



United Nations Office on Drugs and Crime

Austrian
Development
Cooperation

Corruption Risk Assessment (CRA) Monitoring and Evaluation Methodology

REGIONAL ANTI-CORRUPTION INITIATIVE

2023

Publisher

Regional Anti-corruption Initiative

Editor

Aneta Arnaudovska, RAI Senior Anti-corruption Advisor

Author

Radu Nicolae, Anti-corruption Expert, PhD

Design and print

UrbanGRAF, Sarajevo

© Regional Anti-corruption Initiative, 2023

All rights reserved. Any unauthorised reprint or use of this material is prohibited.

The views expressed in this publication are solely those of the author and do not necessarily reflect the views of the Regional Anti-corruption Initiative or its member states or the Austrian Development Cooperation (ADC).



TABLE OF CONTENTS

Introduction	6
Abbreviations	8
Definitions	9
1. General remarks on corruption risk assessment	11
2. CRA stages	12
3. Internal and external factors for the success of the CRA management process	14
4. CRA types and common features	16
5. Monitoring and evaluation	18
5.1. CRA monitoring and evaluation: objectives and benefits	19
5.2. Implementation of CRA M&E: strengths and weaknesses	20
5.3. CRA M&E methodology: general overview	20
5.3.1 Indicators and data collection methods	21
5.3.2 Communication, reporting, and follow-up procedure	23
5.3.3 Stakeholders' engagement procedure	23
5.3.4 Skills and competencies	24
5.3.5 Responsibilities of staff and structures involved	24
5.3.6 M&E resources	25
6. Guidelines on M&E of CRA process	26
6.1 Intervention logic	26
6.2 Organisational structure	28
6.3. Key experiences of other countries	29
7. CRA monitoring process	32
7.1 Planning the monitoring process	32
7.2 Data collection	35
7.3 Data analysis	36
7.4 Reporting and communication	36
7.5 Apply findings	37
7.6 Tables of monitoring indicators	37
7.6.1 Framework monitoring indicators	38
7.6.2 Progress monitoring indicators	41
7.6.3 Impact monitoring indicators	48
8. CRA evaluation process	52
8.1 Evaluation planning	53
8.2. Evaluation data collection	54
8.3. Evaluation data analysis	55
8.4. Evaluation reporting and communication	55
8.5. Apply evaluation findings	55
Bibliography	56
Annex 1 CRA Monitoring & Evaluation Methodology	59
Endnotes	72

LIST OF FIGURES

Figure 1 – Corruption risk management process.....	9
Figure 3 CRA M&E process.....	28

LIST OF TABLES

Table 1 Differences between monitoring and evaluation	14
Table 2 Strengths and weaknesses to successful implementation of the CRA M&E in SEE countries	16
Table 3 Advantages and disadvantages of using indicators for CRA	17
Table 4 Quantitative method vs. Qualitative methods: advantages and disadvantages	18
Table 5 CRA: Results chain	22
Table 6 Key deliverables in planning, monitoring and evaluation by structures involved	24
Table 7 Examples of indicators for monitoring mitigation measures.....	29
Table 8 Evaluation methods	50



INTRODUCTION

The Corruption Risk Assessment (hereafter CRA) Monitoring and Evaluation (hereafter M&E) methodology was developed in the framework of the project "Southeastern Europe - Together Against Corruption" (SEE-TAC) implemented by the Regional Anti-corruption Initiative (RAI) and the United Nations Office on Drugs and Crime (UNODC) and funded by the Austrian Development Agency (ADA) with funds of Austrian Development Cooperation. The overall project goal is to contribute to strengthening the resilience of the SEE societies to corruption, harmonized by strengthening the capacity of governments, civil society organisations, the private sector, and the media to prevent and fight corruption. The project builds upon the SEE Regional Programme on Strengthening the Capacity of Anti-Corruption Authorities and Civil Society to Combat Corruption and Contribute to the UNCAC Review Process, implemented in the 2015-2020 period, funded by the Austrian Development Agency (ADA). The SEE-TAC resumes on the previous Programme phase, during which RAI experts developed national corruption risk assessment (CRA) methodologies for Bosnia and Herzegovina (BiH), Montenegro, and North Macedonia.

The methodology aims to provide readers with a better understanding of the monitoring and evaluation process of corruption risk assessment. The methodology improves knowledge of the key instruments for CRA monitoring and evaluation, such as the list of indicators.

The methodology is intended to be used by practitioners in the public sector in the targeted jurisdictions: Albania, Bosnia and Herzegovina, Kosovo*, Moldova, Montenegro, North Macedonia, and Serbia.

The methodology covers CRA planning, monitoring, evaluation, and management processes. It is intended to be used in public sector institutions to develop bespoke CRA M&E frameworks, indicators, and processes. Experts in the public sector are invited to adapt the proposed indicators to their specific needs. Alternatively, the methodology may be used to develop a national CRA M&E framework. Such a framework may act as a standard applied by all public sector organisations generating comparable data and indices. The CRA M&E Methodology has to allow comparisons between organisations, sectors, and even countries. To allow such a degree of comparability, the methodology has to be approved by regulation and provide pre-defined or standardised indicators and benchmarks that require little discretion.

How is this methodology organised? Chapter 1 provides an overview of the corruption risk assessment and risk management processes. Chapter 2 organises the CRA and management processes in eight steps. Chapter 3 identifies the internal and external factors critical to CRA success. Chapter 4 discusses the common features of three different approaches to CRA: integrity plan, sectoral CRA, and targeted (ad hoc). Chapter 5 is a general overview of the CRA M&E methodology. Chapter 6 provides general guidelines on the M&E of the CRA process, and it has to be read before getting into the CRA monitoring and evaluation planning process. Chapter 7 guides the reader through the CRA monitoring process, including comprehensive tables of the framework, progress, and impact indicators. Chapter 8 sets the steps in the CRA evaluation process. Throughout the methodology, examples from countries in Southeast Europe and other jurisdictions are used to illustrate the topics under discussion.

The development of this methodology was supported by valuable input from the Regional Anti-Corruption Secretariat.

The methodology has several important limitations and should be read and used by taking them into consideration. The CRA M&E methodology was developed based on secondary data analysis, desk reviews of frameworks, guides, and manuals developed by international organisations, as well as

¹ This designation is without prejudice to positions on status, and is in line with United Nations Security Council Resolution 1244/1999 and the ICJ Opinion on Kosovo's declaration of independence.

strategies and plans developed by public sector organisations in the targeted countries in Southeast Europe. The main methods used to develop the methodology were descriptive analysis, exploratory analysis, and diagnostic analysis. Although the documentation tried to identify all the relevant publications for this topic, the bibliography is not all-encompassing. There may be relevant studies, best practises, and approaches that were not included in the documentation and therefore are not mentioned. The templates and list of indicators developed are for capacity building purposes and are not legally binding. They have to be adjusted to local circumstances, data availability, legal requirements, and institutional capacity. For example, the proposed M&E framework can be too complex for small public sector organisations. It is recommended to simplify it or take only what is manageable and relevant. The examples and case studies presented reflect the information available in the documentation analysed.



ABBREVIATIONS

ADA	Austrian Development Agency
ADC	Austrian Development Cooperation
BiH	Bosnia and Herzegovina
CRA	Corruption risk assessment
CRM	Corruption risk management
CSO	Civil Society Organisation
LSG	Local self-governments
M&E	Monitoring and evaluation
NAS	National Anti-corruption Strategy
RAI	Regional Anti-corruption Initiative
SEE	South East Europe
SMART	Specific, Measurable, Achievable, Relevant, Timely
SOE	State-Owned Enterprise
TPM	Third-party anti-corruption monitoring
UNODC	United Nations Office on Drugs and Crime

DEFINITIONS

Control measure	An act to modify the risk. Main control measures are: a) removing the risk source (ex. software-based work processes/ IT control instruments/video recording of employees); b) changing the likelihood of the risk (training and information, updates of the existing procedures, new procedures, transparency measures – publishing open data, public hearings; accountability measures – new reporting mechanisms; human resources – regular retesting or rotation of employees); and c) changing the consequences (new procedures for swift cooperation with law enforcement, reporting information to law enforcement about internal corruption allegations).
Control measure review	Reviewing a corruption control measure means updating the design or operation of the measure based on implementation feedback / corruption incident reports. Maybe a measure is not effectively designed or is not feasible in operation.
Corruption incident / case	An official indictment concerning bribery, peddling influence or other corruption-related crimes.
Corruption risk	The possibility of corruption, ethically and professionally unacceptable practises, or other irregularities that threaten the integrity of the institution/sector
Cost-benefit analysis	A written justification for choosing a specific control measure to lower a corruption risk. The justification should address at least the foreseen costs of implementing the control measure and the expected benefits of the control measure.
Data collection instruments	Main types of data collection instruments: 1) questionnaires / surveys; 2) meetings / consultations; 3) interviews; 4) focus-groups; 5) desk reviews of reports / documents; 6) analysis of work processes; 7) other.
Integrity breach ¹	Disrespecting an integrity or ethical norm or a social value protected by legislation, wrongdoing, violation of the Code of Ethics. Breaching these obligations leads to disciplinary sanctions of an administrative nature (reprimand, suspension, fine, or dismissal) or civil sanctions.
Internal availability	The documents are accessible to any staff member via the intranet, or they were communicated to all staff directly by email.
CRA M&E methodology	A document that describes the organisation/programme/project objectives, the specific methods, procedures, or techniques and indicators used to measure CRA progress, the roles and responsibilities of the staff/structures involved in data collection and analysis, and the reporting and dissemination procedures.
M&E process	The systematic activity of data collection, analysis, and consultations to elaborate M&E reports and issue recommendations, according to the M&E methodology.
Public availability	The documents are published on the Internet.
Residual risk	Risk remaining after risk treatment / mitigation
Risk identification	Recognising all possible manifestations of corruption, ethically and professionally unacceptable actions of certain actors in working processes that may occur
Risk level	Combination of the impact and likelihood ranking of the risk
Risk owner	The person or organisational structure with the accountability and authority to manage a risk
Risk treatment / mitigation	Process to modify risk. Main risk mitigation/treatment options are: a) avoidance of risk (deciding not to start or continue with the activity that gives rise to the risk); b) accepting the risk (risk is tolerated to pursue the entity strategy or it is seen as inherent to the activity); c) reducing/controlling the risk; and d) transfer of risk (contracting with another party, e.g., evaluation of grant applications by a third party).



Stakeholder(s) of CRA	A legal or natural person having a legitimate interest regarding a particular corruption risk assessment exercise. Legitimate interest means that the respective person has a legal or institutional mandate to prevent or combat corruption in the respective jurisdiction (ex. anti-corruption bodies, inspection bodies, civil servants' agencies, rule of law CSOs) or is affected by corruption (ex. private companies, citizens). Stakeholders may be internal to the organisation, project, or sector (such as staff) or external (from other organisations, projects, or sectors). Internal stakeholders: employees at any level, including decision-makers, boards, or steering/oversight committees. External stakeholders include civil society representatives, public service beneficiaries/citizens, private sector representatives, and representatives from other government agencies.
--------------------------	--

1. GENERAL REMARKS ON CORRUPTION RISK ASSESSMENT

Anti-corruption work needs to demonstrate quality and impact in curbing corruption. The CRA Impact Assessment methodology aims to provide the anti-corruption bodies in South Eastern Europe (SEE) with **easy-to-use guidelines and indicators** on how to **measure** and **better understand the effectiveness of the CRA** mechanism in curbing corruption. This methodology continues the effort of RAI and its partners to develop an integrated anti-corruption and good governance framework (transparency, accountability, and integrity). As previously mentioned in RAI publications, one of the main challenges of CRA lies in monitoring and evaluating it:

“One of the important issues (or limits) regarding corruption risk assessment lies in the fact that it is very hard to calculate or to estimate its actual effect or success in practise”².

Previous evaluation reports recommended RAI to address this monitoring and evaluation challenge:

*“For CRA, there is little mention of what needs to be done to address and mitigate the risks identified through the CRA mechanism and **how this can be monitored by agencies**. For some, there is the risk of this becoming a box-ticking exercise if monitoring of responses to identified risks is not built into the activities”³.*

The risk-based approach to the prevention of corruption is recognised as a central element in the design and effective implementation of anti-corruption measures⁴. One-size-fits-all anti-corruption programmes are ineffective because scarce resources are spread across different activities, irrespective of the corruption risks involved. A risk-based approach allows anti-corruption programmes to focus on areas prone to corruption. Thus, effective and regular CRAs are a prerequisite for an effective anti-corruption programme. CRA may be conducted in relation to sectors, organisations, programmes, projects, or internal processes. Although CRA exercises⁵ cannot reduce corruption on their own, they have a direct benefit to the overall integrity climate of an organisation in terms of more awareness of corruption risks at the institutional level. Based on CRA exercises, the organisations design and implement tighter corruption control measures to address the identified risk factors (corruption risk management). Effective implementation of these measures determines the improvement of work processes and fewer corruption opportunities. Improved awareness, tighter controls, and fewer opportunities determine less corruption. This change process is not linear, as other factors (context) influence the end results. Also, the aim is not to eliminate corruption risks but to find tolerable levels based on a cost-benefit analysis of the available treatments.

Corruption risks tend to be treated differently than the other types of risks inherent in a project, a process, or an organisation⁶. Such an approach has strengths but also weaknesses. Treating corruption risks differently may reinforce the zero tolerance for corruption policy and signal to the stakeholders the importance of reputation or trust in achieving project, organisational, or service delivery objectives. This comes at a price. Corruption risk assessment and management may become a parallel process to a more general risk management process. Thus, corruption risk assessment and the accompanying corruption risk management may become less integrated into organisational processes and practises, especially in the strategic planning and review process.

Corruption may include, but is not limited to: bribery, trading in influence, embezzlement, misappropriation, or other diversion of property, abuse of functions, illicit enrichment, concealment of property resulting from corruption, conflicts of interests, obstruction of justice, favouritism, gift-giving, nepotism, cronyism, patronage and corruption-related offences such as money laundering and false accounting. The CRA has to take into consideration all possible manifestations of corruption.



