

INFORMATIVE NOTE

To the draft Governmental Decision on approval of the Methodology of corruption risk assessment in public institutions

The Draft Decision of the Government of RM regarding the approval of the Methodology of corruption risk assessment in public institutions is determined by the need to create a unique and efficient mechanism for the corruption risks assessment at institutional level.

By *corruption risk assessment* we ought to understand the process of identifying organizational factors that favor or might favor the corruption, as well as drawing up recommendations on how to eliminate its effects.

That leads us to the objectives of the assessment: identification of organizational factors that favor or might favor the corruption, as well as drawing up recommendations to prevent corruption (drafting integrity plans).

The corruption risks assessment in public institutions is based on the principles of legality, transparency and participation.

According to the Methodology of corruption risk assessment in public institutions, attached to the draft, the risk assessment is to be carried out through self-assessment. With this purposes, a self-assessment group is to be created, by virtue of the order issued by the Head of the institution. This group should be composed of a representative number of chiefs of relevant subdivisions (from 5 up to 7 members). Employees of the Center for Combating Economic Crimes and Corruption may also be included in the composition of the above group, to offer advisory support to the self-assessment group.

The methodology, attached to the draft, prescribes several stages of the self-assessment process: assessment of preconditions, corruption risks assessment as such, and submittal of recommendations on how to eliminate or diminish the effects of the corruption risks (drafting integrity plans).

The methodology, attached to the draft, offers methods (assessment of the relevant legal framework, assessment of the organizational structure, assessment of codes of ethics, assessment of employees' resistance against corruption factors, administration of the questionnaire to the employees of the institution, assessment of relationship between the institution and the public, analysis of specific corruption cases) and techniques (revision of basic information, collection of information obtained from surveys, use of target – groups, on-site observations), as well as several assessment tools, presented in the annexes (a Model Report on the resistance against corruption risks, a Model of Questionnaire to be filled out by the personnel, an Instrument for the interpretation of answers to the Model Questionnaire for personnel).

The application of the above Methodology will require no financial resources from the concerned authorities for its implementation.

Center for Combating Economic Crimes and Corruption



Draft

THE GOVERNMENT OF THE REPUBLIC OF MOLDOVA

DECISION

No _____

from _____
Chisinau

**On approval of the Methodology of corruption risk assessment
in public institutions**

With the purpose to create an efficient mechanism for the corruption risk assessment in public institutions, the Government

DECIDES:

1. To approve the Methodology of corruption risk assessment in public institutions, in conformity with the annexes.
2. During year 2008, all relevant central authorities of the public administration shall self-assess their corruption risks and report to the Government on the outcomes of the self-assessment.

3. The Center for Combating Economic Crimes and Corruption shall ensure counseling support to the relevant central authorities of the public administration in the process of corruption risks self –assessment.

Prime-Minister

Vasile TARLEV

METHODOLOGY
of corruption risk assessment
in public institutions

I. General provisions

1. Regulatory framework

The present Methodology sets forth the organizational and methodological framework of the corruption risks assessment process in public institutions, namely: the objectives, principles, stages, methods, techniques and outcomes of the above assessment.

In the above Methodology, by *corruption risk assessment in public institutions* (hereinafter – assessment), we ought to understand the process of identification of institutional factors that favor or might favor the corruption, as well as drawing up recommendations to eliminate their effects.

2. Objectives of the assessment

The objectives of the assessment are the following:

- to identify the institutional factors that favor or might favor the corruption;
- to draw up recommendation on how to eliminate or diminish their effects (drawing up integrity plans).

3. Principles of the assessment

The principles of the risk assessment are the following:

Legality – the assessment is to be carried out within the terms of the present methodology, observing the principles of legality at all stages, including measures guarantying the protection of information;

Transparency – the institution disseminates information regarding the outcomes of the assessment at the extent it considers as necessary. The transparency of the assessment process should by no means affect the level of objectivity of that evaluation;

Participation – the assessment process is to be carried out with the involvement and advises of all the stake holders (subdivisions, employees, beneficiaries of supplied services, etc).

