



**COMMISSION FOR
THE PREVENTION OF
CORRUPTION**

 REPUBLIC OF SLOVENIA

THE INTEGRITY PLAN

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INTEGRITY PLAN

- is a tool for establishing and verifying the integrity of the organization;
- is a documented process for assessing the level of vulnerability of an organisation, its exposure to unethical and corruption practices;
- is devoted to:
 - identifying relevant corruption risks in different working fields of an individual organization;
 - assessment, what kind of danger the corruption risks may pose to an individual organization;
 - determining measures to reduce or eliminate corruption risks.

INTEGRITY PLAN

- With the integrity plan we systematically and comprehensively implement national and international standards, principles and objectives in the prevention of corruption.
- We are trying to determine an exposure of different institutions, their organizational conditions, processes and employees to corruption and other illegal and unethical behaviour.
- By identifying risks, planning and implementation of adequate measures we strengthen integrity and anti-corruption culture in a public sector.
- With the integrity plan we eliminate causes of corruption, what strengthens the rule of law and people's confidence in the institutions.

INTEGRITY AND PREVENTION OF CORRUPTION ACT (ZIntPK-B)

Art. 47: The integrity plan shall consist, in particular, of:

- assessment of corruption exposure of the institution;
- personal names and work posts of the persons responsible for the integrity plan;
- a description of organisational conditions, staff and typical work processes including a corruption risk exposure;
- assessment and proposed improvements regarding:
 - the quality of regulations, management, administration, etc.;
 - the integrity of staff and institution;
 - transparency and efficiency of processes and
 - measures for timely detection, prevention and elimination of corruption risks.
- other parts of the plan defined in the guidelines referred to in Article 50 of this Act.

INTEGRITY AND PREVENTION OF CORRUPTION ACT (ZIntPK-B)

- Art. 47: The institutions with obligations under the law to develop and adopt integrity plans and inform the Commission for the prevention of corruption thereof are: government bodies, local authorities, public agencies, public institutes, commercial public institutions and public funds.
- Under certain conditions (clearly defined in a second paragraph of Art. 47) the Commission can order to the legal persons other than those mentioned to develop and implement the integrity plan together with the Commission.
- The Commission provided trainings for the persons responsible for the integrity plan (Art. 47).
- The Commission drafted and published on its website the guidelines for developing integrity plans (Art. 50).

THE SLOVENIAN MODEL

- The Slovenian model of integrity plan has been developed on the basis of a compulsory inclusion into and application of international conventions, standards and principles for corruption prevention into national law doctrine.
- Victorian Managed Insurance Authority (VMIA), the manual »Risk Management, Developing & Implementing a Risk Management Framework«.
- Australian/New Zealand Standard: Risk management-Principles and guidelines (AZ/NZS ISO 31000:2009).

THE SLOVENIAN MODEL

- ISO 31000 was published in 2009 as an internationally agreed standard for the implementation of risk management principles.
- A methodology used by Slovenian government auditors for controlling financial risks.
- INTOSTAI and COSO
- Balanced Scorecard (BSC)

THE SLOVENIAN MODEL

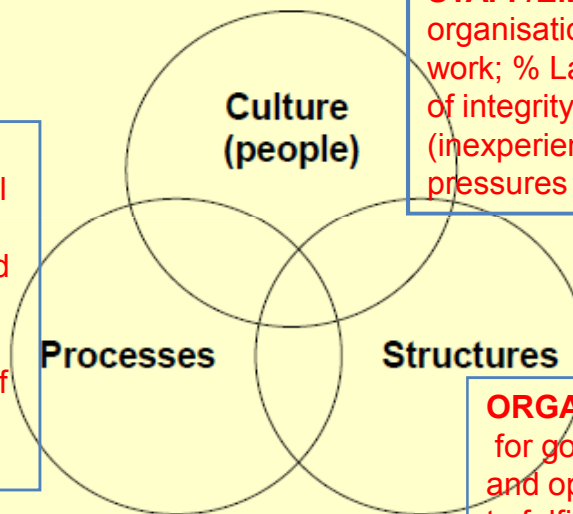
A risk management framework is defined by the Australian Standard as:

Set of components that provide the foundations and organisational arrangements for designing, implementing, monitoring, reviewing and continually improving risk management throughout the organisation.