2. CRA STAGES

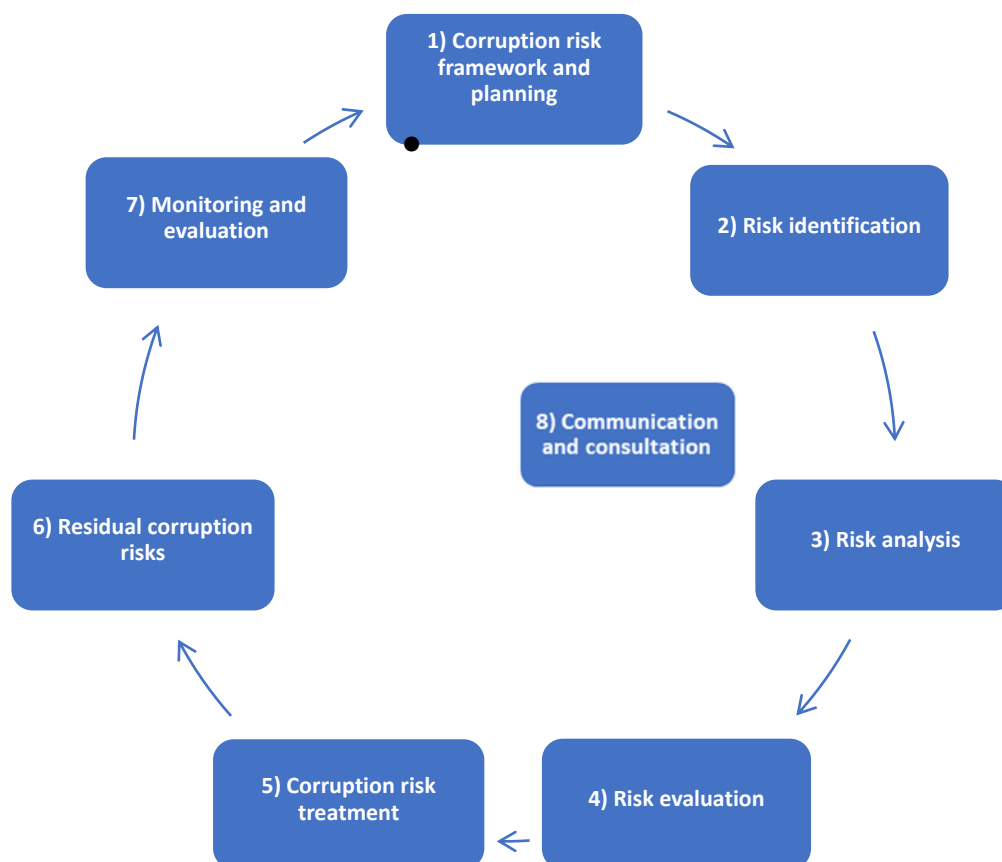
Corruption risk assessment and management methodologies are constantly developed and improved based on international risk assessment standards and research⁷. Although there is no international binding CRA methodology, anti-corruption bodies have different options to choose from⁸. A basic CRA and management process follows several stages⁹:

- 1) **CRA planning** – the process of preparing a corruption risk assessment exercise and the accompanying corruption risk management process in a particular environment: framework development, allocation of resources, establishing responsibilities, approving or updating the calendar and the methodology, and development of M&E methodology. In this step, it is important to integrate CRA into the existing risk management system.
- 2) **Corruption risk identification** – the process of finding, recognising, and describing corruption risks in a particular environment (project, process, organisational, programme, or sectoral level); There are several risk identification tools and techniques that may be used: data collection, desk review, brainstorming, Delphi method, interviewing, SWOT analysis, Root Cause Analysis, Checklist Analysis, Assumption Analysis, etc. In view of the complexity of identifying corruption risks, triangulation methods can provide more accuracy.
- 3) **Corruption risk analysis** – the process of understanding the nature of corruption risks and determining their level (probability x impact).
- 4) **Corruption risks evaluation** - determining whether the risks and/or their magnitude are acceptable or tolerable. The identified corruption risks are evaluated against the entity, sector, or project strategy. The risk profile and risk threshold are discussed at the level of the management board or political leadership. There may be identified circumstances when a higher level of risk is acceptable to pursue strategic objectives, such as an increase in the number of beneficiaries or the speed of procedures. Thus, risk prioritisation is decided, considering risk tolerance, risk threshold, policy priorities, timelines, and available resources. For instance, it may be decided to take a "pick low-hanging fruits" approach, namely addressing corruption risks where visible progress might be made soon at a reasonable cost¹⁰.
- 5) **Corruption risks mitigation stage/risks treatment** – the process of modifying the exposure to corruption risks by identifying and applying control measures based on cost-benefit analysis; this step is about deciding which mitigation or treatment strategy to adopt for each corruption risk based on prioritisation, resources, political, and practical constraints; it is also about the implementation of the mitigation plan. The application of the mitigation measures may introduce secondary risks that have to be considered.
- 6) **Residual corruption risks** – the process of documenting and measuring the remaining corruption risks after the mitigation stage. The residual risks should continue to be monitored, reviewed, and further mitigated if necessary.
- 7) **Monitoring and evaluation** of CRA and management process. Monitoring and evaluation should also be planned in advance, and they consist of regularly checking the progress in implementing all aspects of the process – identification, analysis, evaluation, and treatment,

as well as the impact of CRA exercises. The CRA is not a one-time exercise. It has to be updated regularly so as to reflect changes in priorities, activities, the legal framework, organisational structure, etc.

- 8) **Communication and consultation.** This process should take place during all stages of the risk management process and requires appropriate organisation. The structure or staff responsible for CRA communicates and consults with different internal or external stakeholders, such as employees, civil society, the business sector, and other public entities, about risk identification, risk treatment, M&E reports, etc. For instance, a draft corruption risk matrix / mitigation plan may be disseminated to employees, and their views or comments may be incorporated into the final version. Through internal communication activities, employees understand the CRA process better, and they are more willing to participate in or support the implementation of mitigation measures. Also, internal communication activities (such as meetings, leaflets, and e-mails) bring clarity on roles and responsibilities in conducting CRA and the accompanying corruption risk management process. Good communication of CRA results also ensures the mobilisation of external stakeholders. For instance, civil society organisations may be consulted on the draft CRA M&E report to incorporate their suggestions. Also, approved CRA M&E reports may be disseminated to the public through social media.

Figure 1 – Corruption risk management process





3. INTERNAL AND EXTERNAL FACTORS FOR THE SUCCESS OF THE CRA MANAGEMENT PROCESS

The success (achieving the objectives) of a CRA management process depends not only on internal factors but also on external ones. The most relevant internal factors are:

- The leadership's willingness to provide adequate resources and engage in rigorous corruption risk assessment exercises. CRA exercises may be done to create the appearance of corruption reform (Potemkin village¹¹), but the leadership's intentions are to preserve the corruption status quo and mislead the stakeholders that push for reforms. Leadership is just interested in checking the boxes / formal compliance.
- Employee's and stakeholder's commitment to the CRA exercise. A reform, in general, has supporters (those who benefit from the reform) and opponents (those who benefit from the status quo). CRA is expected to be undermined by those employees or stakeholders who feel threatened and whose corruption benefits are jeopardised. There are also employees who are not interested or convinced to contribute, without having bad intentions. They simply do not believe that the exercises have value, they are interested only in reducing their workload (laziness) and securing their monthly pay checks.
- Organisational culture may encourage or discourage individuals to think in terms of risk management. There may be persistent institutional incentives for individuals to simply discount corruption risks.
- Capacity issues such as limited resources available to CRA (human, financial, and infrastructure), absence of governance expertise, and lack of reliable and accessible data resources. There may be a lack of relevant data/databases to allow and enable the CRA management process and, especially, the CRA M&E stage of the process. The alternatives are to adjust the CRA M&E process to existing data collection and management or adjust data collection and management procedures to meet the CRA M&E needs.
- Poorly designed corruption risk management framework: lack of clearly defined objectives of corruption risk management (CRM), lack of/ or inadequate controls, development of too many or non-verifiable indicators, and ineffective reporting regime or communication.
- The functioning of the general anti-corruption framework or management system in the respective organisation, the lack of compliance procedures, ethics, and conflict of interest rules, especially the whistleblower policy. If whistleblowers are adequately protected and their reports are taken into consideration, the employees will trust the organisational processes more, including CRA.

The most important external factors that can influence the success of a CRA mechanism are:

- Lack of political will to fight corruption—reformist or anti-reform governments.
- Enforcement of corruption offences by the anti-corruption entities (rule of law): track record of enforcement of corruption offences with final convictions and recovery of criminal assets. The sanctions applied for corruption are effective, proportionate, dissuasive, and communicated to the general public.

- The independence of the judiciary and the prosecution service (political interference, selective justice, impunity, especially in cases of prosecution and adjudication of high-level corruption cases). If the anti-corruption enforcement is politically biased, the process will lose legitimacy, and it will demotivate public sector employees to prevent corruption.
- The private sector and the beneficiaries of public services (citizens) may demand anti-corruption reform and involve themselves in collective action¹². Demanding corrupt services signals low trust in government institutions and patronage networks.
- Lack of data collection rules and open data on corruption incidences. Such databases may indicate the most common corruption risks in different sectors.

On the other hand, measuring the existence or absence of corruption is an approximate undertaking, considering the hidden nature of corruption. Corruption may be measured using proxy indicators such as the perception of corruption, experience with corruption, level of transparency and accountability, number of corruption incidents, etc.

Considering these factors, the CRA cannot be reasonably isolated from its internal and external context. CRA exercises may be conducted with professionalism, but the organisations or projects may fail to control corruption because there are not enough synergies between the internal and external factors. Corruption is a social trap, and moving away from a corrupt equilibrium requires a larger and profound reform. Similarly, sustainably curbing corruption in a particular organisation, programme, or sector cannot directly be attributed to the CRA. Ascertaining causality between CRA and reduced corruption is a matter of impact evaluation.

The monitoring and evaluation of CRA exercises and the accompanying corruption risk management have to take into consideration the complex relationships between the different components of an anti-corruption management system or programme.

When it comes to monitoring and evaluation of anti-corruption policies, programmes, projects, and tools, there is also impressive literature and guidance developed by international organisations and researchers. RAI also developed such a methodology to help policymakers further improve the anti-corruption process¹³. In the CRA literature, monitoring and evaluation are seen as integral parts of the CRA process. The joint publication of the Regional Cooperation Council and Regional Anti-corruption Initiative (2015, p. 77) developed a CRA framework methodology that has as the final stage (Phase 5) the development and implementation of a monitoring and follow-up Programme. The United Nations Development Programme (2018, p. 12) highlights that monitoring and review is an essential step in the risk management process and it consists of "the on-going review of the continuous accuracy of the outcomes gained from all previous steps, as well as focuses on the monitoring of the success of mitigation measures". Thus, a specific CRA M&E methodology has to be easily integrated into a general anti-corruption M&E framework, but, at the same time, it has to provide specific guidance and indicators. In this paper, we propose an operational M&E framework for the CRA mechanism.



4. CRA TYPES AND COMMON FEATURES

The Regional Cooperation Council and Regional Anti-corruption Initiative (2015, p. 56) discuss three different CRA types: integrity plan, sectoral CRA, and targeted (ad hoc) CRA. These CRA types are complementary and share three **basic features**: they have the same stages (risk identification, analysis, evaluation, and mitigation); they are not stand-alone exercises and have to be periodically updated and conducted through the engagement of stakeholders. Examples are presented below for each feature.

- **Common feature 1: same stages.** CRA is a process of ongoing identification (understanding risks), analysis (likelihood and impact of specific corrupt risks), and evaluation of risks (tolerability and prioritisation) for planning and implementing adequate corruption control measures (a mitigation strategy). The technical and methodological steps are similar for all three CRA types. The main difference comes from the scope of each type. The integrity plan focuses on corruption vulnerabilities and factors in an individual organisation; sectoral CRA targets a structural weakness in a specific sector, while targeted CRA analyses a specific project or process.

CRA technical steps:

- Integrity plan

Slovenia implements an institutional CRA. Integrity plans “constitute a documented process for assessing levels of vulnerability and exposure to unethical or corrupt practices. All public institutions are obliged to send their integrity plans to the Commission for the Prevention of Corruption, with the primary goal of identifying risks and implementing measures to strengthen integrity”¹⁴. The integrity plan development in Slovenia consists of five stages: preparatory stage, identification of risks, risk analysis, risk evaluation, and addressing risks.

Another similar form of institutional CRA was developed in Romania¹⁵. All central public authorities have to conduct an annual CRA. CRA is used to substantiate and update institutional integrity plans. The CRA stages are: a) the establishment of the CRA Working Group; b) identification and description of corruption risks; c) assessment of corruption risks; d) establishing intervention measures; e) periodic monitoring and review of corruption risks; f) updating the integrity plans. Similar developments are in the Republic of Moldova, Bosnia-Herzegovina, Kosovo*, Montenegro, Serbia, and North Macedonia.

- Sectoral CRA

According to the Conceptual Framework for Corruption Risk Assessment at Sectoral Level developed by UNDP and applied in Tunisia¹⁶, a sectoral corruption risk assessment is divided into five major stages: 1) Identification of Decision Points and Deviated Decisions; 2) Determining the “likelihood” of deviated decisions; 3) Determining the “impact” of deviated decisions; 4) Risk mapping and prioritisation; 5) Propose the necessary reforms and measures to reduce corruption. Sectoral CRA in six different sectors (education, health, etc.) was also developed in Albania¹⁷. The OECD’s Anti-Corruption Network for Eastern Europe and Central Asia documented corruption risks and prevention measures at the sectoral level in education, extractives, and police¹⁸. Dedicated corruption risk assessment manuals and reports for different sectors were developed: water and sanitation sector¹⁹, infrastructure sector²⁰, customs sector²¹. Transparency International (2020) developed a CRA for the mining sector involving three broad steps: 1) mapping the process; 2) assessing the corruption risks (likelihood and impact); and 3) Prioritising the corruption risks for action. North Macedonia developed and implemented in 8 sectors a sectoral Corruption Risk Assessment methodology²² to substantiate the national strategy for prevention of corruption and conflict of interest 2021-2025²³.

- Targeted (ad hoc) CRA

The Global Infrastructure Anti-Corruption Centre, an international not-for-profit organisation, developed a Project Corruption Risk Assessment that is focused on project-level risks²⁴. The World

Bank has developed a detailed corruption prevention and sanction system for the projects it finances²⁵. Corruption risk assessment is conducted by the World Bank when establishing a programme: *“Task Teams are responsible for ensuring high quality-at-entry of the projects they prepare. In addition to focusing on the specific subject matter of the project, it is important to make sure that the risk of fraud and corruption during implementation is minimized”*²⁶. Each loan is substantiated by a project appraisal document (PAD), which includes corruption risk analysis and mitigation measures, if needed. For instance, identified corruption-related risks may be the flow of cash transfers, the weak system of internal controls, the high perception of corruption, and the lack of relevant fraud and corruption provisions in the procurement contracts awarded.

- **Common feature 2: periodic updates.** Irrespective of the type (integrity plan, sectoral CRA, or ad hoc), the CRA is not a one-off undertaking but a continuous process.

- Integrity plan

The Commission for the Prevention of Corruption in Slovenia explains on their website: *“An integrity plan is not a task that you do once and then forget about. An integrity plan is a tool you need to have constantly in front of you. Once you make it, you need to check it periodically to see if it still matches the actual situation (it is desirable to check at least once a year). If not, you need to update it. You must also regularly implement the measures taken and report on their implementation”*²⁷.

- Sectoral CRA

“In the spirit of conducting ongoing efforts instead of one-off activities, it is important to host regular consultations to be able to update the outcomes of the risk assessment process”. (UNDP, 2018, p. 35)

- Targeted (ad hoc) CRA

The OECD recommended to cooperation and development organisations to assure *“analysis and review of corruption risk throughout the project cycle and not as a stand-alone exercise at the project design phase”*²⁸.

- **Common feature 3: engagement of stakeholders.** CRA requires the direct engagement of key stakeholders during all stages of the process. Depending on the CRA type, the stakeholders may be the employees of the public organisation, other state agencies, the community, the business sector, or civil society.

- Integrity plan

In Slovenia, the working group responsible for the plan *“decides on the methodology for obtaining information (questionnaires, interviews, brainstorming, focus group work, forums, etc.), and it is responsible to collect all relevant information to be able to identify corruption risks”* (Regional Cooperation Council and Regional Anti-corruption Initiative, 2015, p. 38).

- Sectoral CRA

Risk assessment at sectoral level in Greece: *“Meet and talk with all the main stakeholders (the minister, the leadership team of the ministry, heads of linked agencies [like hospital CEOs, if the health sector, or colleges if the education sector]), the main professional groups, unions, and representative associations, companies in the industry and industry associations, etc.”* (OECD, 2018, p. 36).

- Targeted (ad hoc) CRA

MACRA recommends involving the communities in documenting corruption risks in the awarding of mining sector licences, permits, and contracts: *“It is helpful to travel to mining regions to speak with key stakeholders such as local government authorities and women and men from affected communities. Try to engage and interview an equal number of women and men, particularly at the community level, as women may have different views to men.”* (Transparency International, 2020, p. 15)

5. MONITORING AND EVALUATION

Monitoring and evaluation (hereinafter M&E) are two related management functions with different roles. Monitoring is focusing on inputs, activities, and outputs (*"monitoring is an ongoing process of obtaining feedback on how well a project or activity is on track to meet its objectives"*)²⁹, while evaluation is focusing on final results, impact, and sustainability (*"evaluation is a means of establishing the efficiency, sustainability, value, or relevance of a project"*). M&E may be applied to different circumstances, such as an activity, a process, a project, a programme, a policy, an organisation, or a sector.

The overall objective of the M&E process is to improve performance and evaluate the achievement of goals. M&E is also essential for learning from past experiences and informing future initiatives. Monitoring keeps track of the progress achieved and informs the stakeholders whether the activities are performed, outputs are delivered as planned, and results are achieved. Monitoring allows the detection of implementation problems in earlier stages of a process, a project, or a programme. Evaluation critically assesses the achievements of a process, project, or programme and judges whether success can be claimed. To ensure objectivity, the evaluation is conducted by independent evaluators. Evaluation results are used for continuous improvement or reorientation.

Table 1 Differences between monitoring and evaluation

	Monitoring	Evaluation
Period	Ongoing throughout the life cycle	Mid-cycle or End-of cycle
Purpose	Track progress, inform about implementation, and substantiate adjustments during implementation	Determine causality by understanding the nature of the change that has taken place; integrate lessons learned in the planning process of the next cycle
Methods used	Government records review Survey	Randomization and field experiments Survey Case-study Focus-groups Interview
Experts used	In-house / Internal	Independent / External

Nevertheless, there are interlinkages and dependencies between monitoring and evaluation. M&E share a similar objective, but monitoring sets the foundation for evaluation. Without proper collection of data throughout the life cycle of the organisation, project, process, or programme, evaluation lacks the basic input. Apart from the monitoring data, evaluation has its own data collection system and analytical framework. Both monitoring and evaluation can lead to changes in the initial frameworks.

