Monitoring anticorruption policy implementation (MACPI)
Identification of two types of gaps in anticorruption policies/measures:

- Implementation gap
- Policy design gap
Levels and content of anticorruption policies

Macro level policies
- Principles of governance

National policies
- Standards (protocols) for the operation of the administration

Policies/measures at public organization level
- General and specific rules for operation in concrete situations

Assessed by MACPI
Assumptions

- Anticorruption policies at macro level are related to political choice (elections)

- National policies can be implemented only if adequately translated into policies/measures at the level of public organisations

- At the public organization level anticorruption policies/measures would be effective if they:
  - Address real risks and vulnerabilities (adequacy)
  - Have rational/optimal design (implementability)
  - Induce both formal and real compliance (implementation)
  - Reduce corruption pressure
MACPI anticorruption policy assessment indicators

Assessment of activities
(1) Corruption interest

- Reflects the theoretical possibility (sense) of corruption transactions of different types associated with specific activities of the public organisation

- Helps identify corruption vulnerability zones
Assessment of corruption vulnerability (risk)

**Corruption vulnerability zones in public organisations**
(activities by types of corruption) and **anticorruption policies**

<table>
<thead>
<tr>
<th>Public organisation activities</th>
<th>Types of corruption</th>
<th>Abuse of power</th>
<th>Abuse of property</th>
<th>Nepotism</th>
<th>Clientelism</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recruitment</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Promotion</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Procurement</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Activities specific for the organisation

**Corruption vulnerability zones**

**Anticorruption policies**
(2) Corruption pressure and involvement in corruption

(results at national and public organization level)
Direct measurement of cases of corruption pressure and involvement in corruption (general population, Bulgaria)

% of the population 18+, who have extended an informal payment or have been asked to make an informal payment (money, gift favour)

- **Involvement in corruption**
  - 1999: 28.7%
  - 2000: 23.4%
  - 2001: 17.4%
  - 2002: 29.3%
  - 2003: 29.3%
  - 2004: 22.6%
  - 2005: 27.5%
  - 2006: 22.1%
  - 2007: 16.4%
  - 2008: 25.2%
  - 2009: 14.8%
  - 2010: 20.3%
  - 2011: 16.5%
  - 2012: 21.4%
  - 2013: 18.3%
  - 2014: 14.5%
  - 2015: 21.0%

- **Corruption pressure**
  - 1999: 34.2%
  - 2000: 31.0%
  - 2001: 27.5%
  - 2002: 22.8%
  - 2003: 21.5%
  - 2004: 16.4%
  - 2005: 22.1%
  - 2006: 16.5%
  - 2007: 25.2%
  - 2008: 14.8%
  - 2009: 20.3%
  - 2010: 16.5%
  - 2011: 21.4%
  - 2012: 18.3%
  - 2013: 14.5%
  - 2014: 21.0%
  - 2015: 27.7%

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## General and specific indicators for assessment of activities

<table>
<thead>
<tr>
<th>General indicators</th>
<th>Specific indicators</th>
<th>Content/interpretation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corruption interest</td>
<td>Existence of interest for basic types of corruption transactions</td>
<td>Reflects the principle interest and practical feasibility/sense of select types of corruption transactions, given the situation in the country and the organisation.</td>
</tr>
<tr>
<td>Corruption pressure</td>
<td>Evasion of regulations</td>
<td>Share of officials who gave above average score on how many individuals/companies (clients) try to circumvent the rules in this activity.</td>
</tr>
<tr>
<td></td>
<td>Outside pressure associated with activity</td>
<td>Share of those who answered that there is some level of outside corruption pressure in this activity.</td>
</tr>
<tr>
<td></td>
<td>Susceptibility to pressure from above</td>
<td>Share of officials who consider it likely that employees would perform illegitimate activities if ordered by a superior.</td>
</tr>
<tr>
<td></td>
<td>Susceptibility to pressure from outside</td>
<td>Share of officials who consider it likely that employees would accept or ask for a bribe associated with activity.</td>
</tr>
</tbody>
</table>
## Corruption vulnerability of activities (Border Police, Bulgaria)

<table>
<thead>
<tr>
<th>Activities</th>
<th>Corruption interest</th>
<th>Corruption pressure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Theoretical possibility of corruption (0 - 100%)</td>
<td>Evasion of regulations (0 - 100%)</td>
</tr>
<tr>
<td>Administrative and punitive</td>
<td>75</td>
<td>33,3</td>
</tr>
<tr>
<td>Public procurement</td>
<td>75</td>
<td>30</td>
</tr>
</tbody>
</table>
MACPI indicators for assessment of anticorruption policies/ measures
MACPI assessment of anticorruption policies (Border police, Bulgaria)

