both enhance knowledge among the public about corruption and promote intolerance at the same time.

- **Reports on implementation**: Most strategies foresee a public report on their implementation. Sometimes, public reporting is part of the anti-corruption legislation.

The reporting process should include ways the public can provide input into strategy execution, as citizens will often have different perspectives or insights from those managing the strategy.

To facilitate effective citizen understanding of and engagement in the implementation, monitoring and evaluation process, public reports should be presented in a clear, simple and easily understandable format, keeping technical language to a minimum, avoiding large “data dumps” and using charts, graphs and other visual aids when appropriate.

As mentioned earlier, new initiatives taken by the Greek public administration could be used to improve communications with citizens and encourage their participation. For example, the Greek “Open Government Initiative” (OpenGov) could be considered as a platform for electronic deliberation of anti-corruption strategies. Citizens and organisations could post their comments, suggestions and criticisms. Also, as a way to increase the visibility of anti-corruption strategies’ progress, implementation reports could be presented at this or similar public fora.

Finally, GSAC has developed with the support of the OECD, a communications strategy for 2017. It would be important for GSAC to revise it for 2018 and to secure resources, including personnel, for its implementation.
6. Updating the strategy

Most strategies take a medium-term view covering four to five years. However, strategy drafters should keep in mind that it is unlikely that the measures included in the anti-corruption strategy will be implemented exactly as set forth. Therefore they need to acknowledge the fact that their anti-corruption strategies will need to be reviewed, updated, and strengthened at least yearly. An anti-corruption strategy is part of a process, one that is about building and sustaining political momentum to address corruption, as well as charting an initial course of action. This means that strategies must be periodically revised and updated as circumstances change and new information arises.

In principle, there should be a commitment from the sector stakeholders to review the policy, preferably including this commitment on its text or agreeing to it in the approving stage of the strategy. There are two main options for updating a sectoral anti-corruption strategy:

- The first option is that the action plan covers only a small proportion of the period of the strategy, and its implementation is thus updated regularly through new action plans.

- The second alternative is that the strategy and its action plan cover a longer period of time and are revised by an Anti-Corruption Council or by a public conference on a regular basis.
References

These guidelines include excerpts from a variety of anti-corruption strategies, manuals, guidelines and other relevant documents reviewed as part of this project, including those listed below.


REFERENCES


Regional Cooperation Council (2016), Corruption Risk Assessment in Public Institutions in South East Europe: Comparative Research and Methodology, Regional Cooperation Council.


U4 Anti-Corruption Resource Centre (2010), “Mainstreaming Anti-Corruption within Donor Agencies”.


Annex A

Sample corruption risk assessment questionnaire

Introduction

The following questionnaire is a means for conducting a basic corruption risk assessment. The questionnaire needs to be adapted to a particular sector or institution within the sector. It is important to follow certain rules when pursuing this questionnaire:

• In general, selection of interviewees should strive to avoid selection bias. However, it is unavoidable that selection will sometimes be biased, for example by targeting complainants to particular institutions. This may imply that the information gathered will indicate more extensive problems than in fact exist. In these circumstances, it is important for the interpretation of the information obtained to take into account such bias, to avoid unjustified generalisation, and to seek access to those who experience no difficulties with the institution.

• Likewise, interview questionnaires should be designed in such a way that they will not elicit systematically biased responses, for example through leading questions that implicitly suggest there is corruption whether this is the case or not (“putting words into the mouths of the interviewed”). Moreover, the standards of evidence need to be symmetrical between complainants and those accused, rather than assuming that there is “no smoke without fire”.

• Questionnaires should strike a balance between focusing specifically on issues identified by the risk assessment team, and provide interviewees with the opportunity to speak outside of certain constraints. Having said that, complaints and concerns that arise in the more open-ended parts of the interview need subsequently to be investigated with a similar degree of rigour as those identified by the risk assessment team, lest casual remarks are given disproportionate weight.

• When undertaking the questionnaire, where possible, it is advised to avoid moral terminology and the word “corruption”.

GUIDELINES FOR DRAFTING SECTORAL ANTI-CORRUPTION STRATEGIES IN GREECE
A. Organisational role

1. What are the core functions of the organisation (e.g. ministry, sub-unit within ministry, sector agency, department, etc.)?

2. Does the organisation have a mission statement or similar description of its function/role? Are the staff aware of this? Do staff consider the mission statement accurate and appropriate?

3. Do the major organisation sub-units have mission statements or a clear definition of their function/role? Are the staff aware of these? Do staff consider them accurate and appropriate?

4. Do all staff of the organisation have clear job descriptions/terms of reference and are staff aware of this?

B. Budget

5. What is the size of the organisation’s budget?

6. What is the rough breakdown of spending between salaries, investment, purchases of goods and services and other types of spending?

7. What is the average size of a purchase/investment made by the organisation: are there a significant number of very large purchases/investments in an average year (or last year)?

8. What percentage of purchases/investment made by the organisation are put out to open tender?

9. How technically complex are the spending decisions made by the organisation? Who makes the more complex decisions and on what basis?

10. Are spending decisions on major items highly centralised (e.g. requiring the signature of one senior official) or highly decentralised?

11. Are spending decisions on minor items highly centralised (e.g. requiring the signature of one senior official) or highly decentralised?

12. Does the organisation receive income from the public, or designated clients (taxation, customs levies, payments for services or rents, etc.) What is the process for recording, banking and auditing these payments? In what form are such payments received?