THE SLOVENIAN MODEL

The "Soft" and "Hard" aspects of risk management

PROCESSES: According to the methodology of the Slovene model of IP the focus is only on those processes which could be exposed to corruption;
 % violations (legal principles and specific provisions), % violations of ethical rules (unfair treatment), % illegal, unethical lobbying.



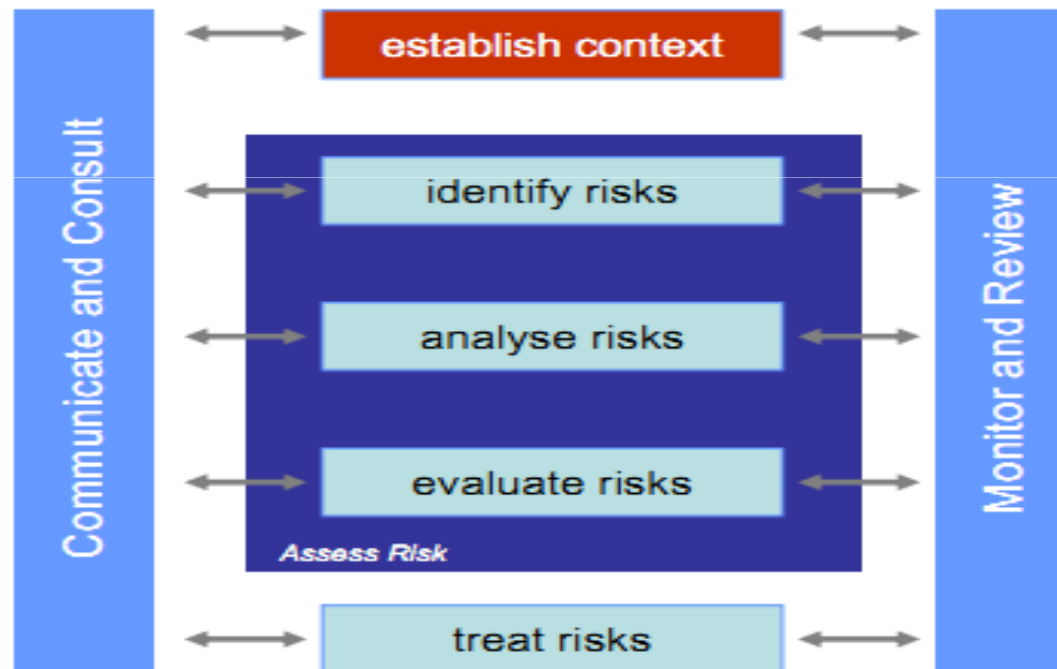
STAFF/EMPLOYEES: who give life to the organisation by fulfilling its goals through their work; % Lack of knowledge (ignorance), % Lack of integrity (immorality), % Lack of practical skills (inexperience), % abuse of power and other pressures in the work environment .

ORGANISATIONAL CONDITIONS: rules and policies for good governance, management, decision-making and operational guidance – enabling the organisation to fulfil its tasks; % Of bad legislation, % Of poor strategic and operational guidelines (policy) ,% Lobbying abuses ("dark field")

Risk Management: Coordinated activities to direct and control an organisation with regard to risk. (AS/NZS 31000:2009)

THE SLOVENIAN MODEL

The key elements of the risk management standard are:



Source: Victorian Managed Insurance Authority (VMIA), Risk Management by Stephen Owen (March 2010)