M&E is a process that has to be carefully planned and adjusted along the way. M&E planning requires defining indicators, outlining the implementation arrangements (structures and responsibilities), and allocating resources.

In the anti-corruption field, measuring corruption, integrity, and anti-corruption or good governance interventions is a challenging undertaking: "effectively measuring the impact of anti-corruption interventions means establishing reporting requirements and rigorous evaluation standards with quantitative, qualitative, and mixed-methods approaches"³⁰. International organisations have developed guides on how to measure in a reliable manner the results and impact of anti-corruption

work, such as strategies, agencies, programmes, and projects. In this respect, M&E is just an alternative method of measurement along with surveys, expert assessment, crowdsourcing, compliance review/tests, and indicator/scorecard-driven case studies³¹.

The anti-corruption M&E process is directed primarily to measure whether performance is on track, objectives are met, and outcomes are achieved³². As the anti-corruption work is results-oriented, the M&E process is conducted for accountability reasons to demonstrate tangible results, cost-effectiveness, and real impacts.

5.1. CRA monitoring and evaluation: objectives and benefits

Corruption risk assessment is a specific type of anti-corruption intervention that can be effectively measured.

- The **objective of CRA monitoring** is to improve the quality and effectiveness of CRA process design, implementation, and outcomes. Periodic monitoring enables maintaining the focus on achievements throughout each step of implementation.
- The **objective of CRA evaluation** is to assess the effectiveness of the corruption risk management framework and the impact of CRA. Evaluation develops evidence and knowledge about CRA, what works and why, and provides arguments for the use of CRA in different contexts.

CRA effectiveness relates to the relevance of the identified corruption risks and the success of corruption risk mitigation in lowering corruption. The effectiveness measure determines if the right corruption risks were identified (or missed) and if there is less corruption manifestation after the implementation of the mitigation measures.

Benefits of M&E of CRA mechanisms³³

- Increased transparency and visibility of performance. Regular CRA performance reports communicated to stakeholders and the general public develop awareness and support for the anti-corruption reform.
- Increased accountability in relation to stakeholders and the general public. Regular CRA performance reports explain and justify the activities undertaken. Thus, the management may easily be held responsible for the anti-corruption results.
- Development of institutional practices and institutional memory. Regular CRA performance reports institutionalise the anti-corruption work, making it part of the institutional backbone. The staff becomes proficient in the corruption risk assessment and passes along the practise to the newcomers.
- Increased anti-corruption learning. Regular CRA performance reports allow institutional learning about corruption risks and their manifestations. Each CRA exercise contributes to a deeper knowledge of the assumptions and practical behaviour. Regular CRA raises awareness about anti-corruption while keeping the focus on it and its importance and embedding anti-corruption values into the organisational culture and daily work.
- Improved internal policies and procedures. Regular CRA performance reports signal policies and procedures that do not yield expected results, making room for improvement.



5.2. Implementation of CRA M&E: strengths and weaknesses

All over the world, democratic countries strive for good governance, transparency, accountability, and integrity, with anti-corruption work at the centre of these efforts³⁴. On their own paths to democratic consolidation and EU membership, countries in Southeast Europe face similar challenges. To reinvigorate the accession process, the European Union issued an updated enlargement methodology³⁵ that requires the candidate countries to deliver concrete and tangible results in the fight against corruption:

- “[...] deliver more credibly on their commitment to implement the fundamental reforms required, whether on rule of law, fighting corruption [...]”
- “anti-corruption work will be mainstreamed through a strong focus in relevant chapters”.
- “A chapter will not be provisionally closed before sufficient anti-corruption policies in that specific chapter are being implemented”

This CRA M&E process helps the countries of Southeast Europe respond to the challenge, mainstream CRA in all sectors, and deliver results. M&E is essential to demonstrating the achievement of concrete results.

The successful implementation of CRA M&E in countries in Southeast Europe depends on political will, legal constraints, and administrative capacity.

Table 2 Strengths and weaknesses to successful implementation of the CRA M&E in SEE countries

Strengths	Weaknesses
<ul style="list-style-type: none">• European Union accession process;• Commitment to meet requirements from the other international anti-corruption monitoring mechanisms (UNCAC, GRECO, OECD-OCN, Moneyval, etc.);• Legal requirements for implementation of the CRA;• Previous experience and knowledge in implementing CRA;• Civil society pressure for good governance;• Available technical support from international organisations;• A better understanding of the nature of corruption and CRA as a tool for decreasing corruption	<ul style="list-style-type: none">• Inconclusive will to control corruption at all levels;• Anti-corruption objectives are not embedded into the strategic planning at the sectoral, programmatic and institutional levels;• Lack of administrative capacity to conduct thorough M&E (personnel with expertise, dedicated structures, budget)• The tendency to treat reforms as mere box-ticking exercises• Insufficient understanding of the benefits of CRA M&E;

5.3. CRA M&E methodology: general overview

A CRA M&E methodology requires several elements³⁶: 1) indicators and data collection methods; 2) communication/reporting/follow-up procedure; 3) stakeholders’ engagement procedure; 4) skills and competencies needed; 5) responsibilities of staff and structures involved; 6) M&E resources. This sub-chapter discusses, in general terms, each element of the methodology. The template in

Annex 1 CRA Monitoring & Evaluation Methodology may be used to develop a bespoke CRA methodology/plan for your particular environment.

5.3.1 Indicators and data collection methods

A robust **set of indicators for the** CRA process. Indicators may be formulated for each CRA stage: 1) planning; 2) risk identification; 3) risk analysis; 4) risk evaluation; 5) risk mitigation/risk treatment; 6) residual corruption risks; 7) monitoring and evaluation; and 8) communication and consultation. For the risk mitigation/risk treatment stage, a separate matrix of indicators is needed to monitor risks and track the implementation of each mitigation measure. Examples of indicators for corruption control measures: number of work processes completely digitalized; number of employees trained or informed about corruption; number of procedures updated; number of new anti-corruption procedures; number of open data released; number of public hearings; number of new corruption reporting mechanisms; number of employees re-tested; number of employees rotated, etc.

Indicators are metrics used to measure certain conditions. Without indicators, the management can hardly track the progress of the activity and take corrective actions. Indicators clarify activities, outputs, and outcomes and make them measurable. Staff performance in conducting CRA may also be assessed in relation to the indicators.

Table 3 Advantages and disadvantages of using indicators for CRA

Advantages	Disadvantages
<ul style="list-style-type: none"> Ensures the transparency of the CRA process; Identify challenges in CRA implementation and adjust; Inform stakeholders on the results obtained (accountability); 	<ul style="list-style-type: none"> The choice of indicators does not adequately track the achievement of the objectives Time-consuming and long-term endeavour; Poor accessibility or quality of data; Exposure of sensitive information

Formulating and deciding which indicators best cover the expected anti-corruption change is a laborious undertaking. Setting the indicators has to be a participatory process³⁷. If relevant indicators (such as those related to complaints of corruption) already exist and are regularly used, they have to be included and aligned with the CRA M&E methodology.

There are different types of indicators:

Framework indicators capture evidence on the framework conditions needed for corruption risk assessment and management to take place. Generally, CRA needs top-level commitment, a legal, procedural, or methodological risk management framework, expertise, a budget and infrastructure. These indicators measure the level of input and rely on administrative data (for example: budget allocation for the development of whistleblowing platforms).

Progress indicators measure the actual implementation of CRA activities and corruption control measures. CRA activities include planning, gathering, and analysing information to generate a risk management plan, risk matrix, gap analysis, and mitigation plan. These indicators measure the outputs and also rely on administrative data (example: number of secured reporting platforms for whistleblowers).

Impact indicators are a metric of CRA outcomes and impacts. Outputs reveal substantial changes to the exposure of corruption and the real benefits for the stakeholders of the anti-corruption intervention (example: the number of whistleblowers enjoying protection against retaliation).



Impacts indicate how anti-corruption changes contribute to good governance objectives. Impact indicators rely on expert assessments, surveys of citizens or beneficiaries' experiences and perceptions of public services, statistics of corruption complaints or cases prosecuted, etc.

Indicators may be quantitative (numerical measures such as number, percentage, rate, and ratio) or qualitative (description of characteristics, judgements, opinions, perceptions, and attitudes), direct indicators (measure the change), or indirect/proxy (measure a contextual aspect related to the change).

Elements of an indicator:

- the quality element (according to a specific standard or an objective criterion).
- the quantity element in each indicator (no. of)
- the “who” element in each indicator
- measurability (selection of the units of measurement)
- clarity about what success is – lower, higher,
- information gaps

Alternative classification of the indicators:

- Impact indicators - overall changes induced by the outcomes;
- Outcome indicators - the direct change determined by the output (ex., employees have better awareness of the risks, employees are aware of the standard responses to corruption situations);
- Output indicators – deliverables, indicate the completion of an activity;

Input indicators – resources allocated.

Table 4 Quantitative method vs. Qualitative methods: advantages and disadvantages

	Quantitative method	Qualitative methods
Advantages	<ul style="list-style-type: none"> • Objectivity and accuracy: data can be very consistent, precise, and reliable; • Generalisation of results based on a large sample of cases; • Easy to analyse by statistical methods; • Easy to replicate results; • Collect information quicker. 	<ul style="list-style-type: none"> • Better describe the nature of the changes, and the complex relationships between change factors; • Less expensive; • Flexibility;
Disadvantages	<ul style="list-style-type: none"> • Difficult to grasp the context of complex issues; • Expensive and time-consuming; 	<ul style="list-style-type: none"> • Small sample size: it is not statistically representative; • It relies upon the experience of the researcher/ experts: conclusions may be biased or misleading; • Difficult to replicate results
Example of	<ul style="list-style-type: none"> • Number of complaints 	<ul style="list-style-type: none"> • Clear criteria for student

indicators ³⁸		admission tests and end-of-school examinations, administered by autonomous bodies
--------------------------	--	---

The anti-corruption literature recommends using a basket of indicators to better grasp the progress, as each type of indicator captures a different aspect. For examples of indicator baskets, please check below. Table 7: Examples of indicators for monitoring mitigation measures

“Indicator baskets typically combine input/output and process indicators (concrete steps taken to address the problem) with outcome indicators (short-term changes resulting from these actions) and impact indicators (longer-term changes and whether these changes are contributing to achieving the target)”.

5.3.2 Communication, reporting, and follow-up procedure

A robust **communication, reporting, and follow-up mechanism**. M&E results have to be communicated and have to be put to good use immediately. M&E reports support evidence-based decisions, but sometimes they are not followed through by the management and do not trigger improvements in the CRA process.

The M&E methodology has to explain how (in what format and through which channel) the results of the M&E will be communicated, when (frequency), and to whom (managers, stakeholders, and the general public). M&E reports have to be formally approved by managers and receive a management response. For instance, managers may have specific reporting requirements on the implementation of the M&E recommendations. Implementation of M&E recommendations may involve updating the risk matrix and risk management plan or modifications to the mitigation measures.

5.3.3 Stakeholders’ engagement procedure

The stakeholders have to be identified during the CRA M&E planning and have to remain engaged in all the monitoring and evaluation steps, including the planning process. In the planning step, stakeholders participate in setting the indicators and M&E parameters. Stakeholders’ feedback is also needed during M&E implementation. They can contribute data for indicators and provide insight into the relevance of the mitigation measures. Stakeholders may offer feedback on the monitoring reports and communicate the results obtained to other audiences.

*“Stakeholder participation throughout the programming cycle ensures ownership, learning, and sustainability of results. **Continued stakeholder participation in monitoring and evaluation cannot be assumed. It must be institutionalized**”³⁹.*

The institutionalisation of stakeholders’ participation in M&E of the Romanian National Anti-corruption Strategy (NAS)

NAS established, by Government Decision⁴⁰, five formal cooperation platforms:

- Independent and anti-corruption agency's platform;
- Central administration platform;
- Local public administration platform;
- Civil society platform;
- Business environment platform;

The platform meetings are convened every six months, or whenever necessary, by the Ministry of Justice (MoJ). The platforms analyse and approve NAS monitoring reports.



CSOs have a distinct and important role in CRA M&E. They ensure third-party anti-corruption monitoring (TPM) and have a genuine interest in the CRA process and its impacts (Participatory monitoring). OECD 2014² and the World Bank (2016, chapter 7) developed tools that CSOs may use to conduct anti-corruption monitoring.

A corruption risk assessment conducted by CSOs on the judicial system of Ukraine⁴¹
In 2009, the Institute of Applied Humanitarian Researches conducted CRA using the following tools: legal framework analysis, analysis of judicial statistics, court rulings and case studies, mass media monitoring, focus groups, and interviews. The CRA exercise reported the prevalent corruption forms, their triggering factors, “participants of corruption alliances”, the abilities of the system to counteract corruption. The recommendations from the research were considered in the course of the judicial reform in Ukraine in 2010.

5.3.4 Skills and competencies

CRA M&E methodology design and implementation require a general set of skills, experience, and competencies:

- knowledge of anti-corruption legislation and national strategy;
- knowledge of corruption prevention tools;
- knowledge of the internal anti-corruption management system;
- monitoring and evaluating technical skills;
- statistical and analytical skills;
- previous experience in conducting monitoring and evaluation, preferable for anti-corruption interventions, if available.

The World Bank (2016, Annex 4) developed a comprehensive list of specific behavioural and technical skills and competences necessary for carrying out monitoring and evaluation of anti-corruption interventions. Based on the World Bank contribution, a check-list is proposed in the M&E methodology template to ensure that all the minimum necessary key skills and competencies are available for CRA M&E.

5.3.5 Responsibilities of staff and structures involved

M&E methodology has to clarify the mandates, responsibilities, and accountability of all the parties involved in the CRA process. Depending on the CRA type (institutional, sectoral, or ad hoc), monitoring responsibilities may entail different organisations, departments, working groups, and individuals. In the provided M&E template (Annex 1), key roles and responsibilities are assigned based on the levels of monitoring: national, sector, policy, institutional, programme, and project.

For example, the Manual on integrity planning and integrity management⁴² in Kosovo* recommends the appointment of a working group on integrity planning before conducting a risk assessment. The mandate and responsibilities of the working group leader are as follows:

“The Leader of the Working Group has to manage the integrity planning process, define and communicate related responsibilities and authorities; organise activities and schedule; promote awareness of the integrity planning at all levels of the organisation and provide guidance and advice on compliance; report to the Head on the integrity planning”.

5.3.6 M&E resources

M&E methodology has to clarify what kind of resources are needed for conducting CRAs, which resources are available, and which have to be planned:

- financial resources (total budget and main cost categories);
- human resources (number of working days per expert involved);
- technology (software, hardware, access to databases);
- information (access to specific types of information);
- time (periods and deadlines).



6. GUIDELINES ON M&E OF CRA PROCESS

Before starting to develop a bespoke CRA M&E methodology based on the procedural steps discussed in the next two chapters, there are several aspects useful to take into consideration:

- Planning the CRA process and developing the CRA M&E methodology happen simultaneously. The General CRA framework has to have an underlining **intervention logic**. This should be the first step in developing the CRA framework: what is the desired change that CRA brings about? What are the CRA objectives? What are the inputs needed? What are the CRA's desired outputs, outcomes, and impacts?
- Another aspect to be decided before starting to plan M&E is the governance structure of the CRA M&E process. Which **organisational structures** are involved in monitoring and evaluation? What are their roles and responsibilities? What are their key deliverables?
- The third aspect useful to take into consideration before planning CRA M&E is the **key experience of other countries** in conducting anti-corruption monitoring and evaluation.

The guidelines are developed for practitioners in the project beneficiaries from the SEE region and they are intended to be read before getting into the CRA monitoring and evaluation planning process.

6.1 Intervention logic

To monitor and evaluate an anti-corruption intervention such as CRA, it is important to understand the Results Chain (logical framework, Inputs-Outputs-Purpose-Goal statements). The Results Chain explains the process (intended sequence of steps) needed to contribute to the desired change in the level of corruption (direct and indirect changes expected). Also, for each step, a results chain identifies indicators to be used to measure the effects and the underlying assumptions. The results chain enhances the quality of anti-corruption programmes by testing their internal logic.