4. Way of organizing the assessment process

The assessment is to be carried out through self – assessment. With this a self-assessment group is to be created, by virtue of the order issued by the Head of the institution. This group should be composed of a representative number of chiefs of relevant subdivisions (from 5 up to 7 members). Employees of the Center for Combating Economic Crimes and Corruption may also be included in the composition of the above group, as observers, to offer advisory support to the self-assessment group.

5. Stages of assessment

The assessment shall be carried out in three stages:

assessment of preconditions;

assessment of corruption risks as such;

submittal of recommendations to eliminate or diminish the effects of the corruption risks (drawing up integrity plans).

II. Assessment of preconditions

6. Assessment of preconditions assumes the following:

assessment of the legal framework, relevant for the specific institution;

assessment of the organizational structure of the institution;

assessment of codes of ethics (code of conduct, deontological code or other regulations that are guiding the behavior of employees in the institution).

7. Assessment of the legal framework assumes the following:

assessment of the legal framework (laws and subordinated normative acts, including interdepartmental acts) that apply to the institution;

assessment of provisions covering vulnerable activities.

8. Assessment of provisions covering vulnerable activities

When assessing the legal framework, a special emphasis ought to be placed on the assessment of legal provisions, covering the vulnerable activities. By vulnerable activities we ought to understand the activities of an institution that, by their specific, assume increased corruption risks. In this sense, the following is to be identified: absence of regulations, incomplete regulations, regulations with insufficient focus on the integrity requirements, insufficient familiarization of employees with the regulations, the inadequate application of rules and regulations.

Vulnerable activities might be as the ones, related to the internal organization of the institution, as the ones, related to the external attributions (tasks) of the institutions. Assessment of provisions covering vulnerable activities may be carried out following the model attached in annexes No 1 to the present Methodology.

9. Vulnerable activities related to the internal organization of the institution

Vulnerable activities related to the internal organization of the institution are dealing with:

handling of information (holding inside information; provision of confidential information; production, examination, administration (storing), duplication of confidential documents, including electronic files and database; internal and external mutation of confidential documents, including electronic files);

management of funds and financial resources (allocation, control and audit of budgets; payment of expenses, granting bonuses, premiums, and allowances);

management of goods and services (making decisions about purchasing or hiring, setting quality requirements of terms of delivery, carrying out negotiations, assigning suppliers, administration and allocation of goods within the organization, using company goods outside office hours or outside the institution).

10. Vulnerable activities related to the external attributions (tasks) of the institution

Vulnerable activities related to the external attributions (tasks) of the institutions are the activities dealing with:

collection of payments (taxes, administrative charges, amounts due, etc.);

contracting (orders, auctions, tenders, contracts etc.);

payments (subventions, premiums, allowances, sponsoring, benefits etc.);

granting rights (issuing licenses, driving licenses, passports, identity cards, authorizations, certificates etc.);

enforcement of legislation (control, supervision, checking compliance with or violation of the law, imposing sanctions, punishments etc.).

11. Assessment of the organizational structure of the organization

The assessment of the organizational structure of the organization assumes:

analysis of flowchart;

analysis of job descriptions;

analysis of work processes and procedures.

12. Assessment of Codes of Ethics

Codul de etică este un set de principii morale sau valori utilizate de instituții pentru a îndruma conduita atât a instituției în sine, cât și a angajaților săi în toate activitățile atât interne, cât și externe. Un cod de etică se aplică atât individual, cât și colectiv membrilor instituției și are impact asupra afacerilor interne, dar și asupra celor cu factori implicați din exterior. Evaluarea codului de etică presupune evaluarea măsurii în care codul oferă orientarea explicită în problemele morale importante, care pot apărea în cursul activităților desfășurate de instituție.

III. Corruption risk assessment

13. The corruption risk assessment as such assumes the following:

Investigation and identification of risks;

Analysis of risks.

14. Investigation and identification of risks

At this stage, information is being collected regarding existent and potential risks of corruption within the institution.

