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"Good Governance and Fight against Corruption"

Designing and Implementing Anti-corruption Policies

Handbook

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FOREWORD

After the fall of the Berlin Wall, all the people of Europe openly embraced the Council of Europe values: respect for Human Rights and pluralistic democracy under the rule of law. However, with the great ideological divide gone, a new surreptitious but daunting threat to these values emerged: corruption. Corruption is capable of metastasing in old and new democracies alike, distorting competition, slowing down economic growth and undermining public trust in the political system and State institutions.

In the 1990, the Council of Europe updated its old and adopted new treaty law instruments. The Committee of Ministers approved several key recommendations and guidelines against corruption. In this way new, tougher standards were established to fight corruption and money laundering and to confiscate proceeds of economic crime.

Monitoring of compliance with anti-corruption standards was entrusted to the Group of States against Corruption (GRECO). GRECO monitors all Council of Europe member States (as well as the United States and Belarus) on an equal basis, through a process of mutual thematic evaluation rounds followed by a compliance procedure designed to assess the measures taken to implement GRECO recommendations.

The first GRECO evaluation (2000–2002) focused on the independence, specialisation and means of national bodies engaged in the prevention and fight against corruption. These are the structures co-ordinating and driving the anti-corruption policies and measures.

To assist its member States in implementing GRECO recommendations and combating corruption, the Council of Europe implements national and regional, multi-annual, multi-million technical assistance projects. Since sound anti-corruption policies are the starting point for any success in the fight against corruption all such projects have included components on designing and putting into practice of anti-corruption strategies and action plans.

This Handbook builds on more than a decade of experience of technical assistance and in particular on the results of two workshops carried out as part of the "Eastern Partnership – Council of Europe Facility Project on Good Governance and Fight against Corruption", a project funded by the European Union and implemented by the Council of Europe.

For the first time, the lessons learned are presented in one publicly available, systematic reference document. The Handbook provides a step-by-step guidance, illustrated by practical examples, on all aspects of designing and implementing anti-corruption policies. I am confident that it can serve as a useful resource for practitioners and civil servants tasked to give policy advice or having other responsibilities in developing national policies or carrying out national anti-corruption reforms.

I am grateful to Mr Tilman Hoppe, the Eastern Partnership Project long-term adviser, who drafted and edited this Handbook, as well as to Council of Europe experts Ms Vera Devine, Mr Edmond Dunga, Mr Valts Kalniņš and Mr Quentin Reed, who reviewed it and provided valuable input.

Special thanks go to the Project's National Anti-Corruption Focal Points of the Eastern Partnership countries Armenia, Azerbaijan, Belarus, Georgia, Republic of Moldova and Ukraine.

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1 INTRODUCTION

There is an abundance of advice on anti-corruption measures, but there is no manual on the formal steps of formulating and implementing policies

The necessity for "coordinated anticorruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability"[1] is recognised by international law.

The success of anti-corruption policies depends on the following three factors:

- Genuine commitment and support of the key stakeholders (political will);
- Addressing the relevant needs through relevant actions (substance);
- An efficient drafting and implementation of the policy (formal management).

Much has been said and published about the necessity for political will, and about the substance of anti-corruption policies: What is the best way of fighting corruption? Which measures are relevant and how they are best combined? NGOs and international organisations have written commentaries and advice on the advantages and dangers of certain anti-corruption measures in many countries. In addition, complex, if not complicated, formulas have been thought up in order to assess the success of anti-corruption measures.

The process of drafting and implementing policies has also received quite a lot of attention in seminars and workshops. However, until now, there is no single step-by-step guidance for practitioners available on this rather formal aspect of anti-corruption policies as management tools. At the same time, there is no comparative overview on different practices.

This Handbook intends to close this gap. It leads systematically through all steps and aspects of anti-corruption policies as management tools. At the same time, it provides a pool of practices existing – at least at the conceptual level – in the Eastern European region, which the reader can compare and use as a template, or as a starting point for taking a different road. This approach is based on the assumption that there is no "best practice" anti-corruption policy that

[1] Article 5, paragraph 1of the United Nations Convention against Corruption (UNCAC).

may be uniformly applied to any context. Whereas the basic guidance available remains abstract in its recommendations, all steps in this Handbook are illustrated by practical examples – whether they are examples of good practices or not.

It is hoped that with this Handbook any country in- or outside the Eastern Partnership will no longer have to go through the troublesome exercise of collecting comparative material from foreign strategies, in order to get inspiration for the drafting and implementation process of their own strategy, as has been done, for example, in Turkey for drafting the Strategy for 2010-2014, by analysing strategies of 13 other countries.[2]

[2] See OECD, Proceedings of the Seminar on "Anti-corruption policy and integrity", March 2011, www.oecd.org/dataoecd/3/17/47912383.pdf at p. 18.

2 SUMMARY/RECOMMENDATIONS

In the last ten to fifteen years, anti-corruption policies have become increasingly common as tools for countries faced with significant or severe problems of corruption. Taking the experience from up to three generations of anti-corruption strategies into account, the following good practices seem to be key factors for successful anti-corruption policies in any country:

Keep policies short and concise

The drive for designing better anti-corruption policies has often resulted in voluminous and complex anti-corruption strategies - often under the influence of recommendations of technical assistance or monitoring bodies. However, such strategies are likely to become unmanageable and prevent resources being concentrated on priority areas, as well as being less accessible to the wider public.

Instead, strategies and polices should be focused on a manageable range of objectives. A short, committed and realistic policy, properly elaborated, will be more credible and understandable for both the general public and the state institutions involved.

One-paper documents might be easier to handle in this context than the breakdown into a strategy and a separate, often subsequent action plan. In the end, the action plan is the pivotal document that will be implemented

Concentrate on what to achieve (good public service), not on what to prevent (corruption)

The necessity of "anti-corruption" policies has become conventional wisdom over the past years. However, fighting corruption by directly addressing it will not suffice alone. Anti-corruption policies interact and need to be embedded into broader policies to ensure good governance, ranging from the design of governing processes (e-government, simplification of procedures, etc.) but also embracing 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 side effects in preventing "anti-corruption", and are as important as conventional measures designed to detect and address corrupt acts.

Use simple and concrete indicators

The indicators used to monitor the implementation and impact of polices should be manageable instead of trying to measure the almost immeasurable without the necessary resources and capacities. Indicators should focus on concrete results and avoid abstract concepts such as "reduction of corruption".

Buy in legitimacy from the public/parliament

Adoption or at least review of the policy by civil society and/or parliament might enhance the (perceived) legitimacy of the policy.

Strategies don't implement by decree

Take the time to build and secure the support of the relevant institutions for the design and implementation of the strategy. Ensure awareness and capacity for identifying needs and measuring progress - sending out instructions by letter will not do the job. Regular coordination and monitoring of stakeholders is necessary. Sometimes, coordination bodies seem to exist rather on paper than making a difference in reality.

Monitoring results should be public

Monitoring of progress should be systematic and produce meaningful reports that are available to the public. This encourages accountability for implementation and may also encourage fruitful competition among agencies.

3 NEEDS ASSESSMENT

GRECO "recommends that a study be undertaken of the scale and nature of possible corruption [...], covering the most exposed sectors, coupled with an assessment of existing instruments [...] to deal with corruption, which would provide a sound basis for the development of anti-corruption policies."*

The starting point for designing any strategy is a proper assessment of a country's needs:

- Models and approaches from foreign good practices may often be appropriate, but this conclusion may only be reached by assessing domestic needs;
- Even where approaches/policies from foreign experience are appropriate, their effective implementation requires deep participation of local stakeholders from the beginning; domestic needs assessment is the natural way to establish such participation.

Such needs assessments may be given various labels, such as "risk analysis", "integrity assessment", "corruption diagnosis", "corruption map", "corruption indicators", "integrity system mapping", etc. These exercises try to answer one or both of the following questions:*

- Incidence and nature of the problem: how widespread is corruption, and what forms does it take?
- Strength of governance policies/institutions: how strong are measures to ensure good governance?

Tools labelled "corruption" tend to focus more on answers to the first question, whereas tools labelled "risk" or "integrity" tend to focus more on the second question.

There is an abundance of guidance available on different methodologies of assessing the incidence and nature of corruption on the one hand, and governance on the other (see literature in appendix 8.3). This chapter does not aim to double those efforts or to favour one method, but simply gives an overview over the main tools available for needs assessment, illustrated with some examples from Eastern Partnership countries.

* GRECO, Joint 1st & 2nd Round Evaluation Report on Andorra, Eval I-II Rep (2006) 1E, 8 December 2006, at no. 24, www.coe.int/greco

3.1 Assessing the extent of corruption

**

GRECO considers "objective research as a key element for the understanding of the phenomenon of corruption, its spread, forms, etc, at the same time as it is an indispensable tool for putting in place efficient measures against corruption."**

Before assessing corruption, people often ask: What is this "corruption" we are assessing? There is an abundance of literature on defining corruption and categorising its forms. However, Council of Europe Conventions and Recommendations, or the UNCAC inherently describe all major forms of corruption, such as criminal acts (bribery, trading in influence, abuse of function, etc.), wrongly handling conflict of interest, nepotism, and improper party financing. As a consequence, there is widespread agreement in practice on what constitutes corruption. The making of assessments should therefore not be distracted by issues of definition.

An additional reason for this is that institutional assessments should not limit their focus too narrowly on corruption alone, but also take into account other types of official conduct which go against the public interest, such as unfair treatment and obstructionism. Such conduct may be correlated with corruption, and efforts in tackling it are likely to have side-effects in terms of making corruption less likely – the "side-effect" syndrome mentioned in Section 2.

On the other hand, it may be very useful - especially in environments where corruption appears to be very widespread or systemic – to include as part of an assessment research on what relevant actors (officials or citizens/clients) understand to be corrupt conduct. The results of such research may yield important information for devising policies – for example, in influencing attitudes.

3.1.1 Types of information

There are two kinds of information, on which corruption assessments can be based on:

Statistical information:

- Statistics on crime, misconduct or the length of administrative procedures;
- Accounts of experienced corruption made by media, ombudsmen, citizens, officials, NGOs, etc.;

** GRECO, 1st Round Evaluation Report on Bulgaria, Eval I Rep (2001) 14E Final, 17 May 2002, at no. 104.

Analytical information:

- Perceptions, opinions and conclusions about corruption (by citizens, experts, domestic or foreign business, NGOs, etc.).

Meanwhile statistical information should not automatically be treated as a reliable measure of corruption, just as analytical information is not necessarily unreliable. Thus statistics on crime may be as much an indicator of the level of corruption as an indicator of the activity of law enforcement institutions. Conversely, interviews with very well-informed experts may sometimes provide very accurate indicators of the incidence, severity and nature of corruption.

3.1.2 Gathering information

There are several tools for gathering information:

"States Parties shall consider [...] conducting evaluations, studies and research relating to the types, causes, effects and costs of corruption in their respective countries, with a view to developing [...] strategies and action plans to combat corruption."*

Desk review
This is the first step in order to look at what is already available, such as previous reports or assessments on the prevalence of corruption by academics, NGOs, international organisations, media, etc. The quality and coverage of information is, however, somewhat left to chance, depending on what is available. International organisations or NGOs regularly assess corruption in a wide range of countries. Existing corruption surveys are often used as data in desk reviews. Some of the most popular ones are:*

Transparency International

- Corruption Perception Index (CPI)[3]: perceptions of corruption in the public sector;
- Global Corruption Barometer (GCB)[4]: perception and experience on petty bribery and high-level corruption;
- Bribe Payers Index (BPI): likelihood of foreign firms paying bribes (perception);

World Bank

- Control of Corruption Index (perception)[5];
- Enterprise Surveys (perception and experience)[6].

* Article 60, paragraph 4 of UNCAC.

[3] www.transparency.org/policy_research/surveys_indices/cpi

[4] http://www.transparency.org/policy_research/surveys_indices/gcb

[5] http://info.worldbank.org/governance/wgi/index.asp

[6] www.enterprisesurveys.org/

Freedom House Nations in Transit assessment (perception of selected experts)

European Bank for Reconstruction and Development and World Bank: Life in Transition Survey (perception and experience)

The Moldovan Anti-Corruption Strategy 2011-2015 analyses and compiles in its "Chapter 1: Existing Situation" all major assessments and indices on corruption already available in the Republic of Moldova.

Surveys

If done properly, surveys can provide valuable data. Eastern Partnership countries have carried out national surveys of both perceptions and experience:

Armenia: Corruption Survey of Households 2010 (USAID)

Azerbaijan: Survey on Corruption 2007 (unpublished)

Georgia: Public Officials Survey 2009 and General Public Survey 2009 (Council of Europe/Netherlands)

Republic of Moldova: Evolution of the Perception Regarding Corruption Phenomenon in the Republic of Moldova 2005 – 2009 (Council of Europe); Moldova Anti-Corruption Assessment 2006 (USAID)

Ukraine: Surveys on Corruption Risks in the Administration and the Criminal Justice System 2009; Justice System 2006 (Council of Europe)

Key factors for obtaining useful data are:

Defining the objective of the survey clearly – what do we want to find out?