C. Human resources management

13. How many staff does the organisation employ?

14. How many of these are employed centrally (e.g. in a ministry), and how many indirectly (e.g. public servants such as teachers)?
15. What percentage of the following categories (or equivalent categories) of your staff have the status of a civil servant, what proportion are currently within the one-year probation period, and what percentage are employed on short-term contracts?:
   a. Secretary-General
   b. Directors of departments or directors-general
   c. Directors of directorates or sector/office chiefs
   d. Specialists

16. Are there any monitoring and statistics to show the rate of staff turnover within the organisation? If so, is the turnover regarded as high, low, or about right?

17. Are there any internal recruitment guidelines in addition to the provisions of the Law on Status of a Civil Servant?

18. In what percentage of recruitments is the selection decision of the relevant superior contrary to the recommendation of the ad hoc recruitment committee, i.e. selects a candidate that was not one of those recommended?

19. Do recruitment procedures for staff in positions that might be regarded as high-risk from a corruption point of view include criteria to attempt to ensure the integrity of those appointed?

20. Are applicants for staff positions questioned/screened to ensure they do not engage in external activities or hold external interests that may conflict with or impair the proper performance of their official duties?

21. Do staff have a clear understanding of what situations constitute conflicts of interest?

22. Do new staff go through any induction processes such as initial training?

23. If so, does such training cover integrity issues? Is this repeated perhaps in more specific ways on promotion or when staff move to new roles?

24. Do staff regard their training as adequate to manage the situations that they face?

25. Who is designated as the person to whom staff should turn for advice? In cases of uncertainty would they seek advice from other colleagues on an informal basis before turning to their line manager, or seek advice elsewhere?

26. Do staff feel that their salaries are adequate, just sufficient or insufficient to ensure a reasonable standard of living?

27. To what extent do staff feel valued by a) the organisation; b) their direct superior, in their role?

D. Procedures and decision-making processes

28. Does the organisation do any of the following?
   a. issue or provide items such as licenses, permits, permissions, certificates, passports or other documents to citizens or entities
b. allocate any financial or other benefits to citizens (for example social security benefits)
c. allocate any financial or other benefits to legal entities (for example subsidies)
d. receive payments from members of the public (such as fees, taxes, etc.).
29. Where it does so, are there clear procedures and clear criteria for the provision of such items and/or receipt of payments?
30. Where can these procedures and criteria be found?
31. Where officials have to exercise discretion in the decisions on such items, are there clear guidelines on how they should exercise that discretion (e.g. that it should serve a particular objective)?
32. If the organisation does not make a decision on items that are the subject of an application period (e.g. for a license or permission) within the deadline defined, is the issue automatically resolved to the benefit of the citizen/entity?
33. Is the procedure for the provision of such items organised in such a way as to minimise the number of contacts citizens need to have with the organisation or other organisations (one-stop shop)?
34. Are there multiple locations at which such items may be secured (e.g. different branches of the same institution, post office, etc.) or does one office have a monopoly?

E. Record keeping
35. Does the organisation have clear rules for the management of records and files?
36. Are individual decisions of the organisation recorded and filed according to clear rules and for a clearly defined and binding minimum period?
37. Who has access to these files, and who is authorised to amend them or review them?
38. What degree of freedom of information exists with respect to the institution’s files and documentation, both in terms of which decisions/files/documents are made public automatically (and how), and which ones are available on request? To what extent is such access guaranteed in practice?

F. Transparency
39. Does the organisation have a formal policy or rules on the automatic dissemination of information? Does this include an automatic provision on the website of the following:
a. organisational structure of the ministry and contact persons
b. ministry policies and policy documents
c. laws and sub-legal acts
d. draft laws and regulations
e. procedures of relevance to citizens and legal entities, such as for applications for items mentioned in Section D.

G. Access to information

40. Does the organisation have an official clearly designated process for responding to requests for information filed under the Law on Right to Information on Official Documents?

41. How many requests were filed last year?

42. How many requests were refused or are currently in dispute?

H. Ethics and integrity framework

43. Does the organisation have its own specific code of conduct or code of ethics?

44. Are staff informed about the existence of the code when assuming their position?

45. How often do staff receive training on ethics?

46. Are staff familiar with the code? What steps are taken to ensure this?

47. Are there, either in such a code or in guidelines or other regulations or staff rules, provisions that instruct staff on how to proceed in situations where they find themselves subject to a conflict of interest?

I. Accountability mechanisms

48. Do staff members have clearly defined work procedures and routines for reporting to superiors – either on a periodic basis (e.g. weekly staff meeting) and on particular decisions or activities?

49. Is there an internal inspection or control department?

50. Approximately how many inspections/controls did the department carry out last year?

51. Is there an internal audit department?

52. What were the most important findings of the department last year?

53. How often is the organisation assessed by an external inspectorate or control body?

54. How often is the organisation audited by an external audit body?

55. Were there any important findings on the organisation by such external bodies last year (or at the last assessment)?
J. Internal notification of ethics breaches

56. Is there a formal procedure by which staff members may notify a designated official or unit of the organisation of suspected breaches of integrity or contravention of the code of conduct within the organisation?

57. Where the designated official is also the official that is the subject of the complaint, is there an alternative channel by which staff may file complaints, e.g. to an external organisation or to a higher superior?

