

# NCPA 2022



## DESIGNING, IMPLEMENTING, MONITORING STRATEGIC ANTICORRUPTION PLANS

**National anti-corruption strategies and plans: the importance of common features and shared challenges in the richness of diversity of national responses.**

*Compendium of emerging policies and practices in the Network of Corruption Prevention Authorities*

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Co-Coordinator: Albania - Ministry of Justice,  
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Working group members: FR, RO, MA, RS, MK, MD, BR



International cooperation between anti-corruption authorities of different countries is one of the key indications of the United Nations Convention against Corruption (UNCAC). The Network of Corruption Prevention Authorities (NCPA) was founded in the light of these principles, and on the basis of recommendations concerning international cooperation, such as those of the Council of Europe - Group of States Against Corruption and of the G20 - Anti-Corruption Working Group. The Italian National Anti-Corruption Authority (ANAC) was one of the co-founders of the NCPA. In the last few years, NCPA has grown in terms of both activities and number of members and partners, demonstrating the profitability of collaboration and its aptitude to widen the network. This period has been marked by a series of global crises and emergencies in which the strengthening of cooperation between anti-corruption authorities was the natural response to promoting the values and good practices of public integrity and the rule of law. This Compendium describes the efforts of countries to design and put into practice effective anti-corruption strategies as a pillar of democracy.

The richness of responses received clearly demonstrates the will to tackle common challenges together, and the importance of disseminating and sharing these policies to move forward the global debate on anti-corruption practices.

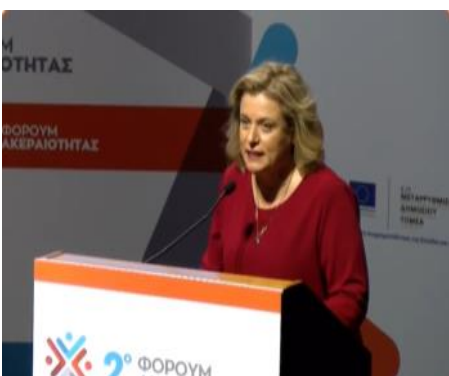
***Giuseppe Busia , President of the Italian National Anti-Corruption Authority – ANAC***



The fight against corruption continues to be one of the main challenges and major priorities in order to advance Albania's European integration process. The concrete measures taken at the legal, institutional, and enforcement levels in terms of preventing and punishing corruption are an international obligation derived from Albania's accession to international instruments for the fight against corruption such as the United Nations Convention against Corruption, the Criminal Convention of the Council of Europe against Corruption, the Civil Convention of the Council of Europe against Corruption, etc. In its role of the National Coordinator Against Corruption, the Ministry of Justice of Albania has increased the country's representation in international anti-corruption organizations and networks, such as the Network of Corruption Prevention Authorities - NCPA. We have been a member of NCPA since its creation and have valued our presence to the Steering Committee for the past two years, offering our advice, expertise, and participation in activities and good initiatives developed. The Guide, "National anti-corruption strategies and plans: the

importance of common features and shared challenges in the richness of diversity of national responses" is a very good collaboration of us, which will have its own added role in the anti-corruption policies of our countries and beyond. The better the strategic planning to be the better the results in practice.

***Ulsi Manja, Minister of Justice and National Coordinator Against Corruption – MoJ/NCAC, Albania***



In the last decade, Greece has developed an integrated policy framework to fight corruption and strengthen public integrity and accountability. As a result, the country has significantly improved its position in the CPI Index of Transparency International ranking 58th on a global scale in 2021. To this direction, the impact of the current National Strategic Plan for the Fight against Corruption for the period 2022-2025 has been pivotal. Built on a three-pronged approach (prevention - detection - raising awareness) NACAP provides for a holistic anti-corruption strategy seeking to safeguard the Rule of Law, improve the business climate and promote citizens' trust in State institutions. In this framework, international co-operation through the participation in NCPA is considered a key element in our common effort to enhance the capacity of national anti-corruption mechanisms, strengthen public integrity and promote a value driven anti-corruption culture. The present guide is a

collective work developed through P2P exchange of know-how. It presents the different experiences in the design and implementation of national anticorruption strategies/frameworks seeking to capitalize lessons learnt and disseminate best practices to policy makers and anti-corruption practitioners.

***Alexandra Rogkakou, Interim Governor of the National Transparency Authority (NTA) – Greece***

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## Foreword

Even before becoming the subject and the content of recommendations, high-level principles, and provisions by international organizations, the preparation and adoption of coordinated strategies for the prevention of corruption and the promotion of public integrity emerged as a common standard in the policies and practices of almost all countries.

These strategic documents/tools can take different names, e.g. "National anti-corruption plan", "National anti-corruption strategy", "Cross-cutting anti-corruption policy", etc., and can be issued by different institutional actors, for example, independent authorities pursuant to Article 6 of the UNCAC, governments collectively or individual responsible ministers, task force/coordination bodies of institutions, etc.

Despite the diversity of names and forms, these plans share the goal of a coordinated and continuous, preferably multi-year, approach to the issue of corruption prevention, on which to graft at the macro-level policies and strategies, and at the micro-level (with local governments and/or single institutions translating national strategies into the specific context) practices for preventing corruption and promoting integrity, transparency, and public ethics.

These initiatives are in line with the principles and provisions of the UNCAC, as well as those of the other competent international, regional and sectoral organizations and networks (UN, OECD, CoE, G20, etc.). In fact, in addition to the UN sphere, other international organizations and fora have also dealt with, and continue to deal with, the preparation of guidebooks and other more specific initiatives.

For this reason, in the NCPA context it would be redundant to trace these experiences. Instead, it is worthwhile to collect information from members and partners that can constitute an added value, for example by declining the theme of anti-corruption strategies on specific challenges that emerge from the changing international context.

The objective of this compendium is therefore to collect contributions by NCPA members and partners, including a brief description in which to explain the features of the respective national contexts, and then focus on in-depth analysis and considerations on specific challenges.

NCPA member organizations were requested to describe anticorruption strategies from a national point of view on and not just their direct role in them, but of course highlighting it providing insights and first-hand considerations.

The exercise far from identifying a single best model on the contrary tries to valorize the enriching differences of national contexts and experiences. From one side, collecting useful and schematic data/information allowed elaborating simple but eloquent statistics and figures on the topic, while the in-depth analysis of specific challenges is an added value in identifying lessons learned and good practices to share among NCPA members and partners and to promote the international debate on the subject.



## Network of Corruption Prevention Authorities

Heartfelt thanks to all NCPA members and partners who, representing their countries, participated in this exercise. Designing and implementing effective anti-corruption strategies, and disseminating best practices and lessons learned to promote public integrity, is even more necessary in times of crisis and emergency, as well as a fundamental requirement of any fair recovery. Special thanks to our Ukrainian colleagues, whose commitment to continue anti-corruption efforts, even during the major emergency represented by the war for the aggression suffered, demonstrates that anti-corruption policies are a fundamental pillar of rule of law and of democracy.

*February 2023*

## Description of the process and brief methodological note

In order to collect and analyze contributions related to designing, implementing, monitoring strategic anticorruption plans, the NCPA created a specific working group to address the topic and to prepare the basis for collecting the proper and useful information.

The working group was coordinated by Italy- National Anti-Corruption Authority, co-coordinated by Albania - Ministry of Justice as National Coordinator Against Corruption and Greece - National Transparency Authority, and included representatives from France - Agence Française Anticorruption (AFA), Romania - Ministry of Justice, Morocco National Authority for Probity, Prevention and Fight against Corruption, Serbia - Agency for Prevention of Corruption, North Macedonia - Commission for Prevention of Corruption, Moldova - National Anti-corruption Centre, Brazil - Office of the Comptroller General of the Union.

In the first part of 2022, the working group held 3 meetings to discuss the objective of the exercise and to focus on specific issues and challenges related to National Anti-Corruption Strategies.

Each meeting was followed by collaborative drafting and consultation related to a “concept note” to be shared with all the NCPA partners in order to start and guide the exercise.

The working group decided to focus the analysis of the anti-corruption strategies on specific set of information, including, among others:

- main actors responsible for the design, approval and monitoring of national anti-corruption strategies;
- participation/consultation phase and stakeholders involved;
- time frame implementation of the strategies and frequency of amending/approving of action plans;
- articulation between national and local / sectoral level;
- typology of the policies: preventive or even punitive;
- financial support for the implementation of the strategies, state budget of other sources.

Before starting the exercise and as a basis to collect useful elements and information about the strategies, the working group selected some potential and common challenges to propose as a focus to NCPA members and partners:

1. integration and relevance of anti-corruption strategies in time of crisis and post-emergencies/recovery policies, assuming the importance of regional/national initiatives to overcome the socio-economic crisis and the huge amount of public funds at stake and the consequent risk of corruption;
2. integration of transparency policies and practices into national anticorruption strategies, e.g. main documents and data with mandatory publication/release on public administrations websites/centralized information systems;

3. implementing and monitoring/assessing/evaluating (external/independent evaluation or even any internal specific evaluation) the impacts of anti-corruption plans, considering that guides/reports promoted at international level usually refer to the design of the strategy but there is a lack of shared knowledge about the outcomes and how to assess them;
4. the role of implementing entities of the National Anticorruption Strategies and the encouragement to perform a pro-active role and to provide timely reports on the implementation of action plans with adequate accountability mechanisms;
5. mechanisms for participation/consultation by stakeholders, both with stakeholders from the public and the private sector and the civil society, in the preparation and monitoring of anti-corruption strategies, taking into account international recommendation in the field and the importance of a common and shared platform among institutional and other socioeconomic actors to prevent corruption and breaches to public integrity;
6. use of technologies for monitoring anti-corruption plans, trying to take advantage of ICT and innovative solutions also for this specific objective.

The working group members also agreed on the items of a brief questionnaire to collect information and data in order to elaborate on some graphs and figures to get an overview of the main features of anti-corruption strategies. The items are organized in three sections, related to the issues of “designing national anti-corruption action plans”, “developing national anti-corruption action plans – consultation with stakeholders”, “approval and amendment - monitoring and evaluation mechanisms”.

Each NCPA member, representing its own country, was asked to:

1. answer the questions included in the questionnaire;
2. provide a 1-2 page general description of the national anticorruption strategy process, tools, and actors;
3. choose one or more challenges to provide an in-depth analysis on the ways they are faced, considering that the added value of the project relies on this aspect.

To broaden the scope of the analysis, the questionnaire was made available also to International Association of Anti-Corruption Authorities (IAACA) members and partners, thanks to the IAACA Secretariat’s kind availability and to the agreement with NCPA in this sense (many countries are represented by the same authorities both in NCPA and IAACA). The survey ended in November 2022. In total, 40 questionnaires have been filled out at least partially. Statistics and percentages reported in Part II are calculated for each item considering the number of total answers to each question. Feedbacks to the descriptive part of the exercise, limited to NCPA members and partners, were sent by representatives of Italy, Greece, Albania, Palestine, North Macedonia, Serbia, Moldova, Ecuador, Brazil, Slovakia, Chile, Austria, France, Romania, Ukraine, Catalonia, Comunitat Valenciana.

Coordinators of the project elaborated on the contributions received to prepare the compendium. The answers to the questionnaire were used to make some figures and graphs. The descriptive sections of the questionnaire, referring to the national systems and the challenges, were elaborated to draw considerations, common elements, and emerging issues and were also included in the document (Part III) due to the richness of the models and approaches described.

The compendium was developed between December 2022 and January 2023 and submitted for consultation to NCPA members and partners before the formal release.

The questionnaire used as a basis for the survey is shown below.

***Designing national anti-corruption action plans:***

1. *Do you define your AC's strategy pillars with regard to the UNCAC Convention priorities?  
YES NO*
2. *Is the approach followed during the design phase?  
Nationwide, Regional-Local, Sectoral, All the Above*
3. *Please prioritize the following principles for the design of your national AC strategy/action plan  
(from 1 to 5 -most important)  
Results Oriented  
"Less is more" Approach  
Stakeholders' Engagement  
Consultation  
Evaluation of prior action/strategy plans*
4. *How many years do your national AC strategies/action plans cover?  
Up to 3 years, 5 years, Up to 10 years*
5. *How many AC strategies have you approved in the last 20 years?*
6. *How many actors are involved in the design of your country's national AC strategy /action plan?  
Up to 10, Between 10-20. More than 20*
7. *Is the agency responsible for designing different from the agency responsible for monitoring?  
YES NO*
8. *Have the relevant guidelines by international and/or European organisations assisted you in  
designing your national AC strategy/action plan(s)?  
YES NO*
9. *What kind of further assistance/elaboration would you deem necessary with regard to the  
guidelines by international and/or European organisations? Pls define in no more than 100  
words*
10. *Do you use the external evaluation process of the current AC strategies prior to the drafting  
process of a new one?  
YES NO*



***Developing national anti-corruption action plans – consultation and stakeholders involved:***

1. *Was the AC Strategy/action plan open to public consultation?*  
YES NO
2. *If Yes, how many actors are involved in the consultation phase?*  
*Less than 30, Between 30 – 50, More than 50*
3. *How long did it take?*  
*Up to 3 months, 3-6 months, More than 6 months*
4. *Do you have drafted/updated a specific AC strategy during the pandemic Covid19?*  
YES NO
5. *Has the pandemic affected the prioritization and selection of interventions?*  
YES NO  
  
*If YES, in what way? Pls define in no more than 100 words*
6. *Do you consult with*  
*Public sector, private sector, civil society (multiple choice)*
7. *Which is considered the most fruitful partnership in consultative process?*  
*Governmental agencies CSOs private sector*
8. *Do you use any stakeholder engagement toolkit?*  
YES NO

***Approval and amendment - monitoring and evaluation mechanisms:***

1. *Define the level of the main actors involved at the approval of National Anti-corruption strategies/action plans?*  
*Independent Authority*  
*Presidency/Prime-minister Office/ Ministerial Cabinet*  
*Steering Committees*  
*Inter Agencies Decisions/Agreements*
2. *Is the approval and amendment process regulated by national law?*  
YES NO
3. *How often do you amend your national anti-corruption strategy/action plan?*  
*Once, Twice, More than twice (during the timeframe of the action plan)*
4. *How many agencies are involved in monitoring and evaluating your country's national AC strategy/action plan?*  
*One, Two, more than two (define no more than 50 words).*

## Structure of the document

**Part I** is devoted to identifying common challenges among countries represented in the NCPA and to identifying and valorizing national responses as potentially useful lessons learned. This part of the document outlines a compendium of emerging policies and practices related to National anti-corruption strategies and plans in the Network of Corruption Prevention Authorities and tries to underline the importance of common elements and challenges in the richness of the diversity of national responses.

Themes emerging from the received feedback are: anti-corruption strategies in times of crisis and post-emergencies/recovery policies, especially but not only with regard to public procurement; disruptive role of ICT tools in designing, implementing, and assessing the anti-corruption strategies and plans and in guaranteeing transparency, accountability, and participation; national anti-corruption strategies and plans as “living documents” and overcome of the control of the compliance approach with initiatives to accompany institutions; the integration of quantitative and qualitative approaches to design and monitor anti-corruption strategies and plans; the importance of indicators and surveys; from participation to co-design and co-execution of national anti-corruption strategies and plans; the crucial role of international frameworks (standards and recommendations). Each theme is described in general terms and with reference with specific national experiences.

**Part II** proposes graphs, figures and key findings related to the elaboration of national responses to the questionnaire. These contents allow to get some knowledge “at a glance” about policies and practices related to anti-corruption policies and practices and are a basis for potentially further developing considerations and analysis beyond the same NCPA.

**Part III** reports the contributions sent by NCPA members and partners in order to represent the various national realities concerning strategies and plans to prevent corruption and foster integrity and to underline the efforts of institutions representing their countries in participating in this exercise.

## PART I

### **National anti-corruption strategies and plans: the importance of common features and shared challenges in the richness of diversity of national responses. Compendium of emerging policies and practices in the NCPA.**

A series of considerations and ideas expressed by participants in the exercise could be summarized such as " National anti-corruption strategies and plans: the importance of common features and shared challenges in the richness of diversity of national responses".

In fact, it is important that also in the field of corruption prevention, countries converge more and more towards the use of common approaches and tools, to learn from the best international practices, to build common bases of cooperation and recognized standards, and to facilitate the exchange of data, information and experiences.

However, it is equally important that this convergence process, facilitated by the conventions and by the various international cooperation fora and networks, does not hinder the possibility of the different systems to offer specific and innovative answers, not only to the particular problems of each country but also to the common challenges. Indeed, it is through this diversity, while respecting the shared frameworks and principles, that innovative solutions can emerge, capable of functioning not only in a specific national context but also potentially in other contexts. This is how good practices and lessons learned are born, as some of the elements collected in this compendium demonstrate, which can then become new standards and models to be made available to the international community.

This is also the case for prevention strategies tools, and methodologies, whose main point of reference at the global level is the UNCAC, which is also the first source to which all countries refer when they begin to introduce prevention systems and the related tools, approaches, and methodologies. This is also the case of anti-corruption strategies and plans that are expressly mentioned in the Convention.

Anti-corruption strategies are provided by UNCAC Article 5: "Each State Party shall, in accordance with the fundamental principles of its legal system, develop and implement or maintain effective, coordinated anti-corruption 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". Article 60 of the UNCAC, encouraging technical assistance, provides for cooperation among States Parties assisting one another in conducting evaluations, studies and research relating to corruption in their respective countries, with a view to developing strategies and action plans. UNCAC mechanisms for implementation (Article 63, par.6), explicitly refer to "programs, plans, and practices, as well as legislative and administrative measures to implement this Convention[...]".

On October 2013, high-level representatives of anti-corruption authorities, national planning authorities and anti-corruption experts from around the world gathered in Kuala Lumpur at the invitation of the United Nations Office on Drugs and Crime (UNODC) and the United Nations Development Programme (UNDP), to discuss a set of guidelines for anti-corruption strategies to instruct the process of developing, designing and implementing sustainable anti-corruption strategies that were included in the “Kuala Lumpur statement”.

The Conference of the States Parties to the UNCAC in its resolution 5/4 to identify and disseminate good practices among States parties regarding the development of national anti-corruption strategies, promoted the development of “National Anti-Corruption Strategies - A Practical Guide for Development and Implementation” released in 2015 by UNODC.

In addition to the UN sphere, other international organizations and fora have also dealt with, and continue to deal with, the preparation of guidebooks and other more specific initiatives. This is the case, for instance, of the ongoing collection by the OECD of data and information on anti-corruption national strategies that feed one of the specific "Public integrity indicators".

All global frameworks and fora are absolutely necessary to guide the work of States on the prevention of corruption and to indicate the common elements from which to start.

What is interesting to note is how, starting from these elements, the models that, with specific reforms or incrementally, are introduced and consolidated in the various countries have a lot to teach in the "richness of their diversity".

The topic of the National Anti-Corruption Strategies design and implementation is very broad and the countries that participated in the exercise offer some emblematic examples of the underway efforts to prevent corruption. The emerging policies and practices based on the contributions provided can be grouped into the following specific topics.

1. Anti-corruption strategies in times of crisis and post-emergencies/recovery policies, especially, but not only with regard to public procurement (e.g. Italy, Ukraine).
2. Disruptive role of ICT tools in designing, implementing, and assessing anti-corruption strategies and plans and in guaranteeing transparency, accountability, and participation (e.g. Palestine, Ukraine, France, Moldova, Italy, Greece, North Macedonia, Romania).
3. National anticorruption strategies and plans as “living documents” and overcome of the control of the compliance approach with initiatives to accompany institutions (e.g. Palestine, Brazil, Italy, Austria, Albania).
4. Integration of quantitative and qualitative approaches to design and monitor anti-corruption strategies and plans. Importance of indicators and surveys (e.g. Serbia, Greece, Austria, Palestine, Albania, France).
5. From participation to co-design and co-execution (e.g. Chile, Moldova, Italy, Greece, Serbia, Catalonia, Albania).
6. Crucial role of international frameworks, standards and recommendations (e.g. Italy, Slovakia, France, Chile, Romania, Albania).

## Anti-corruption strategies in time of crisis and post-emergencies/recovery policies, especially, but not only with regard to public procurement

Anti-corruption strategies in times of crisis and post-emergencies/recovery policies are crucial to guarantee the proper and fair use of public resources and, through them, the protection of the principles of democracy. Indeed, it is above all in these historical phases that public resources and funds are even more precious, they must not be wasted, they must be kept safe from corruption and criminal infiltration. In recent years, our democracies have had to face various crises, due to the Covid-19 pandemic, the energy crisis, the scarcity of raw materials, and wars. A significant increase in public investments has emerged as a common response from the States, in particular through public procurement processes, which according to some estimates have increased from an average of 15% of GDP globally to much higher percentages. In Europe, these processes have been expressed through the enactment of the Next Generation EU and the related NRRPs at the national level, but similar phenomena have occurred in almost all countries. From this point of view, integrating specific anti-corruption rules into the mechanisms for verifying the use of funds is crucial. For this reason, some of the national anti-corruption strategies are focused precisely on NRRPs or are fully aligned with these plans.