The development of a credible results chain is usually done during the substantiation of the anti-corruption intervention. The promoter of the anti-corruption initiative has to explain how the proposed action contributes to increased transparency and accountability and a lower level of corruption. For instance, it has to be explained how the CRA mechanism contributes to greater awareness of corruption risks and to the behavioural change of public servants (increases personal integrity). At the same time, the promoter of the anti-corruption intervention has to propose indicators, establish a baseline, identify targets, sources, and means of verification/data collection. This initial planning work increases the evaluability of the intervention. In the following table is the hypothetical alternative for a CRA Results Chain⁴³, the indicator part being developed in the chapters below.

Table 5 CRA: Results chain

Problem	Input	Output	Outcome	Impact	Long-term goal
Perception of corruption by beneficiaries of public services	CRA Methodology, Staff, data on corruption risks	Corruption risks were identified, analysed and mitigation measures implemented	Greater awareness of corruption risks among public servants	Increased personal integrity of public servants	Less corruption incidents or integrity breaches
			Greater awareness of corruption risks by beneficiaries of public services	Less requests for favours or corrupt services	Less perception of corruption by beneficiaries/ citizens
			Better internal control and a sanction system	Control measures are rigorously implemented	Fewer opportunities for corruption Saving public resources and their usage in line with the public interest
			Better and clearer procedural framework	Increased transparency	Better public services Increased trust of beneficiaries/citizens in an institution that it will provide services in the best public interest
Indicators					
% of beneficiaries of public services believe that corruption is widespread.	No. of staff allocated to the CRA exercise	% of mitigation measures implemented, such as: training, procedural updates, etc.	% of employees that report increased awareness of corruption risks due to the CRA exercise	No. of corruption / integrity breach events/incidents reported at the institutional level	Trend (% decrease) in the evolution of indictments and disciplinary proceedings related to corruption or integrity in the last five years; Score on surveys related to perceptions of corruption or the quality of public services;

The chain result approach and theory of change are used by France's Anti-Corruption Strategy in its Cooperation Action 2021-2030⁴⁴. The overall goal of less corruption in partner countries is sustained by three general objectives: increased capacity and expertise, promotion of good governance, and support for the work of international organisations. The general objectives are further divided into specific objectives. Each expected result has objectively verifiable indicators and success scenarios.



6.2 Organisational structure

A specialised anti-corruption monitoring and evaluation unit, or secretariat, set up within each public sector entity will have the responsibility of conducting not only the monitoring and evaluation process of the CRA but also of the entire anti-corruption programme. Alternatively, if a specialised M&E unit or secretariat cannot be established because of a lack of staff and resources, it is better to use the existing structure responsible for corruption prevention. The existing corruption prevention structures may incorporate M&E responsibilities into their mandate and add new M&E positions to their chart. Such a unit has to involve different stakeholders in M&E, such as civil society, the business sector, and other public entities. Monitoring and evaluation of CRA have to be embedded into the anti-corruption planning process at the institutional level. A similar anti-corruption M&E unit or dedicated staff may be established or assigned at a national or sectoral level within the anti-corruption agencies. These units, or M&E staff, require an adequate allocation of resources.

These units may have the following duties:

- Design M&E methodology and elaborate M&E manuals;
- Organise trainings;
- Data collection;
- Monitoring progress;
- Conduct regular evaluations;
- Organise and analyse data;
- Generate reports, findings, lessons learned, and elaborate recommendations;
- Monitor the response to the recommendations;
- Inform the stakeholders;
- Substantiate future anti-corruption policies.

Table 6 Key deliverables in planning, monitoring and evaluation by structures involved

Structures	Planning	Monitoring	Evaluation
Management	M&E CRA mandate (roles and responsibilities)	Management responses to monitoring	Management responses to evaluation
M&E working group or manager/ staff/employees/civil servants responsible for M&E	M&E methodology	Monitoring reports	Evaluation requirements
Independent evaluation structure	Evaluation plan	-	Evaluation reports

6.3. Key experiences of other countries

- **Put baselines and targets on the indicators.** A baseline indicates an initial measurement that is taken at the beginning of the corruption risk assessment. The baseline is used to gauge progress over time. A target indicates the level or benchmark aimed at achieving the indicator.

The Passport of Indicators for Albania's Inter-sectoral Strategy against corruption 2015-2020⁴⁵ includes 38 performance indicators developed to measure the progress of the Strategy's specific objectives. Among other information, each indicator includes: the baseline value reflecting the situation in the previous three years (2015, 2016 and 2017) and the target performance to be realised in the upcoming three years (2018, 2019 and 2020).

Example: Share of contracts awarded by negotiated procedures without prior publication of the contract notice; Baseline 2017: 31.8 %; Target value for 2018: Below 20%; Target value 2019: Below 15%; Target value 2020: Below 10%.

- Assign the **responsibility of monitoring the risk management plan** and the implementation of the corruption control measures to a specific person or working group.

The Agency for the Prevention of Corruption in Montenegro appointed an integrity plan manager for the 2020-2022 Integrity Plan⁴⁶. Among other tasks, the Integrity Plan Manager will perform tasks related to monitoring the implementation of measures to improve integrity.

In Serbia, according to the Law on Prevention of Corruption⁴⁷ each public entity responsible for the adoption of an integrity plan should appoint a person responsible for monitoring the implementation of the integrity plan and reporting to the Agency on its implementation.

- **Design M&E methodology in conjunction with the CRA planning stage** to align the objectives with the indicators and data collection methods. Pilot Performance Indicators developed for the Istanbul Anti-Corruption Action Plan 5th Round of Monitoring bring valuable insight regarding the key elements of an anti-corruption instrument in general. Thus, the indicators for a successful CRA may be regarded as follows: a) Corruption risk assessment is up-to-date and evidence-based; b) Corruption risk assessment development is inclusive and transparent; c) Corruption risk assessment exercise and the subsequent mitigation measures are effectively implemented; d) Coordination and support to implementation is ensured; e) Regular monitoring and evaluation is ensured (benchmarks: stakeholders are routinely included in the monitoring process, regular monitoring reports are issued, independent evaluation reports are issued, IT tools are used to gather and analyse data for monitoring and evaluation).

Monitoring and evaluation provisions and success indicators are provided in the same document that describes the anti-corruption intervention envisaged. For instance, Bosnia and Herzegovina's Anti-corruption Strategy for 2015 - 2019 and the action plan for the implementation of the anti-corruption Strategy for 2015 - 2019 have two dedicated chapters: 9.5.2. Implementation and monitoring of the implementation of the Strategy and action plan and 9.5.3. Evaluation of the effects of the implementation of the Strategy and action plan.



In Montenegro⁴⁸, the public entities that have adopted an integrity plan have to assess its effectiveness and efficiency every two years. The results of this assessment represent a basis for the revision of the integrity plan and inputs for the new cycle of integrity plan development. This is a relatively rare situation in which assessing the effectiveness and efficiency of one CRA tool (which can be considered an evaluation of integrity plans) is incorporated into the overall corruption prevention public policy defined under this law. In 2017, RAI, with a consortium of CRA experts, piloted a methodology for assessing the effectiveness and efficiency of integrity plans in Montenegro in two areas covered by an integrity plan in each institution (Leadership and general management of the institution and Financial management). The methodology contained a questionnaire with a set of detailed, evidence-based indicators and a scoring system of indicators, meaning how the answers should be scored on certain scales to assess whether and to what extent the problem was targeted and treated by the measures envisaged in the integrity plan. The questionnaire was supposed to be fulfilled by each public entity and used as a basis for answering the question of whether measures were or were not effective and whether they should still be included in the new integrity plan (are there any residual risks that remained after implementation of the integrity plan) or not.

- **Select indicators based on their ability to capture the desired change.** Sometimes quantitative indicators are unable to grasp the actual anti-corruption results obtained. In this case, qualitative indicators have to be identified, although they may prove costly and hard to collect.

Public institutions in Slovenia have to identify, analyse, and periodically update the corruption risks they are exposed to. The CRA process for the public sector in Slovenia is coordinated by the Commission for Preventing Corruption (KPK). Public institutions concerned have to submit an annual monitoring report based on a template designed by KPK. The template comprises several qualitative monitoring questions:

- How many suggestions for integrity plan updates have you received from employees since the last report? What areas of work did these proposals cover?
- What concrete proposals to complete the integrity plan have you received from management/decision-makers since the last report? What areas of work did these proposals cover?
- How many times since the last report have the management/decision-makers met the corruption risk assessment working group?
- How many times since the last report has the Integrity Plan Administrator reported to management on the implementation of Integrity Plan measures?
- How many times have you updated your integrity plan since your last report?
- In what way does the management monitor the implementation of the measures of the integrity plan (e.g., discussion at the board meetings, discussion at the staff council, discussion on other appropriate occasions)? Briefly describe.

- **Combine different types of indicators** into a “basket of indicators” and use triangulation of data. It is not important to have many indicators but only relevant, critical ones. Fewer indicators are always preferable if they cover the entire extent of the desired anti-corruption change.

The Moldova National Anti-corruption Strategy 2017-2020⁴⁹ established the following indicators to evaluate the performance of measure number 14: Ensuring the implementation of corruption risk management:

- Establishment by public entities of risk matrices, which also include corruption risks;
- Number of risk matrices updated with the risks of corruption after the integrity incidents

within the public entities.

- Report on the implementation of risk management measures, prepared annually.

The Romanian National Anti-corruption Strategy 2021-2025⁵⁰ established the following indicators to evaluate the performance of objective number 4.5: Improving integrity in the business environment, measures related to public enterprises:

- Adoption of a normative act for the regulation of the compliance function in public enterprises (Framework indicator);
- Occupational standard for compliance officers in public enterprises (Framework indicator);
- The number of public enterprises that have appointed a compliance officer (Progress indicator);
- The number of public enterprises reporting on compliance (Progress indicator);
- The number of good practises identified (Impact indicator).

- **Involve stakeholders** in planning the monitoring and evaluation process.

As discussed in Chapter 5.3.3 above, the Romanian Ministry of Justice involves stakeholders in five formal cooperation platforms. At the beginning of each anti-corruption strategic cycle, all the platforms are involved in planning the Strategy monitoring process. The draft monitoring methodology is distributed for comments and amendments. Afterwards, each year, the Romanian Ministry of Justice invites all the stakeholders to contribute to the monitoring report and submits the draft monitoring reports to the platforms for further feedback⁵¹.

Regarding the evaluation process, measure 9.3 from the National Anti-corruption Strategy 2016-2020 refers to the ex-post evaluation of the strategy's impact by analysing the way in which resources were used, the accomplishment of the impact expected, and efficiency of the interventions, with the support of some external evaluators. To implement the ex-post evaluation, the Romanian Ministry of Justice started, in April 2021, the implementation of the project "The evaluation of the implementation of the National Anti-corruption Strategy 2016-2020 and the development and recommendations for future steps", through the "Justice" programme, funded by the Norwegian Financial Mechanism 2014-2021⁵². The evaluation was commissioned to the OECD and the stakeholders from each platform were involved in the evaluation process through an online questionnaire and participation in a workshop.

7. CRA MONITORING PROCESS

The CRA M&E process is organised into 5 steps. The proposed steps are similar for monitoring and evaluation (Figure 3):

- planning
- data collection
- data analysis
- reporting and communication
- apply findings

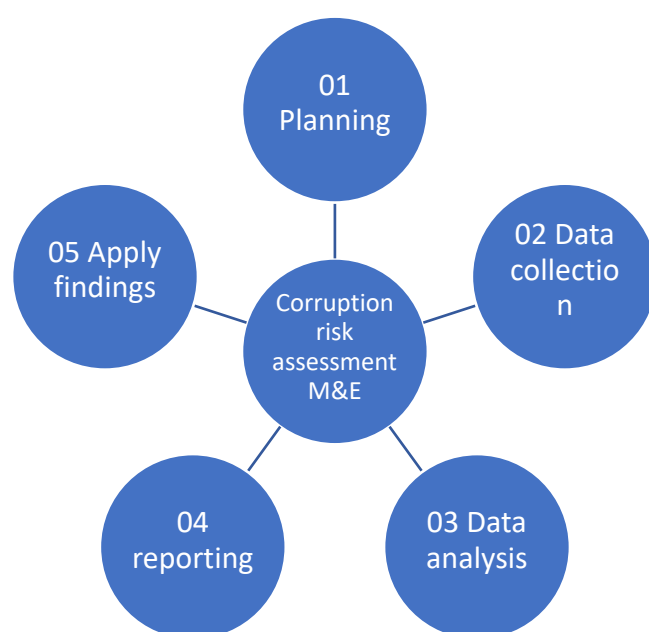


Figure 3 CRA M&E process

7.1 Planning the monitoring process

No.	Task/activity
1.	Conduct a stakeholders' analysis. Which of the stakeholders would be interested in the M&E of the CRA process? Why? How can they contribute?
2.	Cooperate with the CRA planning team and check the theory of change or the logic model to understand the CRA steps and the extent of the desired anti-corruption change.
3.	Engage stakeholders in all steps from this point forward. Organise online co-creation workshops or distribute short questionnaires.
4.	Identify monitoring objectives.
5.	Elaborate M&E bespoke methodology. Plan in detail the resources and the roles and responsibilities. Design a reporting mechanism (data flow) so that top-level decision-makers are constantly informed about CRA progress and results. Design a communication mechanism (what, which channel, who, and how often) so that stakeholders are periodically informed. Design data management and storage rules. Keep in mind also that monitoring is an integral

No.	Task/activity
	part of the risk treatment plan (monitoring the implementation of the mitigation measures to ensure the measures are effective). Risks have to be monitored. Secondary/indirect risks also have to be monitored. Design data analysis techniques. Explain how personal data is protected.
6.	Develop indicators. Some CRA mechanisms already contain indicators to measure the progress of performance. When creating the basket of indicators for CRA M&E, practitioners should analyse and incorporate the already defined indicators. Monitoring against a uniform set of pre-defined indicators ensures objectivity, comparability, and transparency. Indicators should cover the implementation of CRA stages ⁵³ as well as the risk management process ⁵⁴ . Regarding the risk management process, select indicators to monitor both the risk (changes in risk conditions and triggers) and the implementation of its mitigation measures . Ensure that the selected indicators are SMART (Specific, Measurable, Achievable, Relevant and Time-bound). Ensure that for each risk, the basket of indicators (framework, progress, and impact) reflects the place of the risk in the risk heat map. More important risks (having a higher level of probability and impact) have to be addressed more in terms of indicators than the minor ones.
7	Select reliable and realistic data sources for the indicators. Evaluate the existing data sources and the need to develop new data sources (ex., reports) and corresponding data collection instruments (questionnaires, templates). Use multiple data sources if available.

Corruption risks may occur at different levels of government: policy making level, procurement level, service delivery level, human resources level, financial/budget level, etc. It is not the aim of the methodology to provide lists of indicators for all corruption risks and accompanying mitigation measures. Such a task would be impossible. Nevertheless, a compilation of indicators developed by different stakeholders to monitor corruption risks and adapted from different domains could be used as examples for capacity-building purposes.