58. Are staff informed through training of these procedures and the official/unit to whom they should file complaints?

59. Are there any mechanisms in place to protect those who file such notifications from retaliation?

60. How many cases of such notifications by staff have there been in the last 12 months, and what was the outcome of these notifications for both sides involved (the official notifying, and the subject of the notification)?

K. Complaint mechanisms

61. Are there clear procedures by which citizens may file complaints against actions of the organisation or its officials?

62. Where can these procedures be found?

63. Are decisions on complaints taken by the same person or unit in the organisation at which the complaint was directed?

64. How many complaints did the organisation receive last year?

65. How many complaints were upheld as well-founded?

L. Disciplinary procedures and sanctions

66. How many disciplinary proceedings were conducted against the organisation’s staff last year in connection with breaches of ethics rules?

67. How many of these proceedings resulted in sanctions being applied?

68. What was the breakdown in sanctions applied (number of cases for each type of sanction)?

M. Vulnerable areas

69. Can you identify which areas of the organisation or its activities are most vulnerable to misconduct?

70. Has a risk analysis been conducted on the organisation to identify areas vulnerable to misconduct?
71. Does the organisation’s Anti-Corruption Action Plan contain specific measures to tackle these vulnerabilities?

**Annex B**

**Common corruption and integrity risks**

**Passive bribery of a civil servant**

Passive bribery is the act of receiving money, goods or other forms of recompense to a recipient (e.g. a public official) in exchange for alteration of their behaviour (to the benefit/interest of the giver) that the recipient would otherwise not alter.

<table>
<thead>
<tr>
<th>Risk factors</th>
<th>Measures</th>
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</thead>
<tbody>
<tr>
<td><strong>External and systemic risk factors</strong></td>
<td>- Absence of basic legal framework (strict incrimination of bribery criminal offences, asset declaration, free access to public information and whistleblower policy)</td>
</tr>
<tr>
<td></td>
<td>- Absence of penalties for breaching anti-corruption laws and regulation</td>
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<td></td>
<td>- Inefficient law enforcement and prosecution</td>
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<td></td>
<td>- Poor or bad understanding of due public sector functioning by potential bribe givers</td>
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<tr>
<td></td>
<td>- Unclear wording in relevant legislation that enables corrupt interpretations of law</td>
</tr>
<tr>
<td><strong>Organisational risk factors</strong></td>
<td>- Chronic failure to follow existing institutional policies, procedures or systems (including top-level public officials)</td>
</tr>
<tr>
<td></td>
<td>- Bad or inconsistent internal acts and regulation</td>
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<tr>
<td></td>
<td>- Inadequate oversight or supervision mechanisms</td>
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<td></td>
<td>- Supervisors/management don’t recognise that corrupt activity is happening or they facilitate corruption by tolerating low-level non-compliance with all kind of rules (when not themselves engaged in it)</td>
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<td></td>
<td>- Poor organisational culture including unclear messages about what is acceptable and examples set by management</td>
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<tr>
<td></td>
<td>- Public officials have high level of power or influence, not consistent with their actual position</td>
</tr>
<tr>
<td><strong>Individual risk factors</strong></td>
<td>- Lack of integrity</td>
</tr>
<tr>
<td></td>
<td>- Inadequate work review or supervision of concrete public official</td>
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<tr>
<td></td>
<td>- Feelings of dissatisfaction or perceptions of unfairness at work (including low salary)</td>
</tr>
</tbody>
</table>

| Systemic level                    | Clear incrimination and effective, proportionate sanctions for bribery criminal offences |
|                                   | Adopting or improving anti-corruption legislation (including rules on asset declaration, free access to public information or similar rules on public sector transparency, and proportionate penalties for breaching anti-corruption laws and regulation) and ensuring its efficient implementation |
|                                   | Establishing whistleblower system and protection                          |
|                                   | Measures /rules for strengthening responsibilities of superiors or other top-level public officials |
|                                   | Measures for strengthening the role and efficiency of law enforcement and prosecution |
|                                   | Awareness-raising programmes for public or different stakeholders         |
|                                   | Corruption proofing of laws and regulation                                  |

| Organisational level including working processes and individual factors | Adoption or improvement of internal policies, rules and regulations with strong anti-bribery connotation, including written standards such as the code of conduct and anti-corruption policies |
|                                                                       | Establishment of efficient oversight, supervision, review or audit anti-corruption mechanisms (regular and random) in all levels or processes, including additional supervision of public officials on positions that are exposed to higher bribery risk |
|                                                                       | Introduction of transparency into all internal processes - proper records should be kept for |
Working process risk factors
- Public official has a high level of personal discretion and autonomy in decision making
- Non-transparent or unrecorded decision making
- Poor organisation of working processes
- Lack of vertical or horizontal controls inside working processes
- All decisions, and also reasons for all important decisions should be documented, including name(s) of person(s) responsible for the decision
- Establishment of complete electronic audit trail regarding electronic documents (on their creation, access, copy, print, altering and/or deletion) and regular supervision of this trail
- Clear rules on organisational structure and reporting lines (especially rules on who public officials report to, and are supervised by)
- Verification system of key decisions
- Mandatory rotation of public officials in high bribery risk positions
- Employee background checks
- Anti-corruption and integrity training, etc.

Conflict of interest

Conflict of interest is defined as a situation where an individual or the entity for which he/she works, whether a government, business, media outlet or civil society organisation, is confronted with choosing between the duties and demands of his/her position and his/her own private interests.