- Attitudes (e.g. tolerance of corrupt practices, willingness to ask for bribe, to participate in reforms, to report, or to vote for corrupt politicians);
- Perceptions (e.g. how the public perceives the actual behaviour of public officials);
- Experience (e.g. actual experience of e.g. bribery).

The right sample of the population (target group)

- General population (e.g. survey on bribery in general);
- Sampling that avoids over-representation of certain groups. e.g. urban population (despite people being more accessible, and at a lower

cost) or Internet users whose answers may be easier to collect;

- Select people with specific experience – particularly important for example in a survey on procurement.

See e.g. the Georgian General Public survey 2009, p. 6: "The sampling universe includes the adult population of Georgia residing in both rural and urban areas."; Republic of Moldova: "39 % of respondents had urban residence whereas 61 % had rural."

Anonymity and confidentiality

- Corrupt officials and bribe givers may fear sanctions;
- Victims and vulnerable participants in corruption may fear retaliation.

The right questions

- Start off with general questions to gain trust, leave the most sensitive questions to the end; this is particularly important with interviewees who can be expected to be especially insincere, e.g. bidders in public procurement, who are willing givers of bribes;
- Ask specific questions (not about "corruption", but about "gifts" or "payment") – otherwise each respondent will have a different concept about "corruption";
- Avoid shame: Ask hypothetical questions – "what would you do if", or "did anyone in your household or your business experience a request for money";
- Ensure that respondents are told at the beginning that there are 'no right answers' to the survey questions;
- Test the knowledge of respondents about public institutions to see if knowledge correlates with greater or lesser trust in the integrity of the institutions (if the more informed people trust less, it is a sign of greater problem);
- Questions should be understandable regardless of background.

A pilot phase to iron out methodological and practical problems is essential.

See e.g. the Georgian General Public survey 2009, p. 6: "Prior to the fieldwork, a pilot survey was conducted

and findings were incorporated into the final survey questionnaires."

The main problem of surveys is cost: A survey with a sample of at least 1,000 respondents can easily cost from €10,000 upwards depending on the location, the number of questions asked, the service provider chosen, etc.

According to the Compliance Report of GRECO (1st & 2nd Round) the (unpublished) public survey in Azerbaijan carried out by a contractor in 2007 cost €15,000.

Unless the questionnaire design is highly sophisticated, the survey is administered with highly trained interviewers, and the interpretation of the results is conducted by independent respected experts, the benefits gained through mass surveys may be small.

One has to keep also in mind that surveys provide information which is more "statistically accurate", but will not allow more in-depth information on the functioning of the institutions and processes under scrutiny[7], as would be the case with interviews with focus groups.

Interviews

Interviews are generally held with targeted members of government and/or civil society, e.g. with NGOs observing the corruption situation or maintaining advocacy centres, practitioners, business people, citizens/focus groups, officials, politicians, experts, law enforcement officials, judges, etc. Interviews are either semi-structured (flexible, allowing new questions to be brought up during the interview as a result of what the interviewee says within a framework of themes to be explored) or structured (with a more strictly pre-determined set of questions, typically formulated in a written questionnaire). Key factors for obtaining useful data are:

- Either select unbiased interviewees or make a balanced selection of biased 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.

[7] Council of Europe Technical Paper "Corruption risk assessment methodology guide" by Quentin Reed and Mark Philp for PACA Project, December 2010, www.coe.int/paca

Part of the Moldovan "Methodology of Corruption risk Assessment in Public Institutions"[8] is a questionnaire, which contains 70 questions, such as:

"Have you ever heard of attempts by external parties to improperly influence a colleague's professional decisions? (Yes/No) If yes, do you know if these attempts have been formally reported within your organisation? (Yes/No)"

At the same time, the methodology foresees the use of "target groups […] invited to discuss subjects of specific interest."

Focus Group discussions

Targeted interest groups hold in-depth discussion sessions in order to produce assessments on the forms and venues of corruption. One has to keep in mind, though, that focus group discussions are rather a means of inspiring a mutual exchange, whereas the more confidential setting of bilateral interviews can encourage voicing dissenting opinions from among the group members. There are the following differences between focus groups and surveys:

- sample size and precision;
- questions put to a group instead of individuals;
- open discussion among target group following questions.

The survey contained in the Moldovan Anti-Corruption Assessment 2006 combined interviews and focus groups, stating the following: "Final Report Moldova Survey responses were obtained from 35 individuals, most of whom were participants in focus group discussions, structured individual interviews or small group interviews. Of the 35 respondents, 26 were from NGOs, 6 from other entities, and 1 from the state. The remaining 2 did not note their affiliation."

[8] Council of Europe Project against Corruption, Money-Laundering and Financing of Terrorism in the Republic of Moldova (MOLICO), English translation of the draft "Methodology of corruption risk assessment in public institutions", www.coe.int/t/dghl/cooperation/economiccrime/moneylaundering/projects/molico/AC/Output1.6/912%20MOLICO%20Nat%20%20Legisl%20_methodology%20of%20corruption%20risk%20assessment.pdf

Mix of sources

Many assessments combine several of the above tools of collecting information:

The Ukrainian Survey on Corruption Risks in Administration 2009 (p. 11) is based on: "a) Nation-wide poll of population of Ukraine; b) Interviews with entrepreneurs; c) Focus-groups in 5 towns of Ukraine; d) Extended interviews."

Case studies also usually use several of the above means of collecting information for examining specific occurrences of corruption in detail:

The "Case study in Combating Corruption in the Armenian Customs System" (2002)[9] examines in detail the causes of corruption in the Armenian customs system and gives recommendations on possible governance measures.

3.1.3 Analysing information

One needs to ask three questions in order to properly analyse data:*

"If comprehensive data and research [...] was available, the situation could be analysed in a more objective and precise manner."*

1. Who provided the data?

When assessing the validity and reliability of responses, one should consider:

- How much are the respondents likely to know about specific forms of corruption (domestic or foreign nationals, central or local residents, experts or ordinary citizens, business people or members of a private household)?

A 2010 survey by UNDP in Serbia shows 65% of the population perceiving prosecutors as corrupt. However, only a low percentage of these people would have had actual contact with prosecutors – the exact percentage not being revealed by the survey – and only 1% actually reported having given a bribe to prosecutors.

- What interest may respondents have in overstating or understating the problem, such as public officials versus representatives from NGOs?
- Are the respondents, in the narrow sense, rather losers or winners from corruption?

[9] www.afic.am/Summary-Eng.pdf

* GRECO, 1st Round Evaluation Report on Albania, Eval I Rep (2002) 9E Final, 13 December 2002, at no. 148.

- Would fear of prosecution, reprisals or shame distort the results?

Different sources: Often different corruption assessments share the same source and thus provide additional information only to some extent. Where possible, preference should be given to original data sources.

The Heritage Foundation & The Wall Street Journal Index of Economic Freedom (perception)[10] is based on ten "freedoms". "Freedom from Corruption" is "derived primarily from Transparency International's Corruption Perceptions Index (CPI)"[11], and therefore does not provide any new information. In addition, the 2012 "Freedom from Corruption" Index is based on the CPI from 2010.

2. In answer to what question was the data provided?

There is a huge difference if questions are about "corrupt officials" or about "money or gifts expected by officials". In other words: "corruption" ≠ "corruption" – every respondent has a different concept in mind if the question is only about "corruption".

According to the EBRD Life in Transition Survey 2010, 65% of respondents perceive corruption as happening in Azerbaijan, but only 15% do so in Belarus. In contrast, the perception of corruption according to Transparency International's CPI 2010 is almost the same in both countries (2.5/2.4). The contradiction is solved if one looks at the fine print: "Corruption" in LiTS is defined as bribery, whereas "Corruption" in CPI is "all-inclusive".

Analytical data must be treated with caution – it does not necessary reflect reality, but can also reflect:

- A general dissatisfaction or estrangement with public administration;
- Distortion of media coverage because of either censorship or excessive appetite for sensation;
- Generally high-levels of tolerance towards corruption;
- Raised awareness on corruption, rather than an increase in corruption;

[10] Freedom from corruption is one of 10 specific components of economic freedom: http://www.heritage.org/index/

[11] www.heritage.org/index/book/methodology

The International Country Risk Guide (ICRG), which indicates political risk from corruption, rated Ireland very favourably with a "5" during the years of Charles Haughey being Premier Minister (1987 to 1992), but downgraded it in 1997 to a mere "2" with revelations of his corrupt activities in office, even though he was long retired by then. In January 2011, Ireland still ranked only at "3.5".

- A public belief somewhat contradicting experience.

The Armenian Corruption Survey of Households 2010 shows that 68% of respondents believe corruption to be common in the healthcare system, whereas only 22% of those respondents who had been in contact with the healthcare system said that they were asked for a bribe.
Astonishingly, even the reverse can be the case: According to the EBRD Life in Transition Survey 2010, 40% of respondents in Ukraine experience unofficial payments or gifts, whereas only 20% perceive such a practice.

However, subjective data is often the only main source available and can tell about the attitude towards corruption.

3. What data is missing?

- Does the data cover all forms of corruption?

Whereas most surveys focus only on administrative corruption, the Armenian Corruption Survey of Households 2010 includes political parties as possible actors into the questionnaire on perceived levels of corruption, without going into any detail.

- Which segments of society are not covered?

For practical reasons, the Georgian General Public Survey 2009, p. 6 does not cover the population in "military bases and correctional institutes".

- Are there regional differences?

The World Bank's 2011 Enterprise Survey on Azerbaijan (p. 4) shows a 20% higher occurrence of informal payments in certain regions than in the capital Baku.

- The data available might not necessarily support a compelling conclusion.

A survey might find a high percentage of respondents answering the following question in the affirmative: "Did you ever have to give money to a judge in order to facilitate the handling of your case?" However, data might be missing as to whether this bribe had been

paid directly to the judges or via a lawyer. If it has been channelled at least in some cases through lawyers, there it may be that the lawyer only fraudulently pretended the judge had requested a bribe.

In order to allow the analysis of data, surveys regularly make the questions asked and the sample of respondents transparent in the published version.

A 30-page annex to the Georgian General Public Survey 2009 shows all questionnaires used; a similar annex is found in the Armenian Corruption Survey of Households 2010. In the surveys by the Republic of Moldova and Ukraine in 2009 the questions used are embedded in the survey results. The latter has the advantage of putting them in context, but would not allow the reader to see the questions all in one place.

3.2 Assessing the strength of governance measures

"Each State Party shall consider monitoring its policies and actual measures to combat corruption and making assessments of their effectiveness and efficiency."*

There are several handbooks comprehensively listing corruption risks and relevant governance measures, and covering more or less all aspects of society (not only law enforcement but also access to information, public awareness of rights, complaints mechanisms, budget integrity, procurement systems, audit and control, etc.): *

- UNODC, UN Anti-corruption Toolkit (3rd edition 2004)[12];
- UNODC, Technical Guide to the UNCAC 2009 (English and Russian)[13];
- OSCE, Best practices in combating corruption, 2004 (English, Russian and Azerbaijani)[14];
- Transparency International, "Confronting Corruption: The Elements of a National Integrity System", TI Source Book 2000 (English)[15];
- UNODC, UNCAC-self-assessment checklist[16] (in English and Russian);
- OECD: Managing Conflict of Interests in the Public Service. A Toolkit 2005, Specialised Anti-corruption Institutions. Review of Models 2006 (in English and Russian), Lobbyists, Government and Public Trust 2009, Asset Declarations for Public Officials: A Tool to Prevent Corruption 2011 (in English and Russian), Bribery Awareness Handbook for Tax Examiners 2009, etc.[17];
- Checklists of corruption risks for different sectors (customs, health, political parties, etc.), see e.g. USAID Corruption Assessment

* Article 61, paragraph 3 of UNCAC.

[12] http://www.unodc.org/pdf/crime/corruption/toolkit/corruption_un_anti_corruption_toolkit_sep04.pdf

[13] www.unodc.org/unodc/en/treaties/CAC/technical-guide.html

[14] www.osce.org/eea/13738

[15] www.transparency.org/publications/sourcebook

[16] www.unodc.org/unodc/en/treaties/CAC/self-assessment.html

[17] www.oecd.org/document/42/0,3746,en_2649_37447_41799402_1_1_1_37447,00.html

Handbook (2006)[18], Annex 3, page 94 "Diagnostic Guides";

- U4 Anti-Corruption Resource Centre[19].

Most of these sources are based on the belief/assumption that certain legal and institutional arrangements help to prevent or control corruption. In other words: If corruption is prevalent in a country, the absence of comprehensive countermeasures is seen as the cause. There is consensus that governance measures need to include both repressive and preventive aspects, and should cover all sectors (public, business, civil).

The exercise of assessing governance measures is often called "corruption risk assessment" or "integrity assessment". However, its aim is always to review, what governance measures are missing in a country or in a sector.

In any case, seemingly easy formulas are no replacement for a careful analysis of governance measures needed.[20] A notorious example is the "Klitgaard formula", according to which CORRUPTION = MONOPOLY + DISCRETION – ACCOUNTABILITY. With this formula, the American economist Robert Klitgaard summarised the factors encouraging corruption. In other words, the less competition and more discretion service providers enjoy, the more corrupt they will be, while the more accountable they are the less corrupt they will be. The American Supreme Court, however, is the most obvious example for the limits of this formula: the Court enjoys a monopoly of final judicial decision-making, wide discretion, and virtually no formal accountability; according to Klitgaard, the Court would be expected to be highly corrupt or very prone to corruption, which does not seem to square with reality.