15. Methods to carry out investigation and identification of risks

At this stage, different methods are being used:

Assessment of employees' resistance against the corruption risks;

Administration of questionnaire to the employees of the organization;

Assessment of organization's relationship with the public;

Analysis of concrete corruption cases.

16. Assessment of employees' resistance against the corruption risks

The assessment of employees' resistance against corruption risks assumes assessment of the practices related to: selection of personnel; training of personnel; job description; internal and external cumulating positions; consultation and accountability; availability of supervision; special focus/attention for the integrity issues; job appraisal interviews; external contacts; accountability and supervision; interface between the professional/private life; malafide outsiders; malafide employees; gifts/additional income; physical security; lawfulness versus efficiency; loyalty; communication.

The assessment of employees' resistance against the corruption risks might be carried out in conformity with the model, attached as annexes No 1 to the present Methodology.

17. Administration of questionnaire to the employees of the institution

In order to verify the properness of the assessment of employees' resistance against the corruption risks within the institution, a questionnaire is to be distributed to the personnel. In this sense, a model-questionnaire is recommended as instrument, attached as annexes No 2 to the present Methodology. The questionnaire might be adapted to the specific of each organization. The outcomes of the questionnaire are to be analyzed using the answers interpretation instrument, attached as annexes 3 to the present Methodology.

18. Assessment of institution's relationship with the public

The assessment of institution's relationship with the public assumes a detailed analysis of all procedures related to public relation, including procedures related to the examination of petitions, level of transparency of the institution, institution's web page, relationship with mass media.

19. Analysis of concrete corruption cases

The analysis of concrete corruption cases assumes detailed investigation of actual or typical corruption cases, committed by the employees of the institution, in order to identify eventual shortcomings in the management of the organization, as well as to determine the real or potential capacities of the institution to prevent the phenomenon.

20. Techniques for the investigation and identification of risks

In order to investigate and identify corruption risks, the following techniques for collection of information are being used:

Revision of basic information – collection of information from pre-existent sources, as for example, the previous investigation or an assessment carried out by groups of interest, public officials, auditors, Court of Accounts, Parliament, as well as information obtained from petitions of citizens or mass media;

Collection of information from surveys – information obtained from population's answers to written questionnaires or verbal interviews. Those might be administrated to the population in general, or to a group of people, selected for comparative studies;

Use of target groups – collection of information using target groups. The target groups are concrete groups, invited to discuss subjects of specific interest. This technique produces a qualitative assessment rather than a quantitative one, offering

detailed information regarding visions on the corruption, its reasons, as well as ideas regarding the possibilities of a specific authority in fighting corruption;

On-site observations – observation of a concrete activity.

21. Risk analysis

An efficient risks assessment assumes administration of identified risks, a risk analysis. In some cases it is impossible to fully avoid risks; however it is possible to reduce the identified risk till an acceptable level of potential damage.

In a similar way, it is impossible to allocate the same time, attention, and resources to each of the identified risks. Therefore, it is essential to prioritize the identified risks depending on the level of threat those imply for the institution.

The prioritization of risks is to be carried out depending on the impact of each concrete risk, its eventual continuation, or depending on the probability of its occurrence.

21.Prioritization of risks depending on the impact

Depending on the impact it implies, the risk might be:

minor – the risk that will have an insignificant effect on the reputation of the organization or on its capacity to fulfill its objectives;

moderate – the risk that, in case it is not stopped, might have a significant effect on the reputation of the organization or on its capacity to fulfill its objectives;

grave – the risk that, by its consequences, might threaten the stability of the organization and the accomplishment of its objectives, causing significant financial damage, endangering the successful activity or the efficient functioning of the organization.

23. Prioritization of risks depending on the probability of its occurrence

Depending on the probability of its occurrence, the risk might be:

Of high probability of occurrence (almost certain risk) – the risk is expected to occur or will occur in the normal course of events;

Of medium probability of occurrence (possible risk) – the risk might occur at some stage in the future;

Of low probability of occurrence (seldom risk) – the risk might occur only in exceptional circumstances or in some unlikely ones.