This is the case, for example, in **Italy**, where, considering the huge flow of money assigned by the Next Generation EU Fund to the countries of the European Union, with a substantial share for Italy, and the exceptions to the ordinary legislation introduced during the pandemic, the main objective of the Anti-Corruption Strategy 2022-2024 (National Anti-Corruption plan) is the strengthening of public integrity and the planning of effective measures to prevent corruption in the implementation of the Italian National Recovery and Resilience Plan (NRRP). The Plan was developed as a support tool for public administrations to address the challenges related to the implementation in full integrity of the commitments undertaken by Italy with the NRRP, while at the same time safeguarding the efforts to simplify and speed up administrative procedures. The special part of the Plan is dedicated to public contracts/procurement, an area in which not only the Authority plays a role of primary importance but to which the PNRR itself dedicates crucial reforms. The Authority highlights the numerous exemptions and simplifications of the public procurement code with which the government wanted to incentivize public investments in the infrastructure and public services sectors and tackle the negative economic effects of the Covid pandemic. Concerning this "special" legislation, the PNA offers contracting authorities help in identifying measures to prevent corruption and maladministration and to foster transparency. In general terms, the Plan, focused on the PNRR and the use of resources after the pandemic, tries to outline innovative solutions in times of crisis to balance simplification of bureaucracy and prevention of corruption, focusing on transparency and digitalization.

This is also the case of **Ukraine**, where the new National Anti-Corruption Strategy is intended to accelerate the European integration of Ukraine and is aligned with the general Ukraine's Recovery Plan presented by the Ukrainian government to guarantee the start of recovery initiatives to build resilience and agility for the economy to function under continuous security threats.

## The disruptive role of ICT tools in designing, implementing and assessing the anti-corruption strategies and plans and in guaranteeing transparency, accountability and participation

It is well known that over the last years, digitalization and digital transformations have improved the efficiency and effectiveness of public administration and the private sector. Digital technologies also represent a powerful ally in the promotion of transparency, integrity and accountability and to foster civic engagement in the prevention of corruption, thanks to their possibility to enhance the accessibility of information, to facilitate citizens' participation and their capability to connect people. For these reasons ICT is crucial in all the stages of the NACAP-related processes. In fact, some countries, having already resolved the emergency to implement the basic tools for preventing and combating corruption, and having in the meantime gained a solid experience of the main practices (also through profitable relationships with the relevant stakeholders), push themselves to think about anti-corruption of the future, taking full advantage of ICT tools. As noted in the NCPA report "Using innovative tools and technologies to prevent and detect corruption" released at the end of 2021, is interesting to note that the UNCAC, the main tool that in the last twenty years has worked for the convergence of the regulatory systems and practices of countries in the field of anti-corruption, does not directly mention the topic of technological tools and standards. After all, the UNCAC is a legal instrument that by its very nature is focused on other aspects, and it is also necessary to take into consideration that twenty years ago the development of ICT technologies had not yet manifested their disruptive consequences, capable to "change the rules of the game" in all fields of socio-economic life as well as in the field of institutions and ways of working. In 2021, after about 20 years from the approval of the UNCAC, the context has completely changed and ICT technologies must not only be considered as tools to translate traditional institutional processes and models into digital, but as a new component of the action of institutions, capable of generating completely new models and approaches.

Digitalization is a very broad topic and countries that participated in this exercise, provided some emblematic examples of their underway process of change with a specific focus on anti-corruption strategies and plans. In particular, in the contributions received, the issue is addressed both from the point of view of the importance of ICT to improve communication between anti-corruption bodies and stakeholders and from the point of view of potentialities in terms of transparency and accountability.

**Palestine** reports that due to the spread of the Corona pandemic, 2020 and the first half of 2021 have been an extraordinary periods of time. For example, due to movement restrictions imposed to combat the pandemic, the citizen's access to PACC's headquarter to submit complaints and reports has decreased. However, this has changed in the second half of the year through the adaptation of PACC for its application on smartphones to receive complaints and reports. This contributed to mitigating the effects of the pandemic on citizens' ability to access PACC.

**Ukraine** underlines how ICT can be important in a war context also to keep on with anticorruption issues. The Anti-Corruption Strategy was developed by the National Agency on Corruption

Prevention (NACP), following its functions assigned at the legislative level. Thanks to the online platform created by NACP, every person will be able to clearly see how every government body is contributing to tackling corruption. Furthermore, one of the principle at the basis of the strategy is related to digitalization in order to allow the reduction of the “human factor” and to increase in transparency and efficiency of the state’s relations with people and organizations. This will be achieved through the introduction of rules of general administrative procedure and the digitalization of most processes and services.

**Moldova** describes ICT as being fundamental to improving communication with institutional stakeholders in the processes related to NACAP. In the process of carrying out the reporting exercise on the National Integrity and Anticorruption Strategy (NIAS) implementation, public entities submit to the Secretariat, via the e-Institutional Integrity Platform, necessary information to monitor and evaluate the progress in implementation of the planned actions for which they are responsible within the deadlines established in the Strategy Action Plans. In order to familiarize public agents with the electronic reporting process of the National Integrity and Anticorruption Strategy implementation, the National Anticorruption Centre, as the Secretariat of the strategy monitoring groups, ensured the elaboration and dissemination of the Instruction on Electronic Reporting of the strategy implementation, as well as a video tutorial that includes a demonstration of the steps to be taken in order to ensure an intact reporting process.

In fact, ICT is particularly useful concerning monitoring NACAP- related functions In this scope, **North Macedonia** describes how, in order to effectively monitor the level of implementation of the activities of NS 2021-2025, in the second half of 2021, a software solution - WEB application- was developed, which provided the nominees - coordinators of the competent institutions with the ability to periodically submit reports on the level of implementation of the activities for which their parent institution is the bearer in the process of realization. After the training for using the application through the Web application, the evaluation process for the level of realization of the activities was opened, during which the coordinators submitted the reports related to the activities under their competence.

**Romania** reports that in support of the process of monitoring the implementation of the new anticorruption strategy, five cooperation platforms were developed as ownership mechanisms of action for each category of stakeholders: - the platform of the independent authorities and anticorruption institution; the platform of the central public administration; the platform of the local public administration; the platform of the business environment; and the platform of the civil society. The platforms are pillars in successfully fulfilling tasks, such as: approving the yearly progress reports of NAS and the reports drafted following the peer review missions; submitting proposals in regard to the topics of the peer review missions, the monitoring methodology for the implementation of NAS and other initiatives that need their involvement; adopting decisions with the majority of the votes of those present in each platform.

**Albania** describes public procurement procedures are fully digitalized. Use of the Electronic Procurement System is compulsory in all procurement procedures, regardless of all amount,

including the small-amount procedures and negotiated procedures without prior publication of contract award notice.

In general terms, ICT tools have a disruptive role in guaranteeing transparency, accountability, and participation.

In **Ukraine**, one of the pillars, of the National Anti-Corruption Strategy, is the digital transformation of the exercise of powers by state authorities and local self-government bodies, transparency of activities, and data disclosure as a basis for minimizing corruption risks in their activities.

In **France**, the National Multi-Year Plan to Fight Corruption 2020-2022 calls for “enhanced collection and disclosure of data on corruption and better data analysis through data mining” under its first pillar on optimizing data analysis to improve understanding and detection of corruption. This objective includes the development of a national corruption risk mapping project by the French Anti-Corruption Agency (AFA), based on a pragmatic approach that combines various data sets: rulings handed down in corruption trials (convictions and acquittals), starting with the jurisdictions that have signed cooperation agreements with the AFA; data from statistical resources relating to criminal investigations conducted by the Police and the Gendarmerie, obtained with the collaboration of the SSMSI, the Ministerial Statistical Department for Internal Security in view of gaining an insight into more recent events; data from disciplinary procedures (Directorate General for Administration and the Civil Service – disciplinary sanctions imposed on central government civil servants); data from AFA audit activities, in particular whistleblowing reports. The information collected is integrated into a digital database created by the AFA and processed by Bercy Hub, the IT support and innovation unit of the Ministry of Economy. Thanks to this partnership, data visualization tools are being developed and will soon be available online.

In **Albania**, the third objective of the prevention approach (A) of the Intersectoral Strategy Against Corruption is focused on the “Strengthening the electronic infrastructure of public institutions”. The main information technology tools employed by the public administration institutions include e-government services, various electronic admission system (schools, hospitals etc.); electronic monitoring systems, e-procurement; financial information systems. By June 2022, there are 1225 e-services in place in Albania, covering 95% of the requested public services. The digitalisation of the public service provisions has delivered the successful roll-out and effective operations of tools, such as e-albania, C@TS, e-visit, e-depot, U-GOV, ASCAP, Teachers for Albania, e-Payroll Confirmation and e-residence Certificate, etc. Considering the scale by which citizens have adopted these tools to access public services indicate a significant level of advancement in the effort to build a state administration immune to corruption. The increased digital interaction between the public administration and citizens has resulted into a significant reduction of red tape, waiting time and cost for citizens service delivery and, consequently, into less corruption in the counters. The aim for the next phase is to improve service access and measure efficiency, focusing on further shrinking potential room for corruption by closing down in person counters.

In **Italy**, there is a rich system of reactive transparency policies and practices that has been consolidated in the last decade with characteristics similar to those of most European countries and the most common international practices. The policies of pro-active transparency in Italy are instead



characterized by some peculiarities. From a general point of view, both at a theoretical/regulatory level and at the level of implementation, two different models of pro-active administrative transparency can be established: - the centralized model of active transparency, in which each public organization provides administrative data and documents in centrally managed portals/platforms; - the decentralized model of active transparency, in which each public organization is required to publish on its institutional website, in the most standardized form possible, the data and documents required by the regulatory framework. While the first is implemented in some important cases, the second is the prevailing model chosen by the Italian legislator starting from Law No. 190/2012 and Legislative decree No. 33/2013, but with some categories of big data managed at the central level (procurement, use of EU and National funds, infrastructures, etc.). Following the adoption of the PNRR and the need for standardization and digitalization, ANAC promoted a debate and a reflection on how to simplify and enhance the system. Consequently, ANAC is working to realize a centralized system of transparency, to be put in place almost on a reduced set of data and documents.

### **National anticorruption strategies and plans as “living document” and overcome of the control of the compliance approach with initiatives to accompany**

The UNCAC and the other sources in the UNDOC framework related to anti-corruption strategic plans, primarily the aforementioned Guide, as well as the other main sources and international standards on the subject, recommend preparing multi-year plans in order to have a time horizon such as to be able to deploy strategies in a proper way, but to periodically update the plan. In fact, updates are necessary both to take into due consideration the monitoring and evaluation results of the plans, to carry out the necessary "course corrections", and to introduce the necessary measures to prevent corruption in specific sectors and areas due to highly changing contexts. It is interesting to note that all the contributions received from the countries represented in the NCPA refer, to varying degrees, to Plans and Strategies with a multi-year development and updates, usually annually or biennially (for further quantitative details, refer to the elaboration of answers to the specific item in part II). For this reason, the definition given by some countries (in their contributions) of anti-corruption strategies and plans as "living documents" (e.g., Brazil, Italy, Austria, Albania, Greece) appears particularly appropriate, precisely to mark their difference from the merely bureaucratic or compliance-oriented perspective that these fundamental tools for the prevention and fight against corruption may have.

On the other hand, going beyond the mere bureaucratic and compliance logic it allows one of the main functions of anti-corruption strategies and plans to emerge, not as a control and supervisory tool, but as a tool available to public administrations, economic operators, stakeholders, to defend against criminal infiltration, to guarantee high ethical standards in the provision of services, to make the use of resources more efficient, to contribute to the improvement of the public good.

In **Austria**, the main objective of the Austrian National Anti-Corruption Strategy (NACS) is to increase and ensure integrity and transparency in administration, politics, and business. “In order to regularly supplement and update the action plan, it was conceived as a living document”. The national Coordinating Body on Combating Corruption (Koordinationsgremium zur Korruptionsbekämpfung) had decided that an evaluation of the NACS action plan was to take place after the completion of the first cycle. The proposal for quantitative and qualitative indicators developed by the BAK was to be used as a basis for evaluating the implementation of the NACS action plans. The BAK coordinated the activities around the evaluation of the action plans under the NACS.

In **Brazil**, the Federal Government has prepared the Anti-Corruption Plan, for the period 2020 -2025 with the objective of structuring and executing actions to improve, within the scope of the Federal Executive Branch, the mechanisms of prevention, detection, and accountability for acts of corruption, advancing in the anti-corruption legislation’s compliance and improvement, and meeting international recommendations. The Plan was developed within the scope of the Interministerial Committee to Combat Corruption (CICC). “As the Brazilian Anti-Corruption Plan is a living document, which continuously advances in the implementation and improvement of anti-corruption legislation and in compliance with international recommendations, in December 2021, after a review, 11 more actions were proposed to the Plan, which now has 153 actions”. A Plan update round will be held annually, in which the bodies may include new actions to be implemented by 2025.

In **Italy**, the prevention of corruption system is based on a model of regulation that provides for planning and control activities, with a “cascade” planning model that affects all levels of government and that is founded on four instruments - transparency, training, codes of conduct, and risk-analysis. The National Anti-Corruption Plan is the heart of this planning model, and each public administration should adopt an Integrity Plan. The Integrity Plan identifies, on the basis of the National Plan, the specific risks of corruption (using international standards for risk assessment) in each administration and the measures deemed necessary to prevent them (mandatory as rotation of assignments, training, and civic participation, and specific for each organization) and to foster integrity. These planning tools assume a fundamental importance in the system devised by the legislator, as long as the National Anti-Corruption Plan ensures the coordination of national and international strategies for the prevention of corruption in public administration, whereas the integrity plan identifies, on the basis of the first, the specific risks of corruption in individual administrations and the measures deemed necessary to prevent them. The National Anti-Corruption Plan allows for a unified and strategic planning of the activities to prevent and combat corruption in the public sector and provides for measurable objectives and the identification of specific responsibilities. The Plan is a programmatic three-years tool subjected to an annual update. ANAC regularly organizes meetings, technical round tables and surveys to involve the administrations both in the planning stages and in the implementation stage. In particular, the interaction on the subject with the administrations takes place through the figures of the "responsible for the prevention of corruption and transparency (RPCT)", the "integrity managers" within each public organization. With these figures, the ANAC has a “real time” relationship, and a specific web-based interactive communication channel has also been set up (the RPCT forum).

In **Greece**, the National Anti-Corruption Strategy was designed as a dynamic policy tool based on an integrated management system covering the different phases of the policy cycle (design – monitoring – evaluation – review). The IMS establishes standardized procedures that allow NACAP to adapt to external challenges and emerging risks. The review process takes place on an annual basis. It is based on the findings of the semi-annual Monitoring Reports and incoming requests from the Implementing Bodies as well as the recommendations of EU reports and GRECO and WGB Evaluation Rounds and the findings of the internal evaluation. In this context and according to the provisions of the IMS, major changes (i.e. structure and the objectives of NACAP) require the approval of the Council of Ministers while minor changes (i.e. addition of new actions or redefinition of an action's scope or output) are approved by a Co-ordination Committee.

In **Albania**, is in place the Intersectoral Strategy Against Corruption adopted in 2015. The 18th objectives are renewed until 2023, by a decision of the Council of Minister, whose approval was the third action plan, also. Since the approval of ISAC as the main document that defines Albania's anti-corruption policy and directs anti-corruption action at the national level, a series of reforms have been undertaken that aim to increase the country's responsiveness and capacities to prevent, curb and reduce corruption. A multitude of state actors bear specific responsibilities in instilling integrity, transparency, and accountability in public administration institutions. So, Prevention of corruption through transparent and accountable governance systems; Increasing the performance of all structures responsible for pursuing, investigating, and punishing corruption cases; and Raising citizens' awareness and educating young people to proactively engage in the fight against corruption.

### **Integration of quantitative and qualitative approaches to design and monitor anti-corruption strategies and plans. Importance of indicators and surveys.**

As for other strategic documents and plans, concerning public action, even those referring to the prevention of corruption, they cannot disregard indicators and more general measures that make it possible to know the corruption phenomenon and the state of public integrity in order to properly set up prevention and contrast policies and practices. In this regard, it is necessary to distinguish between "ex-ante" initiatives to learn about these phenomena in order to be able to prepare adequate strategies and plans, and "in itinere" and "ex-post" initiatives to be able to monitor and evaluate the progress and effectiveness of what was planned. This is an issue that emerges from all the contributions received in this exercise, and that characterized the discussion between the members of the NCPA working group dedicated to the topic in the various meetings that were held. Over time, almost all countries have followed a similar path: the first corruption prevention strategies and plans usually contain descriptions of objectives and initiatives without associating them, or with a rather generic association, with specific indicators and targets. Over time and in the updates or new plans then, countries, gaining experience and overcoming the more bureaucratic approaches, pay more and more attention to the indicators and to the evaluation of results and outcomes of the Plans. As is known, however, corruption is an elusive phenomenon, difficult to evaluate and even more difficult to measure. Consequently, even the initiatives to contrast and

prevent it are difficult to measure in strictly numerical terms or with single indicators. For this reason, the most effective perspectives, increasingly introduced by countries, are those using multidimensional measures and a mix of quantitative and qualitative approaches. These perspectives, as demonstrated by the experiences of the countries, are useful not only in the phase of verifying the results and impacts, but also for collecting information, data - knowledge - useful ex-ante in order to design strategies and plans that respond to the needs and characteristics of the institutional and socio-economic system, and which therefore are not a mere bureaucratic exercise.

In **Austria**, the assessment of the operationalization of each measure of the Austrian National Anti-Corruption Strategy (NACS) was built on two indicators: a qualitative and a quantitative one. The combination of these two indicators allowed for an objective and targeted evaluation of the implementation of the action plan. The qualitative indicators made it possible to describe the content of the activities carried out and provided objective information for evaluating the content of the measures. The activities were described in terms of strategies, goals or desired results. The quantitative indicators allowed for an assessment based on figures and values in order to clearly measure the performance of a given action. Participating institutions were also invited to reflect on the results of their respective measures and to provide a brief statement on their key findings. The evaluation of the action plan by using qualitative and quantitative indicators led to a representative result and allows conclusions to be drawn on the success and effectiveness of the action plan measures. The evaluation also reflects the overall strategy, the evaluation approach itself and provides recommendations for improvements.

In **Serbia**, the Serbian Agency for Prevention of Corruption (APC) monitors the implementation of the strategic documents including issuing corresponding recommendations and it is responsible for assessing the impact of measures taken to reduce corruption in vulnerable areas (health, taxes, customs, education, local self-government, privatisation, public procurement, and police). These measures were included in the National Anti-Corruption Strategy for the period 2013 – 2018, the corresponding Action Plan for the period 2013 – 2015, the Revised Action Plan for the period 2016-2018, and the Action Plan for Chapter 23 for the period 2016 – 2020. Such impact assessments have never been conducted, and the institutions have not been requested to keep the records in a way that allows impact assessment of anti-corruption measures. It is a new mechanism for all the participants in the process, and that's why this assessment was also a learning process. The main challenge was related to the fact that the indicators for the impact assessments were not properly defined, there were no baseline values, and target values were determined in a small number of cases. Targeted research was also not conducted in the appropriate time intervals (ex ante, baseline, post festum), which made it impossible to conduct a direct analysis of the possible impact of strategic documents. The APC developed proposals for indicators and preliminary questionnaires, based on which it planned to collect data from relevant institutions. The intention was to collect data that could show a certain trend in achieving results in the above areas, at the beginning, during, and after the expiration of the strategic documents. In addition, the APC conducted an online (Google Forms) survey in order to collect more data necessary for the process of evaluating of strategic documents in the field of anti-corruption. As a key source, the APC also used the findings

from external public opinion polls conducted by third parties to examine related phenomena, as a tangible, but supplementary impact indicator.

In **Greece**, an innovative element in National Anti-Corruption action plan 2022-2025 is the development of a comprehensive set of output and results indicators that allow the National Transparency Authority to measure/quantify the outcomes and the impact of the intervention. On a semi-annual basis Implementing Bodies report progress achieved by filling a standardized form via an electronic e-platform hosted by the NTA. Following data compilation, NTA publishes and uploads in the Organization's website progress reports including quantitative and qualitative data reflecting the progress achieved in each pillar of the Action Plan.

In **Albania**, in 2020 it was postponed the duration of the Intersectoral Strategy Against Corruption and a new action plan 2020-2023 was adopted. The same passport of indicators was renewed and only by refreshing of the annual target until 2023.

In **France**, as part of its task of facilitating administrative coordination and under the terms of the 2020-2022 National Multi-Year Plan to Fight Corruption, the French Anti-Corruption Agency (AFA) regularly assesses the degree of awareness and implementation of France's anti-corruption framework in the public sector. For example, it conducts diagnostic surveys of central government or local government entities for this purpose. The AFA conducted its first survey in 2018, followed by a second one in 2021. In this context, local government entities, including municipalities, groups of municipalities, local public establishments and local public-sector businesses were asked to fill out an anonymous online questionnaire. Furthermore, the National Plan explicitly calls for the AFA to provide support for ministries and their agencies in the development of their corruption prevention and detection systems. In application of these provisions, AFA assessed the current state of different ministries' deployment of anti-corruption measures and procedures. The assessment looked first at the ministries (central departments, devolved departments and departments with responsibilities at the national level). Then, in the second phase, it looked at the ministries' national agencies. The AFA drafted a summary inter-ministerial assessment report that was released in early 2022. The report presents the state of play as regards awareness and implementation of the ministries' obligations to prevent and detect corruption in their operations. The report also contributes to the dissemination of France's anti-corruption framework in the ministries and among their employees. It will provide a fulcrum for the ministries in their efforts to establish effective anti-corruption systems that comply with the AFA's guidelines. Central government agencies are legally distinct entities that usually take the form of public establishments performing general interest tasks on behalf of the central government. The AFA conducted an anonymous statistical survey of the agencies' exposure to corruption risk and their progress on the deployment of anti-corruption measures in order to provide its support for the implementation of corruption prevention and detection measures. The survey also provided each agency with an individual assessment that enables it to identify the measures that need further work or that need to be deployed for an effective anti-corruption plan, along with an inter-ministerial benchmark. The survey was also an opportunity for the ministerial departments that oversee the agencies – that relayed this survey to them – to develop a dialogue on corruption issues.