3.2.1 Types of information

Statistical information

- Information on legislation, institutional framework, capacity and public awareness;

[18] http://transition.usaid.gov/our_work/democracy_and_governance/technical_areas/anticorruption_handbook/index.html

[19] www.u4.no/

[20] PACA "Corruption risk assessment methodology guide" (footnote 7).

Analytical information

- Perception or opinions about the cause of corruption, i. e. the lack of certain governance measures, expectations (by public officials, citizens, experts, domestic/foreign business, NGOs, etc.);
- Motives provided for by parties involved in corruption.

3.2.2 Gathering information

"A global governmental initiative should aim at [...] enhancing research on infected and vulnerable sectors [...]."*

Even though there is objective data available on the lack of certain governance measures, identifying the relevant measures is mainly about subjective opinion: Is corruption in procurement procedures due to a lack of prosecution, a lack of internal inspections, a lack of complaints mechanisms or other reasons? The absence of certain measures does not necessarily mean that their absence is responsible for corruption, or that it even facilitates it. In any given case, opinions will vary, whether one asks a citizen, a public official at expert level or executive level, an NGO, or a foreign expert. To get as many and varied perspectives as possible, one can basically use the same methods as for gathering data on measuring corruption itself.*

Desk Review

This is the first step in order to look at what is already available, such as previous reports or assessments on the state of counter measures by academics, NGOs, international organisations, media, etc.

In order to know if certain good governance measures have been adopted, usually the first and most reliable source of information will be official documents – legislative enactments and policy planning documents. These are highly valid and reliable sources although they do not necessarily show how much political commitment is there to back up the documents.

If there have been earlier strategies that have expired, one needs to look at what tasks have not been fully implemented and if they still need to be addressed by the subsequent strategies.

International organisations and NGOs regularly assess the institutional integrity in a wide range of countries. These already existing integrity assessments are often used as data in desk reviews.

* GRECO, 1st Round Evaluation Report on Estonia, Eval I Rep (2001) 7E Final, 14 September 2001 at no. 108.

Compliance with international conventions:

- GRECO monitoring reports (Council of Europe Conventions and Recommendations);
- Country reports on the implementation of the OECD Anti-Bribery Convention;
- UNCAC Review Mechanism;

Integrity analysis:

- The Global Integrity Report;
- OECD Anti-Corruption Network monitoring reports;
- National Integrity Systems assessments by Transparency International.

UNCAC-self-assessment checklist[21] (in English and Russian)

National reports / methods – examples:

Armenia: Institutional Sources of Corruption in the Case of Armenia 2009 (USAID)

Azerbaijan: Micro System Studies (Council of Europe)

Georgia: An Assessment of Georgia's National Integrity System 2008 (Open Society Institute)

Republic of Moldova: Government Decision No. 906 on Methodology for Assessing the Risk of Corruption in Public Institutions

Ukraine: National Integrity System Assessment 2011 (TI); Surveys on Corruption Risks in the Administration and the Criminal Justice System 2009; Justice System 2006 (Council of Europe)

Surveys

As for obtaining valid data, basically the same rules apply as for assessing corruption (see above at 3.1.2). Questions about possible governance measures include especially the following:

- Which governance measures do citizens make use of and which not? Why (e.g. lack of awareness, lack of trust)?
- How are additional governance measures perceived?

Georgia, p. 36: Among the 10 reform measures above, which one would you prefer above others? (Stricter

[21] www.unodc.org/unodc/en/treaties/CAC/self-assessment.html

controls and penalties for public employees, better training for public employees) are the two most favoured.

- Causes for corruption (mirror question to future governance measures), e.g. too much personal contact in service administrations;
- Expectations (e.g. how the public wants public servants to behave).

In addition, and as with assessing the extent of corruption, interviews, and discussions by focus groups are possible tools for gathering information.

For example, (written) interviews, focus groups and case studies are part of the Moldovan "Methodology of Corruption Risk Assessment in Public Institutions", Government Decision no. 906 of 28 July 2008:[22]

"In order to verify the properness of the assessment of employees' resistance against the corruption risks within the institution, a **questionnaire** is to be distributed to the personnel. […]

The **analysis of** concrete corruption **cases** assumes detailed investigation of actual or typical corruption cases, committed by the employees of the institution, in order to identify eventual shortcomings in the management of the organization, as well as to determine the real or potential capacities of the institution to prevent the phenomenon. […]

The **target groups** are concrete groups, invited to discuss subjects of specific interest. This technique produces a qualitative assessment rather than a quantitative one, offering detailed information regarding visions on the corruption, its reasons, as well as ideas regarding the possibilities of a specific authority in fighting corruption."

3.2.3 Analysing information

The same three questions that apply to measuring corruption are also used for analysing information on governance measures. Some particularities:

1. Who provided the data?

- How much do the respondents know about reform measures? Respondents will often only recommend the option they know best and might be completely unaware of other

[22] MOLICO "Methodology of corruption risk assessment in public institutions" (footnote 8).

possibilities and their pros and cons. For example, there is a strong preference among lay people for repressive solutions;

- How much was copied from other sources?

The data of the Freedom House Nations in Transit Survey 2011 for Kosovo is in some parts "only" a compilation of the EU Progress Report on Kosovo* 2010: "The European Commission 2010 Progress Report also noted that the Office of the Auditor General needs more financial independence, as the government continues to influence it through budgetary control. […] The EC's 2010 report on Kosovo criticised the government for continuing to delay significant public administration reform [...]."

2. In answer to what question was the data provided?

- Leading questions make a big difference in the answer, but are somewhat unavoidable:

"Do you think it could help reduce the risk of getting bribe demands, or present requests, from administration officials if one did not have to contact them personally but could instead mail one's papers or submit them to a one-stop shop?"

3. What data is missing?

- Does the data cover all corruption risks and possible governance measures?
- Which segments of society are not covered?
- Is data available on the general respect for laws and rigour in their implementation in the country? This tells us roughly how much credit to give for the mere fact that a certain law exists;
- Is data available on the transparency of institutions and procedures? This gives us an idea of how sure we can be about something being or not being implemented, e.g. if there is an anti-corruption body, can we see whether it is doing any good.

* All reference to Kosovo, whether the territory, institutions or population, in this text shall be understood in full compliance with United Nation's Security Council Resolution 1244 and without prejudice to the status of Kosovo.

3.3 External assessment and self-assessment

External assessments...
...avoid self-protection
...have the bird's eye's view
...use dedicated expertise

Assessing the extent of corruption or identifying possible governance measures can be done by an external party, such as an expert or a body like GRECO. EaP countries had corruption measured and counter measures assessed by outside experts. The Council of Europe, among others, has provided the framework for external assessment in the following cases (either as in-depth assessment of institutions, or with a broader perspective through surveys):

Azerbaijan: Micro System Studies (Council of Europe)

Georgia: An assessment of Georgia's National Integrity System 2008 (Open Society Institute); Public Officials Survey 2009 and General Public Survey 2009 (Council of Europe/Netherlands)

Republic of Moldova: Evolution of the Perception Regarding Corruption Phenomenon in the Republic of Moldova 2005 – 2009 (Council of Europe)

Ukraine: Surveys on Corruption Risks in the Administration and the Criminal Justice System 2009; Justice System 2006 (Council of Europe)

Self-assessments...
...ensure ownership
...profit from local experience
...are cost efficient

However, self-assessment exercises have become increasingly popular. For example, in Slovenia self risk assessments are systematically carried out in all public bodies and local communities.[23] In the Republic of Moldova, as part of the Council of Europe MOLICO-Project, self-assessment of central institutions was introduced in 2008:

"Methodology of Corruption Risk Assessment in Public Institutions", Government Decision no. 906 of 28 July 2008:[24]

"Objectives of the assessment: […]

to identify the institutional factors that favour or might favour corruption;

to draw up a Recommendation on how to eliminate or diminish their effects (drawing up integrity plans).

[23] Drago Kos, "Integrity Plan as a Form of a Consistent Integrity Framework", Presentation at OECD Global Forum on Public Governance, May 2009, www.oecd.org/dataoecd/42/8/43263490.pdf

[24] MOLICO "Methodology of corruption risk assessment in public institutions" (footnote 8).

The assessment is to be carried out through self-assessment. With this a self-assessment group is to be created, by virtue of the order issued by the Head of the Institution. This group should be composed of a representative number of heads of relevant subdivisions (from 5 up to 7 members). Employees of the Centre for Combating Economic Crimes and Corruption may also be included in the composition of the above group, as observers, to offer advisory support to the self-assessment group.

Stages of assessment […]: assessment of preconditions; assessment of corruption risks as such; submission of recommendations to eliminate or diminish the effects of the corruption risks (drawing up integrity plans)."

By the end of 2011, all 24 central institutions had completed self-assessment. The procedure depended to some extent on external assistance for training the institutions involved in the method of self-assessment.

The UN has also introduced a self-assessment checklist for compliance with the UNCAC (in English and Russian)[25]. There exist also self-assessment tools for certain sectors, such as the "Integrity Self-Assessment Process – A Diagnostic Tool for National Defence Establishments" (2009)[26] by NATO and Transparency International.

Self-assessment can be effective if the leadership of the institution is sincerely committed to use the tool for

- an honest identification of the causes of corruption;
- an honest improvement of the performance of the institution;

and if there is high-level coordination among the public institutions.[27]

There exist also combinations of both approaches, such as the risk assessment in local communities in Armenia, Georgia and the Republic of Moldova by the "Partners

[25] www.unodc.org/unodc/en/treaties/CAC/self-assessment.html

[26] www.nato.int/nato_static/assets/pdf/pdf_2010_05/20100603_EAPC_PFP-joint_EAPC-0004-Encl1.pdf

[27] U4 Report 1:2007, "Anti-corruption policy making in practice: What can be learned for implementing Article 5 of UNCAC?", p. 42, www.cmi.no/publications/file/2914-anti-corruption-policy-making-in-practice.pdf

Foundation for Local Development".[28] With this approach, the assessment of risks and the development of solutions remain mainly in the hands of the local governments in question, whereas the process of risk assessment and designing anti-corruption policies is facilitated by outside experts.

[28] www.fpdl.ro/services.php?do=anticorruption_strategies; www.fpdl.ro/publications.php?do=training_manuals&id=15

4 DESIGNING

4.1 Function of anti-corruption policies

"To ensure credibility, […] national anti-corruption strategies […], covering both preventive and repressive measures, should be drawn up and implemented."*

There is no universally-defined terminology for anti-corruption policy documents. UNCAC is the only international Convention mentioning "anti-corruption policies" in its Article 5 as a necessity in the fight against corruption. *

There are other expressions used, such as "State Program for Fighting Crime and Corruption" (Belarus 2010-2012; Azerbaijan 2004-2006), or "Integrity" concept ("Concept of Fighting Corruption in Ukraine 'On the Way to Integrity'" 2007-2010). Integrity plans in general do not put so much emphasis on a direct fight against corruption (e.g. intensifying prosecution), but on achieving the same goal through integrity-raising among public officials.[29] This approach has the advantage of fighting for something positive, instead of against something negative (see below, 4.1.4).

Sometimes, an anti-corruption policy is one document advocating objectives, concrete measures to be taken, and responsible institutions and timelines, e.g. the "State Program for Fighting Crime and Corruption 2010-2012" (Belarus). Often, anti-corruption policies materialise in the form of two subsequent documents: a strategy and an action plan. Strategies usually define the objectives, whereas action plans break the strategic objectives down into concrete measures.

Anti-corruption policies can cover only certain units or branches of government, or a nation as such. The following text focuses on national strategies, but its rationale applies to sector strategies as well.

4.1.1 Policy function

Looking at society at large, systematic and publicly-declared anti-corruption policies – as all policies – have many functions. They

- create transparency in need for action;

* Ten Principles by the European Union for Improving the Fight against Corruption in Acceding, Candidate and Other Third Countries, Principle 1.

[29] Council of Europe Technical Paper "Methodology of corruption risk assessment in public institutions" by Drago Kos for MOLICO Project, February 2008 - unpublished.

- ensure dealing systematically and comprehensively with corruption;
- facilitate coordination among institutions;
- initiate involvement of state institutions and society at large;
- set priorities;
- commit government and society;
- document commitment domestically and internationally;
- may serve as a tool for raising funds from donors;
- allow measuring of delivering on commitment.*

The functions of an anti-corruption strategy are "defining priorities for action, associating all agencies involved and raising awareness among public officials and the general public".*

Often, anti-corruption policies are more the result of international pressure than a domestically recognised need. As one Deputy Minister in Georgia put it: "[W]ithout GRECO there would be no anti-corruption strategy".[30]

4.1.2 Management function

Besides being policy documents, anti-corruption-policies are mainly management tools. They define objectives, concrete measures, timelines, responsibility, and indicators of success, e.g. as in the Georgian Action Plan 2010:

Objective:	"Civil service policy is clearly defined and in compliance with the modern standards"
Measures:	"Adoption of the Code of Civil Service (implementation of principles of impartiality, political neutrality and legality)"
Timeline:	"2011-2013"
Responsibility:	"Parliament of Georgia" (responsible), "Civil Service Bureau" (partner)
Indicator:	"Code of Civil Service is adopted"

* GRECO, 1st Round Evaluation Report on Georgia, Eval I Rep (2001) 5E Final, 15 June 2001, no. 102.