IV. Outcomes of assessment: submittal of recommendations on how to eliminate or diminish the effects of the identified risks (drawing up integrity plans)

24. Report on the risk self-assessment

The assessment of preconditions and corruption risks is to be concluded by issuing a self-assessment Report.

25. Conditions for the self - assessment Report

The self-assessment Report needs to meet the following conditions:

To be written in a coherent and consistent manner;

To be written explicitly;

To ensure correct and clear expression;

To observe uniformity of terminology used.

26. Basic conditions to be met by the Report

The self-assessment Report needs to meet the following basic conditions:

To indicate the date and the place of issue, the composition of the self-assessment group;

To contain conclusions regarding the self – assessment;

To contain recommendations on how to eliminate or diminish the effects of the identified risks;

To be signed by the members of the self-assessment group.

27. Structure of the self-assessment Report

The self-assessment Report is to be issued according to the following structure:

1. Assessment of preconditions;

1.1. Assessment of the legal framework relevant to the institution;

1.1.1. General assessment of the legal framework;

1.1.2. Assessment of provisions covering the vulnerable activities related to the internal organization of the institution;

1.1.3. Assessment of provisions covering the vulnerable activities related to the external attributions and tasks of the institution;

1.2. Assessment of the organizational structure of the institution;

1.2.1. analysis of flowchart;

1.2.2. analysis of job descriptions;

1.2.3. analysis of work processes and procedures;

1.3. Assessment of Codes of Ethics;

2. Assessment of institutional corruption risks;

Assessment of personnel's resistance against corruption risks;

Interpretation of answers to the questionnaire administrated to the employees of the institution;

Assessment of institution's relationship with the public;

Analysis of concrete corruption cases;

3. Analysis of identified risks. General conclusions;

4. Recommendations on how to eliminate or diminish the effects of the identified risks.

28. Integrity Plan

Based on the self-assessment Report, the self-assessment group is to draw up a draft Integrity Plan. The Integrity Plan represents a detailed Action Plan regarding the prevention of corruption within the institution. When drawing up the Integrity Plan, the authors need to take into account the prioritization of risks. Thus, actions dealing with risks of grave impact and risks of high probability of occurrence will have priority. Those actions are to be followed by the ones dealing with diminishing risks of moderate impact and of medium probability of occurrence. Finally, actions dealing with diminishing risks of low impact and of low probability of occurrence are to be planned. The Integrity Plan, after being coordinated with all the interested subdivisions of the institution, is to be approved by an order of the Head of the institution.

V. Reassessment

29. Importance of risk reassessment

The first assessment is an etalon evaluation that identifies and classifies the risks. The repeated assessment (reassessment) is to measure the progress of the prevention measures, applied on the identified risks; it is also to appreciate the efficiency of the integrity plans, to reassess the initial risks, to ensure the efficient use of institution's resources.

30. Periodicity of reassessment

The periodicity of the risks self-assessment is to be determined by the specific of the institution, but it ought to take place at least once in a three years. The risks with grave impact as well as the ones with high probability of occurrence ought to be assessed once a year in order to control and diminish them in an efficient manner. The reassessment is to be carried out also in case of any corruption crime, committed by an employee of the institution.

Annexes No 1

To the Methodology of corruption risks assessment in public institutions

Report-model regarding institutional resistance against corruption risks

Nr.	Aspects	Procedures applied/Identified problems	Identified risks	Solutions
------------	----------------	---	-------------------------	------------------

1.	Presence	No (or incomplete) regulations	<p>No uniform procedures; Insufficient thresholds against abuses;</p> <p>Acting at one's own discretion; Establishment of ad-hoc structures; High pressure on individual interpretation of integrity</p>	<p>Draw up or improve regulations for all categories of vulnerable activities.</p>
2.	Content	<p>Regulations are insufficiently focused on integrity requirement.</p>	<p>Insufficient provisions to prevent solo actions;</p> <p>Insufficient control elements provisions for supervision.</p>	<p>Discourage solo actions and improve supervision through the formulation of regulations pertaining to teamwork, separation of duties, joint decision-making, accountability (structural reporting), structural supervision, unambiguous criteria for evaluation,</p>