Communicate and consult

Identify risks

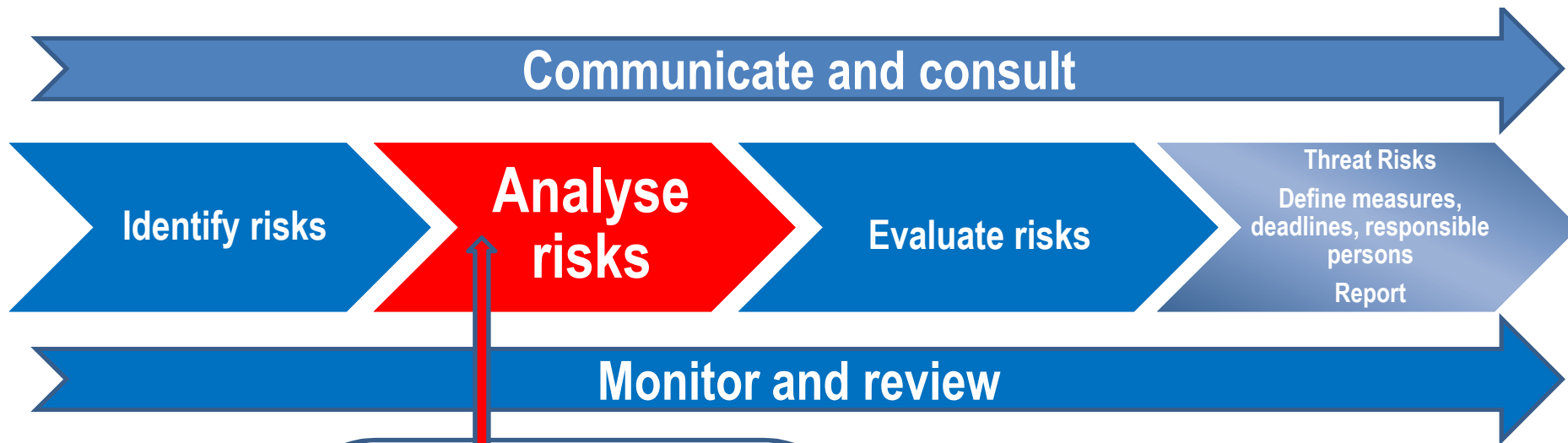
Analyse risks

Evaluate risks

Threat Risks
Define measures,
deadlines, responsible
persons
Report

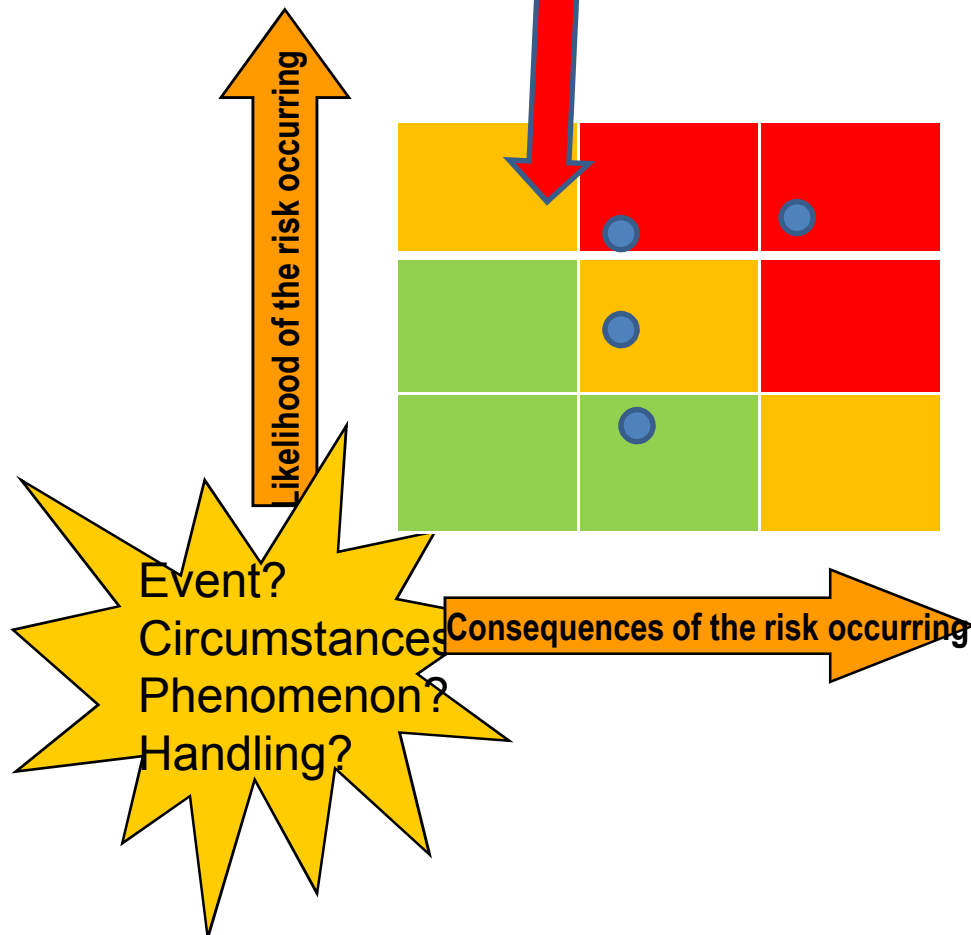
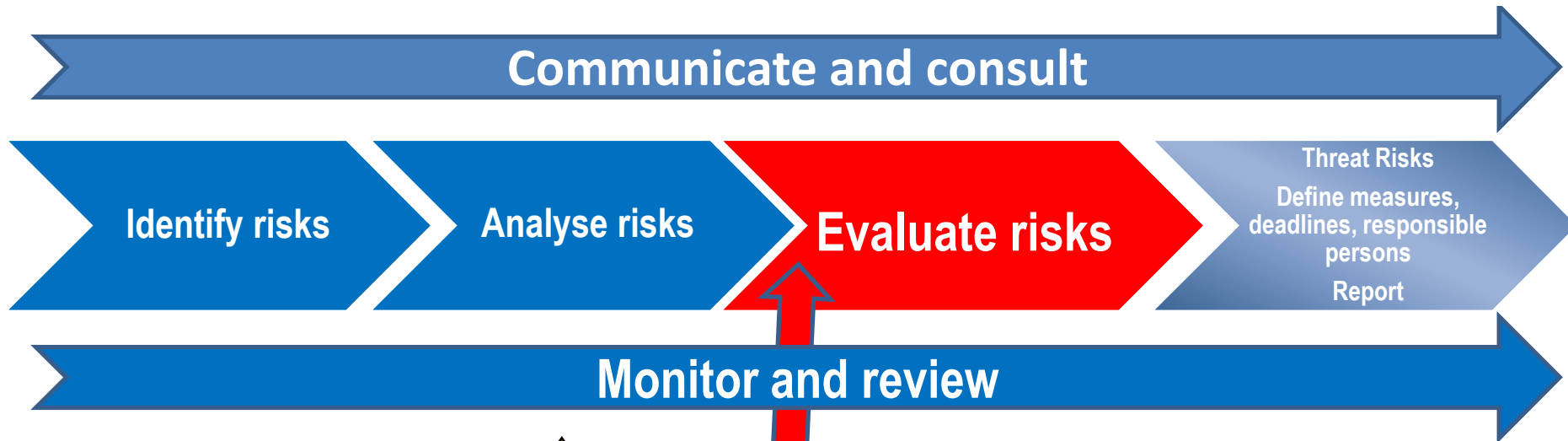
Monitor and review

