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**Eastern Partnership Project on  
“Good Governance and Fight against Corruption”**

Technical Paper

**Pilot Activity: Designing Anti-corruption Strategies for Local Communities  
in the Republic of Moldova**

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## 1 INTRODUCTION AND SUMMARY

The Moldovan “National Anti-Corruption Strategy for the Years 2011-2015”, adopted on 21 July 2011, states in chapter 4.4 C 7 (p. 14):

*“Special attention must be paid to the elaboration and approval of anti-corruption strategies and action plans at local level by the local councils depending on the forms of corruption existing in the local communities. The CCECC will support this process by providing guidance and methodological assistance in the elaboration of local or model anti-corruption strategies.”*

It was the aim of this paper to assist the Moldovan Centre for Combating Economic Crimes and Corruption (CCECC) in developing and adopting a method with which the CCECC can fulfil its role as foreseen in the strategy.

The paper compares five different methods of developing anti-corruption strategies/action plans in local communities and gives a recommendation on how to monitor implementation. It was drafted in anticipation of a Working group meeting on local anti-corruption strategies at the CCECC on 31 October 2011 with the aim of shaping consensus as to the next steps to be taken. In order to provide for an open discussion at the workshop, this paper did not give any recommendations.

At the meeting it was decided – based on the preference expressed by the CCECC – to proceed with the methodology developed by FPDL (see below at 2.1).

## 2 POSSIBLE METHODS

There are different methods possible for developing anti-corruption strategies in local communities.

### 2.1 FPDL – “Restore the Health of Your Organisation”

FPDL, a Romanian NGO, has developed a participatory prevention-oriented method to develop anti-corruption strategies at the local level.<sup>1</sup> The method is based on the often-cited book “Corrupt Cities - a Practical Guide to Cure and Prevent Corruption” (by R. Klitgaard and others, 2000) available online in Romanian and other languages.<sup>2</sup> The method was applied in several local communities in the Republic of Moldova between 2008 and 2011, within the framework of a UNDP project.<sup>3</sup> The method roughly foresees the following steps:

- Capacity building of Local Experts/Facilitators through Training of Trainers (5-day workshop)
- Corruption Diagnosis in a local community (3-day workshop)
- Treating and Preventing Corruption in a local community (2-day workshop)
- Strategic Plan to Treat and Prevent Corruption in a local community (1-day workshop)
- Final Draft Elaboration (experts)

This methodology builds very much on an open process of self-assessment. The discussion of concrete corruption risks requires an atmosphere of confidence, free of any perception of possible sanctions.

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<sup>1</sup> [http://www.fpd.ro/services.php?do=anticorruption\\_strategies](http://www.fpd.ro/services.php?do=anticorruption_strategies).

<sup>2</sup> [http://www.fpd.ro/publications.php?do=training\\_manuals&id=15](http://www.fpd.ro/publications.php?do=training_manuals&id=15).

<sup>3</sup> <http://www.undp.md/projects/ILDP.shtml>.

## 2.2 TI/UN Habitat – “Tools to Support Transparency in Local Governance”

In 2004, Transparency International and the United Nations Human Settlements Programme published a Toolkit to support transparency in local governance, available in English.<sup>4</sup> The Toolkit describes the development of local strategy-making processes in four phases.

- Phase I: Preparation and Stakeholder Mobilisation, involving the collection of information and the identification and involvement of key stakeholders
  - o Political Will
  - o Stakeholder Analysis
  - o Transparency Survey
- Phase II: Issue Prioritisation and Stakeholder Commitment: identifying major issues and steps to be taken
  - o Stakeholder (or City) Consultations
  - o Working Groups
  - o Proposals
  - o Urban Pact
- Phase III: Strategy Formulation and Implementation: developing action plans and implementing demonstration projects
  - o Action Planning
  - o Demonstration Projects
- Phase IV: Follow-up and Consolidation: monitoring progress and institutionalising the lessons learned.
  - o Transparency Survey II

## 2.3 Government Decision no. 906 (of July 2008): “Corruption risk assessment in public institutions”

This method is based on self-assessment<sup>5</sup>. A self-assessment group is to be created by virtue of the order issued by the head of the institution. This group is composed of a representative number of chiefs of relevant subdivisions (from 5 up to 7 members). Employees of the CCECC may also be included in the composition of the above group, as observers, to offer advisory support to the self-assessment group.