Table 7 Examples of indicators for monitoring mitigation measures

Corruption risk	Mitigation measure	Indicator	Type ⁵⁵	Source
Healthcare sector				
Fraudulent behaviour of healthcare professionals	Implementation of a code of conduct for healthcare professionals	Formal adoption of codes of conduct for various health officials, including doctors, nurses, administrators, and healthcare inspectors	F	Trapnell, Stephanie E; Jenkins, Matthew D; Chêne, Marie (2017)
		Number and % of complaints effectively processed based on the codes of conduct	P	
		% of health service users reporting experiencing fraudulent behaviour	I	
Education sector				
Informal payments are required/extended from students and parents	Introduction of a complaints system	Adoption/existence of complaint mechanisms and channels to appeal against extortion	F	Trapnell, Stephanie E; Jenkins, Matthew D; Chêne, Marie (2017)
		Number of complaints by students, parents, and teaching staff and % that are acted upon	P	
		% of students reporting paying a bribe to access education	I	
Favouritism and	Introduction or improvement of	Well-defined, transparent procedures and standards for merit-based teacher	F	Rahman (2020)



Corruption risk	Mitigation measure	Indicator	Type ⁵⁵	Source
nepotism in the hiring and promotion of teachers	quality standards for teaching staff	recruitment and promotion		
		Percentage of teaching staff with a relevant diploma certified by an appropriate authority	P	
		Percentage of parents and students satisfied with the quality of education	I	
Local self-governments (LSG)				
Discretionary disposal of public property	Ensure public access to the registry of public property owned by the LSG.	Formal adoption of a general act to govern the transparency of procedures for acquiring and disposing of the property owned by the LSG.	F	Mojsilović, Miloš (2017)
		The registry of public property owned by the LSG is available to the public, and it is regularly updated (number of updates/ numbers of unique visitors). The registry should also include information about public property granted to other persons for their disposal, persons to whom property has been leased/ who have been granted the use of such property, entities disqualified from leasing or being granted the use of property on account of misuse, etc.	P	
		The number of analyses and reports (including media) based on the data retrieved from the registry.	I	
Public enterprises				
Political corruption due to discretionary powers to appoint SOEs management	Implementation of an open competitive procedures for selecting SOE directors	Formal adoption of a transparent and competitive procedure for selecting SOE directors, which includes clear and precise selection conditions and criteria	F	Mojsilović, Miloš (2017)
		The number of public vacancy announcements for selecting the heads of SOEs Number of SOE's directors appointed based on merit (previous experience and concrete business and financial plan/targets).	P	
		Improvements in business results (financial and non-financial) of SOE: % of implementation of the business and financial plan.	I	
Public administration				
Discretionary budget allocation	Increasing transparency in planning, elaboration, management, and control of	Ratio of procurement procedures modified in the Annual Procurement Plan. Specific formula = Total number of procurement procedures modified / Total number of procurement procedures	I	Albania's Passport of Indicators for Inter-sectoral strategy against

Corruption risk	Mitigation measure	Indicator	Type ⁵⁵	Source
	Budget	listed in the annual plan x 100		corruption 2015-2020
		Share of contracts awarded by negotiated procedures without prior publication of the contract notice. Specific formula = total number of awarded negotiated procedures without prior publication of contract notice / total number of awarded procedures (electronic + negotiated procedures without prior publication)	I	
		Share of contracts amended during the year. Specific formula = total number of amended contracts / total number of contracts x 100	I	
Public servants do not report and manage conflict of interests situations	Training programmes in the field of prevention of conflicts of interest	No. of training sessions on conflicts of interest planned in the annual training plan	F	BiH Anti-corruption strategy for 2015 – 2019
		No. of training sessions conducted	P	
		No. of conflict of interests reported and managed	I	
Political influence in resource allocation at the school level	Legal framework and administrative practises to promote transparency and accountability in school governance	Existence of legislation providing public access to information related to budgets, expenditures, accounting, and procurement records at the school level	F	Rahman (2020)
		The proportion of schools for which a recent audit or public expenditure tracking survey is available	P	
		The percentage of graduating students with the expected proficiency in reading and mathematics	I	

7.2 Data collection

No.	Task/activity
1.	Collect data at the periodicity established. It is important that the same person collects data over a long period of time and gets accustomed to the data collection process. Data may be collected through specific templates (questionnaires, observation protocols, data gathering files), conducting interviews, or IT tools. In general, there are four main categories of data on corruption: perceptions, experiences, assessments, and administrative data ⁵⁶ . •
2.	Validation of data (quality control). Verify the data collected to ensure it is consistent, correct, reliable, and lacks redundancy. Come back with questions for the persons/entities submitting the raw data if you identify outliers in the data. If you use multiple data sources, triangulate the data to verify accuracy.



Example of a data collection template: The Romanian Ministry of Justice developed for the National Anti-corruption Strategy⁵⁷ a template to collect data from state agencies and local governments on the implementation of corruption preventive measures. Excerpt of indicators regarding the implementation of the declaration of gifts policy:

1. Number of gifts received, declared, and registered in the gift registry;	
2. Annual publication of the registry on the institution's website	
3. The number of situations in which the gift was purchased by the receiver ⁵⁸	
4. The value of the gifts purchased	
5. Value of gifts received (per gift and in total)	

7.3 Data analysis

No.	Task/activity
1.	Organise and classify the collected data (code and collate the data).
2.	Apply different statistical methods to the data to extract information for calculating the monitoring indicators. Generate frequencies, summarise, tabulate data, compare data, and disaggregate data by different categories (gender, department, etc.). Analyse the evolution over time and identify patterns.

7.4 Reporting and communication

No.	Task/activity
1.	<p>Elaborate the periodic monitoring reports (recommendation: prepare a CRA monitoring report every three or six months or more frequently, if needed). In the M&E template, there are two matrices that can be further detailed for compiling the analysed data: monitoring the implementation of the risk management plan and monitoring the implementation of risk mitigation measures. Take stakeholders' views on the draft report into account.</p> <p>For instance, the Secretariat of the Romanian National Anti-corruption Strategy communicates the draft annual monitoring report in advance by e-mail and organises a meeting with each cooperation platform to get their views and recommendations on the report.</p>
2.	Elaborate on key findings and recommendations for top management or decision-makers. The monitoring evidence might indicate gaps in relation to the control/mitigation measures; either controls are not implemented, their scope is limited, they are not functional, or they are inappropriate. Thus, recommendations should provide remedial actions.
3.	Submit the monitoring report to the top-level management or decision-making body for endorsement.
4.	Communicate the monitoring report internally and externally. Communication of the monitoring findings may take different forms depending on the target audience's information needs: infographics, executive summaries, dashboards, case studies, workshops, online presentations, short videos, press conferences, interviews, etc. Extensive communication of the monitoring results improves clarity on roles and responsibilities and allows challenges to be detected earlier.

7.5 Apply findings

No.	Task/activity
1.	Implement the recommendations in the monitoring report. Monitoring reports have the role of reporting back on the corruption risk assessment activities and CRA framework. Based on the monitoring reports, new risks may be identified, analysed, and mitigated; mitigation measures may be streamlined or changed; and staff may receive a motivational boost to engage deeper in risk management (examples: an update of the risk map and risk matrix). On the other hand, monitoring reports may highlight gaps in the CRA framework/methodology and require updates. The management or decision-maker level has to report back on how the recommendations were implemented. The implementation of the recommendations has to be explained in the next monitoring report.
2.	Integration of monitoring findings into performance management. The results of the monitoring have to be incorporated into the organisation's performance management: evaluation of the employees' work, management dashboards, evaluation of the fulfilment of the performance objectives, amendments to the ethics and conflict of interest rules
3.	Integration of monitoring findings into the anti-corruption lessons learned ⁵⁹ . Monitoring knowledge has to be inserted into a broader document that reflects the implementation and impact of corruption risk assessment and management.

7.6 Tables of monitoring indicators

In the next three sub-chapters, there are examples of the framework, progress, and impact indicators that may be used to monitor the implementation of each CRA stage and the impact of CRA. The essential indicators have a distinct mark in red **[!]**. The examples may be used to build a bespoke basket of indicators for each CRA stage and fill in the corruption risk assessment implementation monitoring matrix available in Annex 1. Quality CRA implementation ensures appropriate risk identification and management. Gender mainstreaming is integrated into the monitoring and evaluation framework through specific indicators. Combating discrimination and promoting equality between women and men have to be reflected in the way corruption risk assessment is conducted.

The indicators were selected to check the respect for the following principles guiding quality anti-corruption work:

- Leadership (tone at the top);
- Adequate resources;
- Stakeholders' participation;
- Proportional procedures;
- Transparency and public communication;



7.6.1 Framework monitoring indicators

This sub-chapter addresses the CRA framework.

CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data sources	Data collection frequency
CRA planning	[!] Staff allocated to the CRA exercise	Number of persons that have official duties in their job descriptions or are appointed to conduct the CRA exercise (including external experts).	Addition to the number of persons involved in conducting the CRA exercise (working group). The indicator may be also presented as % of total staff. The minimum recommended number of people dedicated to CRA exercise is 1 person (100% time) per 100 employees.	CRA planning decisions or internal work systematisation documents; Consultancy contract or procurement documentation	Annually, at the beginning of each CRA exercise
	[!] Gender balance of staff allocated to the CRA exercise	The indicator measures the proportion of men and women appointed to conduct the CRA exercise compared with the general gender distribution in the respective environment (organisation, project, or sector)	= women/men ratio allocated to CRA exercise vs. women/men ratio in the respective environment. Balance is ensured if both results are either less than 1 or greater than 1.	Human resource files	Annually, at the beginning of each CRA exercise
	CRA staff training	The percentage of staff allocated to the CRA exercise that completed a risk assessment training, including the external experts allocated to the CRA exercise that completed a risk assessment training	= Number of persons appointed in the CRA working group that have participated in the last three years in a specific risk assessment training / total number of persons in the CRA working group.	Human resource files	Annually, at the beginning of each CRA exercise

CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data sources	Data collection frequency
	CRA's annual cost	The indicator includes spending specific to the CRA mechanism, such as CRA training, CRA manuals, CRA consulting, CRA-specific software, the percentage of staff wages of persons fully /partially dedicated to the CRA mechanism, etc.	The amount in local currency spent in a fiscal year to conduct CRA. This amount may also be presented as % of total spending in a fiscal year. The minimum recommended spending for successful CRA implementation is 0.5% of total spending.	Budget explanatory internal notes; Budget execution report;	After the end of each fiscal year
	CRA IT tool availability	IT tool means a specific risk management software to digitally collect, aggregate, and analyse comparable data. Ideally, the software will be able to generate statistics for all the monitoring and evaluation indicators.	The measurement is binary: Yes /No	Software inventory	Annually, at the beginning of each CRA exercise
	CRA legal mandate	The indicator measures the existence of a legal mandate for conducting CRA, such as a normative act, an internal decision or an approved methodological risk management framework	The measurement is binary: Yes /No	Normative acts	Annually, at the beginning of each CRA exercise
Corruption risks identification	[!]Top-level commitment to CRA	The indicator measures the number of CRA meetings attended by the Head of the organisation, project, policy area, etc. The Head is the highest in rank at the operational level, such as president, director etc.	Addition to the number of meetings attended by the Head in one fiscal year. The indicator may be also presented as % of total meetings in one fiscal year. The minimum recommended attendance by the Head is 25% of the total meetings.	Internal notes, emails, attendance lists	After the end of each fiscal year
Corruption risks analysis					



CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data sources	Data collection frequency
Corruption risks evaluation					
Corruption risks mitigation					
Residual corruption risks					
Monitoring and evaluation	[!] Monitoring and evaluation mandate	The indicator checks if the CRA M&E mandate is officially given to specific persons, and it includes data collection and the elaboration of regular implementation/evaluation reports and recommendations.	The measurement is binary: Yes /No	Decision / normative act	Annually, at the beginning of each CRA exercise
Communication and consultation	CRA stakeholders	The indicator measures the number of CRA stakeholders identified. A list of the names and contact details of the legal and natural persons having a legitimate interest regarding the corruption risk assessment exercise.	Addition to the number of stakeholders identified by category: internal and external, natural and legal persons.	Contact database	Annually, at the beginning of each CRA exercise

7.6.2 Progress monitoring indicators

This sub-chapter continues the previous one and it addresses the CRA progress.

CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
CRA planning	Number of CRA planning meetings	The number of onsite or online meetings to plan the CRA process.	Addition of the number of planning meetings in one fiscal year.	Internal notes, emails, attendance lists	After the end of each fiscal year
Corruption risks identification	Data collection instruments used for risk identification	The indicator measures the types of data collection instruments used to identify corruption risks.	The addition of the risk identification instruments used (total number)	Questionnaire reports; Minutes; Notes; Risk summaries	After the end of each fiscal year
	Number of corruption risks identified (initial data collection)	Number of corruption risks identified based on the initial data collection. If each department identified specific corruption risks, those risks should also be added. If the same or similar risk is identified by several internal structures, it will be counted as one corruption risk.	The addition of the corruption risks identified (total number)	Risk summaries; lists of corruption risks identified	After the end of each fiscal year
	[!]Number of new corruption risks identified (after integrity breaches and corruption incidents)	The indicator measures the number of new corruption risks that were not identified during the initial data collection. New corruption risks may be identified during the year after an integrity breach or a corruption incident is uncovered.	An addition to the new corruption risks identified (total number)	Integrity breaches and corruption incidents reports	After the end of each fiscal year



CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
Corruption risks analysis	Number of corruption risks analysed (initial analysis)	The indicator measures the number of corruption risks whose likelihood and impact were determined based on strict criteria. If the same or similar risk were analysed by several internal structures/departments, it would be counted as one corruption risk. The number of risks analysed may be smaller or equal to the number of risks identified.	The addition of the risks analysed (total number)	Risk summaries; Risk matrix/matrices	After the end of each fiscal year
	Number of new corruption risks analysed (after integrity breaches and corruption incidents)	The indicator measures the number of new corruption risks not measured during the initial analysis. Such new corruption risks may become relevant, and they are analysed only after an integrity breach or a corruption incident emerges.	An addition to the new corruption risks analysed (total number)	Updates of the risk matrix	After the end of each fiscal year
	Number of corruption risks updated compared to the initial analysis	The indicator measures the number of corruption risks for which the initial likelihood and impact analysis (risk level) was updated. Such updates may be determined by changes in the external and/or internal context (legislative, institutional, or policy). The indicator measures only corruption risks updated after the initial analysis but before the residual corruption risk calculation.	An addition to the updated corruption risks (total number)	Updates of the risk matrix	After the end of each fiscal year
Corruption risks evaluation	Number of corruption risks evaluated	Risk evaluation is the comparison of the level of risk found during the risk analysis with context and the entity's strategy. Risk evaluation determines the risk treatment and the priority to be treated.	An addition to the corruption risks evaluated (total number)	Risk evaluation minute	After the end of each fiscal year
	Number of risk	The indicator measures the number of risk	Addition of the risk owners	Risk matrix.	After the end of

CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
	owners	owners.	(total number), by type: natural persons, organisational structures		each fiscal year
	Gender balance of risk owners	The indicator measures the proportion of men and women appointed as risk owners compared with the general gender distribution in the respective environment (organisation, project, or sector)	= risk owners women/men ratio vs. women/men ratio in the respective environment. Balance is ensured if both results are either less than 1 or greater than 1.	Human resource files	Annually, at the beginning of each CRA exercise
	Professional training of risk owners	The indicator measures the percentage of individuals (natural persons) designated as risk owners who attended CRA training in the last fiscal year.	= number of individuals (natural persons) designated as risk owners that attended CRA training in the last fiscal year/ total number of individuals designated as risk owners *100	Human resource files	After the end of each fiscal year
	Gender balance in access to CRA training	The indicator measures the proportion of men and women participating in CRA training compared with the general gender distribution in the respective environment (organisation, project, or sector)	= trainees women/men ratio vs. women/men ratio in the respective environment. Balance is ensured if both results are either less than 1 or greater than 1.	Human resource files	After the end of each fiscal year
	[!] Internal availability of the corruption risk matrix	The indicator measures the internal availability of the corruption risk matrix.	The measurement is binary: Yes/No	Intranet folder or distribution list	After the end of each fiscal year



CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
	Public availability of the corruption risk matrix	The indicator measures the public availability of the corruption risk matrix.	The measurement is binary: Yes /No	Website, social media platforms	After the end of each fiscal year
	Corruption risk treatment/ mitigation options	The indicator measures the most commonly used treatment / mitigation option for corruption risks.	Calculated by adding the number of corruption risks included in each mitigation option.	Risk matrix; Risk evaluation minutes	After the end of each fiscal year
	Justification for the treatment / mitigation option	The indicator measures the availability of justification for the mitigation option selected. There must be a rationale available for the treatment option chosen in each case of corruption risk.	Calculating by adding the number of corruption risks that have a substantiated treatment / mitigation option	Substantiation / evaluation templates	After the end of each fiscal year
Corruption risks mitigation	Number of control measures	The indicator assesses the most commonly used control measures for reducing corruption risks.	Adding the number of control measures for each type	Risk matrix.	After the end of each fiscal year
	Number of control measures chosen based on a cost-benefit analysis	The indicator assesses how many control measures were chosen based on a cost-benefit analysis.	Adding the number of control measures that were selected based on a cost-benefit analysis.	Cost-benefit analysis templates / reports	After the end of each fiscal year
	[!]Implementation level of the control measures	The indicator assesses the percentage of control measures fully implemented.	= number of control measures fully implemented / number of control measures *100	Monitoring report	After the end of each fiscal year
	[!]Review of corruption incidents and integrity breaches	The indicator measures the percentage of corruption incidents and integrity breaches that were analysed in the last fiscal year to determine the favourable factors and underlying causes. Such internal reports include recommendations, and they may be used to	= Number of reports on the factors and causes of each corruption incident or integrity breach / total number of corruption incidents and integrity	Disciplinary committee reports Communication from an anti-corruption law	After the end of each fiscal year

CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
		update the corruption risk analysis and control measures.	breaches.	enforcement	
	Number of control measures reviewed during implementation	The indicator measures the process of altering the corruption control measures during implementation. The indicator refers only to control measures reviewed during implementation before the residual corruption risk calculation.	Adding the number of control measures reviewed	Control measures implementation reports	After the end of each fiscal year
	Number of risk mitigation meetings	The number of onsite or online meetings to decide on the mitigation options.	Addition of the number of meetings	Data is available in internal notes, emails, attendance lists	After the end of each fiscal year
	Internal availability of the mitigation minutes	The indicator measures the internal availability of the mitigation minutes.	The measurement is binary: Yes /No	Intranet or distribution list	After the end of each fiscal year
	Public availability of the mitigation minutes	The indicator measures the public availability of the mitigation minutes.	The measurement is binary: Yes /No	Website	After the end of each fiscal year
Residual corruption risks	Number of meetings to calculate residual corruption risks	The number of onsite or online meetings to calculate residual corruption risks.	Addition of the number of meetings	Internal notes, emails, attendance lists	After the end of each fiscal year
	[!] Impact of implemented control measures on risk level	The indicator measures the impact of the implementation of the corruption control measures. Please refer only to the risks reviewed during the residual corruption risk calculation.	The number of risks that have an overall lower risk level after the implementation of corruption control measures.	Updates of the risk matrix	After the end of each fiscal year



CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
	Number of residual corruption risk reports	The indicator measures the number of residual corruption risk reports, namely internal official documents approved by the management explaining the residual corruption risk process, findings, and results.	Addition of the number of reports	Official registry	After the end of each fiscal year
Monitoring and evaluation	Number of M&E meetings on CRA	The number of CRA monitoring meetings of the body responsible for monitoring and evaluation.	Addition of the number of meetings	Meeting's agenda and minutes	After the end of each fiscal year
	Number of monitoring reports on CRA in the last fiscal year	An M&E report on CRA is a document measuring the CRA indicators, evaluating the process, and offering recommendations.	Addition of the number of reports	Official registry	After the end of each fiscal year
	Number of follow-up M&E reports in the last fiscal year.	The M&E follow-up report is a document assessing the implementation of the recommendations in the initial report.	Addition of the number of reports	Official registry	After the end of each fiscal year
	Number of evaluation reports on CRA in the last fiscal year	An evaluation report is a report submitted by an independent evaluator.	Addition of the number of reports	Official registry	After the end of each fiscal year
	Data collection instruments used for evaluation	The indicator measures the types of data collection instruments used for evaluation purposes.	The addition of the risk identification instruments used (total number)	Evaluation report	After the end of each fiscal year
	[!] M&E recommendation implementation level	The indicator measures the implementation level of the recommendations issued during the M&E process	$= \frac{\text{number of recommendations fully implemented}}{\text{total number of recommendations}} * 100$	Follow-up reports	After the end of each fiscal year

CRA stage	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
Communication and consultation	[!]Number of stakeholders involved in corruption risk assessment	The indicator measures the number of persons—natural persons or representatives of a legal person that attended a corruption risk identification meeting or submitted a point of view/questionnaire to the process.	Adding the numbers of stakeholders involved in corruption risk assessment by type: internal \ external	Attendance lists; emails, questionnaire reports	After the end of each fiscal year
	Number of website and social media posts regarding CRA	CRA social media posts mean announcements on social media platforms, such as Facebook, Twitter, etc., regarding the management of corruption risks: results, meetings, published documents, etc.	Adding the social media and website posts on CRA during the year	Social platforms Website	After the end of each fiscal year



7.6.3 Impact monitoring indicators

This sub-chapter continues the previous one and it addresses the impact of the CRA implementation.

Type	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
Impact	[!] Relevance of the corruption risk assessment	The ratio between corruption incidents/integrity breaches not included in the risk matrix and those included: 0, less than 1, greater than 1. A result greater than 1 means that CRA was not done properly and missed the most important corruption risks.	Addition of the number of risks triggered that were not included / included in the corruption risk matrix. Ratio calculation	Desk review of cases/files based on corruption incident reports.	After the end of each fiscal year. Trend of the ratio in the last five years.
	[!] Effectiveness of corruption control measures	The ratio between corruption incidents/events related to the work process where corruption control measures were implemented in the last fiscal year and those unrelated: 0, less than 1, greater than 1. A result greater than 1 means that control measures were not properly designed or implemented and failed to prevent corruption risks.	Ratio calculation	Desk review of cases/files based on corruption incident reports.	After the end of each fiscal year. Trend of the ratio in the last five years.
	Stakeholder perceptions of corruption	The indicator measures the number of stakeholders that perceive corruption in the respective environment (organisation, project, or sector).	= Number of stakeholders reporting they experienced corruption / number of stakeholders that replied to the questionnaire *100.	Stakeholder survey and performance/feedback questionnaire	After the end of each fiscal year. Trend (% decrease) in the evolution of corruption perception in the last five

Type	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
					years.
	[!] Number of corruption incidents and integrity breaches	The indicator measures the number of corruption incidents and integrity breaches in the last fiscal year.	Addition of the number of corruption incidents and integrity breaches in the last fiscal year.	Disciplinary reports; Communication from the anti-corruption bodies	After the end of each fiscal year. Trend (% decrease) in the number of corruption incidents and integrity breaches
	CRA's impact on reducing corruption at the sectoral and national level ⁶⁰	<p>Comparing the number of corruption incidents and integrity breaches at the institutional level between similar institutions/entities (in terms of competencies, budget, and staff) but different in terms of CRA implementation (based on process/output indicators). The assumption is that entities with good implementation of the CRA have fewer corruption incidences reported.</p> <p>Considering the number of corruption incidents and integrity breaches, institutions/entities holding legal status may be organised into three categories: many incidents (more than 3 incidents in the last year), few incidents (between 1 and 3), and zero incidents.</p> <p>Institution/entity category in terms of competencies, budget, and staff.</p>	Regression analysis	The indicator may be measured at a national or sectoral level based on the monitoring reports of different organisations.	Annually



Type	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
		Institutions/entities holding legal status may be organised based on the policy area (education, health, defence, etc.) into three categories: larger (over 800 staff or 10-million-euro annual budget), medium (over 100 staff or more than 5-million-euro annual budgets), and smaller (under 100 staff or less than 5-million-euro annual budgets).			
		CRA implementation may be assessed based on the progress indicators in three categories: full implementation, partial implementation, and no implementation.			
	CRA's impact on good governance at the sectoral and national level	Comparing the stakeholder reports on good governance between similar institutions/entities (in terms of competencies, budget, and staff) but different in terms of CRA implementation (based on process/output indicators). The assumption is that entities with a good implementation of CRA have better stakeholder feedback on good governance.	Regression analysis	The indicator may be measured at a national or sectoral level based on the monitoring reports of different organisations.	Annually
Outcome	% of employees that report increased awareness of corruption risks due to the CRA exercise	Internal (online) survey among the employees regarding the outcome of the CRA mechanism. Specific questions regarding their auto-evaluated level of awareness and work improvements before and after the CRA implementation. A proposed questionnaire for employees is	Calculate frequencies	Survey report	Annually

Type	Indicator name	Indicator definition	Indicator Measurement	Data Sources	Data collection frequency
	% of employees that report improving work processes due to CRA exercise	available in Annex 1.			
	% of employees that report tighter corruption controls due to the CRA exercise				
	% of stakeholders reporting lesser corruption opportunities	A proposed stakeholder questionnaire is available in Annex 1.	Calculate frequencies	Survey report	Ongoing throughout the year



8. CRA EVALUATION PROCESS

There are three main types of evaluation of a CRA: impact evaluation, outcome evaluation, and process evaluation. Each type of CRA evaluation responds to a different set of questions and uses a different set of indicators:

- **Impact evaluation.** What change/long-term sustainable effect was achieved in curbing corruption at the institutional, sectoral, or project level following CRA implementation? Which effects on curbing corruption at the institutional, sectoral, or project level are directly attributable to CRA? Did CRA implementation contribute to enhanced coherence, quality of governance, and management in the respective institution, sector, or project?
- **Outcome evaluation.** Have the CRA's intended objectives been reached? What are the relevance, efficiency, and effectiveness of achieving the CRA's stated objectives?
- **Process evaluation.** Are CRA activities regularly implemented according to the plan? Are the expected outputs produced on time and according to plan? What are the corruption risk management practises of organisations? Output evaluation does not grasp the effects that CRA might have on the control of corruption.

As the evaluation is regularly done by independent experts, the practitioners may specify the type of evaluation method desired in the terms of reference (ToR).

Example of ToR

Purpose of the evaluation	Assess the relevance, efficiency, effectiveness, and impact of the CRA. The evaluation has to provide an independent opinion on the performance of the CRA. It has to provide recommendations from both the strategic and Operational perspectives.
The period covered	Two/Three/Five year period
Specific evaluation objectives	<ul style="list-style-type: none">• Assess the extent to which the mitigation measures were relevant to the corruption risks identified and consistent with the Integrity Plan;• Evaluate the efficiency and effectiveness of the mitigation measures implemented;• Identify challenges, lessons learned, and recommendations for consideration in the next CRA planning phase.
Methodology	Review of data collected during CRA monitoring; Interview relevant stakeholders / survey / data collection through a questionnaire; Field work.
Deliverables	Inception report with the evaluation methodology; Draft evaluation report: findings and recommendations; Final evaluation report.
Schedule	Duration of the evaluation
Location	Place of work
Evaluation team requirements	Knowledge and experience requirements

8.1 Evaluation planning

Corruption risk assessment or evaluation is critical to the strategic planning of new CRA processes. Evaluations generate knowledge, accountability, and improvements.

No.	Task
1.	<p>Identify evaluation requirements (terms of reference) and objectives. Determine the profile of the independent evaluators and the evaluation team.</p> <p>Explanation: Evaluation should be done in an objective manner by independent bodies or experts, with internal audit being an eligible entity. For example, the internal audit may evaluate the effectiveness/efficiency/sustainability of the corruption risk assessment process (in terms of impact, outcome, and outputs) or the effectiveness of the corruption risk management framework. Example of evaluation questions: Does the CRA framework support the achievement of the anti-corruption objectives? Is the CRA framework aligned with the expectations, targets, and plans?). Evaluation of the CRA framework may address CRA policy and procedure (including internal and external communication mechanisms), institutional arrangements for CRA (risk owners, working groups), integration of CRA into organisational processes (especially strategic planning), and resources allocated to CRA (human, financial, training, infrastructure). Also, a CRA evaluation has to document how previous evaluation reports on corruption risk management were included in the last exercise under evaluation. It also has to document lessons learned, achievements, and failures.</p>
2.	<p>Engage stakeholders in all steps of this way forward to enhance credibility, transparency, ownership, and accountability.</p> <p>Explanation: Organise online co-creation workshops or distribute short questionnaires.</p>
3.	<p>Elaborate evaluation design (questions, evidence, methods, data collection tools, roles and responsibilities, timing, and costs).</p> <p>Explanation: The choice of design depends on the evaluation questions, CRA type (institutional, sectoral, or ad hoc), available data, and resources. Include a human rights and gender equality perspective into the evaluation design: fair representation of women and vulnerable groups.</p>
4.	<p>Develop indicators.</p> <p>Explanation: Evaluation indicators are often too ambitious, not precise, vague, not easily verifiable, costly (surveys), and too focused on outputs. Use the indicators measured during the monitoring stage. Data sources for indicators may be:</p> <ul style="list-style-type: none"> • Media reports on corruption incidents; • Internal audit and controls documented; • Reports by civil society/international organisations on CRA; • Perception-based surveys and indicators; • Experience-based surveys and indicators; • Interviews.
5.	<p>Select reliable and realistic data sources for the indicators.</p> <p>Explanation: Evaluate the existing data sources and the need to collect new data. Use multiple data sources if available.</p>

Most evaluations rely on a mixed-methods approach and triangulation.

Table 8 Evaluation methods⁶¹

Type of evaluation method	Validity of findings	Cost/resources	Data availability
Gold: randomization and field experiments ⁶²	produce evaluations with strong internal and external validity	the method requires a substantial budget	it is often difficult to establish a control group
Silver: statistical matching methods and advanced surveys	provide useful and credible evidence of impact	the method is resource-intensive	the collection of survey data is time-consuming
Bronze: interviews, case studies, and small homemade surveys	produce less credible evidence on the outcomes and impacts of an intervention	evaluation's budget is relatively low	use of secondary sources of data

8.2. Evaluation data collection

No.	Task
1.	<p>Collect the data specified in the evaluation plan.</p> <p>Explanation: Use the data available through the monitoring process. Primary data is information collected directly by the evaluators from stakeholders. Secondary data is information collected by another party. Data collection methods (tools): monitoring system, survey (questionnaire), interviewing (interview guide), on-site observation (observation template), focus-group (group interview guide), expert panel (questionnaire), case study.</p>
2.	<p>Validation of data (quality control).</p> <p>Explanation: Verify the data collected to ensure they are consistent, correct, reliable, and lack redundancy. Come back with questions for the persons/entities submitting the raw data if you identify outliers in the data. If you use multiple data sources, triangulate the data to verify accuracy.</p>

Republic of Moldova Anti-corruption Strategy Impact Assessment⁶³

The impact evaluation of the Moldova National Integrity and Anti-corruption Strategy 2017-2020 was based on a set of perception indicators established at the beginning of the process. A baseline and an end-line study have been commissioned. The final impact assessment report measured the changes in the public's perception and experience with corruption (three national surveys targeting the general public, companies, and public sector employees).

About 40% (34% in 2017) of public servant respondents say that the institution they represent has a matrix of corruption risks.

Survey participants were asked to assess the effectiveness of the corruption risk matrix on a scale of 1 to 5, where 1 = the matrix is not completed at all, and 5 = the risks are analysed, updated, and actions are taken to address them. Thus, among the respondents who confirmed the existence of the risk matrix in the institution, about 62% (52% in 2017) assessed the document's efficiency higher,

assigning values 4 and 5. Another 12% (18% in 2017) of the respondents mentioned that the matrix was not completed at all, and just under 1/5 of respondents in both studies did not know or did not want to give any opinions. The estimated average score of the efficiency of the corruption risk matrix is 4.1 (3.6 in 2017).

Indicators:

- # 99. The share of companies that report they have not experienced situations of corruption in their interactions with public agents. Target: the gradual increase of the percentage value: 2017, 53%; 2019, 74%.
- An internal indicator of public agents - the efficiency of the corruption risk matrix is 4.1, which is also an increase compared to the previous study (3.6 in 2017).

8.3. Evaluation data analysis

No.	Task
1.	Organise and classify the collected data (code and collate the data).
2.	Apply different statistical methods to the data to extract information for calculating the monitoring indicators. Generate frequencies, summarise, tabulate data, compare data, and disaggregate data by different categories (gender, departments, etc.). Analyse the evolution over time, and identify patterns.

8.4. Evaluation reporting and communication

No.	Task/activity
1.	Elaborate on the evaluation report based on the empirical evidence. Evaluation conclusions critically assess the findings.
2.	Elaborate realistic recommendations based on the evaluation's conclusions. Identify alternative scenarios and weigh their feasibility against the organisational context. Recommendations should include a rationale.
3.	Submit the evaluation report to top-level management or decision-making.
4.	Communicate the evaluation report internally and externally.

8.5. Apply evaluation findings

No.	Task/activity
1.	Implement the recommendations and results of the evaluation report. Evaluation results help to make evidence-based decisions over the new CRA policy cycle.
2.	Elaborate on and disseminate the lessons learned.