New forms of relationship have developed between the public sector and the business and non-profit sectors, giving rise, for example, to increasingly close forms of collaboration such as public/private partnerships, self-regulation, interchanges of personnel, and sponsorships. New forms of employment in the public sector have also emerged with potential for changes to traditional employment obligations and loyalties. In consequence, there is clearly an emerging potential for new forms of conflict of interest involving an individual official’s private interests and public duties, and growing public concern has put pressure on governments to ensure that the integrity of official decision making is not compromised.

While a conflict of interest is not ipso facto corruption, there is increasing recognition that conflicts between the private interests and public duties of public officials, if inadequately managed, can result in corruption. The proper objective of an effective conflict-of-interest policy would not be the simple prohibition of all private-capacity interests on the part of public officials, even if such an approach were conceivable. The immediate objective should be to maintain the integrity of official policy and administrative decisions, and of public management generally, recognising that an unresolved conflict of interest may result in abuse of public office.

<table>
<thead>
<tr>
<th>Risks factors</th>
<th>Measures</th>
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<tbody>
<tr>
<td><strong>External and systemic risk factors</strong></td>
<td><strong>Systemic level</strong></td>
</tr>
<tr>
<td>• Bad or inconsistent legislation regulating certain sector absence of conflict of interest laws</td>
<td>• Adopting or improving anti-corruption legislation (including conflict of interest laws) and ensuring efficient implementation</td>
</tr>
<tr>
<td>• Inefficient or incompetent oversight institutions</td>
<td>• Measures/rules for strengthening responsibilities of superiors or other top-level public officials</td>
</tr>
<tr>
<td><strong>Internal (organisational) risk factors</strong></td>
<td>• Efficient and dissuasive criminal or administrative sanctions for acting in any form of conflict of interest</td>
</tr>
<tr>
<td>• Poor strategic and operational guidelines (policy) or inadequate policies, procedures or systems</td>
<td>• Awareness-raising programmes on conflicts of interest and due avoidance, etc.</td>
</tr>
</tbody>
</table>
• Chronic failure to follow existing policies, procedures or systems
• Inadequate work review, oversight and audit mechanisms, poor organisational culture (this includes unclear messages about what is acceptable, examples set by management, lack of reinforcement of ethical behaviour, etc.)

Individual risk factors
• Lack of knowledge (e.g. ignorance of conflict of interest rules)
• Lack of integrity (immorality)
• Omission of conflict of interest declaration (where provided)
• Inadequate supervision or work review of concrete public official

Working process risk factors
• Non-transparent or unrecorded decision making
• Lack of vertical or horizontal controls in working processes

Abuse of power

<table>
<thead>
<tr>
<th>Risk factors</th>
<th>Measures</th>
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<tbody>
<tr>
<td><strong>Organisational (institutional, project, etc.) level including working processes and individual factors</strong></td>
<td><strong>Systemic level</strong></td>
</tr>
<tr>
<td>Reference to conflict of interests in relevant internal documents, including policy documents and codes of conduct</td>
<td>Adopting or improving anti-corruption legislation (including clear rules on public sector recruitment, transparency rules and effective, proportionate and dissuasive penalties for any form of abuse of power) and ensuring efficient implementation</td>
</tr>
<tr>
<td>Obligation of public officials to complete (annually or at another appropriate time) a statement of private interests (secondary employment, business dealing, shares, etc.) and/or asset declaration</td>
<td>Establishing a whistleblower system and protection</td>
</tr>
<tr>
<td>Establishment of a register of gifts, benefits or favours given to public officials (not in the form of a bribe, but as a token of gratitude, etc.)</td>
<td>Measures/rules for strengthening responsibilities of superiors or other top-level public officials</td>
</tr>
<tr>
<td>Verification system of key decisions</td>
<td>Efficient, proportionate and dissuasive criminal, civil (including labour) or administrative sanctions for different types of abuse of power</td>
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<tr>
<td>Introduction of transparency into all internal processes - proper records should be kept for all decisions, and also reasons for all important decisions should be documented, including name(s) of person(s) responsible for the decision</td>
<td>Organisational (institutional, project, etc.) level including working processes and individual factors</td>
</tr>
<tr>
<td>Establishment of complete electronic audit trail regarding electronic documents (on their creation, access, copy, print, altering and/or deletion) and regular supervision of this trail</td>
<td>Broad advertising of public sector positions, preparation of appropriate selection criteria and their publication in advance</td>
</tr>
<tr>
<td>Clear rules on organisational structure and reporting lines (especially on who public officials report to, and are supervised by)</td>
<td>Verification system of key decisions</td>
</tr>
<tr>
<td>Establishment of efficient oversight, supervision or review mechanisms (regular and random) in all levels or processes, including additional supervision of public officials that are – on the basis of available information, e.g. statement of private interests - exposed to greater risk of conflicts of interest</td>
<td>Introduction of transparency into all internal processes - proper records should be kept for all decisions, and also reasons for all important decisions should be documented, including</td>
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</table>
ANNEX B. COMMON CORRUPTION AND INTEGRITY RISKS

GUIDELINES FOR DRAFTING SECTORAL ANTI-CORRUPTION STRATEGIES IN GREECE

- Inadequate or weak work review, oversight and audit mechanisms
- Superiors or management don’t sufficiently understand the work to recognise that abuse of power is happening or they facilitate such activity by tolerating low-level non-compliance with all kinds of rules (when not themselves engaged in it)
- Public officials have high level of power or influence, not consistent with their actual position