[30] U4 Report 1:2007 (see footnote 27), p. 68, note 103.

4.1.3 National, regional, local and sector policies

A single national anti-corruption strategy is not the only option for setting policies in a country. In this sense, Article 5 of UNCAC calls not for one policy, but for "coordinated anticorruption policies".[31] Countries have introduced anti-corruption strategies on the regional or local level as well as in certain sectors.

Azerbaijani Strategy 2007-2012: "It is planned to work out and implement comprehensive anti-corruption action plans within central and local executive authorities as well as municipalities [...]."

Moldovan Strategy 2011-2015: "Special attention must be paid to the elaboration and approval of anti-corruption strategies and action plans at local level by the local councils depending on the forms of corruption existing in the local communities. The CCCEC will support this process by providing guidance and methodological assistance in the elaboration of local or model anti-corruption strategies."

The importance of regional/local strategies depends on the degree of decentralisation in a country. Whereas in the Republic of Moldova, local governments take relevant decisions and channel considerable budgetary funds, an absolute majority of decisions in Georgia are reportedly made at the central level and local self-government bodies have very little money at their disposal.[32]

It seems necessary that local and sector efforts should be coordinated 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.[33]

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[31] U4 Report 1:2007 (see footnote 27), p. 45.

[32] Transparency International Georgia, Anti-Corruption Policy: Recommendations by Civil Society Representatives and Experts, 30 March 2009, http://transparency.ge/sites/default/files/post_attachments/Anti-Corruption%20Policy%20Recommendations%20by%20Civil%20Society%20ENG.pdf

[33] U4 Report 1:2007 (see footnote 27), p. 35.

4.1.4 "Anti-corruption" or "Public service"-Strategy?

Corruption is a rather unpleasant task to deal with: it is surrounded by taboos, shame, greed and disgust. In addition, it is an opaque, elusive phenomenon. Therefore, one could argue that corruption might better be fought by focusing on positive issues, such as improving public service through e-government, or by embracing the importance of a public service ethos: as a consequence, officials would refrain from corruption not only 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.

In this context, studies on the success of previous anti-corruption strategies have pointed out that "fighting corruption by directly addressing it (through criminal and administrative control) may not be the most suitable approach in all contexts. Rather, the question arises whether an approach that concentrates on widely accepted antidotes to corruption, such as transparency and accountability, might be more promising. Another basic issue that also should be considered is whether a State Party wants to formulate a 'negative', that is anti-corruption, approach, or a 'positive', that is pro-integrity or transparency, approach."[34] Such an approach, it is argued, might be personally more acceptable to those exposed to threats of corruption.[35]

[34] U4 Report 1:2007 (see footnote 27), p. 50.

[35] MOLICO "Methodology of corruption risk assessment in public institutions" (see footnote 29).

4.2 Strategies

4.2.1 Introduction

Introductions of anti-corruption policies are not indispensable, but useful by answering the following questions:

What has been implemented by the previous strategy?

Armenia (2009-2012): "On the whole, more than fifty laws and by-laws were passed as part of anti-corruption measures included in the 2003-2007 Anti-Corruption Strategy and Implementation Action Plan; main bodies responsible for the fight against corruption were established, key international anti-corruption conventions and agreements were signed and ratified, and the country joined the most respectable organizations enabling international cooperation in the fight against corruption." [further elaborated];

Belarus (2007-2010): "In the period of 2002-2006, against the background of a general increase in crime in the Republic of Belarus (in 2002 there were 135,133 crimes, and in 2006 there were 191,468), the number of corruption cases registered annually since 2003 diminished constantly, and, in 2006, was 3,387, which means 37.6 per cent lower than in 2002 (5,426 crimes)."

What weak points of the previous strategy should be remedied?

Armenia (2009-2012): "[B]ased on the results of the RA Anti-Corruption Strategy and its Implementation Action Plan [ACSIAP] for 2003-2007 [...] the analysis of the trends indicates that: [...] ACSIAP activities were mainly focused on the prevention of corruption, while measures to identify and prosecute corruption-related crimes, increase public awareness of corruption and obtain public support were relatively weak."

What is the current level of corruption?

Republic of Moldova 2011-2015: "The Corruption Perception Index in 2010 was estimated at 2.9 points. The Global Corruption Barometer (GCB) for the year 2010, also issued by TI, attests that around 37% of the respondents from the Republic of Moldova reported to have offered bribe during the last 12 months (the average value for the CIS being 32%, and for the EU states - 5%). [...]"

There are many more aspects an introduction can touch, such as: What are the guiding principles of the strategy (e.g. Republic of Moldova 2011-2015, chapter III)? What are the domestic and international commitments (Armenia Strategy 2009-2012, 1.3)? What are the consequences of corruption in the respective country (Moldovan Strategy 2011-2015, chapter II)? What agencies and sectors need their capacity boosted in particular?

From a formal point of view, a table of content and a list of (possibly used) abbreviations are good practice (for an example see Armenia Strategy 2009-2012).

4.2.2 Core part

The core part of an anti-corruption strategy has to provide answers to the three following questions:[*]

- What are the objectives? (see below at 4.2.3)
- Who is responsible for implementation? (see below at 4.2.6)
- How will the implementation be monitored? (see below at 4.2.7 and 5.2)

It is necessary "that (i) the body/ies in charge of […] implementation and co-ordination with other relevant authorities are clearly identified, (ii) a series of very specific and measurable objectives and the detailed steps required to achieve them are indicated […]."*

Examples:

What are the particular objectives?

One of the many objectives listed in the Anti-corruption Strategy of Armenia for 2009-2012: "Simplify the process of state registration of legal entities by approving sample documents (templates) required for state registration of legal entities and making them available through the Ministry of Justice's official website"

Who is responsible for implementation?

E.g. Republic of Moldova 2011-2015: "Installation of governmental and non-governmental anti-corruption hotlines (Implementers: ministries and other central public authorities, local public authorities, NGOs [...])"

How will the implementation be monitored?

- Who will monitor?

Republic of Moldova 2011-2015: "The persons and entities responsible for the supervision of implementation of this Strategy are: Managers of the institutions responsible for the implementation of the

[*] GRECO, 1st Round Evaluation Report on Czech Republic, Eval I Rep (2002) 11E Final, 28 March 2003, at no. 89.

respective action plans; The Parliamentary Commission; The Monitoring Group; The Secretariat of the Monitoring Group."

- According to which criteria?

Implementation of the Strategy of Armenia (2009-2012) is measured, among others, according to the following indicator: "The ratio of the actual deadlines for obtaining licences and permissions to the deadlines prescribed by law (since the date of application until the date of issue or refusal of the license or permission): (the closer to 1, the lower the level of business corruption in the system of public administration)."

4.2.3 Objectives

Objectives are the core part of a strategy. They define the strategic aims and should be carefully distinguished from measures, activities, outcomes or impact. All five mean different things:

Objective (or goal)	strategic aim (e.g. ethical awareness of public officials)
Measure (or action, activity)	actions and means for achieving the aim (Training of public officials)
Output (or deliverable)	concrete produce of means (600 public officials are trained on code of conduct)
Impact (or outcome, effect)	actual influence of measure compared to strategic objective (degree of ethical awareness of public officials)

Objectives are not as concrete and detailed as outputs; however, they need to be clear and focused nonetheless. For example "improving governance" would be too vague and would need to be broken down into a sharp objective, such as for example "improving access to information".

4.2.4 Setting priorities

The objectives of a strategy derive from the process of needs assessment (see above no. 3). In general, a strategy should cover all measures assessed as relevant for a country's fight against corruption. If resources and time do not allow addressing all identified measures within the time span (see below 4.2.5) of the strategy, a selection based on realistic

"Most countries do not have the ability to fight fires on all sides at the same time because they simply do not have the capacities and resources to do so."*

planning and adequate priorities has to be made.

Possible criteria are:[*]

- Budget/effectiveness;
- Availability of human resources;
- Domestic policies;
- International commitments, such as GRECO;
- Likelihood of quick results;
- Likelihood of addressing the most harmful forms of corruption;
- Possible synergies with other policy aims and efforts (e.g. administrative reforms);
- Existence of dedicated champions.

Experience in the design and implementation of anti-corruption policies underlines the importance of reconciling the scale and scope of the corruption problem (needs) with the resources and capabilities a country possesses (capacity).

Studies on the success of anti-corruption policies suggest "that States Parties may want to consider more modest goals and objectives, stronger implementation modalities, in particular through clearer implementation arrangements, monitoring, and concrete prioritisation of issues, in particular those that constitute battles which can be won in the short to medium term (e.g. service delivery in key areas)."[36]

In other words: "Anti-corruption initiatives fail because of over-large 'design reality gaps'; that is, too great a mismatch between the expectations built into their design" as compared to the on-the-ground reality of implementation capacity, time needed for proper implementation, etc.[37]

This mismatch between expectations according to the policy design and the situation in reality is characterised as follows: whereas the policy is based on the availability of information-flow, IT structures, management structures, well-established processes,

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[*] U4 Report 1:2007 (see footnote 27), p. 45.

[36] U4 Report 1:2007 (see footnote 27), p. 45.

[37] R. Heeks & H. Mathisen, "Understanding Success and Failure of Anti-Corruption Initiatives", U4 Brief, March 2011:2, p.2: http://www.cmi.no/publications/file/3978-understanding-success-and-failure-of-anti.pdf

staffing, shared values and time and money, in reality, such resources are often lacking.

4.2.5 Sequencing

Given the fact that anti-corruption reforms need time for implementation and showing impact, anti-corruption strategies usually cover a time span between 4-5 years. This allows strategies to foresee short-term (1 year), mid-term (2-5 years), and long-term (5-10 years) measures:

Country	Years
Armenia	4
Azerbaijan	5
Belarus	3
Georgia	5
Moldova	5
Ukraine	5

With regards to earlier strategies, it is helpful if current strategies ensure continuity, i.e. explaining which objectives of previous strategies have not been (fully) achieved and need further attention, or whether strategies have barely been implemented at all.

4.2.6 Responsibility for implementation

In general, each institution is responsible for the implementation of measures that fall under its competency.

Republic of Moldova, chapter VI: "The persons and entities responsible for the supervision of implementation of this Strategy are: [...] Managers of the institutions responsible for the implementation of the respective action plans; [...]"; thus, in each government unit a deputy minister is responsible for implementation.

A designated body should "evaluate the functioning of institutions and the efficiency of their mutual co-operation, as well as monitor compliance with the strategic plan."*

At the same time, strategies need to define a body that is responsible for the implementation of the strategy and for its coordination and monitoring. This might be in the form of an independent anti-corruption body such as the CCCEC in the Republic of Moldova, which combines investigation, prevention and public awareness, or in the form of inter-agency coordinating bodies such as those that exist in Armenia, Azerbaijan or Georgia to facilitate coordination between different

line ministries. The necessity of a body marshalling implementation is recognised by UNCAC:[*]

"Article 6 – Preventive anti-corruption body or bodies

1. Each State Party shall, in accordance with the fundamental principles of its legal system, ensure the existence of a body or bodies, as appropriate, which prevents corruption by such means as:

(a) Implementing the policies referred to in article 5 of this Convention and, where appropriate, overseeing and coordinating the implementation of those policies; [...]"

Most bodies are set up by Presidential decree, only in Ukraine this body is defined by law:

Article 5, paragraph 4 of Law of Ukraine "On the principles of prevention and counteraction to corruption": "Coordination of implementation by the executive bodies of anticorruption strategy […] is performed by a specially authorized agency on anticorruption policy […]."

Experience suggests that high-level presence in the coordination and monitoring bodies helps overcome possible difficulties encountered, as Ministers, for example, can immediately address any shortcoming within their competence.

Some of the Eastern Partnership countries have one body responsible for coordination and monitoring at the same time, some countries have two separate bodies, one for coordination and one for monitoring.

[*] GRECO, 1st Evaluation Round Report on Poland, Eval I Rep (2001) 11E Final, 8 March 2002, at no. 136.