The assessment is carried out in three stages:

- Assessment of preconditions;
  - o Legal framework relevant for the specific institution
  - o Organisational structure of the institution
  - o Codes of ethics (code of conduct, deontological code or other regulations that are guiding the behaviour of employees in the institution).
- Assessment of corruption risks as such;
  - o Investigation and identification of risks

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<sup>4</sup> [http://www.transparency.org/tools/e\\_toolkit/tools\\_to\\_support\\_transparency\\_in\\_local\\_governance](http://www.transparency.org/tools/e_toolkit/tools_to_support_transparency_in_local_governance).

<sup>5</sup>

<http://www.coe.int/t/dghl/cooperation/economiccrime/moneylaundering/projects/molico/AC/Output1.6/912%20MOLICO%20Nat%20%20Legisl%20methodology%20of%20corruption%20risk%20assessment.pdf>.

- Risk analysis.
- Submission of recommendations to eliminate or diminish the effects of the corruption risks (drawing up integrity plans).

In the past, prior to the assessment, members of the self-assessment group were trained (in the framework of the Council of Europe's MOLICO-Project) for up to three weeks on the methodology of risk assessment.<sup>6</sup> The initially planned timeframe for building the institutional capacity for corruption-risk assessments had to be substantially adjusted upwards.<sup>7</sup> This method has been designed for, and applied to, only central institutions and would need slight adaptations for local governments. There might be potential for taking advantage of the considerable experience built up in the Republic of Moldova.

#### 2.4 Implementation of National Anti-Corruption Strategy through Participatory Planning

The National Strategy requires local governments to implement 6 specific anti-corruption measures:

1. Raising public awareness
2. Training of officers on anti-corruption laws
3. Transparency in decision-making process
4. Prevention of corruption in the process of recruitment, selection, employment and promotion of staff in public offices
5. Setting-up of governmental and non-governmental anti-corruption hotlines
6. Promotion of the right for access to information (partnerships with mass-media and civil society)

One could take the preconditions set out in the National Strategy and thus leave out the whole step of comprehensive corruption assessment as foreseen in both previous methods (No 1 and 2). This method would take the foreseen core anti-corruption measures as a starting point and assume their relevance and effectiveness in reducing corruption. Developing a strategy in each local community could follow more or less the following steps:

- Desk review of legal and organisational framework of 6 strategic fields
- 1-day Workshop addressing the following issues:
  - National Anti-Corruption Strategy and the role of local communities
  - Training on possible ways of implementing the 6 foreseen anti-corruption measures; case studies
  - Participatory group work of identifying concrete measures
  - Training on drafting a local strategy and action plan
  - Training on monitoring progress
- Ensuing assistance with the implementation of the local strategy (training modules on each of the 6 issues or/and expertise)

The resources saved on going through a whole corruption and risk assessment exercise in each local community can be (partially) used for assistance in implementing the strategy.

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<sup>6</sup> <http://www.coe.int/t/dghl/cooperation/economiccrime/moneylaundering/projects/molico/912%20MOLICO%20OUTPUT%201%206.pdf>;

see also [http://www.rai-see.org/doc/Corruption\\_risk\\_assessment\\_in\\_the\\_Republic\\_of\\_Moldova-Ms\\_Daniela\\_Railean-Center\\_for\\_Combating\\_Economic\\_Crimes\\_and\\_Corruption-Moldova.pdf](http://www.rai-see.org/doc/Corruption_risk_assessment_in_the_Republic_of_Moldova-Ms_Daniela_Railean-Center_for_Combating_Economic_Crimes_and_Corruption-Moldova.pdf).

<sup>7</sup> <http://www.cmi.no/publications/file/3963-lessons-learned-from-the-evaluation-of-five.pdf>.