Individual risk factors
- Lack of integrity
- Inappropriate relationships with clients

Working process risk factors
- Public officials have high levels of personal discretion and autonomy in decision making
- Non-transparent or unrecorded decision making
- Lack of vertical or horizontal controls in working processes

Abuse of public resources

<table>
<thead>
<tr>
<th>Risk factors</th>
<th>Measures</th>
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<tr>
<td><strong>External and systemic risk factors</strong></td>
<td></td>
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<tr>
<td>• Absence of basic legal framework needed to</td>
<td>• Adopting or improving anti-corruption legislation (including rules on</td>
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<td>fight corruption such as asset disclosure</td>
<td>asset declaration) and ensuring its efficient implementation</td>
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<tr>
<td>rules</td>
<td>• Measures for strengthening role and efficiency of law enforcement and</td>
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<tr>
<td>• Inefficient law enforcement and prosecution</td>
<td>prosecution</td>
</tr>
<tr>
<td>• Inefficient or incompetent oversight institutions</td>
<td>• Efficient and dissuasive criminal or/and civil law sanctions for all</td>
</tr>
<tr>
<td>• Non-transparent public finance processes</td>
<td>kinds of misuse of public funds</td>
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<tr>
<td><strong>Internal (organisational) risk factors</strong></td>
<td></td>
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<tr>
<td>• Bad or inconsistent internal acts and regulation</td>
<td>• Consistent policy guidelines regarding the use of allocated resources</td>
</tr>
<tr>
<td>• Inadequate work review, oversight and audit</td>
<td>including clear rules that public officials are not permitted to</td>
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<tr>
<td>mechanisms</td>
<td>approve allocation of resources to themselves</td>
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<tr>
<td>• Superiors or management don’t sufficiently</td>
<td>• Verification system of key decisions on public resources disposal</td>
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<tr>
<td>understand the work to recognise that abuse of</td>
<td>• Introduction of transparency into all internal processes - proper</td>
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<td>public funds is happening or they facilitate</td>
<td>records should be kept for all decisions, and also reasons for all</td>
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<td>such activity by tolerating low-level non-</td>
<td>important decisions should be documented, including name(s) of</td>
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<td>compliance with all kinds of rules (when not</td>
<td>person(s) responsible for the decision</td>
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<td>themselves engaged in it)</td>
<td>• Establishment of independent and efficient internal audit service or</td>
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<tr>
<td>• Public officials have high levels of power or</td>
<td>improvement of its independence and efficiency</td>
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<tr>
<td>influence, not consistent with their actual</td>
<td>• Additional supervision of public officials on positions that are</td>
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<tr>
<td>position</td>
<td>exposed to greater risk of abuse of public resources</td>
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<tr>
<td><strong>Individual risk factors</strong></td>
<td>• Establishment of complete electronic audit trail regarding electronic</td>
</tr>
<tr>
<td>• Lack of integrity</td>
<td>financial documents (on their name(s) of person(s) responsible for</td>
</tr>
<tr>
<td>• Inadequate supervision or work review over</td>
<td>the decision</td>
</tr>
<tr>
<td>concrete public official</td>
<td>• Clear rules on organisational structure and reporting lines (especially</td>
</tr>
<tr>
<td><strong>Working process risk factors</strong></td>
<td>rules on who public officials report to, and are supervised by)</td>
</tr>
<tr>
<td>• Public officials have high levels of personal</td>
<td>• Establishment of efficient oversight, supervision or review</td>
</tr>
<tr>
<td>discretion and autonomy in decision making</td>
<td>mechanisms (regular and random) in all levels or processes, including</td>
</tr>
<tr>
<td>• Non-transparent or unrecorded decision making</td>
<td>additional supervision of public officials on positions that are</td>
</tr>
<tr>
<td>• Lack of vertical or horizontal controls in</td>
<td>exposed to greater risk of abuse of public resources</td>
</tr>
<tr>
<td>working processes</td>
<td>• Introduction of safeguard measures such as anticipated workload (per</td>
</tr>
<tr>
<td></td>
<td>day, week or month), electronic registration of presence at work,</td>
</tr>
<tr>
<td></td>
<td>etc., and efficient supervision over it</td>
</tr>
<tr>
<td></td>
<td>• Establishment of complete electronic audit trail regarding electronic</td>
</tr>
<tr>
<td></td>
<td>documents (on their creation, access, copy, print, altering and/or</td>
</tr>
<tr>
<td></td>
<td>deletion) and regular supervision of this trail</td>
</tr>
<tr>
<td></td>
<td>• Mandatory rotation of public officials in key positions, anti-corruption</td>
</tr>
<tr>
<td></td>
<td>and integrity trainings</td>
</tr>
<tr>
<td></td>
<td>• Clear rules on organisational structure and reporting lines (especially</td>
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<td>rules on who public officials report to, and are supervised by)</td>
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<td>additional supervision of public officials on positions that are</td>
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<tr>
<td></td>
<td>exposed to greater risk of abuse of power</td>
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<tr>
<td></td>
<td>and integrity trainings</td>
</tr>
</tbody>
</table>

GUIDELINES FOR DRAFTING SECTORAL ANTI-CORRUPTION STRATEGIES IN GREECE
### External pressure on public officials