Coordination bodies

(according to most recent strategy)

Country	**Armenia**	**Azerbaijan**	**Belarus**	**Georgia**	**Moldova**	**Ukraine**
Name	Anti-corruption Council	Cabinet of Ministers; Anti-corruption Commission; Working group on improvement of legislation	General Prosecutor's Office, Council of Ministers, Co-ordination Council	Anti-corruption Interagency Coordination Council; Expert working group (under Council)	Parliamentary Commission	Specially authorised body on fighting corruption
Secretariat	Prime Minister's Office	Presidential Office	General Prosecutor	Ministry of Justice, Analytical Department	Parliament's Administration	Staff of body
Chair	Prime Minister	Head of Administration of the President	General Prosecutor	Minister of Justice	Chairperson of Commission	Head of body
Members	10 representatives of the Judicial Department, civil society and business sector	15 representatives of Ministries, Parliament, Judiciary (Commission). 28 members (WG)	Representatives of ministries and government departments (Coordination Council)	23 governmental and non-governmental representatives	Parliamentary members of Commission	Staff of body
Appointed by	Presidential decree	5 by President, Parliament and Constitutional Court each	Presidential decree	Presidential decree	Elected by Parliament	President
Meeting frequency	Twice per quarter (according to statute)	At least every 3 months	Up to 2 times per year	Every 3 months	Parliament's calendar	About twice per year
Publicity of meeting	Minutes of meetings published on website	Optional	No	Minutes of meetings published on MoJ website	Optional	Not applicable

Monitoring bodies

(according to most recent strategy)

Country	**Armenia**	**Azerbaijan**	**Belarus**	**Georgia**	**Moldova**	**Ukraine**
Name	Implementation Monitoring Commission	Function performed by coordination body	Function performed by coordination body	Function performed by coordination body	Monitoring Group	National Anti-corruption Committee
Secretariat	Prime Ministry's Office				Centre for the Combating of Economic Crimes and Corruption	Ministry of Justice
Chair	President's Assistant				Elected by members	President
Members	Representatives of parliamentary factions and groups, non-governmental organizations, and several public administration bodies.				18 representatives of public authorities, civil society and private sector.	30 representatives of executive, legislative, judicative, academic, and civil society sector
Appointed by	Anti-corruption Council				Defined in Strategy by their function	Presidential decree
Meeting frequency	Once per month (according to its Charter)				Minimum 1 meeting per quarter	At least twice per year
Publicity of meeting	Information on website				Public	Press conferences

4.2.7 Corruption indicators

GRECO recommends "that an efficient monitoring of […] implementation is ensured"*

Strategies set out policy aims, generally without defining concrete measures. Therefore, strategies can only foresee indicators that do not relate to concrete outputs, but to the general impact the implementation of the strategy can have, i.e. the reduction of corruption. These indicators are called impact indicators (see below at 4.3.2). Most often these will be direct measurements of experienced and perceived corruption, as well as proxy indicators, for example, the level of trust in public institutions, the share of the grey economy, cost of goods and services purchased through public procurement compared to market prices, etc.*

The Strategy of Armenia sets out such impact indicators for the reduction of corruption:

Armenia: "The main goal and the expected final result of ACSIAP [Anti-Corruption Strategy and its Implementation Action Plan] is a significant reduction in the general level of corruption in Armenia. [...] The final results targets for ACSIAP implementation for 2012 have been set at the following levels: Corruption Perception Index (TI) – 4.1 (instead of 3.0 in 2007); Control of Corruption Indicator (WBI) – -0.05 (instead of -0.58 in 2007). [...]"

A similar, more detailed approach is found in the Strategy of the Republic of Moldova, in fact based on the Armenian example (excerpt):

Performance Indicators (organization)	***Indicator at beginning of implementation***	***Expected indicator at end of implementation***	***Performance unit***	***Performance %***	***Possible limits of variability***
Corruption Perception Index (TI)	*2.9/ (2010)*	*4.0/ (2015)*	*1.1*	*11.0%*	*0÷10*
Estimated amount of bribes paid by households and business people (TI-Moldova)	*894 million MDL (2008-2009)*	*570 million MDL (2015)*	*324 million MDL*	*36,2%*	-

* GRECO, Joint 1st and 2nd Evaluation Round Report on Serbia, 23 June 2006, Eval I-II Rep (2005) 1E Revised, at no. 90.

In most cases, the chosen impact indicators turned out to be overly ambitious.

4.2.8 Drafting and adoption

If a country has a dedicated anti-corruption agency (as most countries do), it will be the most natural lead actor in drafting the strategy. However, a broader set of representatives of the public and private sector should be involved to ensure ownership of the strategic objectives and to raise awareness.[*]

"The design and implementtation of a national strategy requires the whole-hearted participation of a variety of stakeholders."*

Country	Drafting by
Armenia	Working group of experts, state representatives and international organisations
Azerbaijan	Secretariat of AC commission
Belarus	General Prosecutor
Georgia	Anti-corruption Coordination Council
Moldova	Centre for Combating Economic Crimes and Corruption
Ukraine	Ministry of Justice

Time span

The time between the decision to draft a strategy and its adoption varies significantly depending on the political situation and the experience with anti-corruption policies at each time:

Country/Strategy		Drafting time		Months
		from	to	
Armenia	2003-2007	05/2000	11/2003	43
	2009-2012	04/2008	12/2009	15
Azerbaijan	2004-2006	06/2000	09/2004	52
	2007-2011	02/2007	07/2007	5
	2012-2015	12/2011	06/2012	7
Belarus	2002-2006	01/2002	10/2002	9
	2007-2010	05/2006	05/2007	12
	2010-2012	01/2009	09/2009	8
Georgia	2005	01/2005	06/2005	5
	2010	01/2009	09/2010	21
Moldova	2005-2010	07/2004	12/2004	5
	2011-2015	09/2010	07/2011	11
Ukraine	1998-2005	no info	04/1998	-
	2007-2010	09/2005	09/2006	12
	2011-2015	10/2010	10/2011	12
			Average	16

[*] OSCE, Best Practices in Combating Corruption, p. 161.

Procedure

Different bodies decide on the adoption of the strategies:

Country	AC-Council	Cabinet	Parliament	President
Armenia				
Azerbaijan				
Belarus				
Georgia				
Moldova				
Ukraine				

Countries that include parliament in the adoption procedure have pointed to the additional legitimisation and public review of the policies entailed by this procedure.

Legal nature

All anti-corruption strategies in the Eastern Partnership Region are sub-legal but binding decrees/government decisions.

4.3 Action plans

"A strategy [...] sets overall goals that are then translated into [...] action plans"*

An action plan translates the objectives of a strategy (and measures, to the extent they are identified in the strategy) into concrete actions that are assigned to responsible institutions within a concrete time period. In other words: Strategies tend to be high-level policy documents whereas action plans are policy documents on an institutional level. Therefore, strategies formulate the aims and measures in a rather general and abstract manner, whereas action plans are normally larger and more detailed documents breaking down a strategic objective in several implementation actions. *

Some action plans cover the same time span as the strategy; some action plans cover only increments of smaller time spans, such as in the Republic of Moldova. Maybe shorter time spans can be an advantage in that it is easier to adjust and reassess the concrete measures to changing circumstances, while the broader objectives stay the same:

Country	Time span	
	Strategy	Action plan
Armenia	2009-2012	2009-2012
Azerbaijan	2007-2011	2007-2011 (2012-2015)
Belarus	2010-2012 (one document)	
Georgia	2010-2013	2010-2013
Moldova	2005-2010	2005, 2006, 2007-2009, 2010
Ukraine	2011-2015	2011-2015

4.3.1 Necessary and optional elements

Since action plans are implementation documents, the wording used should normally be very concrete and simple, leaving as little room for interpretation as possible. Action plans should follow the structure and numbering of the Strategy:

The 2010 Strategy of Georgia defines as "Result 1.1. Civil service policy is clearly defined and in compliance with the modern standards". The first corresponding measures in the 2010 Action Plan is: "1.1.1. Adoption of the Code of Civil Service (Implementation of principles of impartiality, political neutrality and legality)".

* UNODC, Technical Guide to the United Nations Convention against Corruption, 2009: Commentary II.2 to Article 5 (page 4).

Each line of an action plan should follow a specific structure, which enables all readers to identify at a first glance answers to some key questions such as "what", "who", "when", "if" and "how":

- What: To which objective of the strategy are the concrete actions linked?
- Who: Which institution is responsible?
- When: What is the time-frame?
- If: What are the risks threatening implementation?
- How: What are the indicators for successful implementation?

See the standards set for the format of the action plan by the Moldovan Strategy 2011-2015: "These plans must contain the description of actions to be implemented during the relevant periods, the entities responsible for the implementation of specific actions, the expected results, the progress indicators and the implementation terms."; see also Georgian Strategy 2010: "Action Plan will define objectives, purposes and activities, responsible institutions and implementation time-frames."

Actions can be cross-linked with what is planned in other policy documents such as strategies for administrative reform.

Overview on the structuring of each line in action plans

Country (Action plan)	**Link to strategy**	**Concrete action**	**Responsible institution**	**Partner organisation**	**Time frame**	**Funding**	**Indicator**	**Risks and assumptions**
Armenia (2009-2012)	Strategy Provisions	Action	Responsible Agency		Deliverables 2009, 2010, 2011, 2012	Source of Funding	Monitoring Indicators	
Azerbaijan (2007-2011)	Name of the measure	Activities to be undertaken and expected outcomes	Responsible body for implementation	Partner organisations	Implementation Period	Financial sources		
Belarus (2010-2012)		Name of action	Responsible Institution		Implementation time (years)			
Georgia (2010-2013)	Purpose, Result	Activity	Responsible Institution	Partner Institution	Implementation period		Indicator	Risks and Assumptions
Moldova (2005)	Activity	Action	Responsible Institution		Time frame		Result	
Ukraine (2011-2015)	Task	Activity	Key budget spending unit		Time frame	Estimated funding	Performance Indicators	

4.3.2 Indicators for measuring success

Terminology

There is no commonly defined set of terms for indicators. One can generally distinguish two kinds of indicators: [*]

Objectives need "to enable comparison with the results achieved"*

Output: new service procedure in place

Impact:

- immediate quicker service
- non-immediate less need for "speed payments"

Output indicators (sometimes also called "progress" indicators) refer to the completion of actions, such as drafting of laws, training of staff, etc. They allow for monitoring the implementation process by demonstrating that proposed activities or measures are taking place along the planned timeline.

The Georgian Action plan foresees under 1.1.6. the following measure: "Implementation and monitoring of Electronic Asset Declaration System"; the corresponding output indicator defines successful implementation of the measure as follows: "Asset declarations of public officials are filled out and submitted electronically" [probably meaning "% of declarations submitted"].

Impact indicators (sometimes also called "outcome" indicators) refer to whether outputs, i.e. particular actions bring about substantive change, e.g. setting up a new service procedure for obtaining licences is an output, while quicker procedures are an impact. One can distinguish "immediate" impact, such as the quicker procedure, and "non-immediate" impact resulting out of this, such as reduced need for informal "speed payments".

Indicators are the pivotal point of action plans: they allow for the monitoring of progress on implementation. Without indicators, action plans are declarations of intent; with indicators, they become commitments the fulfilment of which may be easily monitored. Key factors for good indicators are (examples are mostly taken from Eastern Partnership countries):

Keep resources in mind

Measuring success is necessary, but it needs resources. Strategies often set out ambitious methods of measuring progress, but fail in implementation.

[*] UNODC, Technical Guide to the United Nations Convention against Corruption, 2009: Commentary II.2 to Article 5 (page 4).

Be careful with indicators of non-immediate impact

In most cases, indicators about non-immediate impact (see above at 4.2.7) will not be the best option to measure the success of actions. The non-immediate impact of an activity is hard to measure and action plans are mainly management tools: the concern should be about the status and immediate impact of implementation ("quicker licensing") rather than debatable non-immediate impact of the measure ("reduction of speed payments"). At the same time, indicators of non-immediate impact are simply not specific enough to measure any progress.

Indicators should be concrete

Only specific and concrete indicators can be measured, while broad and evasive ones do not fulfil their aim.

Indicators should be assessable

The indicator "Media is better informed about the mandate of the Chamber of Control" itself needs an indicator – how to know when something is better? In this case, proper reference to the mandate of the Chamber of Control in the media could be considered as indicator.

Indicators should be clear

The indicator "The ratio of cases related to the declaration of property, income and interests considered by the Ethics Commission under the Council of the Court Chairs to the total number of cases considered by the Ethics Commission" is unclear because it does not specify whether a higher or lower ratio shall count as achievement – both could be considered as success.

Use multiple indicators if one clear one is missing

For example, improvements in the activity of the anti-corruption department of the Public Prosecutor's Office could be monitored with the help of the following indicators:

- Number of corruption investigations (including proportion of major investigations, which involve transactions over a certain amount or public officials over a certain level);
- Average time from the start of investigation till submission to the court or time within which 90% of such cases are submitted to the court;
- Proportion of cases returned from the court to carry out additional investigatory activities;
- Investigation flaws otherwise identified by the court;
- Proportion of acquittals in the court (however, beware of creating an adverse incentive – see below).

Output alone does not always suffice

Measuring progress on outputs does not necessarily say anything about the direct impact of these outputs. For example, new mechanisms for freedom of information should not be monitored by listing procedural changes only. One should consider indicators such as:

- The number of appeals (successful appeals) regarding requests for information;
- Analysis of complaints and number of subsequent proposals for improvement based on the analysis;
- Number of unsubstantiated denials of information or incomplete answers (data from a supervising body, e.g. the Information Commissioner, survey of journalists and NGOs).

Limitations of quantitative indicators

Impact can often not be fully expressed in quantitative terms. For example, the number of detected conflict of interest cases tells nothing about how the cases are handled. In this case, qualitative analysis of cases will probably be necessary. In general, it is advisable to combine qualitative (analysis, perception, evaluation, concrete verification, etc.) and quantitative indicators.