## From participation to co-design and co-execution

Participation is one of the most crucial aspects of promoting the success of anti-corruption strategies, and it is no coincidence that NCPA members participating in this exercise have focused particularly on this challenge.

The examples below provide a broad spectrum of ways to participate in each stage of the anti-corruption strategy process, from initial consultations to better understand contexts, to participation in implementation and monitoring, to evaluation. The methods of participation are a constant in all countries but can vary greatly in degree, from simple communications and consultation to co-design and co-execution approaches with non-institutional actors. What all the processes have in common is the attempt to progressively involve as many, institutional and non-institutional actors, as possible, to open up the process in particular to NGOs and more generally to stakeholders and citizens. In all countries, therefore, it was understood that although formally perfect national anti-corruption strategies and plans could be designed, fully adhering to the best international standards, the only way to make these tools effective, to make them shared and alive, and not mere bureaucratic exercises of compliance, was to open them up to the institutional system and to society as a whole, involving stakeholders at every stage, from design to implementation and evaluation. This is what all countries are trying to do, with some peculiar and interesting examples.

In **Chile**, one of the key activities of the National Anti-Corruption Strategy drafting consisted of a national consultation on corruption, during which 16,809 people responded to the survey "What do you think of Corruption in Chile?". This was an exploratory study that examined how corruption occurs in the country. This allowed the preparation of the report "Radiography of Corruption in Chile" to define the corruption panorama from the point of view of civil servants and citizens. Once the context of corruption at the national level was clear, the process of drafting the strategy began. The development of the National Strategy involved a process consisting of 155 activities in the 16 regions of the country. The activities included 27 meetings of dialogue with public officials; 23 meetings with citizen comptrollers; 12 meetings with ten priority groups such as children and adolescents, indigenous peoples, senior citizens, and prisoners; and 2 meetings with the Council of Civil Society Associations of the Comptroller's Office. A total of 1554 people participated in the process, of whom 734 identified themselves as women and 814 as men. 77 civil society organizations also collaborated in the drafting process. The process concluded with the elaboration of 15 pilot measures that were submitted to a participatory review where 5000 people collaborated, resulting in the 25 proposals that make up the National Strategy. The Strategy was created through a participatory process that, through different stages, involved more than 21.000 people. To involve citizens in the process, strengthen confidence in the strategy and make it compatible with citizens' needs, a process was designed that involved citizens at all stages. To consider all stakeholders, differentiated strategies were generated to involve: citizens in general, minority and historically excluded groups, public officials, and institutions.

In **Moldova**, the National Integrity and Anticorruption Strategy is based on the analysis of the National Integrity System developed by Transparency International Moldova. During the public consultation process of the draft Strategy 20 public events were organized with the participation of all interested authorities, civil society, and other stakeholders. A total of 1018 proposals were made, of which 92% were accepted in full or in part. Civil society and the media contribute to the efficient implementation of the Strategy through alternative monitoring that provides an impartial and equidistant view of the deficiencies of the system. At the same time, the process includes an annual Survey to monitor its impact based on questions asked of public officials, private sector representatives, and the general public based on specific objectives set for each Pillar of the Strategy.

In **Greece**, the National anti-corruption plan is designed by the National Transparency Authority (NTA) which is the competent authority for the coordination, monitoring, reporting, evaluation, and update of the Action Plan, in cooperation with the implementing bodies. The successful implementation of NACAP required, first and foremost, engaged stakeholders.

The implementation of the action plan, as a nationwide action plan with both a horizontal and multisectoral approach, involves many public entities. Contact points have been appointed in every implementing body, for the better coordination of the consultation phase and for the smooth progress of the monitoring process, as well as for the orderly implementation of the actions. In fact, a high-priority challenge during the design phase 2022 – 2025 was to definitely include all the stakeholders early on in the process and consult them in defining the actions to be included. The action plan 2022-2025 is also for the first time designed through an extensive consultation process. Within this process, more than 44 meetings took place with the participation of the main authorities (for the design and implementation of the relevant public policies), and organisations from the Private Sector and the Civil Society. In fact, as the national framework for the comprehensive response to the phenomenon of corruption in the country and the integration of international good practices, there are a variety of stakeholders involved.

In **Albania**, the Ministry of Justice in the capacity role of the National Coordinator Against Corruption is the responsible authority for design of the strategy and monitoring process of action plan. The anticorruption documents (strategy-action plan and monitoring reports) are regularly consulted and there is a network of Civil Society Organizations established with this regard.

In **Italy**, the Italian National Anti-corruption Authority (ANAC), as an independent authority, according to the law, drafts and issues the anticorruption national strategy in autonomy and far from interference. Despite this, and in a certain sense precisely for these reasons, ANAC pays a lot of attention in the involvement of other institutional and non-institutional actors in the drafting process of the PNA. Long general consultation mechanisms, specific task forces and working groups, stakeholders participation toolkits, targeted events and communication campaigns, are all instruments that the Authority uses to foster participation, consultation and, when possible co-design processes. The involvement of other institutions at national and local levels, stakeholders such as NGOs active in the field of public integrity, and at the end, citizens, is the “flagship” of the drafting process of the PNA, which ANAC considers not its own document but a “document of all”.

In the issuing process of previous PNAs, ANAC received hundreds of comments and several amendments proposals, that was each one was taken into account, processed, accepted, or otherwise commented with a feedback, all through a transparent and public process in each step. Also, for the PNA 2022-2024, before the final approval, numerous comments are expected, especially considering the efforts ANAC is putting in place to spread the knowledge of the draft and to increase the public awareness about the contents. Just to make an example of the ongoing initiatives, ANAC presented the draft of the PNA in a specific event organized in the context of the Italian national "Open government partnership". Several representatives of institutions (particularly the ones involved in the execution and supervision of the NRRP) and of civil society organizations active in the field of public integrity participated to the initiative, proposed their comments, asked for deepening. Following this initiative, a specific channel of consultation was established and there will be further specific initiatives targeted in particular to civil society organizations to build on their experience in the field and to improve the contents of the plan. In this respect, the process fully complies with international recommendations in the field, and it tries to implement a platform among institutional and other socioeconomic actors to prevent corruption and breaches of public integrity by designing and putting into practice anti-corruption strategies.

### Crucial role of international frameworks, standards and recommendations

As mentioned in the introduction, international frameworks, starting with the UNCAC context, are essential for any country that introduces and then develops anti-corruption strategies and plans for the promotion of integrity. In addition to being natural sources in terms of standards and examples to follow, these frameworks and the related design, monitoring and evaluation processes are sometimes also decisive as a "window of opportunity" for introducing policies and practices of prevention of corruption in some countries where would potentially be opposed for political reasons or for the "impermeability" of institutional systems. In this regard, for example, it is remarkable how many countries have first introduced corruption prevention systems according to the UNCAC and how relevant the GRECO CoE evaluation processes are to many countries' efforts to improve standards and mechanisms related both to prevention and repression of corruption.

More in general, in recent years convergence mechanisms have operated, driven both by international conventions and by the dissemination of good practices and lessons learned favored by international networks and fora on the subject, which have led countries to use similar tools - while taking into account and enhancing the specific contexts national - thus contributing to enrich the availability of good practices to be circulated internationally, in a process of continuous improvement and enrichment.

In **Slovakia**, the Government adopted the National Anti-Corruption Program that reflects GRECO recommendations adopted by GRECO plenary in June 2019. The Program contains a more detailed analysis of the current situation and sets particular tasks for central authorities in the area of corruption prevention.



In **France**, the 2020-2022 National Multi-Year Plan to Fight Corruption is based on recommendations from international organizations, such as the United Nations, the OECD and the Council of Europe, as well as on best practices identified in other countries' strategies. Drafted by the French Anti-Corruption Agency (AFA), the Plan sets out France's long-term action and underscores its commitment in the eyes of the global community.

In **Chile**, the development of the National Anti-Corruption Strategy (ENA) had as a starting point a planning process that included the contributions of entities such as UNODC, civil society, public institutions, the private sector, and public servants. To include international recommendations, the process began with a workshop in which organizations such as UNODC and world-renowned experts participated to provide information on the state of the art in the fight against corruption and the best international practices in this area.

In **Romania**, an important tool for the evaluation of the National Anticorruption Strategy refers to the peer review missions carried out in public institutions and authorities (considered a good international practice, partially replicating GRECO's evaluation mechanism) by teams of experts from the five platforms; the evaluated themes are selected from the list of preventive measures provided by the strategy.

In **Italy**, the National Anti-Corruption Plan is issued by the National Anti-Corruption Authority. This is a specific will of the legislator, in order to give even greater strength to the strategy, as ANAC is an independent authority pursuant to Article 6 of the UNCAC and identified by Law No.190/2012 as the coordinator of all the country's corruption prevention strategies. This is the result of a path followed to strengthen anti-corruption strategies over time.

## PART II

### Questionnaire analysis

#### KEY FINDINGS

##### **Designing national anti-corruption action plans:**

1. Most ACAs define their AC Strategy pillars with regard to the UNCAC Convention priorities
2. The approach during the design phase is nationwide, including regional local and sectoral elements.
3. The principles of “results oriented” and “evaluation of prior action/ strategy/plans” are highly prioritized by most of the ACAs.
4. Most national Anti-corruption strategies/Action plans cover up to 3 years
5. Most ACAs have approved (1-3) Anti-Corruption strategies/plans.
6. More than 20 actors are involved in the design of the national Anti-Corruption strategy/action plans.
7. The agency responsible for the design of the Anti-Corruption Strategy is the same with the agency responsible for its monitoring.
8. The relevant guidelines by international and/or European organizations have assisted most ACAs in designing their national Anti-Corruption strategy/action plan.
9. External evaluation process of the current Anti-Corruption strategies is used prior to the drafting process of a new one.

##### **Developing national anti-corruption action plans – consultation and stakeholders involved:**

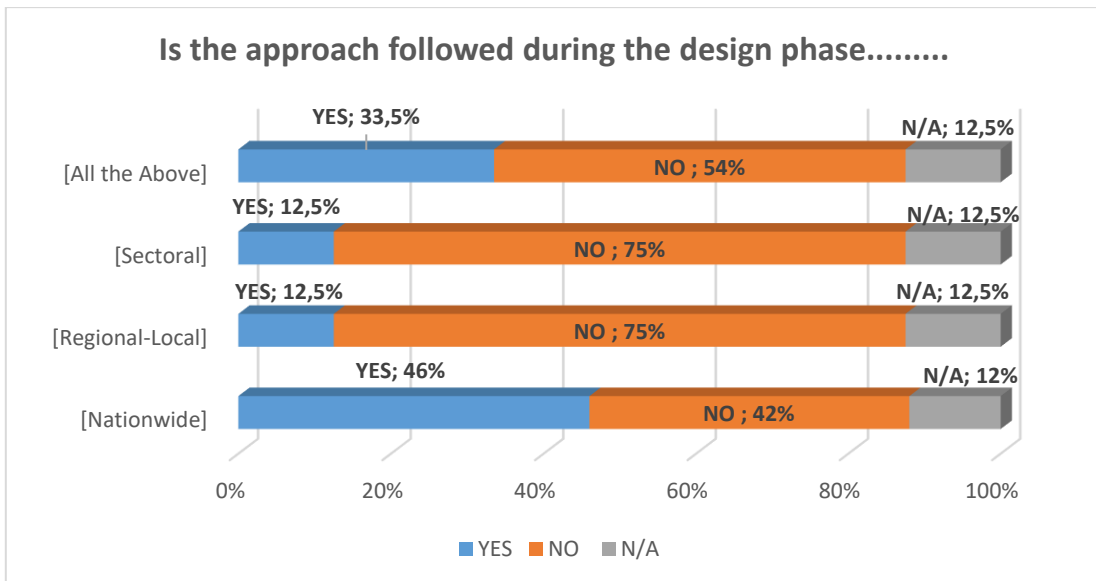
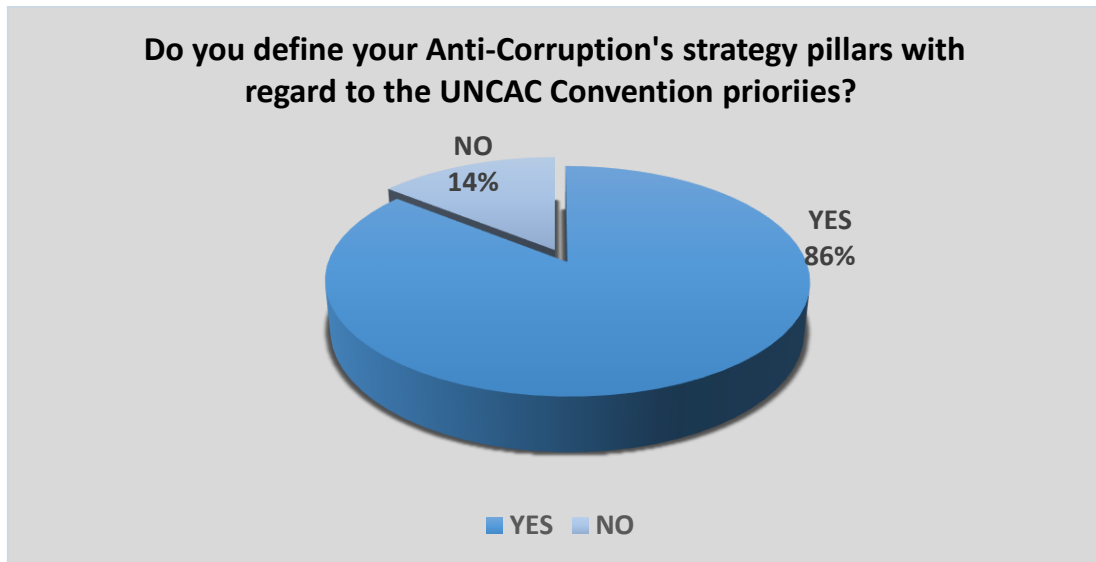
1. The Anti-Corruption Strategy is open to public consultation (with more than 50 actors, up to 6 months).
2. During Covid-19 the majority of ACAs have not drafted a specific Anti-Corruption Strategy; Covid-19 has not affected the prioritization and selection of interventions.
3. The ACAs have consulted with public, civil society and private sector; Governmental Agencies have been considered as the most fruitful partnership.
4. 50% of the ACAs participating in the survey is using a stakeholder engagement toolkit.

##### **Approval and amendment - monitoring and evaluation mechanisms:**

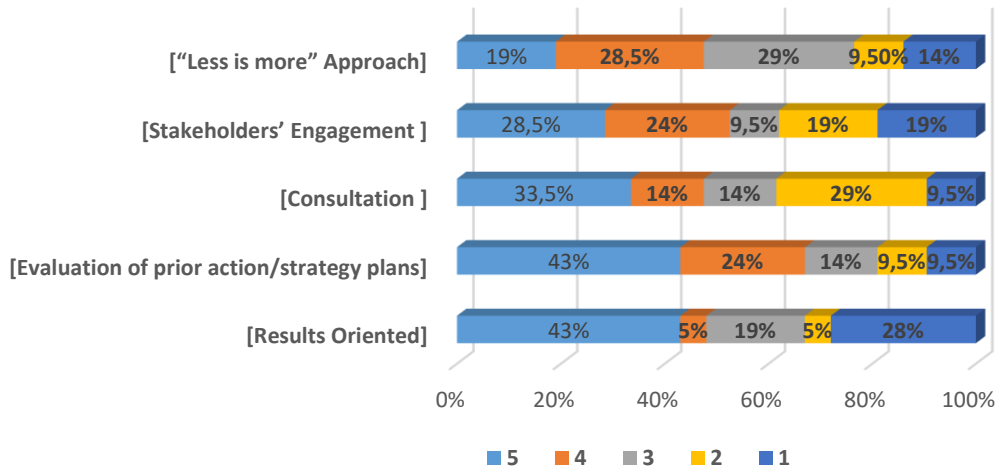
1. Most of the National Anti-corruption strategies are approved at the level of Presidency/Prime-minister Office/Ministerial Cabinet and Steering Committees or released by independent authorities/bodies.

2. The approval and amendment process are regulated by national law in most of the ACAs.
3. Most national anti-corruption strategy/action plans are amended once (*during the timeframe of the strategy/action plan*).
4. The monitoring and evaluating of national AC strategy/action plan is conducted by one actor/agency.
5. The monitoring reports elaborated by the same institutions responsible also for their implementation.
6. The frequency with which monitoring reports are produced varies (*from 1 to 4 times per year*).

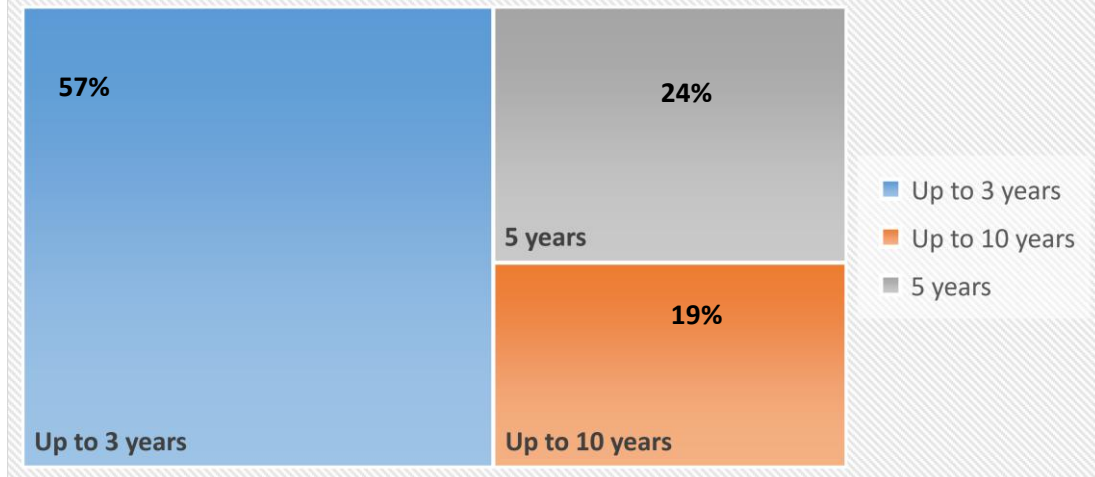
I. **Designing national anti-corruption action plans:**



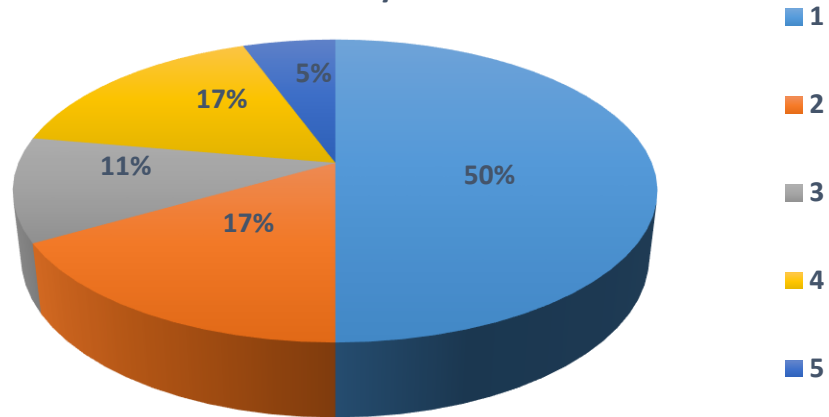
Please prioritize the following principles for the design of your national Anti-Corruption strategy/plans (from 1 to 5 - most important)



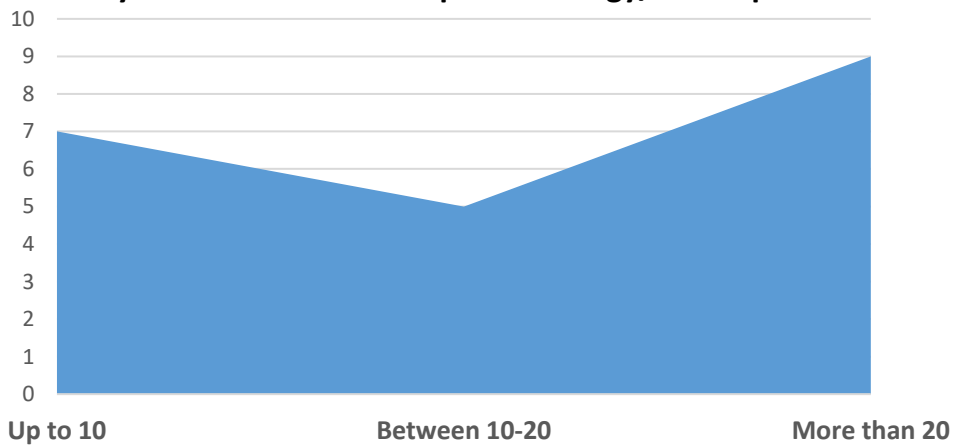
How many years do your national Anti-corruption strategies/Action plans cover?