<table>
<thead>
<tr>
<th>Policies/ measures</th>
<th>Implementability</th>
<th>Implementation</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Ease of</td>
<td>Formal</td>
<td></td>
</tr>
<tr>
<td></td>
<td>implementation (%)</td>
<td>compliance (%)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Difficult to evade (%)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Awareness (%)</td>
<td>Strick implementation (%)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Strict control (%)</td>
<td>Strict application of sanctions (%)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Estimated potential effectiveness (%)</td>
<td>Estimated actual effectiveness (%)</td>
<td></td>
</tr>
<tr>
<td>Declarations of assets and incomes</td>
<td>95,1</td>
<td>71,3</td>
<td>93,9</td>
</tr>
<tr>
<td>Control by direct supervisors of the declarations of their subordinates</td>
<td>93,6</td>
<td>72,9</td>
<td>91,2</td>
</tr>
</tbody>
</table>

...
# Summary: MACPI indicators for assessment of anticorruption policies/ measures

<table>
<thead>
<tr>
<th>General indicators</th>
<th>Specific indicators</th>
<th>Content /interpretation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implementability</td>
<td>Ease of implementation</td>
<td>Share of officials evaluating the policy as “very/rather easy to implement.”</td>
</tr>
<tr>
<td></td>
<td>Difficult to evade</td>
<td>Share of officials considering the policy difficult to evade.</td>
</tr>
<tr>
<td>implementation</td>
<td>Awareness</td>
<td>Share of officials who agree that the policy is well-known to the employees whom it concerns.</td>
</tr>
<tr>
<td></td>
<td>Strict implementation</td>
<td>Share of officials who agree that policy is strictly applied.</td>
</tr>
<tr>
<td></td>
<td>Strict control</td>
<td>Share of officials who think that control is strictly applied.</td>
</tr>
<tr>
<td></td>
<td>Strict application of sanctions</td>
<td>Share of officials who think that sanctions are always applied in cases of violation of the policy.</td>
</tr>
<tr>
<td>Estimated effectiveness</td>
<td>Estimated potential effectiveness</td>
<td>Share of officials who think that the implementation of this policy “could reduce cases of corruption.”</td>
</tr>
<tr>
<td></td>
<td>Estimated actual effectiveness</td>
<td>Share of officials who think that this policy “reduces corruption risk.”</td>
</tr>
</tbody>
</table>
MACPI architecture
Qualitative diagnostics

Quantitative diagnostics

Policy analysis
## MACPI indicators and methods

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Desk research</th>
<th>In-depth interview</th>
<th>MACPI online</th>
<th>MACPI general population/stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corruption interest</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Corruption pressure</td>
<td></td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Involvement in corruption</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Corruption attitudes</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Corruption reputation of sectors/officials</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Implementability of AC policies</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Implementation of AC policies</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Estimated effectiveness of AC policies</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
MACPI implementation cycle

1. MACPI diagnostic scan
2. MACPI benchmarking scan
3. Anticorruption policy analysis
4. Design and implementation of new/adjusted policies
MACPI pilot test implementation results
Corruption pressure trend in time (requires repeated MACPI assessments)

Corruption pressure for the different activities in Institution X

NEW anticorruption policies

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Corruption pressure trend in time (What we currently have)
MACPI: **other possible** usage

- Comparisons of the current AC policies’ scores with the ideal values
- Comparisons of the corruption vulnerability for the different activities of the organization
- Comparisons between the existing AC policies’ scores (and their components – Implementability, Implementation, Effectiveness)
- Comparisons between similar institutions’ AC policy setups
- Comparisons between different groups – employees with and without management functions, external experts, etc.
- Assessment of possible systematic deviations, e.g. institutional patriotism (positive response bias)
Bulgarian Border Police
MACPI implementation phases

Phase 1:
- List of activities
- List of AC policies

Phase 2:
- Survey among employees
General information about pilot tests with MACPI in the Bulgarian Border Police

- First stage – several interviews with experts from Border Police; compilation of a list of the activities of Border police and a list of the anti-corruption policies
- Second stage – anonymous online survey among employees of Border Police; random sample; 506 cases
- 109 employees with management functions (10 of whom are “head of department or higher management staff”); 385 employees without management functions
Assessment of the corruption vulnerability of the activities:

COMPARISON BETWEEN ACTIVITIES; COMPARISON WITH THE IDEAL VALUES

BULGARIAN BORDER POLICE
Corruption vulnerability of activities
Border Police Bulgaria, pilot MACPI assessment

