



Training for Evaluators  
Sixth Evaluation Round on  
Preventing corruption and promoting integrity at the sub-national level  
Session 2: Addressing and managing risk areas  
(Strasbourg, 20-21 March 2025)

*“Beyond compliance: corruption risk assessment from theory to practice”*

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# Pillars and features of an ideal public integrity and prevention of corruption system

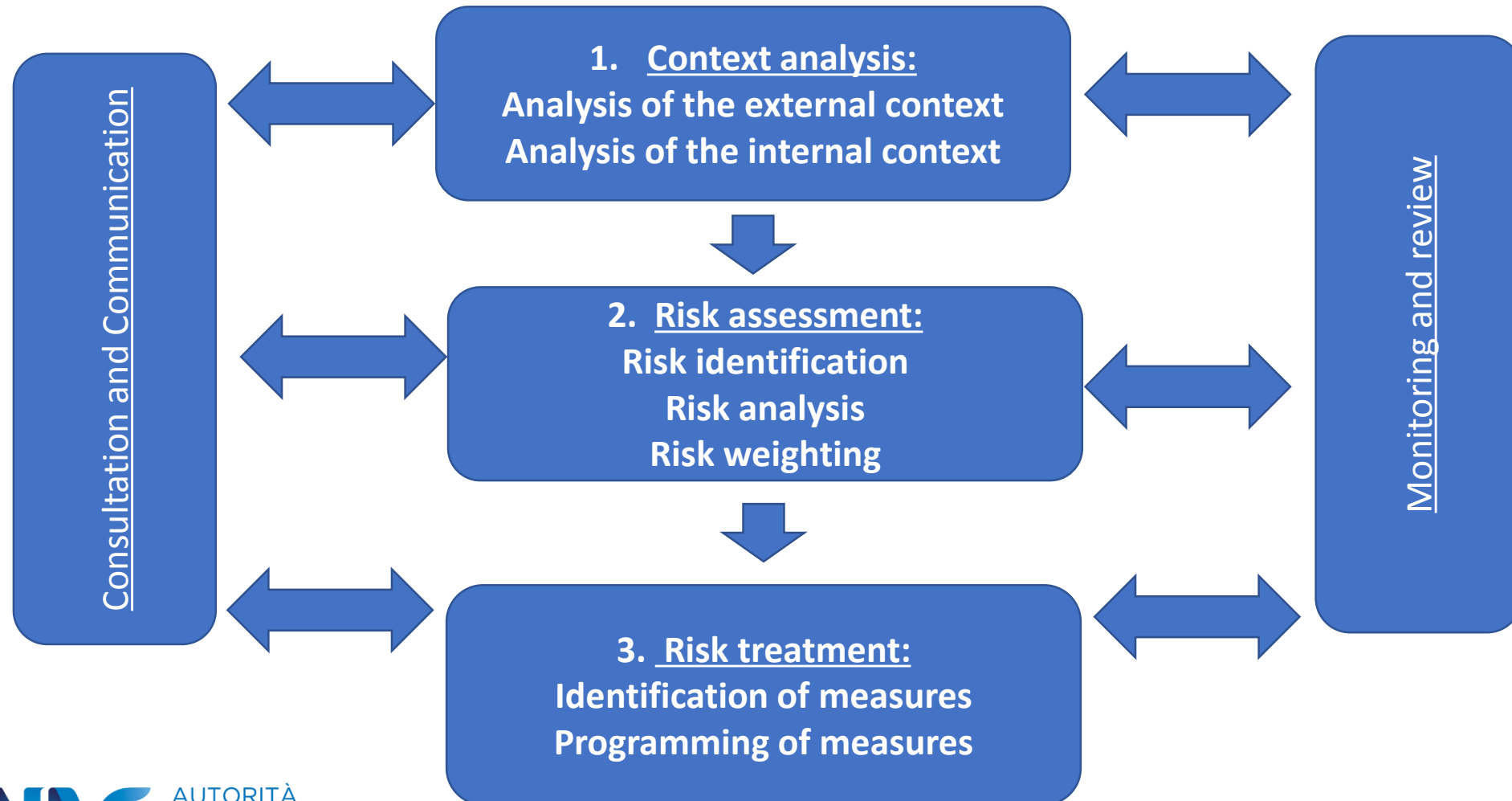
1. Strong and independent anti-corruption bodies as pivot of the system and of institutional synergies
2. Central role of transparency and mix of pro-active and re-active policies
3. National anti-corruption plan/strategy mirrored into integrity plan within each public administration
4. **Corruption risk analysis and management within each public administration**
5. Code of conduct and ethics provisions
6. Lobbying and conflict of interest rules to avoid any form of interference between politics, private interests and administration and to foster impartiality
7. Protection of the employee who reports abuse (whistleblowing)
8. Efforts to better measure corruption and to identify risk indicators, red flags and early warnings
9. Training and initiatives in the field of public ethic and integrity and the spread of a culture of integrity
10. Promotion of citizens and stakeholders participation