Identify
WHERE, WHEN, WHY,
AND HOW
events could prevent,
degrade, delay, or
enhance the achievement
of organisational
objectives



Compare with existing control and measures in the institution and analyse which of the risk measures are appropriate, sufficient and more importantly: effective.

Assess whether these measures are appropriate depending on the degree of likelihood and consequence that may arise.



HEAT MAP – RISK EVALUATION

the likelihood of an event occurring	Major	Minor	Moderate	Major	MAJOR
	moderate	Minor	Moderate	Moderate	Major
	Minor	Minor	Minor	Moderate	Moderate
	nil	NIL	Minor	Minor	Minor
		<i>nil</i>	<i>minor</i>	<i>moderate</i>	<i>major</i>
		impact if the event crystallises			

Heat map is used for overall risk evaluation and not for assessing risk of individual risk factors. Assessment of risk level is performed based on a heat map by analysing the likelihood of an event occurring and its impact if the event crystallises.

Likelihood of the risk occurring is assessed using a heat map with 4 possible scores:

Nil – possibility of a risk factor occurring does not exist (risk factor is not identified/applicable);

Minor – risk factor has never occurred before, or it has occurred only once years ago;

Moderate – risk factor could occur in the next five years and it could repeat several times;

Major – risk factor will occur in the next five years and will repeat several times.

HEAT MAP – RISK EVALUATION

the likelihood of an event occurring	<i>Major</i>	Minor	Moderate	Major	MAJOR
	<i>moderate</i>	Minor	Moderate	Moderate	Major
	<i>Minor</i>	Minor	Minor	Moderate	Moderate
	<i>nil</i>	NIL	Minor	Minor	Minor
		<i>nil</i>	<i>minor</i>	<i>moderate</i>	<i>major</i>

impact if the event crystallises

Heat map is used for overall risk evaluation and not for assessing risk of individual risk factors. Assessment of risk level is performed based on a heat map by analysing the likelihood of an event occurring and its impact if the event crystallises.