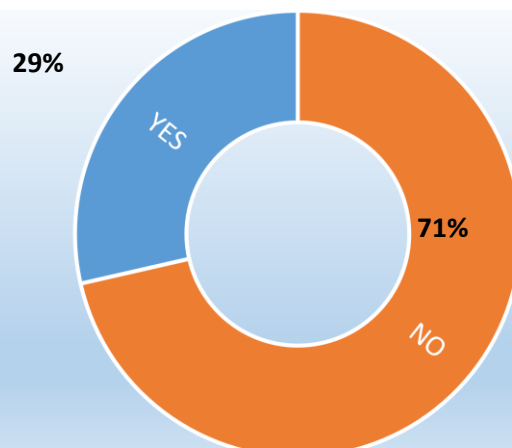
**How many Anti-Corruption strategies have you approved in the last 20 years?**



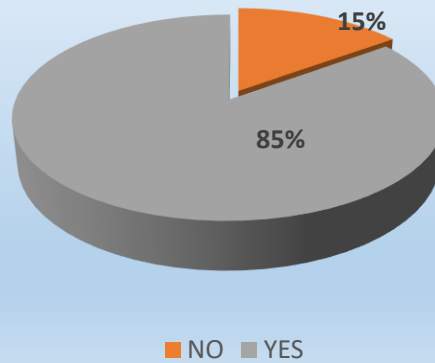
**How many actors are involved in the design of your country's national Anti-Corruption strategy/action plan?**



**Is the agency responsible for designing different from the agency responsible for monitoring?**



**Have the relevant guidelines by international and/or European organisations assisted you in designing your national Anti-Corruption strategy/action plan?**

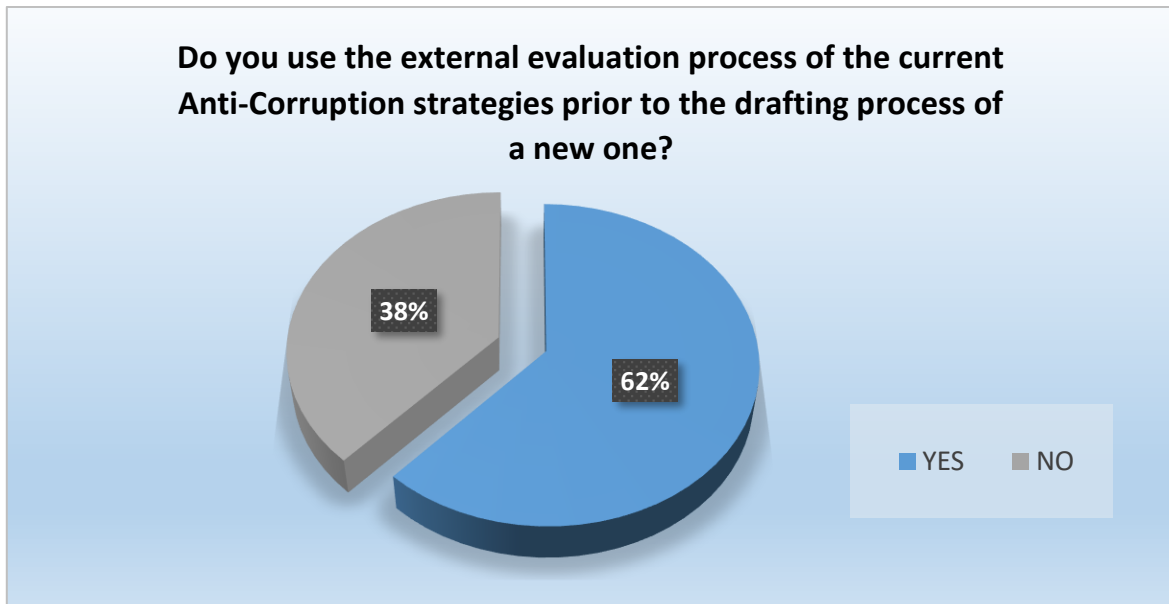


**Further assistance/elaboration has been deemed necessary with regard to the guidelines by international and/or European organizations**

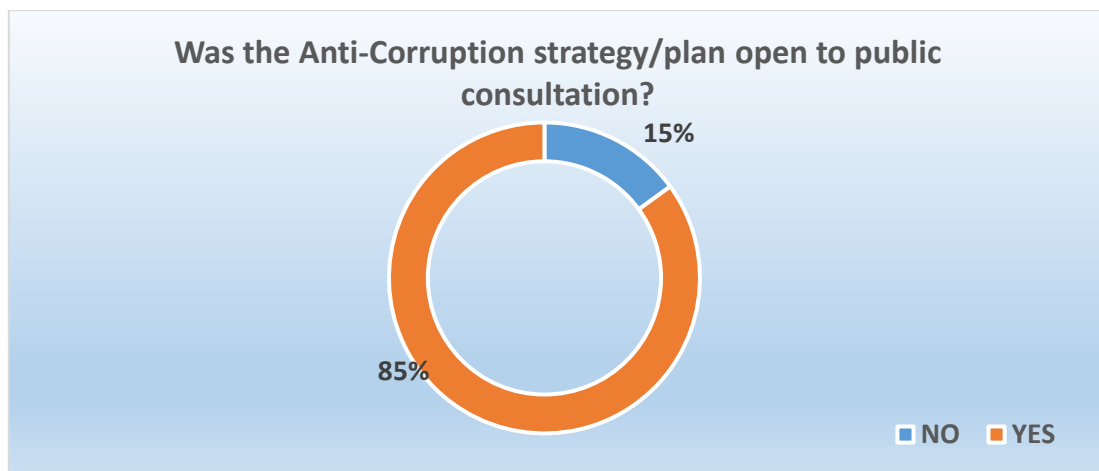
**Further assistance/elaboration needed on:**

- The way to define anticorruption results of the strategic planning; how to deem with concrete initiatives; costing of the initiatives;
- Monitoring and Evaluation. Impact based analyses, success stories;
- Established good practices in the development of strategies and reporting on its implementation.
- Aspects of interest to be developed with the support of external partners in order to ensure the efficient management of anti-corruption policy documents:
  - Developing a better understanding of the international context - the general framework for the design, development, implementation, and evaluation of anti-corruption public policies.
  - Strengthen the process of monitoring and evaluating anti-corruption policies at central and local level. - Good practices on mechanisms and instruments of implementing anti-corruption policies at central and local level.
  - Identify techniques and tools to stimulate the participation of the non-governmental sector in the process of implementing public policies in the field of anti-corruption.

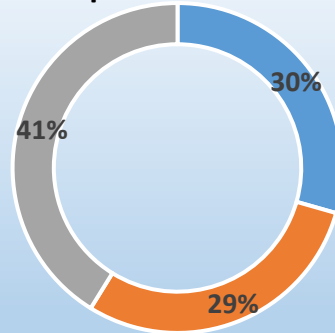
- A sample of an action plan/strategy might be useful. It could contain recommendations for countries about what aims could be followed or what kind of measures might be helpful or the most effective to reach the targets.
- The European Commission should play a more active role in providing guidelines and minimum standards for setting up national anti-corruption strategies.



**II. Developing national anti-corruption action plans – consultation and stakeholders involved:**

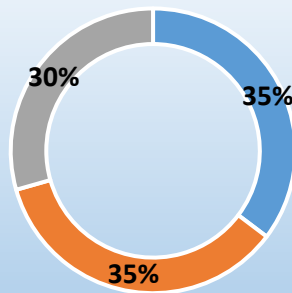


**If Yes, how many actors are involved in the consultation phase?**



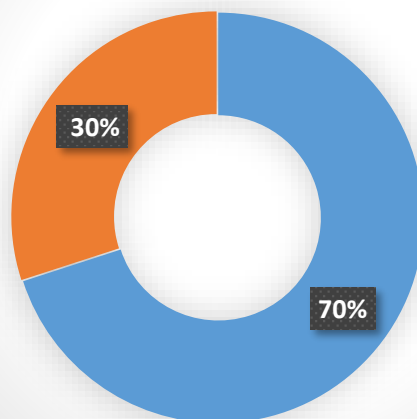
■ Less than 30   
 ■ Between 30 – 50   
 ■ More than 50

**How long dit it take?**



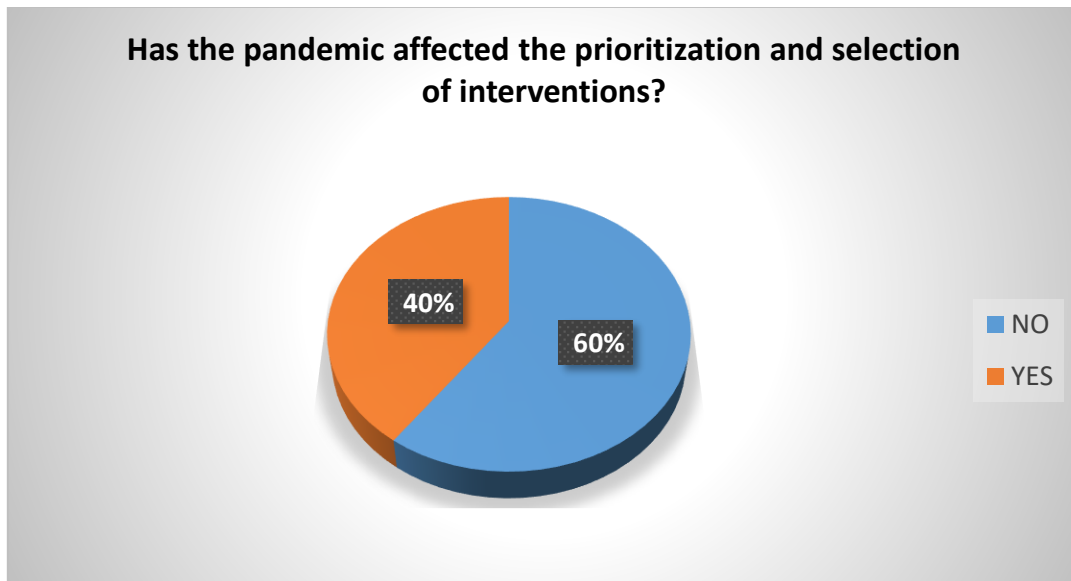
■ Up to 3 months   
 ■ 3-6 months   
 ■ More than 6 months

**Do you have drafted/updated a specific Anti-Corruption strategy during the pandemic Covid19?**



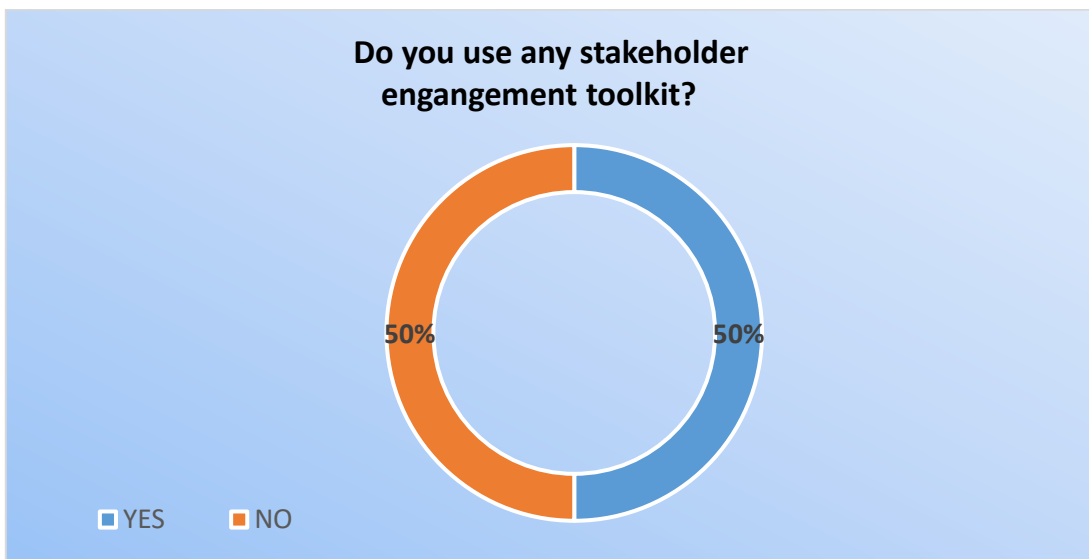
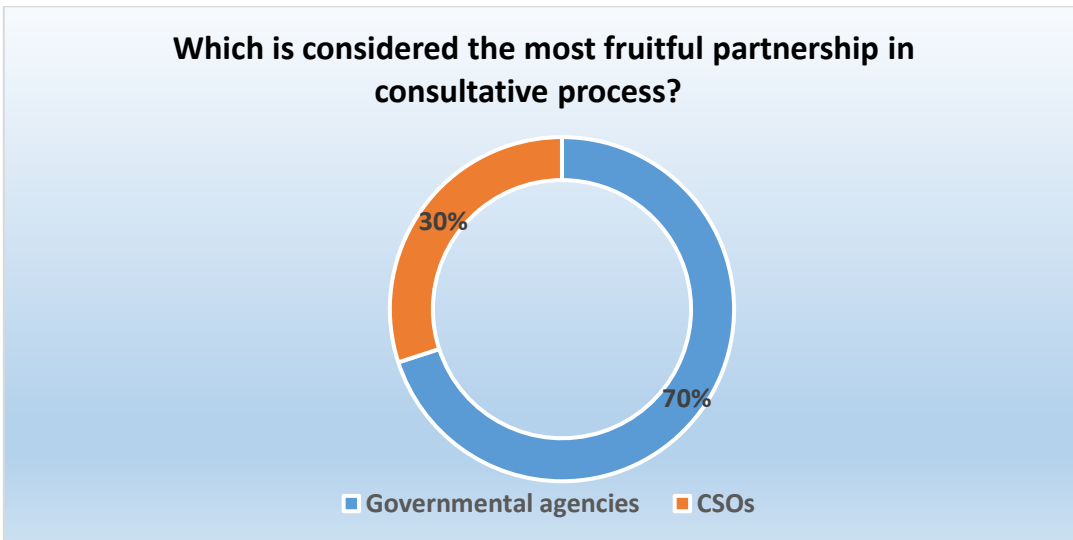
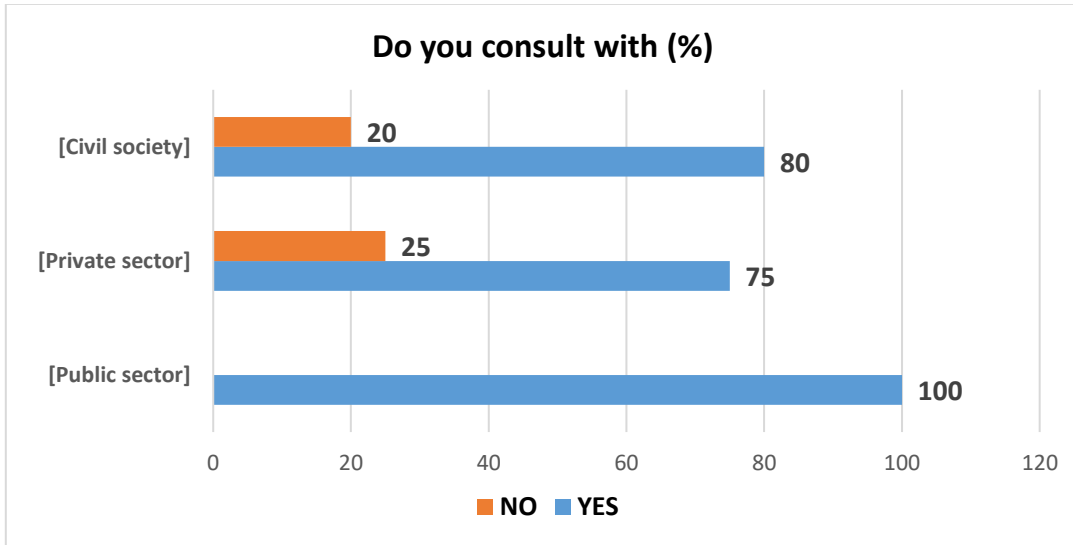
■ NO   
 ■ YES



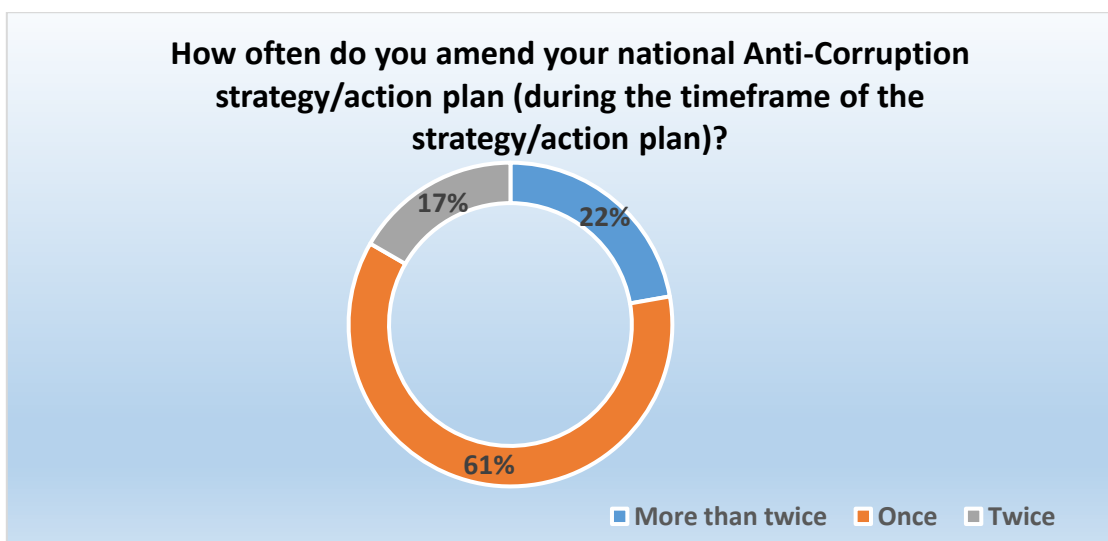
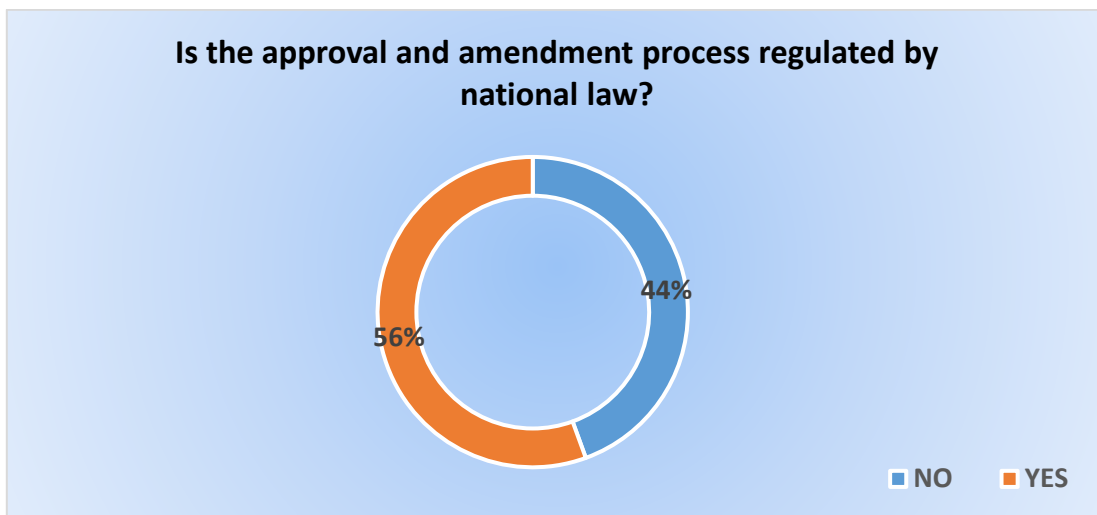
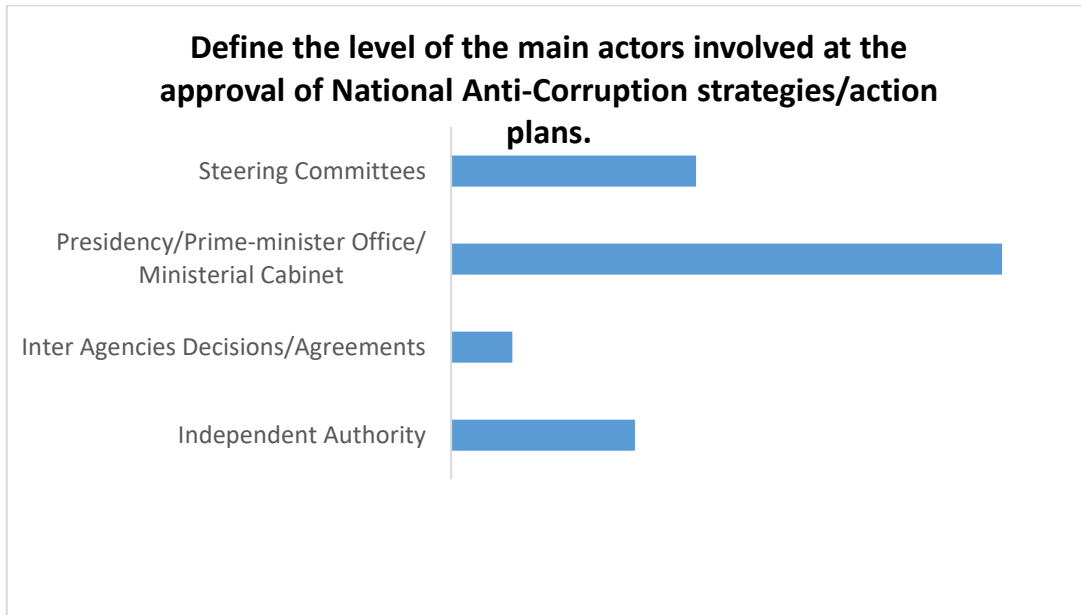


**In what way ...**

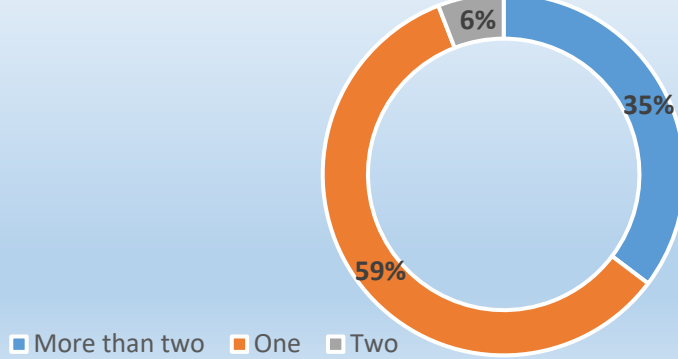
- The Covid 19 pandemic was an aggravating circumstance in terms of implementing the strategy itself, in terms of meeting opportunity, absence of key people from the process due to health reasons, but in terms of prioritizing the already identified risks, the pandemic had no impact.
- The COVID-19 pandemic affected every sector of activity, including anti-corruption plan. The pandemic-induced shock was an important test for the authorities' resilience in prioritizing and selecting areas for direct and prompt intervention. In connection with the circumstances caused by the COVID-19 pandemic, there were no series of public debates with civil society representatives, trainings on the issues highlighted in the measures of the Action Plan, postponed a series of exchanges of good practices carried out by the implementing authorities.
- Focus on special procedures and on sectors exposed to corruption to prevent it empowering transparency and supervision. After the emergency, special focus on the use of recovery funds to prevent misuses and breaches to integrity.
- Interventions in high-risk corruption areas (health, public procurement) were further prioritized due to the pandemic.
- During the consultation process the participants of public institutions, civil society, and private sector constantly emphasized the sharpening of corruption during the COVID-19 pandemic. This is reflected in the introduction section of the National Anticorruption Strategy, and implicitly in its objectives and the interventions considered.