Avoiding adverse incentives

Some indicators can create adverse incentives. For example, the indicator "the ratio of the number of the conflict of interest cases being dealt with by the tax authorities to the total number of tax officers" can create an incentive to hide such cases. This risk can be limited:

- Where appropriate, it should be communicated to the public that detection of conflicts of interest and other breaches is a sign of capacity to deal with problems, which is a good message;
- Setting realistic benchmarks – it should be generally acceptable for an institution to admit that it has managed to review only 90% of applications in due time. Otherwise there is an incentive to avoid accurate reporting at all costs.

4.3.3 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, Croatia, for example, has managed to do a full estimate of required funding for each action in its Anti-corruption Action Plan 2010.[38]

Some experts highly 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.[39] 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. Besides, it seems to be doubling if not partly wasting efforts that seem to be better done once actual implementation is approaching, which might take years in the timeframe of a 5-year strategy. However, an indication, as to whether measures will need additional funding from the budget or from donors, will alert the body responsible for adopting the action plan about the funds necessary for its implementation.

Of all Eastern Partnership countries Armenia, Azerbaijan and Ukraine include a column on the funding of measures in their Action Plans. In Armenia, there is no concrete estimate, but only general references:

> Armenia Action Plan 2009-2012, "Action 2.3: Continuously enhance the professional qualifications of the FMC staff", "Source of Funding: The RA State budget, the donor community support"; Azerbaijan Action Plan 2007-2011, "Measure 9: Improving system of filing complaints on administrative decisions; [...] "Financial sources: State budget and other sources not prohibited by the legislation".

A similar general budget reference is found in the Moldovan Strategy 2011-2015:

> "The financial resources necessary for the achievement of objectives set out in this Strategy are planned in accordance with the applicable laws. The sources of financing may include: 1) the state budget and the budgets of administrative-territorial units, within the limits of costs allocated/approved for the involved institutions; 2) external

[38] www.antikorupcija.hr/lqs.axd?t=16&id=541

[39] Council of Europe Technical Paper "Tools for reporting and implementation of anticorruption measures in line with the new anti-corruption action plan" by Marijana Trivunovic for GEPAC Project, February 2008, www.coe.int/gepac

technical and financial assistance projects and programs of various donors; 3) Sponsors and other sources not prohibited by the law."

Ukraine, on the other hand, introduced the requirement of a concrete financial estimate for each action proposed in the action plan with its new Strategy for 2011-2015. The Ministry of Justice, responsible for drafting the action plan, has thus to develop financial estimates for each action: -

Anti-corruption strategy 2011-2015, IX: The Action Plan will "contain the list of measures, scope and sources of financing, expected outcome, indicators, deadlines, and executives in charge as well as the partners in implementation of the measures."

4.3.4 Drafting and adoption

Time span

The time between the adoption of the strategy and the adoption of the corresponding action plan is defined by all strategies uniformly as 3 months.

"Each State Party shall [...] develop [...] specific training programmes for [...] the development and planning of strategic anticorruption policy"*

Georgian Strategy 2010 of 3 June 2010: "The Georgian Government shall elaborate a 'National Anticorruption Strategy Implementation Action Plan and submit it to the President of Georgia for approval before 1 September, 2010."

However, NGOs have often complained about this period being too short for leaving enough time for drafting the action plan while sufficiently involving civil society.

Drafting

In each of the 6 Eastern Partnership countries, different institutions are responsible for drafting anti-corruption strategies and action plans: *

Country	Action plan
Armenia	Prime Minister's Office
Azerbaijan	Secretariat of Anti-Corruption Commission
Belarus	General Prosecutor
Georgia	Anti-corruption Coordination Council
Moldova	Centre for Combating Economic Crime and Corruption
Ukraine	Ministry of Justice

It is necessary to involve all institutions in the drafting process that will have to implement particular tasks. For this involvement the mere sending out of a letter, asking for contributions, will normally not be enough, but an active buy-in from the drafting unit – for example through workshops

* Article 60 of UNCAC.

and/or periodical meetings – will ensure the necessary understanding of what is required and achieve active involvement in the drafting process.

Procedure

The same bodies that decide on the adoption of the strategies (see above 4.2.8) also decide on the adoption of the action plans:

Country	Council	Cabinet	Parliam.	Presid.
Armenia				
Azerbaijan				
Belarus				
Georgia				
Moldova				
Ukraine				

Legal nature

All anti-corruption action plans in the Eastern Partnership Region are sub-legal, but are binding decrees/government decisions.

4.4 Involvement of NGOs and the public

"[N]ational anti-corruption strategies [...] should be subject to broad consultation at all levels."*

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;

In Armenia and Georgia, several representatives of NGOs are members of the Anti-corruption Councils involved in the drafting of anti-corruption policies. In Georgia, for example, Transparency International compiled and published the advice of NGOs to the Anti-Corruption Council for the designing of the 2010 Strategy.[40]

If there is a larger number of NGOs than seats available, the question arises how members are selected. Both, government and NGO representatives from Eastern Partnership countries have confirmed it as good practice to leave it up to the NGOs to select and nominate members.

- Governments send out drafts for comments by NGOs;

Moldovan Strategy 2011-2015: The Anticorruption Alliance, which is composed of 19 national NGOs, elaborated an expertise and its conclusions have been considered in the strategy's finalisation; Transparency International Armenia provided comments in May 2009 on the Draft Anti-corruption Strategy adopted in October 2009[41]

- Governments send out drafts to the public at large;

The draft of the 2000 "Guidelines for the National Anti-Corruption Program of Georgia" was even sent, together with a prepaid envelope, to 250,000 households for comment. Efforts were made to identify key communicators within each area, including NGOs, politicians, hairdressers, bus ticket sellers, etc. The working group received 10,000 responses.[42]

- Draft policies can be published on websites;

Moldovan Strategy 2011-2015: An announcement on the initiation of the new strategy, and later the draft and accompanying argumentation were published on the anti-

* From the Ten Principles by the European Union for Improving the Fight against Corruption in Acceding, Candidate and Other Third Countries.

[40] See above footnote 32.

[41] Transparency International Armenia, "Remarks and Suggestions on the 4th and 5th Chapters of the Republic of Armenia Anti-corruption Strategy and Its 2009-2012 Implementation Action Plan (ASIAP)", 5 May 2009, www.transparency.am/dbdata/4-5-eng.pdf

[42] Jessica Schultz and Archil Abashidze, "Anti-corruption policy making in practice: Georgia – A Country Case Study", U4 Report 1:2007, Part 2A, www.u4.no/themes/uncac/documents/u4-report-2007-1-country-study-georgia.pdf

corruption agency's website, at the chapter "Transparency of the decision making", indicating the deadline for consulting the draft with the public and the contacts of the responsible persons for consolidating the draft.

For the draft Action Plan 2010 an announcement was placed on the Georgian Ministry of Justice's website: "Comments and proposals on the Draft of the Anti-corruption Action Plan may be submitted to the Analytical Department of Ministry of Justice of Georgia no later than August 26, 2010 at the following address: [...]"[43]

- Policies can be subject to public hearings or comments;*

Moldovan Strategy 2011-2015: The first strategy draft was discussed at the National Anticorruption Conference, held on 9 December 2010, with the participation of high-level officials, experts, central and local public administration, international organizations, civil society and media representatives.

- NGOs can initiate or draft national policies;

In Azerbaijan, the Centre for Economic and Social Development (CESD) submitted a draft national Anti-Corruption Strategy[44] to the Parliament on 17 March 2011.[45] The earliest example of NGOs drafting an anti-corruption policy is probably Bulgaria, where a coalition of NGOs drafted an Anti-corruption Action Plan which was endorsed by a policy forum in November 1998, attended by over 150 government officials, business leaders, NGOs and international organisations. The eventually adopted National Anti-corruption Strategy was largely based on the NGO's draft Action Plan."[46]

GRECO recommends "regular exchanges of information with non-governmental organizations to discuss Government actions and initiatives against corruption with a view to strengthening cooperation in this field."*

[43] www.justice.gov.ge/index.php?lang_id=ENG&sec_id=306&info_id=2635

[*] GRECO, 1st Evaluation Round Report on Poland, Eval I Rep (2001) 11E Final, 8 March 2002, at no. 137.

[44] www.cesd.az/CESD_Anti_Corruption_Strategy.pdf

[45] "CESD Anti-Corruption Strategy Submitted to the Parliament", 21 March 2011, www.cesd.az/new/2011/03/cesd-anti-corruption-strategy-submitted-to-the-parliament/

[46] Open Society Institute, "Corruption and Anti-corruption Policy in Bulgaria", 2002, http://info.worldbank.org/etools/antic/docs/Resources/Country%20Profiles/Bulgaria/OpenSocietyInstitute_CorruptionBulgaria.pdf; Maria Yordanova, "The role of the civil society in preventing and countering corruption in Bulgaria", 2006, www.anticorruzione.it/Portals/altocommissario/Documents/maria%20yordanova.pdf

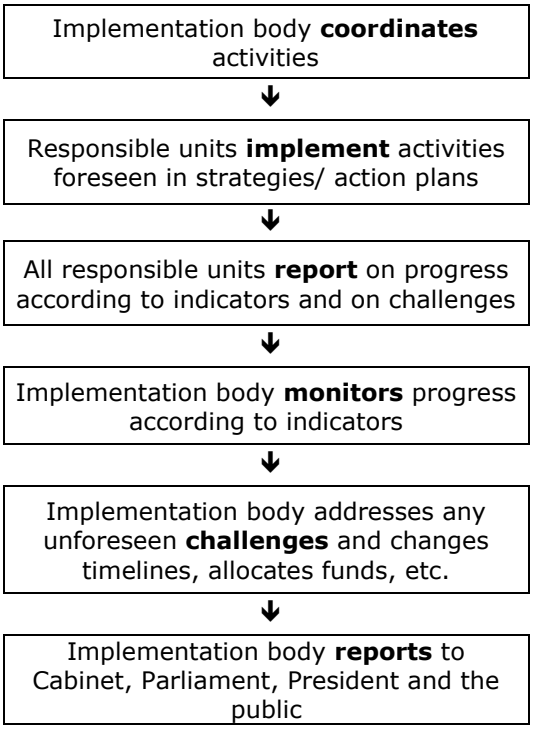
- Members of parliament as elected representatives of civil society can publicly debate draft strategies in parliament.

The Moldovan draft Strategy 2011-2015 was debated and adopted in parliament on 21 July 2011.

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 the civil society. Plus both organised and unorganised representatives of the civil society should have a chance to participate in a meaningful manner. In the past, civil society organisations have pointed out the need for sufficiently long consultation periods to be able to provide well-grounded feedback.

5 IMPLEMENTATION

As with any policy, the proper implementation of an anti-corruption policy is as important as its design, and some might say it is more important than its design. However, it is generally admitted that the success of anti-corruption policies depends mainly of their implementation level. In addition, more energy has often been spent and the focus has been more on the design aspect of anti-corruption policies thus paying less attention to the implementation stage. Implementation includes the following steps:



Example of an implementation process from the Azerbaijan Strategy 2007-2011: "The Cabinet of Ministers and the Anti-Corruption Commission monitors the implementation of the National Strategy and reports to the President on the implementation of measures envisaged in the Action Plan on semi-annual basis.

The central executive authorities [...] semi-annually provide information on the status of implementation of the National Strategy to the Anti-corruption Commission and the Cabinet of Ministers [...].

The Cabinet of Ministers in its annual report to the Milli Mejlis [Parliament] will also continue to provide information on the measures carried out in the field of combating corruption. It is envisaged that the Anti-Corruption Commission will prepare annual national report on the fight against corruption."

The implementation of anti-corruption policies is challenged by the necessity for inter-institutional coordination, changes in political leadership, stakeholders having conflicting interests or changing political objectives. In any case, reporting, monitoring and coordination are the most crucial steps during the implementation stage.

5.1 Reporting

"The establishment of a regular monitoring process is important as a means of identifying, deterring and taking account of noncompliance."*

In order to allow for coordination and monitoring, all responsible institutions should report to the implementation/monitoring body. By following a standard reporting template, each institution/responsible person provides information in the same order, which facilitates its reading and analysis.[47]

Problems with reporting

Low quality of data seems to be one of the main problems with reporting (vague or fragmented information instead of precise and fact-based data). The following factors might contribute to problems with reporting: *

- Indicators are unclear or too difficult to measure/assess (see above at 4.3.2);
- Indicators aiming at non-immediate impact ("less need for speed payments") which is hard to measure;
- Lack of reporting templates;
- Reporting institutions not having been properly instructed on indicators and on measuring them;
- Lack of staffing/capacity for fulfilling reporting obligations;
- Lack of incentive to cooperate.

[47] See e.g.: Council of Europe Technical Paper "Proposed guidelines and templates for reporting and monitoring of implementation of the National Anti-corruption Strategy of the Republic of Azerbaijan" by Quentin Reed for AZPAC Project: Support to the anti-corruption strategy of Azerbaijan, 2008, www.coe.int/azpac; "Presentation on tools of reporting and implementation of anti-corruption measures" by Marijana Trivunovic for GEPAC Project, January 2008, www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/gepac/779_RTD28Jan08_ppt_trivunovic_en.PDF

* United Nations Guide on Anti-Corruption Policies, p. 97.