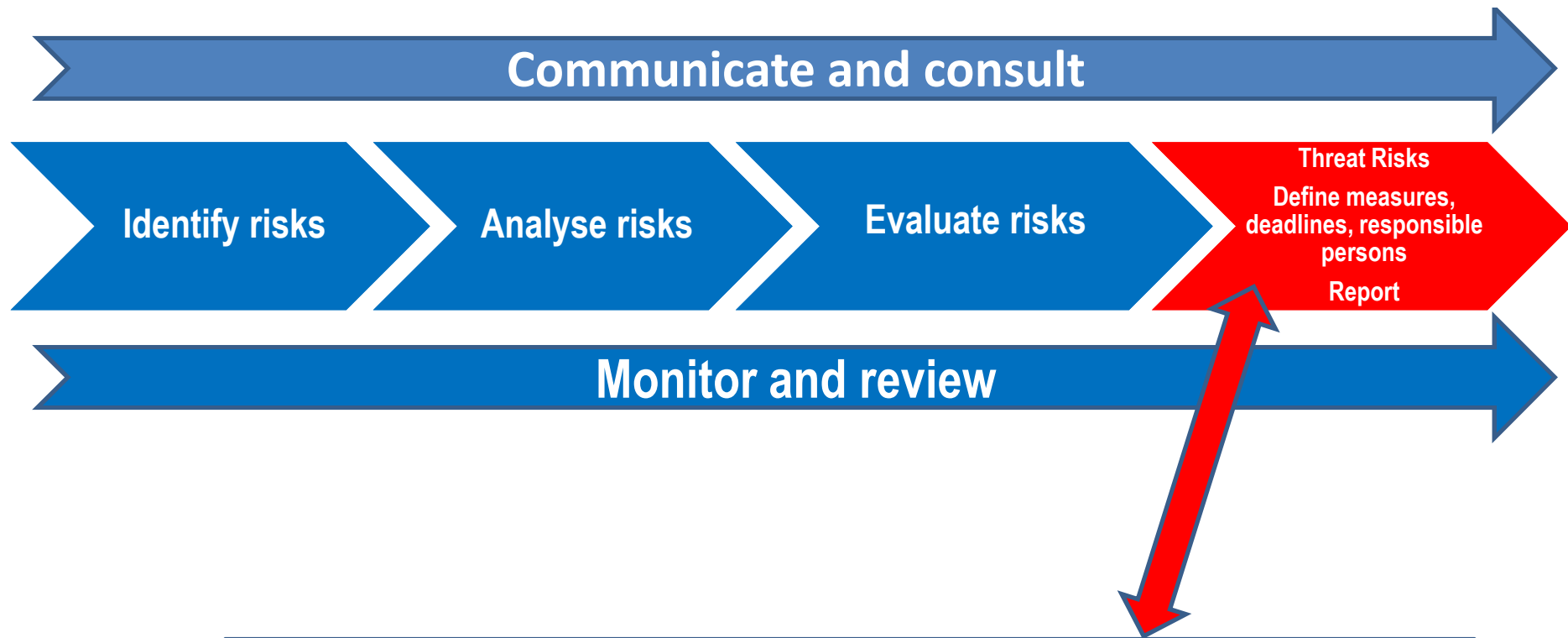
Consequences of the risk occurring identified are assessed using a heat map with 4 possible scores:

Nil – consequence does not exist (consequence is not identified/applicable);

Minor – there are practically no consequences, only minor regulations are necessary to eliminate risk factor

Moderate – consequences are somewhat significant for the organisation as problematic activities have to be reorganised and damage has to be treated;

Major - consequences are significant, core activities have to be reorganised, significant funds are necessary to treat damage.



Based on assessed risk level: risk treatment and control activities are developed, which have to bear in mind available resources.

All risks that exceed acceptable levels and can as such impede or prevent the achievement of the objectives of the institutions are inserted into the final register of risks.

For effective implementation of risk treatment and control activities ownership and deadlines have to be assigned to responsible persons.