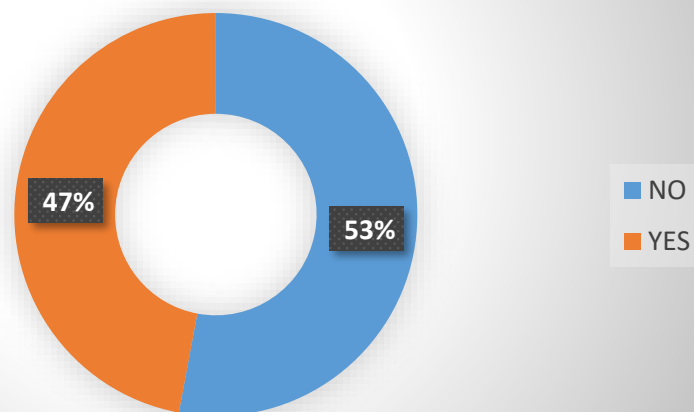
**III. Approval and amendment –monitoring and evaluation mechanisms:**



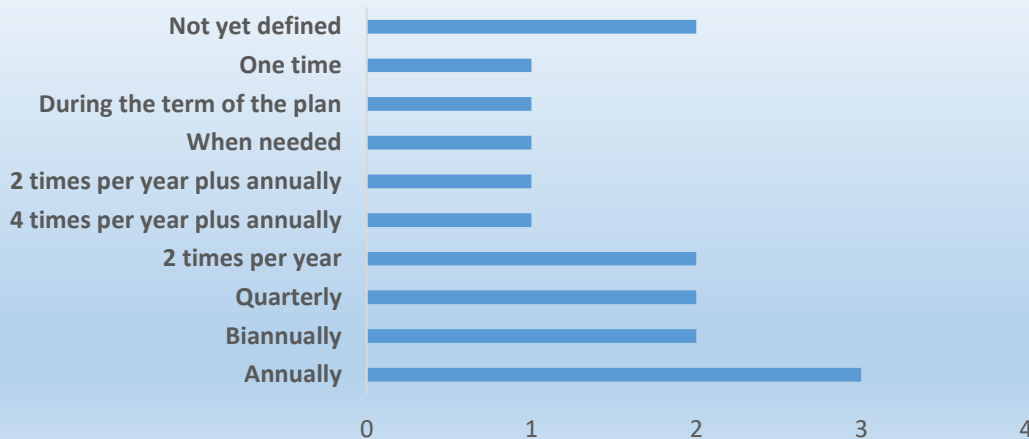
**How many agencies are involved in monitoring and evaluation your country's national Anti-Corruption strategy/action plan?**



**Are there monitoring reports elaborated by organisations different from the institutions responsible for implementation?**



**What is the frequency of producing of monitoring reports?**



## PART III

### National contributions

#### ITALY

#### General description of the national anticorruption strategy process, tools, and actors

With Law No. 190/2012, the legislator, establishing a system for combating corruption, focused on prevention tools, outlining a comprehensive framework and attributing to the Italian National Anti-Corruption Authority a central role of coordination.

Regarding integrity scope, Law No. 190/2012 gave ANAC the responsibility, among others, to:

- draw up a preventive strategy against corruption through the drafting and implementation of the National Anticorruption Plan (PNA);
- supervise and monitoring the adoption of the integrity plans and codes of conduct by public administrations and state-controlled enterprises;
- foster transparency in public administrations;
- guarantee the integrity of civil servants, and to disseminate a culture of integrity and legality;
- sanctioning administrations in the event of failure to adopt the three-year Plans and/or the Codes of Conduct;
- supervise the appointment of the Officers for the Prevention of Corruption and Transparency (RPCT) by each public administration.

The PNA is the highest level of Italian strategy regarding corruption risks, and it is important to underline the particularity of the Italian model, which provides that the anti-corruption strategy of the country is issued by the ANAC, as an independent authority, and that all branches of the State, including those of the government, must follow its contents and consequently adopt their own integrity plans. The fact that the PNA is issued by ANAC and not by a government office is a specific will of the legislator, in order to give even greater strength to the strategy, as ANAC is an independent authority pursuant to Article 6 of the UNCAC and identified by the mentioned Law No.190/2012 as coordinator of all the country's corruption prevention strategies. This is the result of a path followed to strengthen and not weaken anti-corruption strategies over time. In fact, initially the law provided that the PNA was issued by the Public Administration Department, a government office. With the reform of the system in 2014, and at the end of a national debate to

strengthen anti-corruption instruments, the responsibility for preparing the PNA was shifted to ANAC, precisely to give greater independence from the political cycles and strength and credibility to the tool.

The prevention of corruption in Italy is based on a model of regulation that provides for planning and control activities, with a “cascade” planning model that affects all levels of government and that is founded on four instruments - transparency, training, codes of conduct and risk-analysis. The PNA is the heart of this planning model, and each public administration should adopt a Integrity Plan (until the 2022 reform called Three-year Plan for the Prevention of Corruption and Transparency, from June 2022 basically an integrity section in the context of a general plan of organization) using the PNA as the basis to follow. The Integrity Plan identifies, on the basis of the PNA, the specific risks of corruption (using international standards for risk assessment) in each administration and the measures deemed necessary to prevent them (mandatory as rotation of assignments, training, civic participation, and specific for each organization) and to foster integrity. These planning tools assume a fundamental importance in the system devised by the legislator, as long as the PNA ensures the coordination of national and international strategies for the prevention of corruption in public administration, whereas the integrity plan identifies, on the basis of the first, the specific risks of corruption in individual administrations and the measures deemed necessary to prevent them.

The PNA allows for a unified and strategic planning of the activities to prevent and combat corruption in the public sector and provides for measurable objectives and the identification of specific responsibilities. The PNA is a programmatic three tears tool subjected to an annual update with the inclusion of indicators and targets in order to make the strategic objectives measurable and to ensure the monitoring of the possible divergences from these targets arising from the implementation of the PNA.

In order to be effective, also the Integrity Plans must contain appropriate targets and adequate measuring indicators and should be coordinated with other programming tools: the budget, ensuring the financial sustainability of the interventions needed; the Plan of Performance, which should bring the strategic and operational objectives chosen by each administration, including the measures to implement the Integrity Plan.

## Specific challenges related to National anti-corruption strategies in times of crisis and recovery

ANAC, which is the institution to which Italian law assigns the task of preparing the anti-corruption strategy in Italy, at the end of June 2022, published the outline of the National Anti-Corruption Plan 2022-2024, which will be in consultation until mid-September 2022.

This is the IV National Anti-Corruption Plan, the highest level of Italian strategy regarding corruption risks, adopted in Italy since the provision was introduced by Law No. 190/2012.

Italian national anticorruption strategies of last years cover all the challenges mentioned in the concept note of this exercise, offering some smart solutions but also leaving some aspects to further develop. For the sake of synthesis, following will be briefly described how challenges 1, 2 and 5 were and are faced by Italian anticorruption strategy.

*Integration and relevance of anti-corruption strategies in time of crisis and post-emergencies/recovery policies, assuming the importance of regional/national initiatives to overcome the socio-economic crisis and the huge amount of public funds at stake and the consequent risk of corruption*

Considering the huge flow of money assigned by the Next generation EU fund to the countries of the European Union, with a substantial share for Italy, and the exceptions to the ordinary legislation introduced during the pandemic, the objective of the PNA 2022-2024, put for consultation by the ANAC, is the strengthening of public integrity and the planning of effective measures to prevent corruption in the implementation of the Italian National Recovery and Resilience Plan (PNRR). The Plan was developed as a support tool for public administrations to address the challenges related to the implementation in full integrity of the commitments undertaken by Italy with the PNRR, and at the same time safeguarding the efforts to simplify and speed up administrative procedures.

The new PNA is divided into two parts. The general part represents a support to the managers for the prevention of corruption and transparency (RPCT - integrity managers within each public administration) and contains indications for the preparation of the integrity section of the general administration organization plan (PIAO). The ANAC indicates on which processes and activities it is a priority to focus in identifying measures to prevent corruption and provides indications for implementing good monitoring and simplifications processes for administrations with less than 50 employees.

The special part is dedicated to public contracts/procurement, an area in which not only the Authority plays a role of primary importance but to which the PNRR itself dedicates crucial reforms. The Authority highlights the numerous exemptions and simplifications of the public procurement code with which the government wanted to incentivize public investments in the infrastructure and

public services sector and tackle the negative economic effects of Covid pandemic. Concerning this "special" legislation, the PNA offers contracting authorities help in identifying measures to prevent corruption and maladministration and to foster transparency.

The special part also contains an in-depth analysis of the “commissarial management” mechanisms to which the construction of the major works envisaged in the PNRR is entrusted. According to ANAC, the possibility for Commissioners to operate in derogation from sector legislation and the allocation of substantial public funds can amplify the risk of corruption. In order to supervise the activities of the Commissioners, it is therefore essential to identify a person who covers the role of RPTC and who is distinct from the role of Commissioner: this would give rise to a strong centralization of functions in the same person, compromising the autonomy and independence of the Manager with the risk of creating a situation of conflict of interest.

In general terms the PNA, focused on PNRR and on the use of resources after pandemic, tries to outline innovative solutions in time of crisis to balance simplification of bureaucracy and prevention of corruption, focusing on transparency and digitalization.

#### *Integration of transparency policies and practices into national anticorruption strategies*

The issue of transparency is therefore also central in the new PNA, as indeed in the whole system for the prevention of corruption in Italy. In execution of the general anti-corruption Law No. 190/2012, the Legislative Decree No. 33/2013 (as amended above all by Legislative Decree No. 97/2016), "Reorganization of the regulations concerning the obligations of publicity, transparency and diffusion of information by public administrations" specifies ANAC powers of control and inspection on public administrations concerning their duties related to data and information transparency.

The valorization of the principle of transparency of the administrative action, considered instrumental to integrity, was established by Legislative Decree No. 150/2009. Law No. 190/2012 has integrated this system, stressing the importance of transparency as a tool for the prevention of corruption. Legislative Decree No. 33/2013 introduced the duty of publication on public organization's internet websites of a great number and typologies of documents and data. It also designed a system, in charge of the ANAC, of checks and sanctions regarding the implementation of the mandatory publications. In addition, the possibilities of a widespread control of the operations of public administrations have been broadened, with the recognition of the right of “civic access” to be activated by anyone for the publication of mandatory information and data in case of lack or lateness in compliance by public administrations. The governance of this system was attributed to the ANAC with overview and regulatory functions. Following legislative interventions also introduced in Italy transparency re-active tools inspired to the freedom of information act in use in other countries. These measures completed the framework aimed at the maximum diffusion of the transparency of administrative action as an instrument that, by acting as an effective deterrent of the phenomena of mismanagement of public resources, ultimately benefits of the widespread control and accountability of public administration.



In Italy, therefore, a rich system of re-active transparency policies and practices has been consolidated in the last decade with characteristics similar to most European countries and to the most common international practices.

The policies of pro-active transparency in Italy are instead characterized by some peculiarities. From a general point of view, both at a theoretical/regulatory level and at the level of implementation, two different models of pro-active administrative transparency can be established:

- the centralized model of active transparency, in which each public organization provides administrative data and documents in centrally managed portals/platforms;
- the decentralized model of active transparency, in which each public organization is required to publish on its institutional website, in the most standardized form possible, the data and documents required by the regulatory framework.

While the first is implemented in some important cases, the second is the prevailing model chosen by the Italian legislator starting from Law No. 190/2012 and Legislative decree No. 33/2013, but with some categories of big data managed at central level (procurement, use of EU and National funds, infrastructures, etc.).

Following the adoption of the PNRR and the needs for standardization and digitalization, ANAC promoted a debate and a reflection on how to simplify and enhance the system. Consequently ANAC is working to realize a centralized system of transparency, to be put in place almost on a reduced set of data and documents. This vision is described also in the last report of the ANAC to the Italian Parliament, as well as in the new PNA and will be developed during 2022.

*Mechanisms for participation/consultation by stakeholders, both with stakeholders from the public and the private sector and the civil society, in the preparation and monitoring of anti-corruption strategies*

As mentioned, ANAC, as an independent authority, according to the law drafts and issues the anticorruption national strategy in autonomy and far from interferences. Despite this, and in a certain sense precisely for these reasons, ANAC pays a lot of attention in the involvement of other institutional and non-institutional actors in the drafting process of the PNA. Long general consultation mechanisms, specific task forces and working groups, stakeholders participation toolkits, targeted events and communication campaigns, are all instruments that the Authority uses to foster participation, consultation and, when possible co-design processes.

ANAC regularly organizes meetings, technical round tables, surveys, to involve the administrations both in the planning stages and in the implementation stage. In particular, the interaction on the subject with the administrations takes place through the figures of the "responsible for the prevention of corruption and transparency (RPCT)", the "integrity managers" within each public organization. With these figures, the ANAC has a "real time" relationship, and a specific web-based interactive communication channel has also been set up (RPCT forum).

The involvement of other institutions at national and local level, stakeholders such as NGOs active in the public integrity scope, and at the end of citizens, is the “flagship” of the drafting process of the PNA which ANAC considers not its own document, but a “document of all”. In the issuing process of previous PNAs ANAC received hundreds of comments and amendments proposals, and each one was taken into account, processed, accepted, or otherwise commented with feedback, all through a transparent and public process in each step. Also, for the PNA 2022-2024, before the final approval, numerous comments are expected, especially considering the efforts ANAC is putting in place to spread the knowledge of the draft and to increase the public awareness about the contents. Just to make an example of the ongoing initiatives, ANAC presented the draft of the PNA in a specific event organized in the context of the Italian national “Open government partnership”. Several representatives of institutions (particularly the ones involved in the execution and supervision of the PNRR) and of civil society organizations active in the field of public integrity participated to the initiative, proposed their comments, asked for deepening. Following this initiative, a specific channel of consultation was established and there will be further specific initiatives targeted in particular to civil society organizations to build on their experience in the field and to improve the contents of the plan. In this respect, the process fully comply with international recommendations in the field and it tries to implement a platform among institutional and other socioeconomic actors to prevent corruption and breaches to public integrity, designing and putting in practice together anti-corruption strategies.

## GREECE

### General description of the national anticorruption strategy process, tools, and actors

NTA has designed NACAP 2022-2025 based on a **three-pronged approach to fight corruption**:

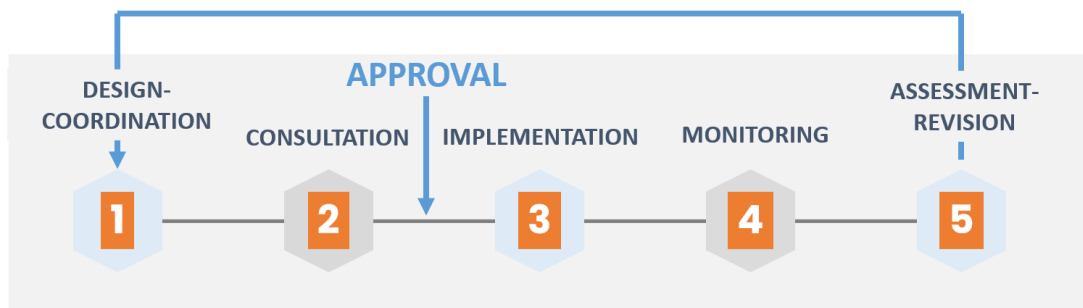
- **An integrated national framework for the comprehensive response to the phenomenon** of corruption in the country and the integration of international good practices.
- A **dynamic four-year policy tool** for the design, implementation, monitoring and evaluation of horizontal and sectoral actions.
- An **effective mechanism for coordinating the action of public policy actors** in which **synergies** are developed with the **private sector and civil society**.

The main priorities of NACAP are:

- **preventing, detecting and tackling fraud** and corruption;
- promoting transparency, integrity and accountability in public life, and
- raising awareness in the society, the development of a culture of zero tolerance towards corruption and the strengthening of citizens' trust in institutions.

Their achievement contributes to the national effort **to eliminate conditions conducive to the development and manifestation of corruption phenomena, to strengthen the effectiveness of control mechanisms and to enhance integrity, accountability and transparency.**

**Figure 11.**The policy cycle of NACAP



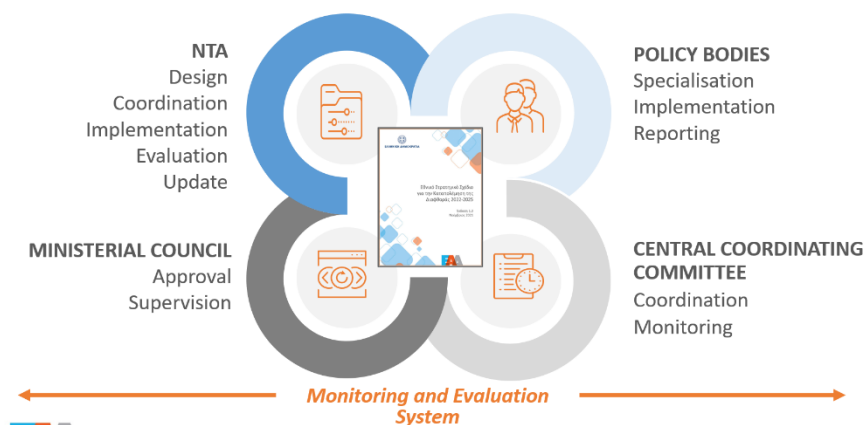
For the first time with the provision of art. 1 of Law 4915/2022 (GG 63/A/24-03-2022) NACAP 2022-2025 is officially approved by the Ministerial Cabinet. Furthermore, the Cabinet will also monitor the implementation progress of NACAP, in an annual basis.

**The vision of NACAP 2022 - 2025** is the establishment and further deepening of the principles of Integrity, Accountability and Transparency in the functioning of the state, society and economy. At the very center of the design is the development of a **holistic and coherent National Action Plan**, with **specific objectives**, within the framework of which **targeted interventions of high added value** were included and specialized. Another **innovative element in NACAP 2022-2025** is the development of a comprehensive set of **output and results indicators** that will allow the NTA to **measure/quantify the outcomes and the impact of the intervention**.

NACAP 2022-2025 includes **one hundred and twenty-nine (129)** actions the scope of which has been specified in co-operation between the NTA and **twenty-four (24) public policy institutions**.

Establishing an inclusive and operationally effective governance system has been a priority. The main stakeholders and their role in the implementation of the NACAP are presented below:

**Figure 7. Governance scheme of NACAP 2022 – 2025**



- NACAP is designed by the **National Transparency Authority (NTA)** which is the competent authority for the coordination, monitoring, reporting, evaluation and update of the Action Plan, in cooperation with the **implementing bodies**.
- The **Central Coordinating Committee (CCC)** is responsible for the coordination and supervision of the consultations and the finalization of the content of the actions included in the NACAP. Also, it approves changes concerning the content of NACAP actions. The CCC is composed of representatives from the Presidency of the Government, the General Secretariat for Coordination, the Ministries of Interior, Finance, Justice and Digital Governance and General Secretariat of Information Systems. The Court of Auditors has the observer status. The body is chaired by the Governor of the NTA.

- The **Council of Ministers** approves the NACAP as well as changes/updates related to the structure, the strategic and/or special objectives of the Plan. The CoM also monitors the NACAP implementation progress on an annual basis.

The successful implementation of NACAP requires first and foremost engaged stakeholders. As a nationwide action plan with both a horizontal and multisectoral approach, a great amount of public entities is involved in NACAP's implementation.

Contact points have been appointed in every implementing body, for the better coordination of the consultation phase and for the smooth progress of the monitoring process, as well as for the orderly implementation of the actions.

Last but not least, both in terms of human and material resources, NTA exhibits a high level of efficiency and effectiveness, in order to successfully fulfill its mission.

## Specific challenges related to National anti-corruption strategies in times of crisis and recovery

*Mechanisms for participation/consultation by stakeholders, both with stakeholders from the public and the private sector and the civil society, in the preparation and monitoring of anti-corruption strategies*

A major setback for NTA was the fact that there was limited consultation with the majority of the stakeholders when designing NACAP 2018 – 2021. As a result, the actions weren't always clearly defined and, in many cases, there were no appointed focal points. These conditions made it difficult to gather all the necessary information for monitoring progress.

That is why a high-priority challenge during the design phase of NACAP 2022 – 2025 was to definitely include all the stakeholders early on in the process, communicating NACAP's aim and structure and consulting them in defining the actions to be included. We have focal points from all the stakeholders with whom we communicate and whom we will thoroughly inform with regards to the monitoring process, through meetings and perhaps webinars.