# Starting point: a shared and widely used methodology for corruption risk assessment and management

Sequential and cyclical process that favors continuous improvement

## Phases



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# What evaluating in general terms regarding the system of corruption risk assessment at local level

As you are not going to perform a corruption risk assessment (CRA) but to evaluate the existence, the functioning and effectiveness of the system in different countries and local contexts, it is suggested to focus, inter alia, on the following aspects.

- Existence of the system at **local level**, mirroring the indication of National Anticorruption Plan/Strategy.
- Level of application of the CRA - specific typology of institutions or **each individual public administration** or **all organizations managing public resources** - and oversight bodies and procedures at upper/central level.
- Adoption of approaches/methodologies/tools to perform the CRA taking into account **international standards and recommendations** (ISO, CoE-GRECO, UNODC-UNDP, OECD, ...).
- Beyond mere compliance **how policies and formal provisions are translated into practice**.
- Involvement and **participation of stakeholders** in the CRA phases, not only ex-post.



# Check the contents of the CRA in particular and in practice



- ✓ Mapping of transversal and specific areas
- ✓ Processes correctly identified
- ✓ Comprehensive but non-redundant risk catalog
- ✓ Risk assessment (qualitative or quantitative) performed objectively
- ✓ Measures to mitigate the risks: Clear, Transparent, Measurable, Shared, Compatible with human, financial and technical resources
- ✓ Indicators and targets well designed



# Check on which areas/sectors, and how, the CRA is applied



✓ Potentially common and transversal areas/sectors for all types of organizations:

- Procurement
- Recruitment
- Authorizations/concessions issued to stakeholders
- Grants and any form of public funds/resources allocation



✓ Additional areas/sectors taking into account the specific typology of the public organization at local level:

- Municipalities - e.g. local public services, urban planning, ...
- Hospitals/health organizations - e.g. waiting lists, private activity within public organization, ...
- Public education system organizations - access criteria, evaluation commissions, examination tests, ...
- ...



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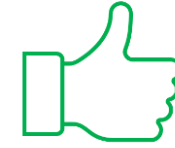
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# Risks .... of corruption risk assessment at local level



- ✓ Corruption risk analysis only “de jure”
- ✓ Integrity/anti-corruption plans/risk mapping that contain measures and lists of mere statements of principle
- ✓ Bureaucratic implementation of legislative provisions and prevalence of the culture of compliance
- ✓ Too many risks and mitigation measures: “bulimia of information and anorexia of knowledge”



- ✓ Corruption risk management “de facto”
- ✓ Risk mapping and related mitigation measures/activities easily understandable and objectively measurable
- ✓ Risk assessment process part of organizational culture and of staff skills to perform CRA from a substantial point of view
- ✓ Analyzes that go “straight to the point” to address and mitigate the most significant corruption risks