				written accounts of activities and decisions.
3.	Familiarity	Insufficient familiarity with the regulations.	No uniform procedures; Acting at one's own discretion.	Improve familiarity with the regulations by wide distribution and general accessibility.
4.	Application	Inadequate application of the regulations.	Arbitrariness	Encourage application of the regulations by exemplary conduct of the management, supervision, imposing sanctions in the event of non (or miss) application.
5.	Specific regulations on management of	Lack of, unknown and/or not applied regulations.	Threshold against leaking of information too	Prevent inspection by

	confidential information		low; insufficient alertness; reduced personal carefulness	unauthorized persons through drawing up regulations for the handling of information (production, mutation, distribution, duplication, administration, storing, etc.); wide distribution of the regulations; imposing sanctions on non-compliance; independent audits
6.	Specific regulations on management of funds and budgets	Lack of, unknown and/or not applied regulations.	Thresholds against malversation too low; Insufficient alertness; Too much pressure on personal perception on personal carefulness.	Prevent malversation by drawing up regulations for handing funds and expense claims (granting, control, spending, payments);

				<p>wide distribution of the regulations;</p> <p>imposing sanctions on non-compliance;</p> <p>independent audit.</p>
7.	<p>Specific regulations on purchase of goods and hiring services</p>	<p>Lack of, unknown and/or not applied regulation.</p>	<p>Thresholds against malversation too low;</p> <p>Insufficient alertness;</p> <p>Too much pressure on personal perception on personal carefulness.</p>	<p>Prevent fraud and conflict of interests by drawing up regulations for buying goods or hiring services (concerning quality demands, terms of delivery, questions, negotiations with suppliers, tenders;</p> <p>wide distribution of the regulations;</p> <p>supervision of compliance;</p> <p>imposing</p>

				sanctions on non-compliance.
8.	Specific regulations on private use of goods and services	Lack of, unknown and/or not applied regulation.	<p>Thresholds against malversation too low;</p> <p>Insufficient alertness;</p> <p>Too much pressure on personal perception on personal carefulness.</p>	<p>Prevent unlawful use by drawing up regulations for the private use of goods and services; wide distribution of the regulations;</p> <p>supervision of compliance;</p> <p>imposing sanctions on non-compliance.</p>
9.	Selection of personnel	Insufficient attention for integrity requirement.	<p>Insufficient insight into integrity of potential personnel;</p> <p>insufficient attention for vulnerable aspects of the new job;</p> <p>arbitrariness</p>	<p>Selection and appointment via consistent application procedures; requiring extensive CV's; requiring an verification of references; enquiries about performance in previous jobs; verification of original diplomas and certificates;</p>

				requiring a certificate of good behavior; informing applicants about integrity aspects involved in the position; taking the oath (or solemn affirmation) of office (integrity requirement); introduction program (attention for integrity).
10.	Training of personnel	Omission of an important means to draw attention to the integrity requirement.	Reduced alertness; Reduced awareness; Reduced carefulness.	Enhance integrity-related alertness an awareness by drawing specific attention to the integrity requirement in courses, information material.
11.	Job description	No or not updated, incomplete or	Insufficient clarity about duties and	Provide clarity on duties and

		imprecise job descriptions.	powers; Acting at one's own discretion.	powers through up-to-date, complete and precise job descriptions.
12.	Internal and external cumulating positions	Many types of vulnerable activities combined in one position	Inadequate concentration	Make the risk controllable through separation of duties
13.	„Gray area” presence	Virtual powers have wider scope than formally permitted	Lack of clarity about lawfulness of activities and decisions	Remove grey area through adequate job descriptions
14.	Consultation and accountability	No prior consultation, nor evaluation afterwards; No prior consultation, in the conditions of afterwards evaluation.	Lawfulness not checked; Mistakes not detected or corrected; Correction only possible when	Guarantee lawfulness of activities in “grey area” through consistent prior consultations (optimum