<table>
<thead>
<tr>
<th>Risks factors</th>
<th>Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>External and systemic risk factors</strong></td>
<td><strong>Systemic level</strong></td>
</tr>
<tr>
<td>• Bad or inconsistent legislation regulating the certain sector, working field of the public sector institution, specific project, etc.</td>
<td>• Adopting or improving anti-corruption legislation (including rules on lobbying) and ensuring its efficient implementation</td>
</tr>
<tr>
<td>• Absence of basic legal framework needed to fight corruption such as clear lobbying regulation</td>
<td>• Measures/rules for strengthening responsibilities of superiors or other top-level public officials</td>
</tr>
<tr>
<td>• Inefficient law enforcement and prosecution</td>
<td>• Measures for strengthening the role and efficiency of law enforcement and prosecution</td>
</tr>
<tr>
<td>• Inefficient or incompetent oversight institutions</td>
<td>• Efficient and dissuasive criminal or administrative sanctions for illegal lobbying, illegal trading in influence or illegal forms of pressure</td>
</tr>
<tr>
<td>• Poor or bad understanding of proper public sector functioning by external community</td>
<td>• Awareness-raising programmes for public or different stakeholders on lobbying</td>
</tr>
<tr>
<td><strong>Internal (organisational) risk factors</strong></td>
<td><strong>Organisational (institutional, project, etc.) level including working processes and individual factors</strong></td>
</tr>
<tr>
<td>• Unclear mandate of the institution, project, etc.</td>
<td>• Adoption or improvement of internal policies, rules and regulations regarding dealing with external pressure and the introduction of efficient safeguards against external pressure</td>
</tr>
<tr>
<td>• Superiors or management don’t sufficiently understand the work to recognise that external pressure is happening</td>
<td>• Introduction of transparency into all internal processes - proper records should be kept for all decisions, and also reasons for all important decisions should be documented, including name(s) of person(s) responsible for the decision</td>
</tr>
<tr>
<td>• Inadequate or insufficient knowledge, skills or experience of public officials or related superiors or managers to resist or oppose the pressure</td>
<td>• Establishment of efficient support mechanisms at all levels or processes, including additional support for public officials on positions that are exposed to greater risk of external pressure</td>
</tr>
<tr>
<td>• Insufficient support mechanisms for public officials when exposed to external pressure</td>
<td>• Verification system of key decisions</td>
</tr>
<tr>
<td><strong>Individual risk factors</strong></td>
<td>• Anti-corruption and integrity training, training on how to resist pressure</td>
</tr>
<tr>
<td>• Lack of knowledge (e.g. on lobbying regulation)</td>
<td></td>
</tr>
<tr>
<td>• Lack of practical skills (inexperience)</td>
<td></td>
</tr>
<tr>
<td>• Inadequate knowledge, skills of experience on how to resist pressure, pressures in the work environment</td>
<td></td>
</tr>
<tr>
<td>• Inappropriate relationships with clients</td>
<td></td>
</tr>
<tr>
<td><strong>Working process risk factors</strong></td>
<td></td>
</tr>
<tr>
<td>• Public officials have high levels of personal discretion and autonomy in decision making</td>
<td></td>
</tr>
<tr>
<td>• Non-transparent or unrecorded decision making</td>
<td></td>
</tr>
<tr>
<td>• Poor organisation of working processes</td>
<td></td>
</tr>
<tr>
<td>• Lack of vertical or horizontal controls in working processes</td>
<td></td>
</tr>
</tbody>
</table>

### Internal pressure on public officials

<table>
<thead>
<tr>
<th>Risk factors</th>
<th>Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>External and systemic risk factors</strong></td>
<td><strong>Systemic level</strong></td>
</tr>
<tr>
<td>• Absence of basic legal framework needed to fight corruption such as a whistleblower system and protection</td>
<td>• Adopting or improving anti-corruption legislation (including rules on whistleblower protection and anti-mobbing rules) and ensuring efficient implementation</td>
</tr>
<tr>
<td>• Inefficient law enforcement and prosecution</td>
<td>• Measures/rules for strengthening responsibilities</td>
</tr>
<tr>
<td>• Inefficient or incompetent oversight institutions</td>
<td></td>
</tr>
</tbody>
</table>

Guidelines for Drafting Sectoral Anti-Corruption Strategies in Greece
Internal (organisational) risk factors
- Poor strategic and operational guidelines (policy) or inadequate policies, procedures or systems
- Chronic failure to follow existing policies, procedures or systems
- Bad or inconsistent internal acts and regulation
- Inadequate work review, oversight and audit mechanisms
- Poor organisational culture (especially unclear messages about what is acceptable, examples set by management, inappropriate attitudes to subordinates)

Individual risk factors
- Lack of knowledge (e.g. on whistleblower protection)
- Lack of integrity by superiors
- Inadequate knowledge, skills or experience of public officials to resist pressure
- Pressures in the work environment
- Inadequate supervision or work review

Working process risk factors
- Non-transparent or unrecorded decision making
- Poor organisation of working processes
- Unconnected working processes and procedural gaps, causing a lack of sense of responsibility or ignorance of competences
- Lack of vertical or horizontal controls in working processes