NACAP 2022-2025 is also for the first time designed through an **extensive consultation process**. Within this process, more than **44 meetings took place, between May and November 2021**, with the participation of the main authorities for the design and implementation of related public policies, as well as organisations from the Private sector and the Civil Society.

At the same time, we also have clearly defined actions. During the design phase we prepared a three-page standardized document for the description of each and every action. Subsequently, there is at least a minimum set of necessary information for every action included in NACAP, which will serve as a point of reference during the implementation.

## Network of Corruption Prevention Authorities

In addition, and in order to maximize outreach, ensure ownership and stakeholders commitment a Central Coordinating Committee was established for the coordination of the consultation process whereas the Greek Cabinet has a strategic/supervisory role in the approval of the final draft of the Action Plan and any major upcoming revision (GG A/163/24.03.2022).

Simultaneously, the development of a monitoring and evaluation mechanism and its ongoing simplification with the introduction of digital tools and the introduction of new actors, for the enhancement of engagement and ownership (Central Coordinating Committee and the Ministerial Cabinet).

As the national framework for the comprehensive response to the phenomenon of corruption in the country and the integration of international good practices, there is a variety of stakeholders involved, mainly from the public sector. Last but most certainly not least, during the consultation phase of NACAP 2022 – 2025 actors from the private sector and the civil society were invited to participate and contribute to the design with proposals.

## ALBANIA

### General description of the national anticorruption strategy process, tools and actors

At the government level, the efforts to curb corruption are led by the Ministry of Justice in its capacity as National Coordinator on Anticorruption in coordinating all governmental efforts in preventing, raising awareness and punishing corruption in the public administration.

The Ministry of Justice is the National Coordinator against Corruption in the national level, since 2017. As NCAC, the Ministry of Justice coordinates the work for the drafting of policies and the preparation of legal and by-laws for the prevention and fight against corruption. It also exercises executive powers in the field of policy-making, receives anti-corruption initiatives, is represented in regional and international organizations as well as exercises verification and control powers at the administrative level for cases of denunciations against corruption.

The role of the Ministry of Justice in the exercise of its powers of the National Anti-Corruption Coordinator is confirmed in the accordance with the decision of the Council of Ministers no. 606, dated 20.10.2021, "On determining the scope of responsibility of the Ministry of Justice".

To facilitate all the work processes, the Ministry of Justice has established the General Directorate of Anti-Corruption, which has been operating since October 2021.

This technical directorate is composed of three directorates and consists of 27 officials and is headed by the General Director of Anticorruption.

- Directorate of the Network of Anti-Corruption Coordinators: a dedicated structure responsible for monitoring the Coordinators in the institutions that are part of the Anti-Corruption Network. In doing so, this Directorate determines the specific objectives, plans the division of work between the employees and coordinators part of the Network, evaluates in advance the reported cases referred by the Anti-Corruption Coordinators or presented directly to this Directorate, giving the relevant instructions to the investigation of each case. The structure also evaluates the investigation of reported cases of corruption by the Coordinators and proposes appropriate measures to the NCAC regarding each case under investigation.

The Directorate consists of 2 Sectors: the Monitoring Sector of the Anticorruption Network (1 Head of Sector and 5 Specialists), and the Analysis and Reports Sector (1 Head of Sector and 3 Specialists).

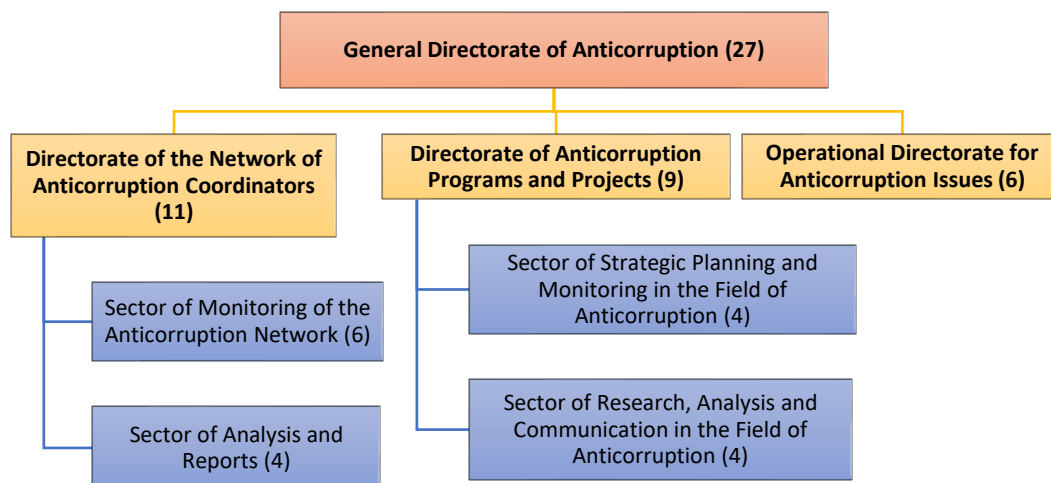
- Directorate of Anticorruption Programs and Projects: the technical structure in the Ministry of Justice responsible for strategic planning, coordination and evaluation of the necessary instruments for the implementation of anti-corruption policies, evaluation and implementation of programs and projects in the field of anti-corruption, as well as setting up the necessary infrastructure.

The Directorate consists of 2 Sectors: the Strategic Planning and Monitoring Sector in the Anticorruption Field (1 Head of Sector and 3 Specialists), and the Research, Analysis and Communication Sector in the Anticorruption Field (1 Head of Sector and 3 Specialists).

- Operational Directorate for Anticorruption Issues: the structure responsible for determining the objectives related to the in-depth investigation of reported cases of corruption in the institutions that are part of the Anti-Corruption Network. Through working groups, it performs the in-depth administrative verification in relevant institutions, coordinating with other institutions when necessary. Also, this Directorate supports the activities of the Coordinators and conducts in-depth investigations regarding the reported cases that refer to the relevant institutions that are part of the Network. Through dedicated operational actions carried out by its officials/employees, the Directorate aims to prevent corruption and eventually undertake the necessary sanctions for responsible officials in cases under investigation that are found to be in violation.

This directorate consists of 5 officials and is headed by the Director.

*Cooperation of three structures:* They fully cooperate and coordinate when necessary, in order to perform on the given tasks and follow the joint work processes. Thus, the Operational Directorate for Anticorruption Issues and the Directorate of the Network of Anti-Corruption Coordinators are part of the implementation of the Intersectoral Anti-Corruption Strategy 2015-2023, which is followed, implemented and monitored by the Directorate of Anticorruption Programs and Projects. On the other hand, the latter ensures the representation, training design/training programming and planning, communication and visibility of other two directorates, as the technical structures of the administrative investigations.



The general strategic framework in the anti-corruption field in Albania consists of the Intersectoral Strategy Against Corruption (ISAC) 2015-2023, approved by the Decision of the Council of Ministers no. 247, dated 20.03.2015, "On the approval of the Intersectoral Strategy Against Corruption, 2015-2023", as amended. In implementation of this strategy, the Action Plan, 2020-2023, which is the



third action plan for this strategy, was approved by Decision of the Council of Ministers no. 516, dated 01.07.2020.

The vision of this strategy is: the creation of transparent institutions, with high integrity, that apply the trust of citizens and guarantee quality and non-corruptible service. This vision has been adopted in three approaches: preventive, punitive and awareness-raising towards corruption. And based on this approach, the activity of the National Coordinator Against Corruption operates for the implementation of measures and activities of the preventive, punitive and awareness-raising approach.

The Anticorruption Action Plan 2020-2023, in force, consists of a total of 18 objectives, 85 measures and 152 activities. In total there are 37 performance indicators, which are respectively distributed in 21 indicators for the objectives of the preventive approach, 9 indicators for the objectives of the punitive approach and 7 indicators for the objectives of the awareness approach.

There are 22 public institutions committed to the implementation of the Action Plan, 2020-2023 of the ISAC and the achievement of performance indicators. The priority measures of this action plan are: strengthening the transparency of public institutions; progressive growth of digital public services; the drafting and implementation of anti-corruption instruments in the public administration; strengthening cooperation between institutions and law enforcement agencies against corruption; strengthening the punitive capacities against corruption of the institutions in the field; increasing cooperation between authorities that receive corruption complaints; and increasing public awareness of corruption. These measures are in line with the good-governance agenda and aim to improve the synergy of the implementation of the ISAC.

Policy Framework: Intersectoral Strategy Against Corruption, 2015-2023 and Action Plan, 2020-2023, diagram as below:



## Network of Corruption Prevention Authorities

The mechanism assuring the cooperation and partnership with the CSOs working in Albania is the Coordination Committee for the implementation of the Intersectoral Strategy Against Corruption.

The Committee is chaired by Minister of Justice, and is composed by 10 deputy ministers, representatives from all line ministries, covering anti-corruption portfolio.

The Committee is the coordinating and supervising mechanism of the ISAC through further implementation and approval of action plan, monitoring of the implementation of the action plan and public reporting of its progress and assessment.

This mechanism is supported by a technical secretariat, and to assure its functioning of the leading mechanism, the Committee will ask contribution by all the participating institutions in the ISAC.

By support of the monitoring process, the Committee will have the responsibility to use all possible platforms for communication and the involvement of independent institutions and civil society in the implementation and monitoring of the strategy.

The technical secretariat of the Committee is the General Directorate of Anticorruption is the mechanism that ensures interaction with NGOs. The Secretariat has a list of civil society organizations and their contact points, who are invited consultation processes and various fora that the Ministry of Justice follows in the framework of the drafting and consultation of policy documents and anticorruption initiatives. The “Week of Integrity”, awareness campaign is an annual initiative making together stakeholders in the fight against corruption in Albania.

Monitoring reports are regularly produced and published in the website of the Ministry of Justice, and can be easily accessible in the link: <https://www.drejtesia.gov.al/raporte-monitorimi/>, in both languages: Albanian and English.

Albania has increased its partnership cooperation and assistance with international partner and organizations as the: EUD (twinning projects and technical supports contracts); embassies, UNPD, regional partners in anticorruption.

## REPUBLIC OF NORTH MACEDONIA

### General description of the national anticorruption strategy process, tools, and actors

The adoption of the National Strategy for Prevention of Corruption and Conflict of Interest (hereinafter: NS) is the first and extremely important competence provided by the Law on Prevention of Corruption and Conflict of Interest. In recent years, the SCPC has adopted and implemented state programs for the prevention of corruption and conflict of interest, but the fact that for the first time this Strategy is adopted by the Parliament of RNM, speaks of the determination and readiness of the state to strengthen prevention and fight against corruption. Involvement of all relevant actors in the system in generating such a particularly important strategic document. The vision of this strategic document is to prevent corruption and strengthen integrity.

The National Strategy for Prevention of Corruption and Conflict of Interest with the Action Plan for its implementation 2021-2025 (NS2021-2025) was adopted by the SCPC on December 10, 2020, and was adopted by the Assembly of the Republic of Northern Macedonia on April 18, 2021. It is prepared on the basis of a previously established Methodology and conducted a corruption risk analysis, applying a broad, inclusive, and transparent consultation process with the participation of representatives of the public and private sector, media, civil society organizations and foundations, experts and representatives of relevant international organizations.

An integral part of NS2021-2025 is an action plan for its implementation, which elaborates in detail the problems measured by activities and indicators, which are systematized in 2 horizontal areas and 13 vulnerable sectors, for overcoming which a total of 111 measures and 191 activities have been identified. Specifically, with a deadline for implementation as of 2021, a total of 109 activities are envisaged, of which: 21 activities were realized (19%), 30 are ongoing (27.5%), and 58 activities were realized (53.5%).

Pursuant to Article 18 paragraph (6) of the Law on Prevention of Corruption and Conflict of Interest, the SCPC is obliged to monitor the implementation of the measures of the Strategy and to prepare annual reports and a final report on the implementation of the national strategy.

These reports are submitted to the Assembly by the SCPC, with a deadline no later than March 31 of the current year for the previous year. The reports are also published on the SCPC website.

In order to effectively monitor the level of implementation of the activities of NS 2021-2025, in the second half of 2021 was developed a software solution - WEB application, which provided the nominees - coordinators of the competent institutions to periodically submit reports on the level of implementation of the activities for which their parent institution is the bearer in the process of realization. After the training for using the application, in the period 15-31 December, through the Web application, the evaluation process for the level of realization of the activities for 2021 was opened, in which period the coordinators submitted the reports related to the activities under their competence.

After the collection of the reports and their evaluation by the SCPC, in the period from 07-11.03.2022, in the premises of the State Commission for Prevention of Corruption were held 12 round tables by individual sectors of the National Strategy for Prevention of Corruption and Conflict of Interest. 2021-2025, where, within the process of monitoring the implementation of the activities of the National Strategy, the submitted reports were submitted by the competent institutions on the level of realization of the activities for which the deadline for realization was the end of 2021. In addition to the reports and their evaluation by the SCPC, the roundtables were used to collect additional data on activities, as well as suggestions for their strengthening.

At the moment, after the adoption of the Annual Report, SCPC is in the phase of planning of the process of revision and amendment of the Action Plan, which according to the Law will be implemented with the same procedure as during the preparation of NS 2021-2025.

We consider it especially important to mention and use the following tools:

- Using the knowledge of external/independent evaluation or even any internal specific evaluation
- The importance of measuring the impacts of anti-corruption plans, considering that guides / reports promoted at international level usually refer to the design of the strategy but there is a lack of shared knowledge about the outcomes and how to assess them;
- The use of technology is inevitable, it has enabled us to collect all data faster use of technologies for monitoring anti-corruption plans, trying to take advantage of ICT and innovative solutions also for this specific objective;
- Last but not least - mechanisms for participation / consultation by stakeholders, both with stakeholders from the public and private sector and civil society, in the preparation and monitoring of anti-corruption strategies, taking into account international recommendation in the field and the importance of a common and shared platform among institutional and other socio-economic actors to prevent corruption and breaches to public integrity.

## SERBIA

### Specific challenges in Implementing and monitoring/assessing/evaluating the impacts of anti-corruption plans

Within the Revised Action Plan for Chapter 23 - subchapter 'Fight against Corruption', the Serbian Agency for Prevention of Corruption (hereinafter: APC) is responsible for the assessing of the impact of measures taken to reduce corruption in vulnerable areas (health, taxes, customs, education, local self-government, privatisation, public procurement, and police). These measures were included in the National Anti-Corruption Strategy for the period 2013 – 2018, the corresponding Action Plan for the period 2013 – 2015, the Revised Action Plan for the period 2016-2018, and the Action Plan for Chapter 23 for the period 2016 – 2020.

Such impact assessments have never been conducted, and the institutions have not been requested to keep the records in a way that allows impact assessment of anti-corruption measures. It is a new mechanism for all the participants in the process, and that's why this assessment was also a learning process.

The main challenge was related to the fact that the indicators for the impact assessment were not properly defined, there were no baseline values, and target values were determined in a small number of cases. Targeted research was also not conducted in appropriate time intervals (ex ante, baseline, post festum), which made it impossible to conduct a direct analysis of the possible impact of strategic documents.

The data collection process and quality of data for other evaluation criteria such as relevance, effectiveness, efficiency, and sustainability was also a challenge. The reasons were most frequently the lack of institutional memory, the long process of databases searching, non-uniform databases or their complete absence, etc. In addition, public authorities and other entities do not keep records that could directly or indirectly identify possible changes before the adoption of strategic documents and after its termination.

To overcome the challenges, and to fulfill the task, the APC developed the Methodology for Impact assessment, with the support of IPA 2013 Project "Prevention and Fight against Corruption". In order to ensure the involvement of all stakeholders the APC issued the two calls for civil society organisations to express interest in participating in this process. As there was no response from CSO, the APC went further on with the establishing of working groups. The constitutive meeting for all working groups was attended by 24 representatives of relevant institutions. Then, the APC developed proposals for indicators and preliminary questionnaires, based on which it planned to collect the data from relevant institutions. After that, the APC organised meetings with representatives of all relevant institutions, at which preliminary questionnaires and data to be submitted to the APC by the competent institutions in the process of impact assessment were considered. After the meetings with the competent institutions, the APC developed improved versions of the questionnaires and submitted them to the members of the working groups. The

intention was to collect data that can show a certain trend in achieving results in the above areas, at the beginning, during and after the expiration of the strategic documents.

In addition, the APC conducted an online (Google Forms) survey in order to collect more data necessary for the process of evaluation of strategic documents in the field of anti-corruption. The link to access was sent to the e-mail addresses of 55 competent institutions. The intention of the APC was to include in the survey the employees and managers who participated in the working groups for development of strategic documents, who were in charge of implementing the activities as well as reporting on the implementation of anti-corruption strategic documents valid until July 2020.

As a key source, the APC also used the findings from external public opinion polls conducted by third actors to examine related phenomena, as a tangible, but supplementary impact indicator, since they were not focused on impact assessment.

Finally, in June 2022, the APC drafted the Report on Impact assessment of the measures undertaken as to reduce corruption in eight vulnerable areas and sent it to the National Assembly.

In order to overcome similar challenges in the future, the next anti-corruption strategic document should be methodologically consistent and developed in an inclusive and transparent manner. It is necessary to strengthen the skills of employees involved in drafting, implementation and reporting. The goals must be defined in a way that it can be concluded with certainty what purpose (social change) they are supposed to achieve and how the eventual (non) occurrence of such a change will be detected. It is also important to conduct targeted research at appropriate intervals, which will enable a direct analysis of possible impact of the strategic document. In order to achieve this, it is necessary to establish statistics and records that could directly or indirectly identify possible changes in the situation before the adoption of the strategic document and after the finalization of its implementation.

## MOLDOVA

### General description of the national anticorruption strategy process, tools, and actors

The responsibility for systematizing and streamlining the efforts of public entities in the field of anti-corruption and strengthening integrity are coordinated in a single national document – the National Integrity and Anticorruption Strategy for 2017-2020 (NIAS).

The implementation term was extended until 2023 by adoption on December 24, 2021 of the Parliament Decision no. 241 on the modification of the Parliament Decision no. 56/2017 for the approval of NIAS 2017–2020.

NIAS is based on the analysis of the National Integrity System (NIS) developed by Transparency International Moldova. It is built on 8 pillars of integrity: I. Parliament; II. Government, public sector and local public administration; III. Justice and anti-corruption authorities; IV. Central Electoral Commission and political parties; V. Court of Accounts; VI. People's Advocate; VII. The private sector; VIII. Civil society and the media.

During the public consultation process of the draft NIAS, 20 public events were organized with the participation of all interested authorities, civil society and other stakeholders. A total of 1018 proposals were made, of which 92% were accepted in full or in part.

For the first seven pillars of NIAS are described the issues, the specific targets of the UN Sustainable Development Goal 16 relevant to the pillar, pillar objectives, impact indicators, priorities for overcoming problems, expected results, result indicators and cost assessment of implementing the priorities of each pillar. Civil society and the media (pillar VIII) contribute to the efficient implementation of NIAS through alternative monitoring conducting to an impartial and equidistant information of society about the deficiencies in the system.

The action plans sum up the efforts of public entities to achieve the objectives of NIAS to: Discourage the involvement in acts of corruption, Recover the proceeds of corruption, strengthen Ethics and integrity in the public, private and non-governmental sectors, Protect whistleblowers and victims of corruption, ensure Transparency public institutions, party funding and the media, educate society and officials.

Also, NIAS includes the sectoral approach to corruption by coordinating the approval of 9 sectoral anti-corruption plans in vulnerable areas: customs, ensuring public order, administration and denationalization of public property, taxation, environmental protection, agri-food, education, health and compulsory health care and public procurement, as well as local anti-corruption plans by local public authorities at the II level.

The National Anticorruption Centre (NAC) represents the Secretariat of the monitoring groups (the Secretariat) of NIAS, ensuring efficient management of anti-corruption policies, through the

coordination, monitoring and objective evaluation of the process of their implementation by all public entities.

The public entities shall submit to the Secretariat, via E-Institutional Integrity Platform, the necessary information for monitoring and assessing the progress of implementation of the planned actions for which they are responsible.

The Secretariat is responsible for the elaboration of the monitoring and assessment reports of NIAS's implementation, which are publicly heard during the monitoring group's meetings.

At the same time, NIAS provides for the annual Survey to monitor its impact based on questioning public officials, private sector representatives and society based on specific objectives set for each Pillar of the Strategy.

### **Specific challenges related to National anti-corruption strategies in times of crisis and recovery**

*The role of implementing entities of the National Anticorruption Strategies and the encouragement to perform a pro-active role and to provide timely reports on the implementation of action plans with adequate accountability mechanisms*

In order to ensure the efficient management of the National Integrity and Anticorruption Strategy (NIAS) in the process of coordination, monitoring and evaluation of its implementation by the responsible institutions, a series of procedural deficiencies were identified, such as:

- submission by the reporting authorities of low-quality and incomplete information on progress and shortcomings in the implementation of NIAS;
- failure of central public authorities to collect the necessary information from subordinate entities;
- exceeding the deadlines by public entities for the presentation of information regarding the implementation of NIAS.

Thus, the National Anticorruption Centre (NAC) - representing the Secretariat of the monitoring groups of NIAS, undertook a series of measures meant to solve the created situations. These measures included training activities on familiarizing the representatives of the reporting authorities with the provisions of the strategic document, the process of reporting and monitoring the progress and deficiencies registered in NIAS implementation. At the same time, an ongoing process realized by the Secretariat included the methodological support and ongoing advice/communication with representatives of reporting institutions on the implementation of NIAS on resolving all ambiguities in the implementation, monitoring and reporting process. Also, a direct measure taken by the Secretariat included the reiteration during the meetings of the NIAS Monitoring Groups, about the importance of ensuring enforcement discipline in the data collection process including progress and shortcomings in the implementation of the Strategy Action Plans and their transmission to the NAC.