			<p>mistakes have already been made occasional prior consultation or evaluation afterwards;</p> <p>Arbitrariness</p>	<p>threshold) or evaluation afterwards (minimal threshold)</p>
15.	Availability of supervision	Supervisor /direct chief/ not available for quick consultation.	<p>Solo actions;</p> <p>Acting at one's own discretion.</p>	<p>Prevent solo action and improve control by</p> <p>adequate availability of the supervisor;</p> <p>appoint deputy supervisor (if necessary).</p>
16.	Attention for integrity	No or few consultations focused on integrity (less than once a month)	<p>Acting at one's own discretion;</p> <p>Insufficient (social) control;</p> <p>Insufficient alertness for or awareness of integrity requirement.</p>	<p>Prevent solo actions, stimulate (social) control and attention for integrity through</p> <p>regular consultations (at least once a month);</p> <p>Integrity as a</p>

				permanent item on the agenda
17.	Job appraisal interviews	Job appraisal interviews less than once a year and/or no attention for vulnerable aspects.	Inadequate control, guidance supervision and correction; Reduced alertness and awareness.	Stimulate control and alertness by periodical job appraisal / evaluations interviews in which attention is paid to integrity aspects.
18.	External contacts	Supervisor / direct chief/ is not aware of external contacts of employees.	Inadequate control; Reduced opportunity to identify risky contracts; Solo action.	Prevent solo actions stimulate control and prevent conflicts of interests through obligatory reports on external contacts; external contacts as a permanent item on the

				agenda.
19.	Accounting and supervision	<p>Frequency of giving account of vulnerable activities is insufficient;</p> <p>Routine checks by supervision</p>	<p>Inadequate supervision;</p> <p>Solo action;</p> <p>Acting at one's own discretion;</p> <p>Inadequate control</p>	<p>Stimulate the correct and careful performance of vulnerable duties in a preventive sense and if necessary correct mistakes through asking employees to provide accounts as regularly as possible;</p> <p>overall supervision or representative random checks of work</p>
20.	Interfaces business/private life	<p>Private problems affecting the job are not discussed;</p> <p>Official decisions with consequences for private life are handled by one person.</p>	<p>Breach of integrity caused by insufficient recognition of tensions and conflict situations;</p> <p>Breach of integrity caused by insufficient recognition of complex of interests.</p>	<p>Prevent breach of integrity as a result of interfaces between business and private life through the creation of a working climate in which private problems can be discussed; the</p>

				<p>appointment of a company social worker;</p> <p>obligation to report decisions with consequences for private life to the supervisor;</p> <p>Delegating or sharing such decision-making.</p>
21.	Malafide outsiders	Attempted violations of integrity are not reported	Undermining of the organization.	Stimulate company-wide alertness through obligation to report attempted violations of integrity to the supervisor.
22.	Malafide employees	Lack of, unknown and/or not applied guidelines on how to deal with malafide employees	<p>Inconsistent approach and correction of violations (arbitrariness);</p> <p>No awareness of the consequences of corruptible behaviour.</p>	Prevent corruptible behavior by employees through imposing sanctions.
23.	Gifts, additional income	Lack of, unknown and/or not applied regulations dealing	Conflict of interests; (Too) much	Prevent conflict

		with gifts and additional income.	pressure on personal perception of integrity.	of interests by drawing up regulations, and distributing them widely. Supervision of compliance and, if necessary, imposing sanctions on non-compliance.
24.	Physical security	Inadequate provisions.	thresholds (too) low against violations of integrity by third parties.	Prevent integrity violations by outsiders through adequate physical security (entrance checks, duty to identify oneself, registration and escort of visitors, locking offices, closets, desks, etc.).
25.	Lawfulness versus efficiency	Disproportionate attention for efficiency at the expense of lawfulness	Pressure on personal perception of integrity becomes (too) much.	Increase emphasis on lawfulness and decrease pressure on personal perception of integrity by