<table>
<thead>
<tr>
<th>Activities</th>
<th>Corruption interest</th>
<th>Corruption pressure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Types of corruption possible (0 - 100%)</td>
<td>Evasion of regulations (0 - 100%)</td>
</tr>
<tr>
<td>Border Police Bulgaria</td>
<td>75</td>
<td>33</td>
</tr>
<tr>
<td>Administrative and punitive</td>
<td>75</td>
<td>33</td>
</tr>
<tr>
<td>Border checkpoints</td>
<td>50</td>
<td>21</td>
</tr>
<tr>
<td>Green border security</td>
<td>75</td>
<td>27</td>
</tr>
<tr>
<td>Human resources</td>
<td>75</td>
<td>13</td>
</tr>
<tr>
<td>Information activities</td>
<td>25</td>
<td>25</td>
</tr>
<tr>
<td>Preventive investigation</td>
<td>50</td>
<td>27</td>
</tr>
<tr>
<td>Public procurement</td>
<td>75</td>
<td>30</td>
</tr>
</tbody>
</table>
Corruption vulnerability

Average corruption pressure for the different activities

- Public procurement: 33%
- Administrative and punitive: 32%
- Preventive investigation: 26%
- Information activities: 23%
- Border checkpoints: 21%
- Green border security: 20%
- Human resources: 16%

Ideal zone
Corruption vulnerability:
Average corruption pressure and coverage with specific and general anticorruption policies (ACP)

<table>
<thead>
<tr>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Human resources</td>
<td>16%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Public procurement</td>
<td>33%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Preventive investigation</td>
<td>26%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Green border security</td>
<td>20%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Information activities</td>
<td>23%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Border checkpoints</td>
<td>21%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
<tr>
<td>Administrative and punitive</td>
<td>32%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
</tr>
</tbody>
</table>

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Assessment of the implementation of anticorruption policies

COMPARISON BETWEEN AC POLICIES; COMPARISON WITH THE IDEAL VALUES

BULGARIAN BORDER POLICE
Assessment of AC policies

Immediate reactions to each signal for corrupt behaviour
- Implementability: 86%
- Implementation (Formal compliance): 90%
- Implementation (Real compliance): 63%
- Effectiveness: 91%

Unannounced visits
- Implementability: 85%
- Implementation (Formal compliance): 89%
- Implementation (Real compliance): 52%
- Effectiveness: 88%

Information campaigns among the citizens
- Implementability: 83%
- Implementation (Formal compliance): 86%
- Implementation (Real compliance): 48%
- Effectiveness: 88%

Anticorruption training of personnel
- Implementability: 79%
- Implementation (Formal compliance): 85%
- Implementation (Real compliance): 49%
- Effectiveness: 88%

Information campaigns among staff
- Implementability: 82%
- Implementation (Formal compliance): 86%
- Implementation (Real compliance): 47%
- Effectiveness: 84%

Rotation
- Implementability: 78%
- Implementation (Formal compliance): 91%
- Implementation (Real compliance): 52%
- Effectiveness: 82%

Declarations of assets and incomes
- Implementability: 83%
- Implementation (Formal compliance): 93%
- Implementation (Real compliance): 61%
- Effectiveness: 70%

Measures for inspection and testing of job applicants
- Implementability: 77%
- Implementation (Formal compliance): 84%
- Implementation (Real compliance): 45%
- Effectiveness: 88%

Interviews with passengers and illegal immigrants
- Implementability: 75%
- Implementation (Formal compliance): 87%
- Implementation (Real compliance): 50%
- Effectiveness: 85%

Direct superiors have to read and sign asset declarations
- Implementability: 83%
- Implementation (Formal compliance): 90%
- Implementation (Real compliance): 56%
- Effectiveness: 71%

Issuance of additional orders and instructions
- Implementability: 70%
- Implementation (Formal compliance): 83%
- Implementation (Real compliance): 49%
- Effectiveness: 80%
Assessment of AC policies in Border Police Results and conclusions

Results:

- Control and sanctions have relatively low scores for all policies
- Asset declarations are the most implementable and most strictly implemented AC policy but at the same time – the least effective

General Conclusions:

- Asset declarations could become more effective (improve scope and control)
- A more detailed analysis by the organisation experts is needed
Comparison between Bulgarian Border Police and other public organizations
MACPI AC policy assessments in Bulgarian and Italian public organizations

Implementability of AC policies

- Slatina Municipality, Bulgaria
- Border Police, Bulgaria
- Municipality of Riva del Garda, Italy
- Health Service of Trento, Italy
MACPI AC policy assessments in Bulgarian and Italian public organizations

Implementation of AC policies

Slatina Municipality, Bulgaria
Border Police, Bulgaria
Municipality of Riva del Garda, Italy
Health Service of Trento, Italy
MACPI AC policy assessments in Bulgarian and Italian public organizations

Estimated effectiveness of AC policies

- Slatina Municipality, Bulgaria
- Border Police, Bulgaria
- Municipality of Riva del Garda, Italy
- Health Service of Trento, Italy
MACPI AC policy assessments in Bulgarian and Italian public organizations

Corruption Pressure for different activities

% employees who have been offered a bribe in the previous year
Thank you