Incentives

A possible way of creating an incentive for properly reporting on progress of action could be as follows: -

- Publish progress reports or aggregated information on the status of implementation – this creates competition between agencies, and accountability to the public;
- Provide necessary training support for responsible units and thus make the implementation easier;
- Maintain the implementation of anti-corruption measures as a political priority;
- Ensure that through legislation and/or contracts managers of responsible units are obliged to ensure implementation and liable to sanctions in cases of gross non-compliance;
- Including the reporting template in the action plan might also facilitate reporting by setting out clear requirements for reporting and avoiding sending out separate forms.

Verification

Another challenge with reporting is the accuracy of data: It may be difficult or even impossible for the monitoring body to verify the data received beyond evident completeness and consistency. The more concrete and detailed indicators are (see above at 4.3.2), the easier they are to verify. Additionally, transparency of the reports and thus the possibility of verification of their truthfulness by civil society will probably be most effective.

Template

The reporting template should probably include, at a minimum, the following items: -

- Identification of reporting entity and responsible person
- Reporting Period

List of specific activities and measures which it is responsible for implementing: -

- Objective identified in action plan;
- Specific measure relating to the objective;

  (For ease of following the numerous activities, a system of enumeration of objectives and activities is recommended in action plans (as is already the case in the last Moldovan Action Plan), and the same enumeration should be followed in the reports.);

Update on status of each activity/measure:

- Number and brief description of activity/measure;
- Dates when new activities implemented;
- Progress toward indicator/benchmark;
- Challenges;
- Next steps (within timeframe), possibly including estimated cost.

Reporting on the Moldovan Strategy 2011-2015 takes place through a template containing the following columns:

Action (description)

Indicator of progress

Level of achievement

Description of measures

Problems and solutions

Possible model of reporting template

Institution	Ministry of Transportation
Responsible person	Mr. M.
Reporting period	1 January – 31 March 2012

Objective (no./description)	5. Training of all officials working in public procurement on corruption risks			
Measure (no./description)	**Indicator**	**Progress (description/dates)**	**Challenges**	**Next steps**
5.1 Training of trainers	20 trainers trained	20 trainers received 1 week training, 5-12 March 2012	2 of the 20 trainers will be transferred to another Ministry by end of year	Training of 2 additional trainers
etc.				
Objective (no./description)	etc.			
etc.				

Reporting frequency

Country	**Armenia**	**Azerbaijan**	**Belarus**	**Georgia**	**Moldova**	**Ukraine**
Public institution to monitoring body	**Quarterly**	**Semi-annually**	**Annually** Attorney General's Office and Council of Ministers compile information until 1 March for Coordination Council	**every 6 months**	**Quarterly**	**Annually** until 15 February
Monitoring body to Cabinet/ President	**Quarterly**	**Semi-annually** Cabinet of Ministers and Anti-corruption Commission [...] to the President on the implementation of Action Plan on semi-annual basis	**Annually** Co-ordination Council informs the Council of Ministers until 1 April on implementation of the state program	**Annually**	not stated	not stated
Monitoring body to Parliament	not stated	**Annually** Cabinet of Ministers annually reports to the Milli Mejlis on measures of combating corruption.	not stated	not stated	Continuous supervision by parliamentary committee	not stated
to public	not stated	**Annually** By Anti-Corruption Commission	not stated	**Annually**	**Annual** national anti-corruption conference	**Annually** By Anti-corruption policy agency

5.2 Monitoring

The monitoring bodies use the information provided through the reports for ensuring that the measures/activities are being undertaken, and for evaluating the progress towards indicators. The main challenge of monitoring is dealing with low quality or incomplete reported data available (see above 5.1). *

GRECO recommends "that an efficient monitoring of [...] implementation is ensured."*

Monitoring bodies

In some countries, the same body responsible for overseeing implementation also ensures monitoring; some countries have a separate monitoring body. The advantages of either structure are:**

"A cross-cutting monitoring Commission possibly linked to the Parliament, and comprising representatives of the various governmental bodies – including [...] civil society and the business community"**

One single body for overseeing implementation and monitoring:

- Saving resources/staff: Having two commissions normally requires an additional number of members as well as supportive staff;
- Efficiency: With one body there is no need for communication between two bodies.

Separate monitoring body:

- Avoiding conflict of interest: Implementation bodies could be more lenient about monitoring results;
- Specialisation: Monitoring can follow quite complex methodologies, something which a high-level implementation body does not necessarily want to deal with, and for which it does not necessarily have the time.

It is also important to decide where the monitoring body shall be placed. Placing it closer to the political level can increase its clout, but also increase the risk of political interference. On the other hand, an autonomous body may be more politically independent but be less capable to prompt other agencies to action.

In practice, meetings of monitoring bodies and their working groups often take place much less frequently, if at all, than formally foreseen.[48]

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* GRECO, Joint 1st and 2nd Evaluation Round Report on Serbia, 23 June 2006, Eval I-II Rep (2005) 1E Revised, at no. 90.

** GRECO, 1st Evaluation Round Report on Croatia, Eval I Rep (2002) 4E Final, 17 May 2002, at no. 140.

[48] Center for Regional Development/Transparency International Armenia, Anti-corruption policy in Armenia, Yerevan 2006,

In any case, it is important that the monitoring by state bodies is complemented by the monitoring by NGOs: government bodies are inescapably in the dilemma of needing to report success to the public, and might thus "inflate" the actual progress achieved.

Tasks

One of the key and complex issues during the implementation stage is the coordination of the efforts of a number of disparate agencies in order to ensure coherence. Using the monitoring results, implementation bodies can take the following measures whenever an action is not implemented according to plan:[*]

- Leadership: Ensure there is a responsible person with the necessary hierarchical weight in charge of implementation;
- Communication: Ensure exchange where implementation of particular measures depend on cooperation of several agencies;
- Timelines: It might turn out that timelines have been too tight and a new timeline has to be set. It is recommended that the change of timelines in the action plan be documented by making the old and new timelines transparent;
- Budget, staff: The implementation body can initiate allocation of budget or staff for the action in question;
- Update: Sometimes parts of an action plan need to be reviewed and redesigned.

"GRECO recommends "to establish a [...] body [...] responsible for bringing together the top managers of higher public authorities concerned by the fight against corruption and for steering the work of all subordinated bodies [...]."*

Technically speaking, the implementation bodies can often only provide recommendations on above measures. However, as high-level members (Ministers etc.) of such bodies are at the same time often responsible for the execution of such recommendations, such recommendations are, in fact, quite authoritative.

Some areas will be difficult to implement for cultural reasons, such as whistleblower regulations, that will meet mistrust in societies with past experiences of abusive internal security agencies. Some areas such as transparency in political finance, asset declaration of high-level public officials, or reducing immunities of officials, will be supported by political

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http://unpan1.un.org/intradoc/groups/public/documents/apcity/unpan047863.pdf.

[*] GRECO, 1st Evaluation Round Report on Poland, Eval I Rep (2001) 11E Final, 8 March 2002, at no. 136.

will in society at large, but not by a corresponding political leadership.

Implementation bodies should 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. Too often, putting action plans into practice is left to the self-initiative of each institution without providing enough advice and build-up of capacity to deal with sometimes complex policies. Sending out a letter with instructions and timelines will not usually be enough. Therefore, some countries, such as Armenia, have – with support by international donors – carried out training for government bodies to fulfil their role in implementing the anti-corruption policies.

5.3 Involvement of NGOs and the public

NGOs can be involved in the implementation of anti-corruption policies in two ways: either as part of the coordinating and monitoring bodies or by giving independent advice as an NGO from "outside" government. *

"[T]he implementation process appeared to be rather closed and restricted to Government circles. [...] Such an approach may [...] have a negative impact with regard to the awareness of the reforms by the public as well as to their support for the reforms in public administration."*

Internal involvement

Country	NGO membership	No.
Armenia	Anti-corruption Council (coordination body) Implementation Monitoring Commission	- minimum 3
Azerbaijan	-	-
Belarus	-	-
Georgia	Anti-corruption Interagency Coordination Council (coordination and monitoring)	5 out of 23
Moldova	Monitoring body	7 out of 18
Ukraine	Monitoring body	2

If there is a larger number of NGOs than seats available, the question arises, how members are selected. Both, government and NGO representatives from Eastern Partnership countries have confirmed it as good practice to leave it up to the NGOs to select and nominate members among themselves (see already above at 4.1.4). The Republic of Moldova follows this model and at the same time, additionally defines one of the five NGO members as having to be from Transparency International:**

"Members of the Monitoring Group are: [...] 5 representatives of the Anti-Corruption Alliance, including one representative of Transparency International - Moldova; […]"

External involvement

Besides membership in state commissions/councils, civil society has several ways of participating in the monitoring of anti-corruption policies:

The National Anti-Corruption Plan should be amended "explicitly with a stronger notion of involvement of the civil society and the business sector in the implementation of the Plan."**

- NGOs can comment on the implementation of anti-corruption strategies by publishing self-initiated reports;

Azerbaijan claims explicitly in its 2007-2011 Strategy to make use of such reports: "It is envisaged that the Anti-Corruption The Commission will prepare an Annual National Report on

* GRECO, Joint 1st and 2nd Evaluation Round Report on Turkey, Eval I-II Rep (2005) 3E, 10 March 2006, at no. 195.

** GRECO, 1st Round Evaluation Report on Albania, Eval I Rep (2002) 9E Final, 13 December 2002, at no. 142.

the fight against corruption. The report will be prepared with the participation of relevant state authorities, and information provided by the civil society institutions will be used in the preparation of the report."

- Citizens can lodge individual inquiries or petitions with the Government or Parliament;
- Citizens can vote during elections based on results of anti-corruption policies;
- Citizens can discuss implementation of anti-corruption policies in the media or other public forums.
- Public institutions can delegate certain tasks to NGOs, such as gathering data for monitoring or carrying out educational activities. However, such activities, if financed, create a certain dependence of NGOs on public institutions.

In practical terms, evaluating the effectiveness of anti-corruption policies may be a natural function left to NGOs for the sake of (relative) impartiality, credibility and objectivity. While monitoring looks at progress in implementation, evaluation is focused on outcomes (the impact) of anti-corruption policies. However, this should not absolve the government, which by definition carries primary responsibility for the whole implementation.

No matter what kind of involvement is practised, it is a precondition that public agencies ensure transparency and disclose all relevant non-classified information.

6 UPDATING STRATEGIES AND ACTION PLANS

Monitoring provides "essential information for the substantive design of new strategic elements and the modification of existing ones as necessary."*

Anti-corruption policies are long-term decisions covering a time span of 4-5 years. Obviously, these documents need to be revised and adapted over the course of time. In principle, there should be a commitment to review the policy (preferably in its text or in the approving decision). There are two main options for the updating process: *

First, action plans may cover only a small proportion of the period of the strategy, and its implementation is thus updated regularly through new action plans.

The Moldovan Anti-corruption Strategy 2005-2010 was implemented by four consecutive action plans for the years 2005, 2006, 2007-2009 and 2010.

The Republic of Moldova ensures continuity of the action plans by the following guideline: -

"The actions left without implementation must be well grounded and if still actual, must be carried over into the next action plans."

Secondly, the strategy and action plans are revised by an Anti-Corruption Council or by a public conference on a regular, e.g. annual, basis, and are adapted if necessary.

Georgian Strategy 2010: "National Anticorruption Strategy of Georgia can be made subject to revision and amendment based on the monitoring of implementation."

In the Eastern Partnership countries, the Strategy is usually approved by the President; sometimes amendments or changes, though, can be delegated to the implementation body: -

According to the Georgian Strategy 2010, one of the functions of the Interagency Coordination Council is "making amendments to" the anticorruption strategy and the action plan.

In order to allow for keeping track of events, the reasons for changes should be documented in the policy document.

* United Nations Guide on Anti-Corruption Policies, p. 97.

7 PUBLIC AWARENESS

"The strategy and the action plan should be made widely known to ensure a high degree of public awareness of the strategy and the measures to be taken."*

Publicity of the anti-corruption policy will make the population aware of what they can expect for themselves from its implementation. Furthermore, publicity raises the public's awareness on need for action, and can initiate involvement and commitment by society (see above at 4.1.1). The main tools of achieving public awareness are:*

Internet

All Eastern Partnership countries, as is most likely the case in any other country, publish their anti-corruption policies on the Internet: -

Armenia
www.gov.am/en/anticorruption/

Azerbaijan
www.antikorrupsiya.gov.az/

Belarus
www.prokuratura.gov.by/sm.aspx?guid=10789

Georgia
www.justice.gov.ge/index.php?lang_id=ENG&sec_id=649

Republic of Moldova
http://en.cccec.md/Strtegianaonalanticorupie

Ukraine
http://zakon.rada.gov.ua/cgi-bin/laws/main.cgi?nreg=1001%2F2011

Conferences

Some countries hold yearly Anti-Corruption Conferences: -

Moldovan Strategy 2011-2015: the first draft strategy was discussed at the National Anticorruption Conference, held on 9 December 2010, with the participation of high-level officials, experts, central and local public administration, international organizations, civil society and media representatives.