				<p>focusing on proper job descriptions, awareness raising about vulnerable activity, relevant procedures regarding external contacts, encouraging accountability and supervision</p>
26.	Loyalty	<p>Insufficient loyalty or exaggerated loyalty with one's own department or colleagues</p>	<p>(Too) little attention for general interest; Defiant behavior; Covering up of mistakes or shortcomings.</p>	<p>Stimulate loyalty within the (total) organization by drawing up a general code of conduct. Reduce the risk by focusing on the measures dealing with external contacts, interface business/private life, gifts/additional income.</p>
27.	Communication	<p>Inadequate internal Communication.</p>	<p>Gap between management and employees;</p>	<p>Reduce the risk by focusing on the measures</p>

			<p>No clarity about activities of colleagues;</p> <p>Reduced social control.</p>	<p>dealing with the job description, supervision, frequency of consultations, focus on integrity, job appraisals, external contacts, regulations covering the confidential information, funds and budgets, purchase of goods and hiring services, private use of goods and services, gifts and additional income; stimulate internal communication and also lay down agreements in a general code of conduct.</p>
--	--	--	--	---

Annexes No 2

To the Methodology of corruption risks assessment in public institutions

MODEL QUESTIONNAIRE FOR THE PERSONNEL

Please tick only one box per question

Nr.	Question	Answer
01	Do you carry out vulnerable actions? (If not, continue with question 05)	Yes
		No
01A	If you do carry out vulnerable actions, could you give (a maximum of) three examples below?	
	Example 1.	
	Example 2.	
	Example 3.	
01B	Are there regulations for the execution of the actions you have mentioned?	
	Example 1.	Yes
		No

		Don't know
	Example 2.	Yes
		No
		Don't know
	Example 3.	Yes
		No
		Don't know
01C	If yes, please indicate for each example whether you know the content of these regulations.	
	Example 1.	Yes
		No
	Example 2.	Yes
		No
	Example 3.	Yes
		No
01D	If yes, please indicate for each example whether you have a copy of these regulations.	
	Example 1.	Yes
		No
	Example 2.	Yes
		No
	Example 3.	Yes
		No
02	Do you receive special guidance from your superior for the execution of	Yes

	those actions, apart from possible normal job- related consultations	
--	--	--

		No
03	Do you execute these actions in co-operation with close colleagues?	Yes
		No
04	When you are absent, are you replaced by a colleague who is equally qualified to execute the vulnerable actions?	Yes
		No
05	Are you in possession of your job description?	Yes
		No
06	Do you think that, in practice, you have greater authorizations than you have formally been given? In other words: is there a 'grey area' in this respect?	Yes
		No
07	If yes, do you consult with your superior <i>beforehand</i> for decisions in this 'grey area'?	Yes
		Sometimes
		No
08	Do you account to your superior <i>afterwards</i> about decisions in this 'grey area'?	Yes
		Sometimes
		No
09	Is your superior generally quickly and easily accessible for consultation?	Yes
		No
10	Is there a form of joint consultation about work (work consultation) with your superior and close colleagues? If not, continue with question 13.	Yes

		No
11	If you have work consultations, can you indicate the average frequency?	
	Less than once per month	Yes
	Once per month	Yes
	More than once per month	Yes
12	If you do have work consultations, how often is the topic 'integrity in work situations' discussed?	
	Never	Yes
	Less than once per month	Yes
	Once per month	Yes
	More than once per month	Yes
13	Do you have an evaluation by your superior (a minimum of) once per year?	Yes
		No
14	If you have an evaluation by your superior, is attention given to the topic of 'integrity in work situations'?	Yes
		No
15	Do you have contacts with external parties in your work? (If not, continue with question 18)	Yes
		No
16	Does your superior know which external parties you have contact with in your work?	Yes
		No

17	Does your superior know what these contacts are about?	Yes
		No
18	How often, on the average, do you report to your superior about your work?	
	Less than once per month	Yes
	Once per month	Yes
	More than once per month	Yes
19	Does reporting to your superior about your work lead, in practice, to:	
	Complete report and control of content?	Yes
	Testing or controlling parts of the work?	Yes
	Routine approval of the work?	Yes
20	In your work, have you ever heard about of a colleague's private problems (financial or relationship problems etc.)?	Yes
		No