GUIDELINES FOR INTEGRITY PLANS

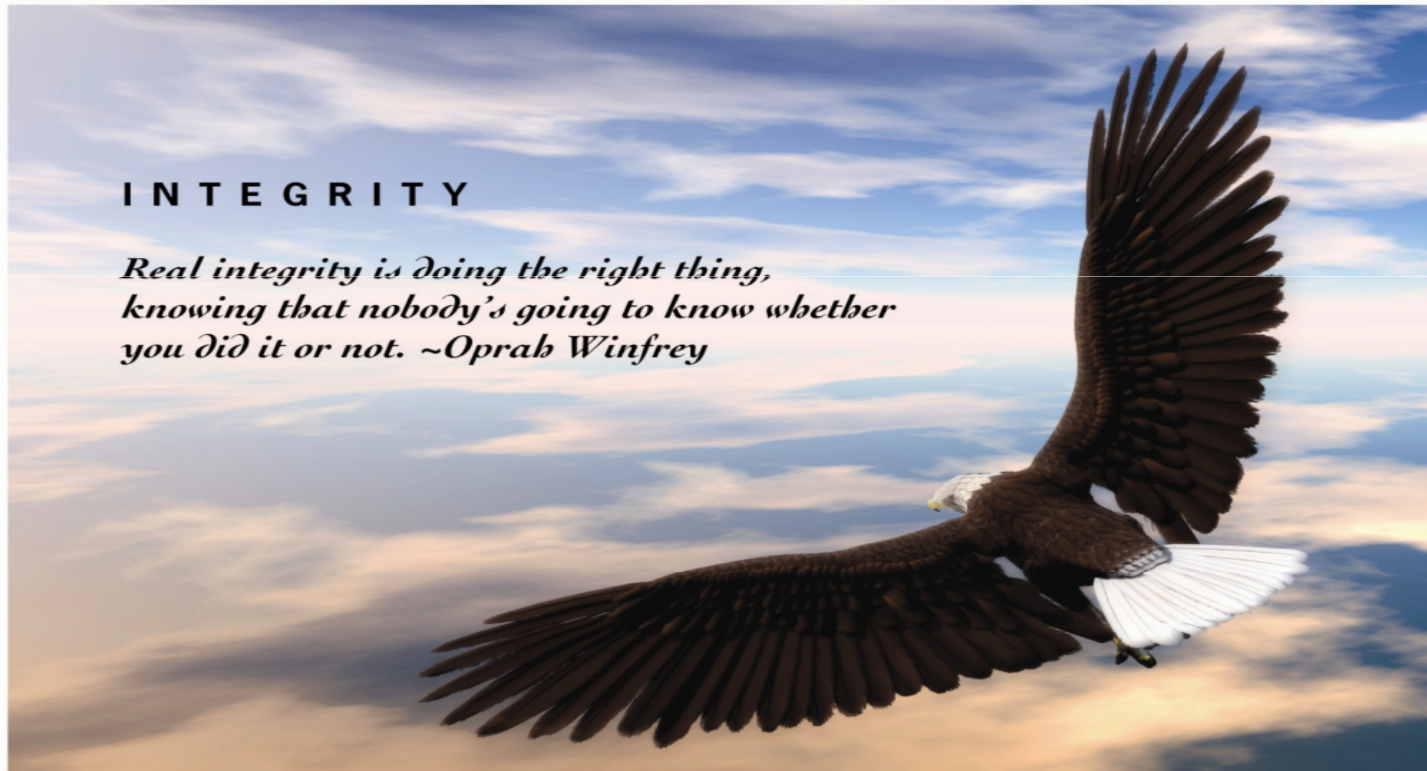
FIELDS or RISK SOURCES	GENERAL CONTENT		SPECIFIC CONTENT		
	ZIntPK GOALS: •STRENGTHENING INTEGRITY and TRANSPARENCY •PREVENTION OF CORRUPTION • PREVENTION and CONFLICT OF INTEREST MANAGEMENT	MEASURES DEFINED IN ZIntPK for ACHIEVING ZIntPK GOALS	PRE-SET RISKS AS DEFINED ON THE BASIS OF CPC OPINIONS or INDIVIDUAL CASES	SETTING ADDITIONAL RISKS BY THE BENEFICIARIES	M E A S U R E S
ORGANISATIONAL CONDITIONS	Rules and policies for good governance, management, decision-making and operational guidance – enabling the organisation to fulfil its tasks				
STAFF	“Give life” to the organisation by fulfilling its goals through their work				
PROCESSES	Performing under pre-set conditions and in line with standards as defined by rules and policies (organisational conditions) in order to achieve goals				

IMPLEMENTATION

How did the process of developing of the integrity plan model start?

- We invited all persons/institutions (obliged by the law to develop the IP) to participate in the making of a model.
- After reaching the consensus with institutions on a model the model was presented to the institutions (obliged by the law to develop the IP) at the high level conference.
- Educations and trainings for the persons responsible for the integrity plan.
- Open Days, “a hot phone”, communicating with the public.
- Permanent professional assistance to persons/institutions (obliged by the law to develop the IP), inspection, etc.
- Analysis and Evaluation.

Thank you for your attention.





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