BIBLIOGRAPHY

1. Asian Development Bank (2016), Evaluating and monitoring anticorruption reforms and programs reports on a high-level panel discussion and training workshop
2. Centrul de Studii Sociale și Marketing „CBS-Research” (2019), Studiu de evaluare a impactului strategiei naționale de integritate și anticorupție – Moldova 2019, Chișinău
3. Council of Europe (2019), Rationale and outline of a Corruption Risk Assessment methodology, paper for comment and decision: <https://rm.coe.int/eccd-cra-methodology-proposal-en/168098f194>, last accessed 06/08/2021
4. Direcția Generală Anticorupție (2014), Manual de bune practici privind utilizarea aplicațiilor informatice pentru analiza riscurilor și vulnerabilităților la corupție
5. Independent Commission Against Corruption (2009), Public Sector Anti-Corruption Framework Manual
6. International Organization for Standardization (2018), ISO 31000:2018 (en) Risk management — Guidelines; available at: <https://www.iso.org/obp/ui/#iso:std:iso:31000:ed-2:v1:en> (last accessed 13/10/2021)
7. Johnsen, Jesper (2012), Theories of change in anti-corruption work. A tool for programme design and evaluation, Chr. Michelsen Institute (CMI), U4 Anti-Corruption Resource Centre
8. Johnsen, Jesper and Søreide, Tina (2013), Methods for learning what works and why in anti-corruption. An introduction to evaluation methods for practitioners, Chr. Michelsen Institute (CMI), U4 Anti-Corruption Resource Centre
9. Johnsen, Jesper (2015), The basics of corruption risk management: A framework for decision making and integration into the project cycles, Chr. Michelsen Institute (CMI), U4 Anti-Corruption Resource Centre
10. Klitgaard, Robert E., MacLean-Abaroa, Ronald, Parris, H. Lindsey (2000), Corrupt cities: a practical guide to cure and prevention, Institute for Contemporary Studies (Oakland, Calif.), World Bank Institute, ICS Press
11. Komisija za preprečevanje korupcije (2017), Navodila za uporabo elektronskega registra tveganj
12. McDevitt, Andy (2011), Corruption Risk Assessment Topic Guide, Transparency International
13. Mojsilović, Miloš (2017), MODEL LOCAL ANTI-CORRUPTION PLAN with Guidelines for Adoption, Implementation and Monitoring
14. Mulcahy, Suzanne and Pring, Coralie (2020), Final External Evaluation of the Joint Regional Anti-Corruption Initiative (RAI) and United Nations Office of Drugs and Crime (UNODC) Southeast Europe (SEE) Regional Programme on Strengthening the Capacity of Anti-corruption Authorities and Civil Society to Combat Corruption and Contribute to the UNCAC Review Process
15. OECD¹ (2014), Istanbul anti-corruption action plan. Manual for monitoring experts
16. Norwegian Agency for Development Cooperation (2011), Joint Evaluation of Support to Anti-Corruption Efforts 2002-2009, report 6 synthesis

17. OECD (2014)², Practical guide: How to conduct Monitoring by Civil society. Istanbul anticorruption action Plan
18. OECD (2017), 2016 Recommendation of the Council for Development Co-operation Actors on Managing the Risk of Corruption: A Compendium of Existing Practices
19. OECD (2018), Manual of Standard Procedures for the National Anti-Corruption Action Plan Cycle in Greece
20. OECD (2019), Analytics for Integrity. Data-driven approaches for enhancing corruption and fraud risk assessments
21. OECD (2021)¹, Istanbul Anti-Corruption Action Plan 5th Round Monitoring: Pilot Overview and Procedures, OECD Anti-Corruption Network for Eastern Europe and Central Asia
22. OECD (2021)², Istanbul Anti-Corruption Action Plan 5th Round Monitoring: Pilot Performance Indicators, OECD Anti-Corruption Network for Eastern Europe and Central Asia
23. Regional Anti-corruption Initiative (2015), Monitoring and evaluation of the implementation of National anti-corruption Strategies and action plans Methodology
24. Regional Cooperation Council and Regional Anti-corruption Initiative (2015), Corruption Risk Assessment in Public Institutions in South East Europe Comparative Study and Methodology
25. Rahman, Kaunain (2020), Approaches to monitor identified external corruption risks in development programmes, U4 Anti-Corruption Resource Centre and Transparency International
26. Schütte, Sofie Arjon (2017), Bespoke monitoring and evaluation of anti-corruption agencies, Bergen: Chr. Michelsen Institute, U4 Brie
27. Selinšek, Ljiljana (2015), Corruption Risk Assessment in Public Institutions in South-East Europe – Comparative Research and Methodology, Sarajevo: Regional Cooperation Council
28. Terracol, Marie (2015), Corruption risk assessment and management approaches in the public sector, Transparency International
29. Trapnell, Stephanie E; Jenkins, Matthew D; Chêne, Marie (2017), Monitoring Corruption and Anti-corruption in the Sustainable Development Goals: A Resource Guide, Transparency International
30. Transparency International (2020), Mining Awards Corruption Risk Assessment Tool (3rd edition)
31. United Nations Development Programme (2009), Handbook on planning, monitoring and evaluating for development results, New York
32. United Nations Development Programme (2014), Anti-corruption Strategies: Understanding What Works, What doesn't and Why? Lessons learned from the Asia-Pacific region
33. United Nations Development Programme (2015), User's guide to measuring corruption and anti-corruption, New York
34. United Nations Development Programme (2018), Conceptual framework: corruption risk assessment at sectoral level: United Nations development programme, New York



35. United Nations Office on Drugs and Crime (2018), Manual on corruption surveys. Methodological guidelines for the measurement of bribery and other forms of corruption through sample surveys, Vienna
36. United Nations Global Compact (2013), A Guide for Anti-Corruption Risk Assessment
37. World Bank (2016), Monitoring and Evaluation (M&E) of Anti-Corruption Action Plans

ANNEX 1 CRA MONITORING & EVALUATION METHODOLOGY

CONTENTS

1. Introduction	60
1.1 Purpose of this methodology	60
1.2 CRA process	60
1.3. M&E resources	60
2. Corruption risk assessment monitoring matrix	61
3. Corruption risk mitigation monitoring matrix	62
4. Indicators passport	63
5. M&E team: roles and responsibilities	63
5.1. Checklist of minimum skills and competences of the CRA M&E team	63
5.2. Roles and Responsibilities for monitoring	64
5.3. Roles and Responsibilities for evaluation	65
6. Data Flow	65
7. Data Management	66
7.1 Storage	66
7.2 Data analysis	66
7.3 Privacy and data protection	66
8. Elaborating findings and recommendations	66
Appendices	68
- Stakeholder questionnaire	68
- Employees questionnaire	69



1. Introduction

1.1 Purpose of this methodology

<Describe what the purpose of the monitoring and evaluation methodology is, such as who prepared it, for which audience and why, and what the legal framework is>

1.2 CRA process

<Explain the type of CRA process for which the monitoring and evaluation methodology is prepared>

1.3. M&E resources

Resource type	Explanation
Financial	<i><Please put here the total annual M&E budget and explain the main cost categories (procurement, travel, salaries/bonuses, etc.). Please explain how the required funds will be allocated on an annual basis></i>
Human resources	<i><Please put here the total number of individuals involved in CRA M&E and the number of working days per staff member></i>
Technology	<i><Please explain the technological needs and if they are already met or if they have to be secured before implementation: software, hardware, access to databases, etc></i>
Information	<i><Please explain the informational needs and if they are already met or if they have to be secured before implementation: access to specific types of information, etc.</i>
Time	<i><Please explain the milestones and deadlines></i>

2. CORRUPTION RISK ASSESSMENT IMPLEMENTATION MONITORING MATRIX

Please use this template to fill in the monitoring indicators for CRA implementation. It is important that the CRA process be conducted in an effective manner. This set of indicators ensures that planned resources are allocated and planned activities are conducted, including monitoring and evaluation activities. Without a professional CRA implementation, it is hard to keep the risks under control.

CRA Stage	Responsible person	Indicator (basket of indicators)	Indicator baseline	Indicator Target		Data Collection			Indicator Status (the actual value of the indicator. The actual value has to be compared with the target)	
				Period 1	Period n	Source	Tools	Frequency	Period 1	Period n
CRA planning		a) Framework b) Process								
Corruption risks identification		a) Framework b) Process								
Corruption risks analysis		a) Framework b) Process								
Corruption risks evaluation										
Corruption risks mitigation stage										
Residual corruption risks										
Monitoring and evaluation of the CRA										
Communication and consultation										



3. CORRUPTION RISK MITIGATION MONITORING MATRIX

Please use this template to fill in the monitoring indicators at the beginning of the risk mitigation stage.

Risks	Risk level on the heat map	Risk treatment	Specific actions	Responsible person	Indicator (basket of indicators)	Indicator baseline	Indicator Target		Data Collection			Indicator Status	
							Period 1	Period n	Source	Tools	Frequency	Period 1	Period n
Example 1		a) avoidance of risk	Repeal of the decision										
Example 2		b) accepting the risk	Implementation of the existing corruption controls		a) Framework b) Process c) Impact								
Example 3		c) reducing/controlling the risk	New measure: training, transparency, new rules		a) Framework b) Process c) Impact								
Example 4		d) transfer / sharing the risk	Subcontracting evaluation of grant applications by a third party										

4. INDICATORS LIST

The purpose of this form is to present in detail each indicator used to monitor and evaluate the corruption risk assessment process. This form should be filled in when the set of indicators for the CRA process is formulated (see Section 5.3.1).

ID and name of the indicator	
Indicator type	The indicator may be a framework, process or impact type.
Indicator definition and role	The indicator may measure the implementation of a CRA stage, the implementation of a mitigation measure, or changes in a risk (changes in risk conditions or risk triggers).
Indicator measurement	Measurement is the process of associating numbers with physical quantities and phenomena.
Data source/s	Where are the data collected? Ex. from the institution's departments, from another organisation
Data collection tool	How are the data collected? Ex. available on a website, collected from departments using a template, collected from employees using a questionnaire
Data collection frequency	How often is the indicator collected?
Indicator Baseline	year/value
Indicator target	year/value
Responsible person	The person responsible for reporting this indicator

5. M&E TEAM: ROLES AND RESPONSIBILITIES

5.1. Checklist of minimum skills and competencies of the CRA M&E team⁶⁴

The checklist may be used as a self-assessment tool or it may be used by high-level management to assess the competence of the relevant staff before appointing them to the CRA M&E team.

Note: Please mark (✓) for each team member's skills and competencies (actual skills). It is strongly encouraged that team members have complementary skills and competencies.

Minimum skills and competencies required for the CRA M&E Team	Team member "A" ⁶⁵	Team member "Z"
<ul style="list-style-type: none"> Behavioural Competencies 		
Ability to identify and engage stakeholders at all levels; collaborates with partners on assessing progress and dealing with critical issues.		
Written and oral communication		
Time management, organisational, and work planning		
<ul style="list-style-type: none"> Technical Competencies 		
Experience and familiarity with M&E concepts		
Ability to identify, develop, calculate, and improve indicators		
Ability to develop, regularly update, harmonise, and communicate M&E plans		
Ability to identify the sources of data, collect, manage, analyze, and interpret data		
<ul style="list-style-type: none"> CRA and anti-corruption knowledge 		
Knowledge of anti-corruption legislation and national strategy		



Knowledge of the CRA tool		
Knowledge of the internal anti-corruption management system		

5.2. Roles and Responsibilities for monitoring

Please fill out this table according to your specific situation. Change the parties' names to real-life structures and individuals, and further develop roles and responsibilities into concrete tasks.

Parties	M&E Roles and Responsibilities
• Institutional CRA	
Supervising national authorities	<ul style="list-style-type: none"> • Receive and organise M&E institutional reports; • Manage the national CRA M&E IT system; • Use monitoring evidence and lessons learned to inform policy development and decision making; • Provide M&E technical assistance to public sector organisations;
Institutional management	<ul style="list-style-type: none"> • Submits the monitoring reports to national authorities; • Reports on the corrective actions taken; • Receives and approves regular monitoring reports; • Approve the CRA M&E budget;
M&E working group	<ul style="list-style-type: none"> • Conduct M&E stakeholder analysis; • Involve stakeholders in monitoring and evaluation; • Elaborate CRA M&E methodology/plan (sets indicators, baselines, and targets); • Collect monitoring data; • Elaborate regular CRA monitoring reports; • Communicate CRA monitoring reports; • Elaborate evaluation requirements;
Risk owners	<ul style="list-style-type: none"> • Monitor risks;
• Sectoral CRA	
Sectoral decision-makers	<ul style="list-style-type: none"> • Use monitoring evidence and lessons learned for informing policy development and decision-making; • Reports on the corrective actions taken;
National multi-stakeholder task force	<ul style="list-style-type: none"> • Elaborate sectoral CRA M&E methodology/plan; • Collect monitoring data; • Elaborate and disseminate regular CRA monitoring reports; • Provide M&E technical assistance to M&E managers;
M&E managers / responsible persons across the sector	<ul style="list-style-type: none"> • Submit monitoring data to the task force;
• Ad-hoc CRA	
Decision-makers (at project/programme/policy level)	<ul style="list-style-type: none"> • Use monitoring evidence and lessons learned for informing project/programme/policy adjustments; • Reports on the corrective actions taken;
M&E manager	<ul style="list-style-type: none"> • Elaborate CRA M&E methodology/plan • Collect monitoring data; • Elaborate and disseminate regular CRA monitoring reports • Provide M&E technical assistance to risk owners
Risk owners	<ul style="list-style-type: none"> • Monitor risks

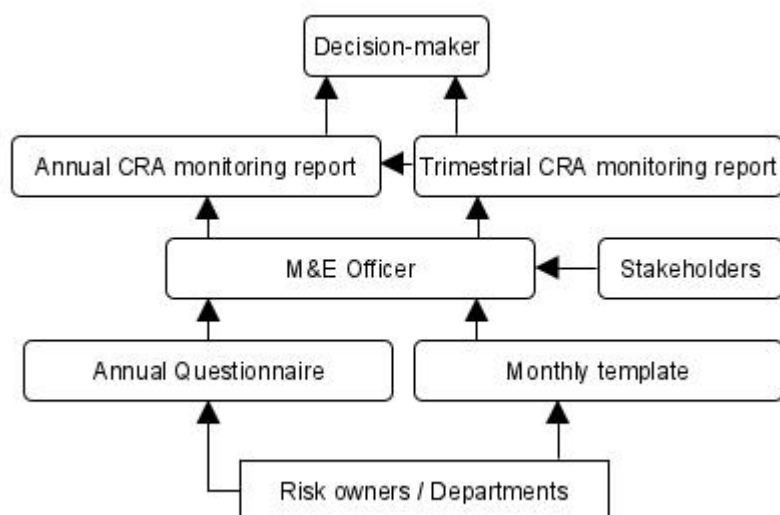
5.3. Roles and Responsibilities for evaluation

Please fill out this table according to your specific situation. Change the parties' names to real-life structures and individuals, and further develop roles and responsibilities into concrete tasks.

Parties	Evaluation Roles and Responsibilities
Institutional management / sectoral decision-makers / project, programme, and policy decision-makers	<ul style="list-style-type: none"> • Sets evaluation objectives based on stakeholder consultation • Ensures the independence of the evaluators (selection of evaluators) • Reports on the response to the evaluation;
Internal audit or external evaluation	<ul style="list-style-type: none"> • Decides on the evaluation design • Elaborate Evaluation plan • Data Collection • Elaborate evaluation report
M&E working group / national multi-stakeholder task force / M&E manager	<ul style="list-style-type: none"> • Providing the necessary documentation • Arranging meetings • Supporting logistics • Providing feedback on the draft evaluation report; • Disseminate the evaluation report

6. DATA FLOW

<Elaborate a data flow diagram and describe the procedure for data collection (who, what, when, and how). Explain who the potential users of monitoring and evaluation knowledge>





7. DATA MANAGEMENT

7.1 Storage

<Explain how the data collected will be stored. For example, data is stored in special drives, folders, or spreadsheets. Explain the backup procedures. Explain how data is archived and for how long.>

7.2 Data analysis

<Explain how the data collected is organised, classified, cross-checked, and compared. Explain the statistical methods used: frequency analysis, cross-tabulation>

7.3 Privacy and data protection

<Explain if monitoring and evaluation involve access to personal data and how this kind of data is managed>

8. ELABORATING FINDINGS AND RECOMMENDATIONS

The recommendation part of the process is extremely important. For example, several types of recommendations can derive from the CRA M&E process: revision/improvement of the CRA, improvement of indicators, improvement of the framework for CRA M&E, targeting corruption risks, and development of additional public policies to target corruption. The recommendations have to be provided for a specific timeframe (short-term, mid-term, and long-term) and to specific audiences (decision-makers, departments). The recommendations have to be based on and directly respond to the findings. Recommendations are specific interventions or strategies to address the challenges identified by the findings. The findings are arguments derived from the qualitative and quantitative analyses (analysis of the indicators). Analysis may also suggest gender-relevant findings. Findings may be challenged by stakeholders, so consultation has to be conducted before issuing recommendations. Findings may be prioritised based on a multi-criteria analysis.