Press releases

The adoption of anti-corruption strategies is always accompanied by equivalent press releases by the government.

Press release by the President of Belarus on 10 May 2007: "State Program on the Fight against Corruption for 2007-2010 approved – By his Decree No 220 of May 7, the President of the Republic of Belarus, Alexander Lukashenko, approved the

* GRECO, Joint 1st & 2nd Round Evaluation Report on the Russian Federation, Eval I-II Rep (2008) 2E, 5 December 2008, at no. 57.

State Program on the fight against corruption for 2007-2010. [...]"[49]

[49] http://president.gov.by/en/press44562.html#doc.

Schools, universities, libraries

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

Press release of 21 June 2010 by the National Library of Belarus: "From June 21st to August 31st a subject book exhibition 'The Struggle against Corruption – the Major Direction of Strengthening the State' will take place in the Legal Information Reading Room (room 207)."[50]

Radio and television

Anti-corruption strategies are a regular subject of radio and television features.

As part of the Council of Europe "Support to the Anti-Corruption Strategy of Azerbaijan" Project, five awareness raising events were held in 2008 in order to raise awareness of the Government's Anti-corruption Strategy and Action Plan. Several TV stations (AzTV, ANS, Space, Lider) covered the events.

Advertising

Advertising campaigns can be an important tool in order to both enhance knowledge in 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.*

"[T]he lack of information to the public on the measures adopted and the results achieved in the fight against corruption, seems to hinder the trust in governmental institutions."*

According to Article 19 of the Law of Ukraine "On the principles of prevention and counteraction to corruption", the special authorized anti-corruption policy agency "shall, by no later than 15 April, prepare and publish a report of the outcome of efforts taken to prevent and counter corruption. The report should contain [...] information on the status of implementation of the anticorruption strategy determined by the President of Ukraine."

Surveying awareness on anti-corruption initiatives

Sometimes, awareness on anti-corruption initiatives is surveyed, allowing the government to adjust its awareness measures accordingly. The publication of survey results in itself often helps in the transmission of important messages.

Armenia: Corruption Survey of Households 2010, chapter 4, p. 38: "[T]he percentage of people who were aware of the

[50] www.nlb.by/portal/page/portal/index/detailed_news?param0=24289&lang=en&rubricId=1012

* GRECO, 1st Evaluation Round Report on Hungary, 28 March 2003, Eval I Rep (2002) 5E Final, at no. 90.

Anti-Corruption Strategy Monitoring Commission made up only 14% of respondents in 2010."

8 APPENDIX

8.1 List of anti-corruption strategies in EaP countries

Country	Time span	Title	adopted
Armenia	2003-2007	Anti-Corruption Strategy	11/2003
	2009-2012	Anti-Corruption Strategy	10/2009
Azerbaijan	2004-2006	State Program on Fighting Corruption	09/2004
	2007-2011	National Strategy on Increasing Transparency and Combating Corruption	07/2007
	2012-2015	National Anti-Corruption Action Plan	09/2012
Belarus	2002-2006	Governmental Program for the Years 2002-2006 to Accelerate the Fight against Corruption	10/2002
	2007-2010	State program for fighting corruption 2007-2010	05/2007
	2010-2012	State program for fighting crime and corruption 2010-2012	09/2010
Georgia	2005	The National Anti-Corruption Strategy of Georgia 2005	06/2005
	2010	Georgian National Anticorruption Strategy 2010	09/2010
Moldova	2005-2010	National Anti-Corruption Strategy for the Years 2005-2010	12/2004
	2011-2015	National Anti-Corruption Strategy for the Years 2011-2015	07/2011
Ukraine	1998-2005	The Anti-corruption Concept for 1998-2005	04/1998
	2007-2011	Concept of Fighting Corruption in Ukraine 'On the Way to Integrity' 2007-2011	08/2007
	2011-2015	National Anti-Corruption Strategy for 2011-2015	10/2011

An (unofficial) **English** version of the most recent Strategy and Action Plan can be found at:
www.coe.int/eap-corruption

A version of the Strategy and Action in the original **national language** can be found under the following web links:

AM Strategy and Action Plan 2009-2012:
http://www.gov.am/en/anticorruption/

AZ Strategy and Action Plan 2012-2015:
http://www.commission-anticorruption.gov.az

BE State Programme 2010-2012: [one document containing strategy and action plan]
http://prokuratura.gov.by/sm.aspx?guid=10800

GE Strategy and Action Plan 2010:
http://www.justice.gov.ge/index.php?lang_id=GE&sec_id=649

MD Strategy 2011-2015:
www.cccec.md/Sites/cccec_md/Uploads/Proiect Noua Strategie Nationala Anticoruptie.559347D7E6ED4E0CA7DFF0BD183C70A7.pdf

UA Strategy 2011-2015:
http://zakon2.rada.gov.ua/laws/show/1001/2011/conv

UA Action Plan 2011-2015:
http://zakon1.rada.gov.ua/cgi-bin/laws/main.cgi?page=1&nreg=1240-2011-%EF

8.2 International standards

International Conventions

The United Nations Convention against Corruption (UNCAC) is the only international convention explicitly addressing anti-corruption policies.

"Article 5 Preventive anti-corruption policies and practices

1. Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anticorruption policies that promote the participation of society and reflect the principles of the rule of law, proper management of public affairs and public property, integrity, transparency and accountability."

See on this Article Commentary II.2, UNODC, Technical Guide to the United Nations Convention Against Corruption, 2009, page 4: "The UNCAC approach to prevention of corruption is premised on the need for a coherent framework that moves from general principles to clear and realistic strategies, action plans and procedures, and regular monitoring of implementation of measures to apply the strategy. This requires a comprehensive and coordinated approach, from the systematic collection and collation of quantitative and qualitative information on the basic situation in the country, to a strategy that sets overall goals that are then translated into objectives and action plans in order to enable comparison with the results achieved and enable adjustments to the policies and their implementation. The processes of drafting, adoption, implementation and monitoring and assessment of the strategy should be planned, led and coordinated among all relevant stakeholders (public and private sectors, civil society) and cover the full range of sectors or areas where corruption might occur."

See also Introduction, page xviii: "[T]he four pillars of the Convention (prevention, criminalization and law enforcement, international cooperation and asset recovery) are constituent elements of a comprehensive and multidisciplinary anti-corruption strategy."

"Article 60 Training and technical assistance

1. Each State Party shall, to the extent necessary, initiate, develop or improve specific training programmes for its personnel responsible for preventing and combating corruption. Such training programmes could deal, inter alia, with the following areas: [...] (b) Building capacity in the development and planning of strategic anticorruption policy;"

International recommendations

"Ten Principles for Improving the Fight against Corruption in Acceding, Candidate and other Third Countries", Annex to the Communication from the [European] Commission to the Council, the European Parliament and the European Economic and Social Committee - On a comprehensive EU policy against corruption (COM/2003/0317 final)[51]

Principle 1: "To ensure credibility, a clear stance against corruption is essential from leaders and decision-makers. Bearing in mind that no universally applicable recipes exist, national anti-corruption strategies or programmes, covering both preventive and repressive measures, should be drawn up and implemented. These strategies should be subject to broad consultation at all levels."

[51] http://eur-lex.europa.eu/smartapi/cgi/sga_doc?smartapi!celexplus!prod!DocNumber&lg=en&type_doc=COMfinal&an_doc=2003&nu_doc=317

8.3 Literature

Needs assessment

Council of Europe Technical Paper "Corruption risk assessment methodology guide" by Quentin Reed and Mark Philp for PACA Project, December 2010
www.coe.int/paca

UNODC, UNCAC-self-assessment checklist (in English and Russian)
www.unodc.org/unodc/en/treaties/CAC/self-assessment.html

USAID Corruption Assessment Handbook (2006)
http://transition.usaid.gov/our_work/democracy_and_governance/technical_areas/anticorruption_handbook/index.html

Counter measures

UNODC, UN Anti-corruption Toolkit (3rd edition 2004)
http://unpan1.un.org/intradoc/groups/public/documents/un/unpan020658.pdf

UNODC, Technical Guide to the UNCAC 2009 (English and Russian)
www.unodc.org/unodc/en/treaties/CAC/technical-guide.html

OSCE, Best practices in combating corruption, 2004 (English, Russian and Azerbaijani)
www.osce.org/eea/13738

Transparency International, "Confronting Corruption: The Elements of a National Integrity System", TI Source Book 2000 (English)
www.transparency.org/publications/sourcebook

OECD: Managing Conflict of Interests in the Public Service. A Toolkit 2005, Specialised Anti-corruption Institutions. Review of Models 2006 (in English and Russian), Lobbyists, Government and Public Trust 2009, Asset Declarations for Public Officials: A Tool to Prevent Corruption 2011 (in English and Russian), Bribery Awareness Handbook for Tax Examiners 2009, etc.
http://www.oecd.org/corruption/keyoecdanti-corruptiondocuments.htm

Designing policies

OECD, Proceedings of the Seminar on "Anti-corruption policy and integrity", March 2011
www.oecd.org/dataoecd/3/17/47912383.pdf

OSCE, Best practices in combating corruption, 2004 (English, Russian and Azerbaijani), Chapter 13 "National Anti-Corruption Strategies" pages 155-164 (focusing on the substance of anti-corruption strategies rather than on formal aspects)
http://www.osce.org/eea/13738

UNODC, United Nations Guide on Anti-Corruption Policies (2003) (focusing on the substance of anti-corruption strategies and, according to what was an international standard at that time, on the design and implementation of anti-corruption policies)
www.unodc.org/pdf/crime/corruption/UN_Guide.pdf

World Bank, "Anticorruption in Transition: A Contribution to the Policy Debate", Chapter 5: "Designing Effective Anticorruption Strategies", November 2000, pages 58-78 (focusing on the substance of anti-corruption strategies rather than the formal aspects)
http://siteresources.worldbank.org/INTWBIGOVANTCOR/Resources/contribution.pdf

R. Heeks & H. Mathisen, "Understanding Success and Failure of Anti-Corruption Initiatives", U4 Brief, March 2011:2
www.cmi.no/publications/file/3978-understanding-success-and-failure-of-anti.pdf

Impact/corruption indicators

UNDP/Global Integrity, A Users' Guide to Measuring Corruption, 2008
www.undp.org/oslocentre/flagship/users_guide_measuring_corruption.html

Output/progress indicators

Council of Europe Technical Paper "Tools for reporting and implementation of anticorruption measures in line with the new anti-corruption action plan" by Marijana Trivunovic for GEPAC Project, February 2008
www.coe.int/gepac

Presentation "Setting indicators for measuring progress" by Valts Kalniņš at the Workshop on "Improving the designing of anti-corruption policies", Eastern Partnership-Council of

Europe Facility Project on "Good Governance and Fight against Corruption", 4 November 2011
www.coe.int/eap-corruption

Council of Europe Technical Paper "Qualitative and Quantitative indicators to assess/measure the implementation of the Anti-Corruption Strategy (ACS), the Action Plan (AP) and line Ministries' Action Plans & Practical guidance to the coordinating institution and the Ministries" by John Heck for PACA project, April 2010
www.coe.int/paca

Council of Europe Technical Paper "Line Ministry reporting on implementation of the 2009 Anti-corruption Action Plan and proposed measures for 2010" by Quentin Reed for PACA project, January 2010
www.coe.int/paca

Reporting

Council of Europe Technical Paper "Tools for reporting and implementation of anticorruption measures in line with the new anti-corruption action plan" by Marijana Trivunovic for GEPAC Project, February 2008
www.coe.int/gepac

Public awareness

International Anti-Corruption Conference (IACC), "Making Public Awareness Campaigns Work! A Multi-Media Experience", Final Workshop Report (2008)
www.13iacc.org/files/_2_5_public_awareness_campaigns_final_report.doc

8.4 Abbreviations

AC	Anti-corruption
AM	Armenia
AZ	Azerbaijan
BE	Belarus
BPI	Bribe Payers Index
CCCEC	Centre for Combating Economic Crimes and Corruption (Republic of Moldova)
COM	Print legislative proposals and other communications issued by the EC
CPI	Corruption Perception Index
CoE	Council of Europe
EaP	Eastern Partnership
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EU	European Union
Eval I/II	Evaluation Round I/II
GCB	Global Corruption Barometer
GE	Georgia
GEPAC	Council of Europe Project "Support to the Anti-Corruption Strategy of Georgia" funded by the voluntary contribution of the Ministry for Development co-operation of the Netherlands
GRECO	Group of States against corruption
IACC	International Anti-Corruption Conference
ICRG	International Country Risk Guide
MD	Republic of Moldova
MOLICO	Council of Europe "Project against Corruption, Money-Laundering and Financing of Terrorism in the Republic of Moldova" funded by the EU, Sida and CoE
NATO	North Atlantic Treaty Organisation
NGO	Non-governmental organisation
OECD	Organisation for Economic Co-operation and Development
OSCE	Organization for Security and Co-operation in Europe
PACA	Council of Europe "Project against Corruption in Albania" funded by the EU and CoE
Rep	Report

TI	Transparency International
UA	Ukraine
UN	United Nations
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development