## 2.5 Adapting a Model Strategy through Participatory Planning

One could develop a Model Strategy based on the strategic objectives (see above 2.4) laid down in the National Strategy. The Model Strategy could be adopted in a participatory planning session according to each local community's needs. The schedule would follow the previous one (2.4) slightly modified (see underlined changes):

- 1-day Workshop addressing the following issues:
  - o National Strategy and the role of local communities
  - o Training on possible ways of implementing the 6 foreseen anti-corruption measures; case studies; Model Strategy
  - o Participatory group work of identifying necessary adaptations
  - o Finalising and adopting strategy
  - o Training on monitoring progress
- Ensuing assistance with the implementation of the local strategy

### 3 COMPARISON

Method	FPDL	TI/UN Habitat	Decision No. 906	National Strategy	Model Strategy
<b>Focus on</b>	Open process of developing strategy	Open process of developing strategy	Open process of developing strategy	Implementing National Strategy	Implementing National Strategy
<b>Approach</b>	Bottom up	Bottom up	Bottom up	Top down/bottom up	Top down
<b>Measuring corruption</b>	Yes	Yes	Partially	No	No
<b>Assessing risks</b>	Yes	Yes	Yes	No	No
<b>Assessing measures</b>	Yes	Yes	Yes	Yes	Partially
<b>Local ownership</b>	High	High	High	Medium	Low
<b>Necessity of experts</b>	High	High	High	Low	Low
<b>Capacity building</b>	High	Medium	Medium	Medium	Low-medium
<b>Resources (w/days)</b>	> 12 days	> 4	> 4	> 1	> 1
<b>Underlying assumptions</b>	High local ownership leads to sustainable change of culture	High local ownership leads to sustainable change of culture	High local ownership leads to sustainable change of culture	National Strategy is binding and addresses relevant issues	National Strategy is binding and addresses relevant issues
<b>Advantage</b>	Thorough, individual approach with high impact on officials	Thorough, individual approach with high impact on officials	Known and uniform methodology (for central institutions)	Effective in numbers of communities reached	Effective in numbers of communities reached
<b>Disadvantage</b>	Low ratio of communities reached per working day; local strategy might differ from national one; given its prosecution mandate, involvement of CCECC might be a risk.	Low ratio of communities reached per working day; local strategy might differ from national one; given its prosecution mandate, involvement of CCECC might be a risk	Low ratio of communities reached per working day; local strategy might differ from national one	Comparatively low training impact on civil servants	Comparatively low training impact on civil servants

## 4 REPORTING

The Moldovan “National Anti-Corruption Strategy for the Years 2011-2015”, adopted on 21 July 2011 states in chapter V (p. 22):

*“The public authorities shall present to the Secretariat of the Monitoring Group quarterly explanatory notes on the results of implementation of each activity and on the difficulties faced, as well as their proposals on how the existing situation can be improved, before the 15<sup>th</sup> day of the month following the reporting quarter.”*

The reporting of local governments on progress with their action plan should use the same templates, as central institutions do. The reporting structure depends on the methodology chosen.

By following a set template, each institution/responsible person provides the same information in the same order, which facilitates its reading and analysis.<sup>8</sup> As far as it can be said at this stage, the reporting template should probably include, at a minimum, the following items:

Identification of reporting entity:

- Name of local community
- Responsible person
- Reporting period

List of specific activities and measures which they are responsible to implement:

- Objective identified in action plan
- Specific measure related to the objective

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

Update on the status of each activity/measure:

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

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<sup>8</sup> See e.g.: <http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/azpac/951-AZPAC-TP-CCC-Template%20for%20reporting-Reed.pdf>;  
[http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/gepac/779\\_RTD28Jan08\\_ppt\\_trivunovic\\_en.PDF](http://www.coe.int/t/dghl/cooperation/economiccrime/corruption/projects/gepac/779_RTD28Jan08_ppt_trivunovic_en.PDF).

<b>District</b>	Exemplusat
<b>Responsible person</b>	DI. Exemplu
<b>Reporting period</b>	1 January – 31 March 2012

<b>Objective (no./description)</b>	5. Setting-up of governmental and non-governmental anti-corruption hotlines			
<b>Measure (no./description)</b>	<b>Indicator</b>	<b>Progress (description/dates)</b>	<b>Challenges</b>	<b>Next steps</b>
5.1 Displaying hotline-number of CCECC in all waiting areas	8 posters on anti-corruption hotline put up in all waiting areas	1 February 2012: 8 posters put up	Some posters are repeatedly taken down by unknown persons	Monthly checking on status of posters by anti-corruption official; renewal if necessary
etc.				
<b>Objective (no./description)</b>	etc.			
etc.				

At the CCECC, an excel tool to be developed by this Project could help to register, consolidate and analyse progress in the implementation of local action plans.