Example of the link between the findings and the recommendations:

Finding	Recommendation	Source
The integrity risk assessment at this level (central government) is not conducted in practise. Furthermore, in order to be effective, such an assessment needs to be fully embedded in operational management practises and culture across the public sector and regularly evaluated as to its impact. The authorities concede to a number of flaws, such as the meagre capacity of internal control units, including a lack of certified auditors, no harmonisation of control systems and risk	II. (i) to systematically carry out integrity risk assessment in central government covering all functionaries and personal advisers and external associates, as appropriate;	GRECO, 2019 Evaluation report North Macedonia, Fifth Evaluation Round

assessments, and low awareness of Corruption risks except for bribery, and poor computerization.		
The Integrity Plan and the Methodology for the Integrity Risk Assessment for the central administration of the Ministry of Justice were adopted after the on-site visit, on 7 October 2020. However, such Integrity Plans have not been drafted yet for other ministries. The integrity plans are supposed to be based on an anti-corruption risk assessment that should identify the major corruption risk factors.	II. that i) concrete integrity plans be adopted and implemented within all ministries, including a systematic analysis of integrity-related risks that ministers and political advisors might face in the exercise of their duties and monitoring and compliance mechanisms	GRECO, 2019 Evaluation report Albania, Fifth Evaluation Round



Appendices⁶⁶

The questionnaires below are not a mandatory part of the CRA M&E process. They can add value to the process, but CRA M&E may be done without this part if there are not sufficient time, staff and resources for this activity.

Questionnaire on the satisfaction over the public services received

The questionnaire is addressed to beneficiaries/customers/service users. Data for impact indicators may be collected through this survey (see section 7.6.3 Impact monitoring indicators). If regular satisfaction surveys are already conducted, they may be used instead of this questionnaire. This questionnaire is just an example that may be adapted to local needs.

The purpose of this questionnaire is to identify your level of satisfaction with the public services received. The questionnaire is anonymous and we will not communicate it to anyone in this form.

1. How satisfied are you with the quality of public services received from this public organisation?

Not at all satisfied

Slightly satisfied

Moderately satisfied

Very satisfied,

Completely satisfied

2. How satisfied are you with the way you were treated by the institution's personnel? (Ex. aptitude, interest in delivering quality services)

Not at all satisfied

Slightly satisfied

Moderately satisfied

Very satisfied,

Completely satisfied

3. During your interaction with our institution, did it happen that you had to give a gift, a counterfavour, or some extra money, including through an intermediary, to receive the requested public service (with the exclusion of the correct amount of official fees)?

Yes

No

4. [If "Yes" to question no. 3] What was the main purpose of paying extra money or giving a gift?

Speed up the procedure

Make the finalisation of the procedure possible (which would otherwise not be possible)

Avoid paying a fine

Receive preferential treatment

Receiving information on the process (where to go, whom to approach, etc.)

It was a sign of appreciation for the service provided

No specific purpose (it is better to keep good relationships)

<p>5. <i>[If “Yes” to question no. 3]</i> How did you understand that an extra payment or gift was expected from you?</p> <p>Direct request from the official</p> <p>The official indirectly requested a payment</p> <p>A third person requested the extra payment</p> <p>Nobody asked for it; I did it to facilitate/accelerate the procedure</p>
<p>6. <i>[If “Yes” to question no. 3]</i> When exactly did you give the gift/money?</p> <p>Before the service was delivered</p> <p>After the service was delivered</p> <p>At the same time as the service was delivered</p> <p>Partly before and partly after the service was delivered</p>
<p>7. <i>If “No” to question no. 3]</i> What do you think we can improve in the delivery of public services?</p>
<p>Demographics</p>
<p>Sex</p> <p>Female</p> <p>Male</p>
<p>Education level</p> <p>Post-university</p> <p>University</p> <p>Highschool</p> <p>Secondary</p> <p>Primary</p>

Employee’s questionnaire

Please adapt the proposed questions below and develop a bespoke internal (online) questionnaire to survey employees regarding the outcome of the CRA mechanism.

The purpose of this questionnaire is to identify the extent to which you are aware of and satisfied with the outcomes of the most recent CRA exercise. The questionnaire is anonymous, and we will not communicate it to anyone in this form. The role of the questionnaire is to assess the relevance of CRA exercises in your day-to-day activities.

<p>1. Did you participate in the last year to a corruption risk assessment exercise?</p> <p>Yes</p> <p>No</p> <p>I don’t remember</p>
<p>2. Do you know what corruption risks you have to take into consideration in your day to day activity?</p> <p>Yes</p>



No
I do not remember
3. What was your awareness level of the corruption risks before the corruption risk assessment exercise?
Lower level
Same level
Higher level
I cannot determine
4. How aware are you of the corruption risks you face in your day to day activity?
Very aware
Moderately aware
Slightly aware
Not at all aware
I cannot determine
5. Do you agree that work processes improved after corruption mitigation measures were implemented?
Completely disagree
Disagree
Neither agree nor disagree
Agree
Completely agree
6. Do you agree that the corruption mitigation measures implemented lowered the level of exposure to corruption?
Completely disagree
Disagree
Neither agree nor disagree
Agree
Completely agree
7. What do you think may be improved for the next CRA exercise?
Demographics
Sex
Female
Male
Education level
Post-university

University

Highschool

Secondary

Primary



ENDNOTES

¹ The term is used in the same sense as in the OECD's Public Integrity Handbook

² Regional Cooperation Council and Regional Anti-corruption Initiative (2015), p. 32

³ Mulcahy, Suzanne and Pring, Coralie (2020), p. 24

⁴ According to the ISO 37001:2016 Standard, the planning process of an anti-bribery management system is based on the understanding of the context of the organisation, the needs and expectations of stakeholders and the bribery risks.

⁵ In the literature, there is a difference between Corruption Risk Assessment (CRA) and Corruption Risk Management (CRM). According to Transparency International (McDevitt, Blais and Shenkelaars, cited in Terracol, M., 2015), "corruption risk assessment is a diagnostic tool which seeks to identify weaknesses within a system which may present opportunities for corruption to occur", while "*corruption risk management is about taking steps to address the corruption risks thus identified*". Regional Cooperation Council and Regional Anti-corruption Initiative (2015) define CRA as a management tool for improving governance of a specific public sector institution (organisation, department, agency etc.), sector, project or process. Johnsen (2015) has a more general approach considering that corruption risk assessment is embedded into corruption risk management: "risk management entails interlinked but conceptually independent processes of risk identification, assessment, and mitigation".

⁶ Johnsen (2015), p.1

⁷ In the Regional Cooperation Council and Regional Anti-corruption Initiative (2015), there is a comprehensive review of the standards and methodologies of (corruption) risk assessment (ISO 31000:2009 standard, Technical Guide to the United Nations' Convention against Corruption (UNCAC), OECD Framework for Assessment of Public Sector Integrity, and USAID Anti-Corruption Assessment Handbook) as well as good practises.

⁸ A comprehensive list of CRA tools is available in the Council of Europe (2019).

⁹ Johnsen (2015, p. 5) defines three broad categories: risk identification, risk assessment, and risk mitigation. Nevertheless, for this methodology, we consider that the ISO 31000 standard provides a detailed classification of the steps: "Risk assessment is the overall process of risk identification, risk analysis, and risk evaluation".

¹⁰ The approach is described in detail in Klitgaard, Abaroa, Parris, 2000, p.74-77.

¹¹ A "Potemkin village" signifies a deceptive construct whose purpose is to hide an undesirable fact or condition. Based on a tale about Grigory Potyomkin, an 18th century Russian nobleman.

¹² Collective Action is a collaborative approach to address corruption challenges and raise standards of integrity and fair competition in business. More information on collective action: <https://baselgovernance.org/collective-action>

¹³ Regional Anti-corruption Initiative (2015)

¹⁴ European Commission, 2020 Rule of Law Report Country Chapter on the rule of law situation in Slovenia

¹⁵ Government Decision No. 599/2018 for the approval of the Standard Methodology for assessing the risks of corruption within the central public authorities and institutions.

¹⁶ UNDP, Report on assessing and managing corruption risks in the health sector in Tunisia, 2021: <http://www.undp-aci.org/resources/ac/publications.aspx#other> (last accessed 13/10/2021).

¹⁷ Council of Europe, Project against Corruption in Albania (PACA): <https://www.coe.int/en/web/corruption/completed-projects/paca> (last accessed 13/10/2021).

¹⁸ OECD, 2017, Corruption Prevention in the Education, Extractive and Police, <https://www.oecd.org/corruption/acn/OECD-ACN-Study-Corruption-Prevention-Sector-Level-2017-ENG.pdf> (last accessed 13/10/2021).

¹⁹ World Bank, 2008, Deterring Corruption and Improving Governance in the URBAN Water Supply & Sanitation Sector, <https://openknowledge.worldbank.org/handle/10986/11737> (last accessed 13/10/2021).

²⁰ Department for International Development, 2013, How to Note: Reducing corruption in infrastructure sectors <https://www.gov.uk/research-for-development-outputs/how-to-note-reducing-corruption-in-infrastructure-sectors> (last accessed 13/10/2021).

²¹ World Customs Organisation, 2015, Guide to corruption risk mapping http://www.wcoomd.org/-/media/wco/public/global/pdf/topics/integrity/instruments-and-tools/risk_mapping_guide_june_2015.pdf?la=en (last accessed 13/10/2021).

²² The methodology Corruption risk assessment for strategic planning against corruption and conflict of interests in the Republic of North Macedonia:

https://dksk.mk/fileadmin/user_upload/2019/Procenka_na_rizicite_od_korupci_a_02.10.2019_mk.pdf (last accessed 13/10/2021).

²³ North Macedonia: National strategy for prevention of corruption and conflict of interest: https://dksk.mk/wp-content/uploads/2021/09/NACS-2021_25-and-Action-Plan-EN-final.pdf (last accessed 13/10/2021).theory

²⁴ The Global Infrastructure Anti-Corruption Centre <https://giacentre.org/risk-assessment-project/> (last accessed 13/10/2021).

²⁵ World Bank, Summary of WBG Integrity Compliance Guidelines <https://thedocs.worldbank.org/en/doc/06476894a15cd4d6115605e0a8903f4c-0090012011/original/Summary-of-WBG-Integrity-Compliance-Guidelines.pdf> (last accessed 13/10/2021).

²⁶ World Bank, 2000, Preventing Fraud and Corruption in World Bank Projects. A Guide for Staff, p. 13 <http://www1.worldbank.org/publicsector/anticorrupt/fraudguide.pdf> (last accessed 13/10/2021).

²⁷ Commission for the Prevention of Corruption website: <https://www.kpk-rs.si/delo-komisije/instituti/integriteta/nacrt-integritete/> (last accessed 13/10/2021).

²⁸ OECD Recommendation of the Council for Development Co-operation Actors on Managing Risks of Corruption (2016)

²⁹ United Nations Development Programme (2015), p. 31

³⁰ United Nations Development Programme, 2015, p.8

³¹ The main methods to measure anti-corruption are explained in UNDP, 2015, p.17-19

³² A major weakness of M&E measurement is its low level of comparability unless common M&E standards are used.

³³ Adapted from Schütte, Sofie Arjon (2017)

³⁴ For instance, the Fight Against Corruption was established as a core US national interest: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/06/03/memorandum-on-establishing-the-fight-against-corruption-as-a-core-united-states-national-security-interest/> Also France adopted the Anti-Corruption Strategy in Its Cooperation Action (2021-2030).

³⁵ European Commission (2020), Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - Enhancing the accession process - A credible EU perspective for the Western Balkans, COM (2020) 57 final; Council of the European Union (2021), Application of the revised enlargement methodology to the accession negotiations with Montenegro and Serbia 8054/21 ELARG 19

³⁶ A CRA M&E methodology template is available in Annex 1

³⁷ Indicators have also to be SMART: Specific, Measurable, Achievable, Relevant, Timely.

³⁸ Trapnell, Stephanie E; Jenkins, Matthew D; Chêne, Marie (2017)

³⁹ UNDP, 2009, p.93

⁴⁰ sna.just.ro/Metodologia+de+monitorizare (last accessed 13/10/2021)

⁴¹ Example is taken from OECD, 2014², p. 24-25

⁴² UNDP, 2015, Manual on Integrity Planning and Integrity Management, p. 17

https://www.ks.undp.org/content/kosovo/en/home/library/democratic_governance/manual-on-integrity-planning-and-integrity-management.html

⁴³ Adapted from Johnsen, Jesper and Søreide, Tina (2013), p. 5-6

⁴⁴ France's Anti-Corruption Strategy in Its Cooperation Action 2021-2030:

<https://www.diplomatie.gouv.fr/en/photos-publications-and-graphics/publications/article/france-s-anti-corruption-strategy-in-its-cooperation-action-2021-2030>

⁴⁵ The Strategy is available at: https://drejtesia.gov.al/wp-content/uploads/2018/10/passport_indicators.pdf (last accessed 13/10/2021)

⁴⁶ The 2020-2022 Integrity Plan of the Agency for the Prevention of Corruption in Montenegro is available at: https://www.antikorupcija.me/media/documents/Plan_integriteta_Agencije_za_sprje%C4%8Davanje_korupcije_2020-2022.pdf (last accessed 13/10/2021)

⁴⁷ Law on Prevention of Corruption, article 97: <https://www.acas.rs/law-and-regulations/laws/law-acas/>

⁴⁸ Montenegrin Law on Prevention of Corruption (Article 76) and in Rules for the Drafting and Implementation of the Integrity Plan (Article 26): (https://www.antikorupcija.me/media/documents/Pravila_za_izradu_i_sprovođenje_planova_integriteta_-_ENG.pdf)

⁴⁹ Moldova Anti-corruption Strategy 2017-2020: <http://lex.justice.md/index.php?action=view&view=doc&lang=1&id=370789>



- ⁵⁰ Romanian National Anti-corruption Strategy 2021-2025:
<https://legislatie.just.ro/Public/DetaliuDocument/249828>
- ⁵¹ The yearly monitoring reports are available here: <http://sna.just.ro/Rapoarte+de+monitorizare>
- ⁵² Details about the project are available here: <http://sna.just.ro/Limba+Englez%C4%83>
- ⁵³ A template is proposed in Annex 1: corruption risk assessment implementation monitoring matrix. Also, a list of proposed framework, progress and impact monitoring indicators is available below.
- ⁵⁴ A template is proposed in Annex 1: corruption risk mitigation monitoring matrix
- ⁵⁵ F = framework indicator; P = Progress indicator; I = Impact indicator
- ⁵⁶ United Nations Development Programme (2015), p. 15
- ⁵⁷ https://ec.europa.eu/antifraud-knowledge-centre/library-good-practices-and-case-studies/good-practices/national-anti-corruption-strategy_en (last accessed 13.10.2021)
- ⁵⁸ Gifts above a certain value cannot be retained by the recipient and they become the property of the state. Nevertheless, the receiver may purchase it from the state at market value.
- ⁵⁹ Integration of the lessons learned is a key element in the evaluation of anti-corruption programs. Please consider U.S. Department of Justice Criminal Division, Evaluation of Corporate Compliance Programs (Updated June 2020)
- ⁶⁰ A separate methodology is needed to develop such an index. A similar ranking system based on points is the Pilot Performance Indicators developed for the Istanbul Anti-Corruption Action Plan 5th Round of Monitoring.
- ⁶¹ Table adapted from Johnsen, Jesper, and Søreide, Tina (2013)
- ⁶² The randomization and field experiment method consists of comparing two randomly selected groups with identical or similar characteristics but differently exposed to the anti-corruption intervention: the control group and the intervention group. The differences between the groups may be attributed to anti-corruption interventions, such as the CRA. Based on the differences, the evaluators may conduct an analysis between the cost (budget) and the benefits (decreased corruption) of the anti-corruption intervention.
- ⁶³ Centrul de Studii Sociale și Marketing „CBS-Research”, Studiu de evaluare a impactului strategiei naționale de integritate și anticorupție – Moldova 2019, Chișinău, 2019
- ⁶⁴ Adapted, based on World Bank (2016, Annex 4).
- ⁶⁵ The names of the M&E team members are listed in alphabetical order.
- ⁶⁶ The questions proposed in this methodology are adapted from those developed by UNDOC (2018).



REGIONAL
ANTI-CORRUPTION
INITIATIVE

Fra Andjela Zvizdovica I, B/14
71000 Sarajevo
Bosnia and Herzegovina
Phone: +387 33 296 327/328
E-mail: info@rai-see.org
www.rai-see.org