Organisational (institutional, project, etc.) level including working processes and individual factors
- Introduction of efficient safeguards against internal pressure, such as written notifications of duties and responsibilities, verification system of key decisions, etc.
- Anonymous staff surveys for assessing workplace satisfaction and culture, and adequate measures based on findings
- Effective appeal system and anti-mobbing measures
- Introduction of transparency into all internal processes - proper records should be kept for all decisions, and also reasons for all important decisions should be documented, including name(s) of person(s) responsible for the decision
- Establishment of complete electronic audit trail regarding electronic documents (on their creation, access, copy, print, altering and/or deletion) and regular supervision of this trail
- Clear rules on organisational structure and reporting lines on who public officials report to, and are supervised by
- Establishment of efficient oversight, supervision or review mechanisms (regular and random) in all levels or processes, including additional supervision of public officials on positions that are exposed to risk of internal pressures
- Anti-corruption, integrity and anti-mobbing training

Source: Adapted from the Regional Cooperation Council (2016), Corruption Risk Assessment in Public Institutions in South East Europe: Comparative Research and Methodology, Regional Cooperation Council.
# Annex C

## Types of anti-corruption strategies

<table>
<thead>
<tr>
<th>Preventive strategies</th>
<th>Repressive strategies</th>
<th>Educational strategies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ex ante strategies</strong>: They prevent the problem of corruption from occurring in the first place.</td>
<td><strong>Ex post strategies</strong>: They fix the problem of corruption after it has occurred.</td>
<td><strong>Change values strategies</strong></td>
</tr>
</tbody>
</table>
| **Managerialism strategies**: Individuals or agencies seeking to engage in corrupt behaviour can be discouraged or prevented from doing so by establishing appropriate systems, procedures and protocols. This approach employs *ex ante* preventive anti-corruption measures by reducing the opportunities for corrupt behaviour through the establishment of clear, transparent and accountable decision-making processes of allocating public goods and services. In essence, managerialism advocates the reduction or elimination of opportunities such that those who generally benefit from them cease to be able to do so. There are limitations with this school of thought also, key amongst them is the fact that individuals do not necessarily operate according to the predetermined principles of managerialism. | **Interventionism strategies**: The relevant authorities wait for the corrupt action to occur and then intervene to capture and punish the offender. It is an *ex post* curative crime or corruption control approach, assuming that society is protected by enforcing laws. This is done, for instance, by increasing the probability of detection, punishment and severity of the penalties imposed so that the potential and actual offenders are repressed and deterred from committing crimes or corruption. This school stimulates retribution, rehabilitation and deterrence but there remain a number of obstructive variables including:  
  - The harm has already occurred and cannot be undone.  
  - The majority of crimes remain unreported.  
  - The demand on finite resources will inevitably be infinite given the degree of supervision necessary to ensure that the deterrence effect operates. | **Societal strategies**: They essentially target changing people’s attitudes and values from tolerance to intolerance for corruption through education, ethical norms and public vigilance. |

**Organisational integrity**: It involves the integration of corruption control strategies and ethical standards into all of the organisation’s operational systems. It is about establishing a social norm in an organisation that accurately defines and resists corruption. This school of thought presupposes that deviance stems from the organisation rather than the individuals of which it is comprised, as if the breach of ethics involved in corrupt practices occurs almost by osmosis from the malfeasant organisation to the innocent individual within it. Arguably, targeting individuals in anti-corruption efforts is likely to be less successful than targeting the organisational context in which individuals operate.  

**Legal strategies**: They focus on the use of sanctioning mechanisms to deter and repress corrupt behaviour or activities through the enforcement of legal codes by increasing the effectiveness and probability of detection, punishment, and imposed penalties.  

**Public awareness strategies**: They target the resources and tactics to engender anti-corruption values, ethics, norms, and attitudes into the public’s mind, thus empowering them to fight or not tolerate the corrupt behaviour. Conducive legal, administrative, and societal environments must be created to facilitate these efforts.
### ANNEX C. TYPES OF ANTI-CORRUPTION STRATEGIES

**Preventive strategies**

**Market strategies:** They stress the functioning of competitive market forces in the allocations of public goods and services through, for instance, deregulation and bureaucratisation of public policies.

**Enforcement strategies:** They focus their tactics on enhancing the likelihood and effectiveness of detection, punishment, and imposed penalties of the corrupt activities. For this purpose, therefore, it is essential to have an independent judicial and enforcement system. Also, the rule of law must be enforced.

**Political strategies:** They direct their tactics to control the use of public powers through, for example, the institutionalisation of good governance in policy-making and decision-making processes.

**Educational strategies**

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Annex D. Anti-corruption action plan template

Goal: _______________

General objective: ________________

<table>
<thead>
<tr>
<th>Specific objectives</th>
<th>Link to the national strategy</th>
<th>Action(s)/measures</th>
<th>Timeframe</th>
<th>Outputs (deliverables)</th>
<th>Output indicators</th>
<th>Intermediate results or targets</th>
<th>Results indicators</th>
<th>Risks, assumptions and/or long-term impact (outcome)</th>
</tr>
</thead>
<tbody>
<tr>
<td>[ ]</td>
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<td>[ ]</td>
</tr>
</tbody>
</table>
Annex E

Ten principles of effective monitoring and evaluation

Ten Principles of Effective Monitoring and Evaluation for the Implementation of National Anti-Corruption Strategies and Action Plans

Principle 1 – Sound indicators

Well-formulated indicators are the basis for clear and comprehensive monitoring. They need to call for specific, measurable, qualitative, and quantitative data. Reporting on progress towards indicators should go beyond the limitations that indicators sometimes contain. It should provide the monitoring body and the public with all information they might look for in the context of each indicator.