*Use of technologies for monitoring anti-corruption plans, trying to take advantage of ICT and innovative solutions*

In the process of carrying out the reporting exercise on the NIAS implementation, public entities submit to the Secretariat, via the e-Institutional Integrity Platform, necessary information to monitor and evaluate the progress in implementation of the planned actions for which they are responsible within the deadlines established in the Strategy Action Plans. Thus, the Secretariat certified a reluctance of the representatives of the implementing authorities to report electronically on the platform e-Institutional Integrity the progress and deficiencies registered in the implementation of NIAS. As a result, in order to familiarize public agents with the electronic reporting process of NIAS, NAC as the Secretariat of the strategy monitoring groups, ensured the elaboration and dissemination of the Instruction on Electronic Reporting of NIAS Implementation, as well as a video tutorial which includes a demonstration of the steps to be taken in order to ensure an intact reporting process. In addition, as in case of the challenge described above, the Secretariat communicated at the SNIA Monitoring Groups meetings about the importance of ensuring an electronic reporting process of data including progress and shortcomings in implementing the Strategy Action Plans.

## ECUADOR

### Specific challenges related to National anti-corruption strategies in times of crisis and recovery

#### *Implementing and monitoring/assessing/evaluating the impacts of anti-corruption plans*

Due to the stage of the National Anticorruption Strategy, the challenges identified are related to its implementation, in particular:

- To establish a National System for Public Integrity and the Fight against Corruption that coordinates the inter-institutional action of all State functions and other levels of Government.
- To define, within the executive function, an entity responsible for coordination, with all the functions of the State and other levels of Government to establish the System of Public Integrity and Fight against Corruption.
- To strengthen the role of the institutions of the Executive Function in promoting, supporting and building a culture of public integrity, particularly the Ministry of Labor in its work of coordinating policies related to integrity, meritocracy, the professionalization of public servants, code of ethics, conflict of interest, organizational culture, change management, capacity building and detection and sanction of disciplinary cases.
- To formulate a long-term State policy of public integrity and fight against corruption that affirms the coordination and inter-institutional action between the different functions of the State and other levels of Government to contribute to the fulfillment of the constitutional obligations of the State, Sustainable Development Goal number 16 and international commitments on integrity and the fight against corruption.
- To create an entity responsible for public integrity in the Executive Function that is dedicated to integrity and prevention of corruption, which does not include exclusive powers of the other functions of the State.

## BRAZIL

### General description of the national anticorruption strategy process, tools, and actors

The Federal Government has prepared the Anti-Corruption Plan, for the period 2020 -2025, with the objective of structuring and executing actions to improve, within the scope of the Federal Executive Branch, the mechanisms of prevention, detection, and accountability for acts of corruption, advancing in the anti-corruption legislation compliance and improvement and in meeting international recommendations. The Plan was developed within the scope of the Interministerial Committee to Combat Corruption (CICC).

#### Final purpose dimensions: prevention, detection, and accountability

The Federal Executive Branch's anti-corruption system is intended to **prevent** and **detect** corruption-related conduct and also hold persons **accountable** for such conduct. Thus, the diagnosis and actions of this Plan were classified according to these final purpose dimensions.

#### Diagnosis

The diagnosis was carried out from January to October 2020, at the CICC bodies, and had the following objectives:

- Competence axis: verify the implementation level of the regulations that determine the mechanisms for fighting against corruption;
- Improvement need axis: map possible improvements to the anti-corruption capabilities of each federal body that makes up the CICC;
- International recommendation axis: analyze the degree of compliance with the international recommendations received by Brazil from the three international conventions against corruption to which it is a signatory (OECD, OAS and UN).

This mapping made it possible for the Federal Executive Branch to plan integrated actions to comply with the current legal framework and implement the necessary improvements.

#### Action Plan

After prioritizing the situations identified in the diagnosis, short- and medium-term actions were proposed to be carried out by the Federal Executive Branch over the next five years.

At this stage, each CICC body prepared a sectoral plan of actions to improve the exercise of its competences, fulfill identified improvement needs, and be in accordance with international recommendations not yet adopted.

The actions proposed by the bodies were approved by the CICC after analysis by its Technical Advisory Committee and, when consolidated, gave rise to the Federal Executive Branch's action plan.

One hundred forty-two actions were proposed in the Anti-Corruption Plan, 42 normative and 100 non-normative.

As the Brazilian Anti-Corruption Plan is a living document, which continuously advances in the implementation and improvement of anti-corruption legislation and in the compliance with international recommendations, in December 2021, after a review, 11 more actions were proposed to the Plan, which now has 153 actions.

The actions will be implemented by the competent body or entity, which will propose corrective measures to the Plan, if deemed necessary, and will report quarterly to the CICC's Technical Advisory Committee on the stage of action implementation.

A Plan update round will be held annually, in which the bodies may include new actions to be implemented by 2025.

### Specific challenges related to National anti-corruption strategies in times of crisis and recovery

*Mechanisms for participation/consultation by stakeholders, both with stakeholders from the public and the private sector and the civil society, in the preparation and monitoring of anti-corruption strategies*

In the Federal Government, competences and anti-corruption measures and tools are not exclusive tasks of a single body or entity, but of several of them, each with a portion of tasks in the fight against corruption. This is because the phenomenon of corruption involves various types of conduct and must be attacked in various ways and using various strategies, to enable an effective combat.

The **Interministerial Committee to Combat Corruption (CICC)** was established by [Decree No. 9.755, of April 11, 2019](#), and is responsible for advising the Presidency of the Republic in the elaboration, implementation, and evaluation of anti-corruption policies, with participation of members of the following bodies:

- Office of the Comptroller General, coordinating the Committee;
- Ministry of Justice and Public Security;
- Ministry of Economy;
- Institutional Security Office;
- Attorney General's Office, and
- Central Bank of Brazil.

Among the reasons that motivated the creation of this collegiate advisory body, the following can be highlighted:

## Network of Corruption Prevention Authorities

- the need for coordinated action between the various bodies of the federal Executive Branch invested with legal competence to combat corruption;
- the guideline for streamlining the efforts employed in the prevention of corruption, the timely detection of its occurrence, and the fair and adequate liability of the public and private agents involved;
- the need to prioritize the implementation of recommendations from international conventions on the subject, to which Brazil is a signatory.

The creation of CICC, comprised of the main bodies of the federal Executive Branch that have competences related to preventing and fighting against corruption, made the development of the Anti-Corruption Plan possible, ensuring that future activities to combat corruption are coordinated and have adequate resources.

The CICC is advised by a Technical Committee, made up of representatives with notable knowledge and experience in the fight against corruption. The technical committee is responsible for monitoring quarterly the implementation stage of the Anti-Corruption Plan's actions.

## PALESTINE

### Specific challenges related to National anti-corruption strategies in times of crisis and recovery

#### *Corona Pandemic and its Effects*

Due to the spread of Corona pandemic, 2020 and the first half of 2021 has been an extraordinary period of time on the global level. It casts its shadows on all aspects of life, affected them negatively, which was reflected on the governments tendencies and the peoples interest without distinction. The pandemic has disrupted several laws, regulations and instructions, where a system of special procedures that states needed to take in order to confront the pandemic, in addition to dedicate and allocate a large part of those states budget for its confrontation.

Despite of those condition, PACC was keen to continue performing its work, tasks and competencies assigned to within the extent those exceptional circumstances allow.

PACC external work level: in the field of law enforcement the citizen's access to PACC's headquarter to submit complaints and reports has become less due to restrictions of movements imposed to counter the pandemic. However, this has been changed in the second half of the year through the adaptation of PACC for its application on smartphones to receive complaints and reports. This contributed in mitigating the impacts of the pandemic on the citizens in terms of their abilities to access to PACC. Moreover, PACC worked with national parties and institutions to enhance environment that rejects corruption within the various fields, sectors and institutions. PACC was able in cooperation with its partners to accomplish several breakthroughs on the level of activating the level compliance for some institutions to the requirements of integrity, governance, preventive measures and promoting a culture of rejecting corruption through conducting risks studies by PACC.

PACC internal work level: PACC managed to overcome the restriction imposed by Corona pandemic considerably. It worked on harness technology for the purposes of enabling its cadre to perform their work remotely, which contributed in the continuity and durability of performing its tasks. In conjunction with the commitment of its cadre to be present in its headquarter according to the scheduled program. Within the same context PACC was keen to continue its awareness-raising activities and meetings with the national and international partners through the available means and via online meetings.

#### *Integration of transparency policies and practices into national anticorruption strategies*

In Palestine we have the national policy agenda, which includes components that referred to transparency policies which were integrated into the national action plans of the Palestine Anti-Corruption Strategy.

#### *Implementing and monitoring/assessing/evaluating the impacts of anti-corruption plans*

The outcomes are a process which we considered in our first monitoring and evaluation plan which were introduced by end of 2021. But due to lack of resources which accompanied by the effect of

the Pandemic, such a plan could not be implemented, though we follow up with implementing parties from the various sectors on their views and positions on the outcomes of the anti-corruption plans.

*The role of implementing entities of the National Anticorruption Strategies and the encouragement to perform a pro-active role and to provide timely reports on the implementation of action plans with adequate accountability mechanisms*

In the course of the implementation of our anti-corruption programs (we have 13 programs which we built to implement the anti-corruption strategy, that target public, private, civil society, education, media...etc), follow up with committed institutions is made regularly and a monthly report is developed by programs facilitators.

*Mechanisms for participation/consultation by stakeholders, both with stakeholders from the public and the private sector and the civil society, in the preparation and monitoring of anti-corruption strategies*

Preparation of strategies and action plans is done with wide consultation process through meetings, MoUs, division of responsibilities. All sectors are represented in the Strategy's National Committee.

*Use of technologies for monitoring anti-corruption plans, trying to take advantage of ICT and innovative solutions also for this specific objective.*

Action Plans and implementation Programs are developed; an Interactive monitoring computerized system is built to follow up on them.

## SLOVAK REPUBLIC

### **General description of the national anticorruption strategy process, tools, and actors**

The Anti-Corruption Policy of the Slovak Republic for the period of 2019-2023 sets out a vision to contribute through a consistent implementation of anti-corruption activities at all levels of Government to stronger inclusive economic growth, enhanced security and legal certainty, increased standards of living, self-confidence of and quality of life for the citizens in the Slovak Republic. It is an open document that should be kept up to date with regard to corruption risks identified, in order to increase the effectiveness of the anti-corruption efforts.

The main objective of the Anti-Corruption Policy of the Slovak Republic is to reduce the room and opportunities for corruption in all areas of public authorities, the national economy and the society and to increase public confidence in public authorities and their employees.

Priority 1: To promote and protect the public interest through reducing the room and opportunities for corruption.

Priority 2: To improve the quality of the legislative and regulatory environment.

Priority 3: To improve conditions for entrepreneurship.

Based on the Anti-Corruption Policy of the Slovak Republic the Slovak Government adopted the National Anti-Corruption Program on 4 September 2019. The Program contains more detailed analysis of the current situation and sets particular tasks to central authorities in the area of corruption prevention. The Program reflects also GRECO recommendations adopted by GRECO plenary in June 2019.



## CHILE

### General description of the national anticorruption strategy process, tools, and actors

The development of the National Anti-Corruption Strategy (ENA) had as a starting point a planning process where the contribution of entities such as UNODC, civil society, public institutions, the private sector, and public servants from the Comptroller General's Office was crucial. One of the key activities of this process consisted of a national consultation on corruption, where 16,809 people responded to the survey "What do you think of Corruption in Chile?", an exploratory study that examined how corruption occurs in the country and the perception of people regarding the problems that the Comptroller General of the Republic should address concerning corruption. This allowed the preparation of the report "Radiography of Corruption in Chile", to define the corruption panorama from the point of view of civil servants and citizens.

Once the context of corruption at the national level was clear, the process of drafting the strategy began. The development of the ENA involved a process consisting of 155 activities in the 16 regions of the country.

The activities included 27 meetings of dialogue with public officials; 23 meetings with citizen comptrollers; 12 meetings with ten priority groups such as children and adolescents, indigenous peoples, senior citizens, and prisoners; and 2 meetings with the Council of Civil Society Associations of the Comptroller's Office. A total of 1554 people participated in the process, of which 734 identified themselves as women and 814 as men. 77 civil society organizations also collaborated in the drafting process. The process concluded with the elaboration of 15 pilot measures that were submitted to a participatory review where 5000 people collaborated, resulting in the 25 proposals that make up the ENA.

When the draft document of the strategy was ready, we evaluate the participatory process to establish concrete numbers, the impact of citizen contribution, and some conclusions to be shared with other public institutions. The Office of the Comptroller General of the Republic identified five corruption nodes: a disconnection between the State and the citizenry, a lack of trust in public institutions, a feeling of impunity for acts of corruption, the existence of areas more vulnerable to corruption, and the perception of a lack of coordination in the fight against corruption.

The National Anticorruption Strategy seeks to contribute through three pillars to the construction of a more probative and transparent State through the development of coordinated actions for the prevention and control of corruption. The 25 proposals of the ENA are directly related to the objective of strengthening Integrity in the whole country, through national, regional, and local actions directly implemented by the Comptroller's Office or in partnership with other organizations.

Currently, the Strategy has almost a year of implementation since its presentation in October 2021. For its evaluation, the strategy has a permanent management control system that is responsible for coordinating the nine CGR teams that are part of its implementation. The first biannual evaluation

of the progress of the ENA was recently carried out and will provide insight to improve the implementation process.

## Specific challenges related to National anti-corruption strategies in times of crisis and recovery

*Mechanisms for participation/consultation by stakeholders, both with stakeholders from the public and the private sector and the civil society, in the preparation and monitoring of anti-corruption strategies*

The ENA was created through a participatory process that, through different stages, involved more than 21 thousand people. To involve citizens in the process, strengthen confidence in the strategy and make it compatible with citizens' needs, a process was designed that involved citizens in all stages:

- Diagnosis of the problem, through a national corruption perception survey.
- Design of measures, through working groups, focus groups, and public consultations.
- Validation and feedback, through the participatory review of 5,000 people virtually.

To encourage participation, one of the pillars of the process was transparency. All the information obtained in the participatory process was published on the strategy's website so that anyone could access, validate and reuse the data. In addition, the process was widely disseminated on social networks.

To consider all stakeholders, differentiated strategies were generated to involve: citizens in general, minority and historically excluded groups, public officials, and institutions.

On the other hand, to include international recommendations, the process began with a workshop in which organizations such as UNODC and world-renowned experts participated to provide information on the state of the art in the fight against corruption and the best international practices in this area.

Once the strategy was finalized, it was widely shared with public and private organizations, and various actors were called upon to collaborate in its implementation. Many actions are being carried out in collaboration with Chile's UNCAC alliance, in which 32 public, private and civil society institutions participate.

The first implementation evaluation will be shared with the institution's council of civil society organizations to receive recommendations for improvement. The council is also permanently informed of the actions developed.

## AUSTRIA

### General description of the national anticorruption strategy process, tools, and actors

The main objective of the Austrian National Anti-Corruption Strategy (NACS) is to increase and ensure integrity and transparency in administration, politics and business. The NACS was adopted by the Austrian Federal Government on 31 January 2018 to provide the framework for all measures to prevent and combat corruption. It consists of two parts: Prevention and Prosecution.

The action plan for the NACS was adopted in January 2019. It comprised measures in the field of prevention and prosecution which represent implementation goals set by the Federal Chancellery and the Federal Ministries for themselves. The aim was to implement the measures listed in the action plan in a binding manner and to initiate corresponding implementation steps at federal level between 2019 and 2020. In order to regularly supplement and update the action plan, it was conceived as a “living document”. Furthermore, some authorities, the regions (Bundesländer) and some organisations decided to participate voluntarily in the implementation of the NACS by developing an action plan of their own. The voluntary participants adhered to the structure and measures described in the initial action plan for the NACS. Their action plan was published on 1 May 2019.

The national Coordinating Body on Combating Corruption (Koordinationsgremium zur Korruptionsbekämpfung) had decided that an evaluation of the NACS action plan was to take place after the completion of the first cycle. The proposal for quantitative and qualitative indicators developed by the BAK was to be used as a basis for evaluating the implementation of the NACS action plans. The BAK coordinated the activities around the evaluation of the action plans under the NACS.

The approach for an evaluation based on indicators was presented to the participating institutions in July 2021. The assessment of the operationalization of each measure was built on two indicators, a qualitative and a quantitative one. The combination of these two indicators allowed for an objective and targeted evaluation of the implementation of the action plan.

The qualitative indicators made it possible to describe the content of the activities carried out and provided objective information for evaluating the content of the measures. The activities were described in terms of strategies, goals or desired results. The quantitative indicators allowed for an assessment based on figures and values in order to clearly measure the performance of a given action. Participating institutions were also invited to reflect on the results of their respective measures and to provide a brief statement on their key findings. The BAK team supported the participating institutions in the development of the indicators, the data collection and the actual evaluation.

All contributions were compiled by the BAK in a final evaluation report and submitted to the Coordinating Body on Combating Corruption. The final report will be published in the October 2022 meeting of the Coordinating Body on Combating Corruption.

The evaluation of the action plan by using qualitative and quantitative indicators led to a representative result and allows conclusions to be drawn on the success and effectiveness of the action plan measures. The evaluation also reflects the overall strategy, the evaluation approach itself and provides recommendations for improvements.

The chosen evaluation approach was presented to the participating institutions in a virtual presentation. The presentation included theoretical aspects, practical examples, a timetable and clear expectations for the implementation of the evaluation. In addition, the requirements for the evaluation were communicated in bilateral talks.

The strategy's action plan covers a cycle of two years. At the end of a cycle, an evaluation of the measures and the strategy should always be carried out as an integral part of the strategy. The evaluation recommends the approach of using qualitative and quantitative indicators also for future action plans. The institutions involved are now familiar with this approach and have the practical and theoretical skills. In the revised action plan for the next cycle, subsequent evaluation should be taken into account when defining the measure. As already mentioned, the measures should be formulated as concretely as possible, contain realistic objectives and be clearly measurable.

The participating institutions developed the indicators to carry out the evaluation independently according to the specifications. The BAK supported the institutions during the evaluation process (development of the indicators, actual evaluation, preparation of the evaluation report). The evaluation contributions showed different informative qualities of the indicators and the evaluation results derived from them. Not all persons responsible for the evaluation attended the information session. The theoretical background and the prerequisites for conducting the evaluation were often not fully known. Since the introduction of the NACS, the responsibilities and organisational structures in the participating institutions have changed. It happened that the person involved in the original formulation of the measure was no longer available and the person carrying out the evaluation did not know the full background of the measures.

Institutions that had clear responsibilities since the beginning of the NACS and also participated in the information event submitted better evaluation outputs with more meaningful final results.

## FRANCE

### General description of the national anticorruption strategy process, tools, and actors

Pursuant to Article 3 of the Law No. 2016-1691 of 9 December 2016 on Transparency, Anti-Corruption and Economic Modernization, known as the “Sapin II” Law, the French Anti-Corruption Agency (AFA) participates in administrative coordination, centralizes and disseminates information to help prevent and detect “offences against probity”, i.e., bribery, influence peddling, unlawful taking of interest, misappropriation of public funds, extortion by public officials and favoritism.

In this respect, and pursuant to Article 1 of Decree No. 2017-329 of 14 March 2017 on the French Anti-Corruption Agency, the AFA is tasked with preparing “a national multi-year plan to fight bribery, influence peddling, extortion by public officials, unlawful taking of interest, misappropriation of public funds and favoritism” (the National Multi-Year Plan to Fight Corruption).

The Minister of Justice and the Minister for the Budget launched the 2020-2022 National Multi-Year Plan to Fight Corruption jointly on 9 January 2020.

Drafted by the AFA, the National Plan is based on recommendations from international organizations, such as the United Nations, the OECD and the Council of Europe, as well as on best practices identified in other countries’ strategies. The Plan sets out France’s long-term action and underscores its commitment in the eyes of the global community.

The Plan is aimed at all public sector players, as well as businesses, to make the national anti-corruption strategy a boost for economic performance. The Plan revolves around four pillars covering the following eight priorities:

- Pillar 1: Optimizing data analysis to improve understanding and detection of corruption;
- Pillar 2: Developing training and awareness-raising for public employees;
- Pillar 3-1: Supporting the deployment of anti-corruption programs in all ministries by 2022;
- Pillar 3-2: Supporting the deployment of anti-corruption programs in major local governments and their establishments by 2022;
- Pillar 3-3: Promoting integrity in sports organizations and events;
- Pillar 3-4: Supporting businesses in their efforts to take ownership of the French anti-corruption framework and encouraging them to make anti-corruption compliance a means of boosting competitiveness;
- Pillar 3-5: Strengthening sanctions for corruption;
- Pillar 4: Enhancing France’s international action.

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Under these priorities, many activities were implemented and a vast array of stakeholders involved. For instance, as part of the first pillar on data analysis, the AFA has been mapping corruption risks across France. This vast exercise is being conducted in partnership with judicial authorities, the Police, the Gendarmerie, different ministries and academia. It combines various data sets, such as judicial decisions on corruption cases, as well as data from criminal investigations, disciplinary sanctions, the AFA's audits and whistleblowing reports.

Moreover, a new National Plan is currently being drawn up for the period 2023-2025, in consultation with all the ministries and authorities involved in the fight against corruption.