Principle 2 – Reporting by state bodies

Each state entity responsible for the implementation of a certain action should be responsible for reporting on progress. State bodies should ideally report at least twice a year to ensure public scrutiny of progress. Any paper-based reporting requires templates. For ease of following the numerous activities, a system of enumeration of objectives and activities is recommended in action plans, and the same enumeration should be followed in the reports. Information from other sources should serve to complement and countercheck the data submitted by state bodies. Reports should contain quantitative data on the overall level of implementation, combined with a matrix on the quantitative and qualitative status of each action.

Principle 3 – Usage of IT tools

Information technology (IT) solutions facilitate structured input, render paperwork obsolete, provide data in real time, and allow for easy public reporting. Ideally, the monitoring body is connected through a web application with all reporting entities. Whenever an online reporting system is not available, offline software can support the aggregation and analysis of all institutional reports. As an alternative, reports should still be in electronic format sent by email to be consolidated into one table, or such tables could be shared on line.
Principle 4 – Incentives for reporting

Incentives should be available to facilitate reporting. This includes clear institutional and individual responsibility for reporting; clear instructions; high-level endorsement; public availability of progress reports; IT support; and the possibility of onsite audits by the monitoring group.

Principle 5 – Monitoring bodies

Monitoring bodies (if a collegial body) should be comprised of diverse stakeholders, including civil society, or (if an agency) ensure input from various stakeholders. They should meet at least as often as is the frequency of reporting. They should ensure political weight by its location or level of members and should employ staff with relevant expertise as well as promoting the body’s work to the public.

Principle 6 – Public access

Public access to progress reports can increase pressure and demand for change. It provides a strong incentive for public bodies to comply with benchmarks contained in indicators. It furthermore allows the public at large to scrutinise how the government lives up to its commitments. Public access means putting all progress reports on line in a machine-readable format to allow for keyword search or for migrating part of the data for further analysis by civil society organisations. The same is true for evaluation reports.

Principle 7 – Participation of civil society

The inclusion of civil society in monitoring and evaluating strategies ensures ownership of the process by a large societal basis. Civil society representatives should be included in any monitoring/co-ordination commission and its working groups (e.g. for onsite audits), should have access to progress reports, and the monitoring/co-ordination commission as well as implementing state bodies should take their comments on the implementation of anti-corruption strategies into consideration.

Principle 8 – Co-ordination

Monitoring is not just taking note of progress reports; monitoring bodies also have to steer activities in the right direction. To this end, the monitoring/co-ordination commission and implementing state bodies have to show leadership; communicate; review compliance with timelines; allocate resources; and update parts of an action plan in need of review or redesign. Co-ordination of activities has to reach out to the regional and local levels to ensure inclusion of all stakeholders and flow of information between all levels of government.
**Principle 9 – Ensuring compliance**

Accessibility of progress reports to the public creates a healthy competition between public entities. Implementation bodies should apply result-oriented management with their staff to facilitate achieving objectives. In addition, it is indispensable for monitoring bodies to not only react to the progress made, but explain from the beginning to each agency and staff their particular role and responsibility, and point out the benefit of doing so. The possibility of onsite audits by the monitoring body provides an additional incentive for implementing entities to comply with the action plan.

**Principle 10 – Evaluations**

It is necessary to review the overall success of an anti-corruption policy at least once during its timespan. The evaluation should be transparent and result in recommendations on updating the existing anti-corruption policy or on designing a follow-up one.

Annex F

Example of a local government anti-corruption action plan with indicators

<table>
<thead>
<tr>
<th>Awareness-raising and education on public integrity</th>
<th>Anti-corruption training in local government entities (LGEs)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Priority 1</strong></td>
<td>Efforts will be made to introduce anti-corruption education at all stages of the Greek local government system, including at the municipal and regional level. This will require co-operation between government departments, particularly the Ministry of the Interior and Administrative Reconstruction.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Result 1</strong></th>
<th><strong>Integrity training integrated in local government entities</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Results indicators</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Benchmark</strong></td>
<td><strong>Benchmark completion</strong></td>
</tr>
<tr>
<td>1.1 Survey conducted of existing anti-corruption and integrity training in LGEs</td>
<td>Survey has been completed, with the participation of over 50% of Greek LGEs</td>
</tr>
<tr>
<td>1.2 Workshop held to evaluate present gaps in integrity training</td>
<td>Workshop concluded with agreement on key gaps in integrity training and key features of possible training</td>
</tr>
<tr>
<td>1.3 Draft integrity training content developed for LGEs</td>
<td>Draft integrity training content completed and amended following consultation with workshop participants</td>
</tr>
<tr>
<td>1.4 Integrity training piloted in a limited number of LGEs</td>
<td>Curriculum is taught successfully in a minimum of 30 LGEs across Greece</td>
</tr>
<tr>
<td>1.5 Integrity training revised in line with feedback from piloting institutions</td>
<td>Updated training completed incorporating comments from all LGES participating in pilot programme</td>
</tr>
</tbody>
</table>

Source: Adapted from UNODC materials for national workshops.
ANNEX F. EXAMPLE OF A LOCAL GOVERNMENT ANTI-CORRUPTION ACTION PLAN WITH INDICATORS

GUIDELINES FOR DRAFTING SECTORAL ANTI-CORRUPTION STRATEGIES IN GREECE

oecd.org/corruption