The AFA ensures the preparation of the 2023-2023 Plan by coordinating the activities of an inter-ministerial working group. The results of these activities, presented in the form of proposals, will be submitted for approval to an inter-ministerial committee placed under the authority of the Prime Minister.

These proposals will consist in the definition of priority strategic objectives accompanied by the measures and means needed to achieve them, the identification of the departments/entities involved in their implementation and of the authority responsible for the proper completion of each measure. To this end, each measure will include an appropriate indicator for monitoring and measuring results, when possible, as well as a timetable for operational implementation.

In accordance with recommendations by international organizations, this draft Plan will be opened to public consultation on the AFA's website in order to allow multiple stakeholders (NGOs, business representatives, scholars, compliance professionals, etc.) to contribute to the discussion.

## ROMANIA

### General description of the national anticorruption strategy process, tools, and actors

The first anticorruption policy of Romania was elaborated in 2001, but the drafting process of the National Anticorruption Strategy 2012-2015 was an important cornerstone because, for the first time, representatives from various sectors (the executive, legislative and judicial branches, the local public administration, the business environment and the civil society) were directly involved in this endeavour alongside the Ministry of Justice - the institution responsible for elaborating the anticorruption policies in Romania. Also, the entire mechanism for monitoring the implementation of the national anticorruption policy designed by NAS 2012-2015 was followed by the further anticorruption strategies (NAS 2016-2020 and NAS 2021-2025).

The National Anticorruption Strategy 2021-2025, approved through the Government Decision no. 1269/17.12.2021, was elaborated after extensive consultations carried out by the Ministry of Justice with all the stakeholders; the document is addressed to all public institutions from central al local administration, independent authorities and anticorruption institutions, civil society and business environment and provides performance indicators, risks associated with objectives and measures of the strategy, inventory of the corruption prevention measures with evaluation indicators, general standard for publishing information of public interest, applicable to public institutions and public enterprises.

To facilitate the process of monitoring the anticorruption strategies and the access of institutions or any interested persons to relevant information and good practices in the anticorruption field, since 2012, the MoJ created a dedicated web page [sna.just.ro](https://sna.just.ro) ([https://sna.just.ro/SNA+2021-2025+-+English+version+%28unofficial+translation%29+ / https://sna.just.ro/docs/pagini/79/NAS%202021-2025.pdf](https://sna.just.ro/SNA+2021-2025+-+English+version+%28unofficial+translation%29+/)).

The mechanism for monitoring the implementation of NAS, designed in 2012 and applied by the strategy in force as well, provides the following tools:

I. In support of the process of monitoring the implementation of the new strategy, five cooperation platforms were developed as ownership mechanisms of action to each category of the stakeholders:

- the platform of the independent authorities and anticorruption institutions
- the platform of the central public administration
- the platform of the local public administration
- the platform of the business environment
- the platform of the civil society.

The platforms are convened half-yearly or whenever needed, usually at the headquarters of the MoJ in order to discuss recent developments in anticorruption matters, the meetings being chaired by a representative of the MoJ; they are pillars in successfully fulfilling tasks, such as:

- approving the yearly progress reports of NAS and the reports drafted following the peer review missions;
- submitting proposals in regards to the topics of the peer review missions, the monitoring methodology for the implementation of NAS and other initiatives which need their involvement;
- adopting decisions with the majority of the votes of those present in each platform.

II. Another important tool refers to the peer reviews missions carried out in public institution and authorities (considered as being a good international practice, partially replicating GRECO's evaluation mechanism) by teams of experts from the five platforms; the evaluated themes are selected from the list of preventive measures provided by the strategy.

III. The annual reporting according to which every public institution has to send to the Technical Secretariat (embedded within the MoJ and considered as the engine of the implementation process, responsible for the central co-ordination) a progress report on NAS` implementation.

As the previous two anticorruption strategies, NAS 2021 – 2025 promotes the institutional integrity, pointing out the consequences of the integrity incidents considered as management failures and has the same three-pronged approach: prevention – education – fighting.



## Specific challenges related to National anti-corruption strategies in times of crisis and recovery

*Mechanisms for participation/consultation with both stakeholders from the public and the private sector and the civil society in the preparation and monitoring of anti-corruption strategies*

The most important challenge in the drafting process of the anticorruption policies was bringing at the same table, ten years ago, all the stakeholders and to connect people and institutions (public institutions representing the executive, legislative, judicial authorities and the local administration as well, business environment and civil society).

The Ministry of Justice succeeded to manage this challenge by organising multiple meetings with all the stakeholders and by offering an ownership mechanism of action to each category of them - the so-called cooperation platforms:

- (1) the platform of independent authorities and of the anti-corruption institutions
- (2) the platform of the central public administration
- (3) the platform of the local public administration - coordinated in partnership with the Ministry for Development, Public Works and Administration
- (4) the platform of the business environment and
- (5) the platform of the civil society.

The cooperation platforms created ten years ago are forums for debate provided by NAS 2021-2015 as well. The most important example for proving that this challenge was well managed is the fact that the formal discussions from the first meetings of the cooperation platforms organised ten years ago have been transformed in informal and constructive debates on anticorruption issues and ways to move forward.

## UKRAINE

### General description of the national anticorruption strategy process, tools, and actors

On July 7th, Ukraine's President Volodymyr Zelenskyy signed the law on the [National Anti-Corruption Strategy of Ukraine up to 2025](#), which consequently entered into force.

The National Anti-Corruption Strategy accelerates the European integration of Ukraine and will be aligned with general [Ukraine's Recovery Plan](#) presented by the Ukrainian government in July in Lugano, Switzerland.

The Strategy was developed by the National Agency on Corruption Prevention (NACP), following its functions assigned at the legislative level. In order to ensure the high quality of the document, during the development process, the NACP involved key experts, civil society activists, international partners, and all interested entities.

The NACP will also coordinate the implementation of the Strategy, developing the corresponding Action Plan that will assign key performance indicators (KPI) for tackling corruption to each involved government authority. Thanks to the online platform created by NACP, every person will be able to clearly see how every government body is contributing to tackling corruption.

The Strategy is based on 5 key principles:

1. Optimization of functions of the state and local government. In particular, it is envisaged to eliminate excessive powers of the state bodies as well as the duplication of their functions.
2. Reduction of the "human factor" and increase in transparency and efficiency of the state's relations with people and organizations. This will be achieved through the introduction of rules of general administrative procedure and digitalization of most processes and services;
3. Creation of convenient and legal alternatives to corrupt practices;
4. Ensuring effective state control over the observance by public servants of the rules of ethical conduct and requirements of anti-corruption legislation;
5. Ensuring the inevitability of liability for corruption and corruption-related offenses.

Every year, the NACP will assess the implementation of the Anti-Corruption Strategy, preparing a National Report on Implementation of the Anti-Corruption Policy. Also, through this, the Action Plan for the implementation of the Strategy may be amended annually in order to sustain its relevance

The issue of formation and implementation of anti-corruption policy is regulated by the Law of Ukraine "On Prevention of Corruption" (hereinafter - Law No. 1700-VII).

In accordance with the provisions of Article 18 of Law No. 1700-VII, the principles of anti-corruption policy (Anti-corruption Strategy) are determined by the Verkhovna Rada of Ukraine (Parliament).

The draft Anti-corruption Strategy is being developed by the National Agency on Corruption Prevention (NACP) based on the analysis of the corruption situation, as well as the results of the previous anti-corruption strategy. The implementation of the Anti-corruption Strategy is carried out through the implementation of the state program, which is developed by NACP and approved by the Cabinet of Ministers of Ukraine (Government).

Heads of state bodies bear personal responsibility for ensuring the implementation of the state program for the implementation of the Anti-Corruption Strategy.

The state program for the implementation of the Anti-corruption Strategy is subject to annual review, taking into account the results of the implementation of the specified measures, conclusions and recommendations of the parliamentary hearings on the situation regarding corruption.

02.10.2019 the Verkhovna Rada of Ukraine adopted the Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine on Ensuring the Effectiveness of the Institutional Mechanism for the Prevention of Corruption", which changed the collegial management model of the NACP to a one-person one, introduced a number of other novelties regarding the functioning of the NACP, and became the basis for a "reboot" NACP, which began with the election and appointment of its Head on January 15, 2020.

The absence in the state of the main strategic document in the field of prevention and counteraction of corruption - the Anti-Corruption Strategy - caused, first of all, the need for its urgent development (the time for which the previous Anti-Corruption Strategy and Program were calculated was released in 2017).

The anti-corruption strategy was supposed to become a reliable anti-corruption guide and toolkit for the next five years, as well as provide a significant strategic step forward in the direction of minimizing corruption in Ukraine and significantly increase the rate of its socio-economic growth.

In 2020, the updated team of the NACP began developing a draft of a new Anti-corruption Strategy, which would be based on the results of studying the situation regarding corruption in Ukraine and evaluating the effectiveness of the implementation of the previous anti-corruption policy, as well as taking into account Ukraine's international obligations in the field of preventing and combating corruption.

In September 2020, the draft of the Anti-corruption Strategy was approved by the Government and determined by the President of Ukraine as urgent, and in early November 2020 it was adopted by the Parliament of Ukraine in the first reading (Reg. No. 4135 dated 09/21/2020) (<https://bit.ly/3NhuCbN>) (draft law No. 4135).

On June 20, 2022, draft Law No. 4135 was adopted by the Parliament of Ukraine as a Law and, as of July 4, 2022, was sent to the President of Ukraine for signature.

The concept of forming an anti-corruption policy and the Anti-corruption Strategy proposed for approval are based on a combination of two approaches:

- further improvement of the general system of preventing and countering corruption (chapters II and IV of the Anti-corruption Strategy);
- minimization of corruption in the most priority areas from the point of view of overcoming corruption, including through the implementation of the most successful sectoral reforms (Chapter III of the Anti-corruption Strategy).

A balanced combination of these approaches will make it possible not only to reduce the level of corruption, to increase the trust of citizens in the authorities, but also to significantly accelerate the pace of socio-economic growth of Ukraine.

The results of the analysis of the state of corruption in Ukraine, the effectiveness of the anti-corruption policy of previous periods, international standards and the best global practices in the field of prevention and countering corruption made it possible to formulate the following basic principles of anti-corruption policy, on which the Anti-Corruption Strategy is based on:

- 1) optimization of the functions of the state and local self-government, the implementation of which primarily involves: elimination of duplication of powers by various bodies; temporary suspension of implementation of inefficient powers, which are characterized by a high level of corruption risks; elimination of cases of exercise of powers by the same body, the combination of which creates additional corruption risks;
- 2) digital transformation of the exercise of powers by state authorities and local self-government bodies, transparency of activities and data disclosure as a basis for minimizing corruption risks in their activities;
- 3) creating, in contrast to existing corrupt practices, more convenient and legal ways of meeting the needs of individuals and legal entities;
- 4) ensuring the inevitability of legal responsibility for corruption and corruption-related offenses, which creates an additional deterrent effect for all subjects of legal relations;
- 5) formation of public intolerance to corruption, establishment of a culture of integrity and respect for the rule of law.

At the same time, the determination of priority areas in the prevention and counteraction of corruption, which are related to the Anti-Corruption Strategy, took place in view of the results of a standard survey on the level of corruption in Ukraine conducted in 2020, other studies on the state, dynamics and prevalence of corruption in Ukraine, as well as the results analysis of the effectiveness of anti-corruption policy implementation.

In each of the priority areas of the Anti-Corruption Strategy, it identifies key problems and formulates strategic results that should be achieved to solve them. These results are formulated in such a way that they give an unambiguous understanding of the set of measures necessary for their implementation.

For each of the expected strategic results, the state anti-corruption program will determine measures, performance indicators for each measure, measure implementers, terms of measure implementation, as well as sources and amounts of financial resources necessary for their implementation.

## **Specific challenges related to National anti-corruption strategies in times of crisis and recovery**

### *Implementing and monitoring/assessing/evaluating the impacts of anti-corruption plans*

In accordance with Article 5 (3) of the UN Convention against Corruption, each participating State strives to periodically evaluate relevant legal instruments and administrative measures in order to determine their adequacy from the point of view of preventing and fighting corruption.

Conducting such an assessment will ensure that its results are taken into account in the adjustment of the anti-corruption policy and the selection of the optimal and most realistic, but at the same time ambitious, measures to increase the integrity of the public service and its transparency.

One of the problems that, in our opinion, may arise in the framework of the evaluation of the effectiveness of the implementation of the anti-corruption strategy and/or the plan for its implementation (strategic plan and action plan) or the implementation of the anti-corruption policy in general, may be the lack of appropriate tools that would allow to outline miscalculations in the formation of anti-corruption policy and determination of measures for its implementation.

At the same time, the results of the use of such tools should be available to the public in order to, in turn, ensure the implementation of the requirements of clause 1 of Article 5 and Art. 13 of the UN Convention against Corruption in terms of involving society in preventing and fighting corruption and deepening society's understanding of the fact of existence, causes and dangerous nature of corruption, as well as the threats created by it.

During the period of validity of the Principles of State Anti-Corruption Policy in Ukraine (Anti-Corruption Strategy) for 2014-2017, approved by the Law of Ukraine No. 1699-VII of October 14, 2014, and the State Program for the Implementation of the Principles of State Anti-Corruption Policy in Ukraine (Anti-Corruption Strategy) for 2015- 2017, approved by Resolution No. 265 of the Cabinet of Ministers of Ukraine dated April 29, 2015, an obligation was established for executors (ministries, other central bodies of executive power, the Council of Ministers of the Autonomous Republic of Crimea, regional, Kyiv and Sevastopol city state administrations) of measures to implement the state program regarding the quarterly submission of information on the status of implementation of this program.

The NACP should ensure monitoring of the state of implementation of the State Program and coordination of the work of executors of the implementation of the State Program regarding its

implementation, as well as quarterly informing the Cabinet of Ministers of Ukraine about the state of implementation of the State Program (prior to the establishment and commencement of activities, the implementation of such functions relied on Ministry of Justice of Ukraine).

In the Anti-Corruption Strategy for 2021-2025, the draft of which was developed by the NACP, which was approved as a law by the Parliament of Ukraine on 20.06.2022 and was sent to the President of Ukraine for signature as of 04.07.2022, a different, compared to the existing, implementation monitoring mechanism was proposed of the state anti-corruption policy, which strengthens the role of the NACP in coordinating the implementation of the Anti-Corruption Strategy and the state anti-corruption program for its implementation.

Thus, it is determined at the legislative level that the coordination of the implementation of the Anti-corruption Strategy and the state anti-corruption program for the implementation of the Anti-corruption Strategy is carried out by the National Agency for the Prevention of Corruption in the manner determined by it.

Executors of the state anti-corruption program for the implementation of the Anti-Corruption Strategy will submit to the NACP information on the state of implementation of the measures provided for by it every year by February 15 and July 15.

NACP will publicly inform the Cabinet of Ministers of Ukraine about the results of the implementation of the measures of the state anti-corruption program for the implementation of the Anti-Corruption Strategy annually by April 1, and will also publish these results on its official website.

Monitoring and evaluation of the effectiveness of the implementation of the Anti-corruption Strategy and the state anti-corruption program will also be carried out in accordance with the procedure determined by the NACP.

Specially authorized entities in the field of anti-corruption and executors of the state anti-corruption program for the implementation of the Anti-Corruption Strategy, within the limits of their powers, will annually submit statistical information on the results of their work to the NACP by February 15.

At the same time, the NACP must ensure the creation and functioning of the Information System for monitoring the implementation of the state anti-corruption policy, which will provide open 24-hour access through the official website of the National Agency to the information available at the NACP, which, in particular, will include:

- statistical data on the results of the work of specially authorized entities in the field of anti-corruption, as well as the implementation of the measures of the state anti-corruption program on the implementation of the Anti-Corruption Strategy by the relevant implementers of the measures;
- the results of monitoring and evaluating the effectiveness of the implementation of anti-corruption strategies and the implementation of measures of state anti-corruption programs;
- national reports on the effectiveness of state anti-corruption policy implementation;

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- information on the results of unplanned measures to prevent and combat corruption, including within the framework of international cooperation.

Access to this information will be provided through the ability to view, copy and print the information, as well as in the form of a data set (electronic document) organized in a format that allows its automated processing by electronic means (machine readable) for the purpose of reuse.

Regulations on the information system for monitoring the implementation of the state anti-corruption policy will be approved by the NACP.

It is also worth noting that at the NACP will be formed a Coordination Working Group on Anti-Corruption Policy, the main tasks of which will be to facilitate the coordination of the actions of state authorities regarding the implementation of the Anti-Corruption Strategy and the implementation of measures of the State Anti-Corruption Program for its implementation, the preparation of proposals for the formation and implementation of the state anti-corruption policy (including improvement of the legal framework).

## CATALONIA

### General description of the national anticorruption strategy process, tools, and actors

At this moment Spain does not count with an anti-corruption strategy and only at the regional level (specifically in Catalonia) an anti-corruption strategy was put into place (of which the implementation period has already ended and without the certainty that it will be retaken by the Government).

In order to put this initiative into context, in June 2019 an agreement to elaborate a Strategy was passed by the Catalan Government and on 15.01.2020 a strategy was approved; the Strategy defined 25 actions to be implemented in the timeframe of 2 years maximum. Among these actions, a new system for whistleblower protection, consisting in 100% anonymous mailboxes, collaboration between the Tax Agency and Catalan Police, publication of agendas of senior technical staff and actions regarding the selection process of managerial public staff, among others, were targeted.

The creation process of the Strategy used a participative model (meetings with academic experts, comparative law, public consultation, etc.).

The model was based in two main axes:

**Organisational:** identification of the actors and their responsibilities and capacities to implement the strategy.

**Accountability:** actors involved in the strategy must exercise the entrusted functions, demand accountability and evaluate the impact of the actions as well as identifying weaknesses.

From the Office we acknowledged positively this initiative, making proposals, and we have also taken part in the axe of accountability. The reports regarding the follow-up and the assessment of the Strategy can also be found in the following link (at the bottom of the website the reports from the Office can also be consulted): [Implementació de l'Estratègia. Govern obert \(gencat.cat\)](#)

You can find out more general information regarding the strategy in the following link:

[Strategy to fight against corruption and strengthen public integrity. Open government \(gencat.cat\)](#)

Finally, the follow-up reports regarding the strategy, which have been issued by the Catalan government have been submitted to social scrutiny (Space of Citizen Participation) and by the Anti-Fraud Office of Catalonia.

Furthermore, the II Summit against the structural causes of corruption organised by the Citizen's Observatory against corruption that took place in July 2022 in the Parliament of Catalonia also contemplated the continuity of the Strategy.



## COMUNITAT VALENCIANA\*

### General description of the national anticorruption strategy process, tools, and actors

In 2016 the Valencian Parliament agreed to establish an anti-corruption strategy assuming and implementing the United Nations Convention against Corruption by approving Law 11/2016 of the Agency for the Prevention and Fight against Fraud and Corruption (AVAF) <https://www.antifraucv.es/wp-content/uploads/2022/02/Ley-11-2016-Ingles.pdf>.

The Valencian anti-corruption strategy has as its axis the AVAF, an independent authority with its own legal personality that extends its action to the entire territory of the Community with competences over the autonomous administration and its dependent bodies; its 542 municipalities and 3 provinces; its 5 public universities; all public and mixed enterprises; trade unions, employers' organizations and parties; as well as to any legal or natural person receiving public funds or contracting with public administrations.

Its main goal is to strength the actions of Valencian public administrations and institutions to prevent moral deterioration and economic impoverishment that might be detrimental to Valencian citizens. Furthermore, the Agency was created to promote integrity and public ethics, and to promote a culture of good practices and rejection of fraud and corruption in the design, execution and evaluation of public policies and in the management of public resources.

This strategy has been structured around the following course of action:

- Prevent, train and document in order to promoting transparency, accountability and that all administrations have integrity and anti-corruption plans, as well as internal reporting channels and links to the external channel of complaints of the AVAF.
- Detect, analyze, investigate corrupt practices by receiving complaints\*\*\* developing actions of AVAF analysts and investigators for the restoration of legality.
- Protect whistleblowers in good faith by guaranteeing confidentiality or even anonymity, providing legal advice, accompanying them and preventing them from suffering reprisals, persecution or worsening of their working conditions by impose, if necessary, sanctions on reprisals that can reach fines of up to € 400,000\*\*.
- To be a support and collaboration body with the prosecutor's office and the judicial authority in anti-corruption matters, making reports and expertise.
- To be accountable to Parliament and maintain a link with society through the AVAF Citizen Participation Council, which integrates more than a dozen civic organizations.

AVAF's main challenges are aimed at:

- The harmonization of the anti-fraud and corruption policies of the different regional entities with the state policy of the Spanish state. Emphasizing the correct transposition of Directive 2019/1937 (EU) into state legislation, which is currently in the process of approval by the Spanish Parliament.
- Achieving that all Valencian administrations and their dependent bodies maintain integrity and anti-corruption plans, internal complaints channels establishing mechanisms of collaboration and coordination with the AVAF for prevention and fight against corruption and protection of whistleblowers.

\* The Comunitat Valenciana is an autonomous territory of the Spanish State located in the east of the Iberian Peninsula. It covers a territory of 23,255 km<sup>2</sup> and currently has 5,072,176 inhabitants. The Valencian Community is territorially subdivided into 3 provinces, 34 counties and 542 municipalities.

\*\* The AVAF was the first Spanish authority to have a Statute for the Protection of Whistleblowers of Corruption, three years ahead of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

\*\*\* Since 2018, AVAF has a Complaints Mailbox on its website that allows citizens to report infractions. This mailbox, using GlobalLiks and open source technology, incorporates mechanisms that guarantee the confidentiality of all information and offers a secure communication space to maintain contact with the Agency and allow interaction between it and whistleblowers anonymously if they decide so.