21	Is it possible to discuss private problems (financial or relationship problems etc.) in your organization?	Yes
		No
22	Have you ever been confronted with matters in which your professional decisions could have consequences for your private life?	Yes
		No
23	If yes, have you handed over the matter to someone else, or involved a colleague or your superior in the decision?	Yes
		No
24	Have you ever heard of attempts by external parties to improperly influence a colleague's professional decisions?	Yes
		No
25	If yes, do you know if these attempts have been formally reported within your organization?	Yes
		No
26	Have you ever heard of cases of fraud, theft, or other actions that constitute breaches of integrity?	Yes
		No
27	Are there regulations for dealing with such cases? (If not, continue with question 30)	Yes
		No
		Don't know
28	If so, do you know the content of these regulations?	Yes
		No
29	Are these regulations applied in practice?	Yes

		No
		Don't know
30	Do you deal with confidential information?	Yes
		No
31	Are there regulations in your organization or department regarding the dissemination to unauthorized persons of confidential information?	Yes
		No
		Don't know
31A	If yes, do these regulations relate to:	
	The production, mutation and/or translation of confidential information?	Yes
		No
		Don't know
	The dissemination of confidential information?	Yes
		No
		Don't know
	The reproduction of confidential information?	Yes
		No
		Don't know
	The administration or documentation of confidential information?	Yes
		No
		Don't know
	The storage or safekeeping of confidential information? (For example a 'clean desk policy')	Yes
		No
		Don't know

32	Are these regulations applied in practice?	Yes
		No
		Don't know
33	Do you deal with funds or budgets? (If not, continue with question 36)	Yes
		No
34	Are there regulations for your organization or department with respect to dealing with funds or budgets?	Yes
		No
		Don't know
34A	If yes, do these regulations concern: The allocation of funds or budgets?	Yes
		No
		Don't know
	The management of funds or budgets?	Yes
		No
		Don't know
	The spending or disbursing of funds or budgets?	Yes
		No
		Don't know
35	Are these regulations applied in practice?	Yes

		No
		Don't know
36	Do you deal with expense claims? (If not, continue with question 42)	Yes
		No
37	Are there guidelines for your organization or department with respect to filing and approving expense claims?	Yes
		No
		Don't know
38	If yes, do you know the content of these guidelines?	Yes
		No
39	Do you deal with the procurement of goods and services? (If not, continue with question 42)	Yes
		No
40	Are there regulations for the procurement of goods and services in your organization or department?	Yes
		No
		Don't know
40A	If yes, do these regulations apply to:	
	Determining quality requirements or conditions of supply or purchase	Yes
		No
		Don't know
	Requesting quotes, offers or tenders?	Yes

		No
		Don't know
	Negotiations with (potential) suppliers?	Yes
		No
		Don't know
41	Are these regulations applied in practice?	Yes
		No
		Don't know
42	Are there regulations in your organization or department for the private use of goods and services from work? (If no, or unknown, continue with question 45)	Yes
		No
		Don't know
43	If yes, do you know the content of these regulations?	Yes
		No
44	Are these regulations applied in practice?	Yes
		No
		Don't know
45	Are there regulations in your organization or department for accepting gifts or hospitality? (If no, or unknown, continue with question 48)	Yes
		No
		Don't know
46	If yes, do you know the content of these regulations?	Yes
		No

47	Are these regulations applied in practice?	Yes
		No
		Don't know
		Don't know
		No
48	Are there regulations in your organization or department for moonlighting or additional income? (If no, or unknown, continue with question 51)	Yes
		No
49	If yes, do you know the content of these regulations?	Yes
		No
50	Are these regulations applied in practice?	Yes
		No
		Don't know
51	Are there regulations in your organization or department for accepting remuneration from third parties for activities that are a natural part of your function or job (such as giving lectures or courses, consultancy etc.)? (If no, or unknown, continue with question 54)	Yes
		No
		Don't know
52	If yes, do you know the content of these regulations?	Yes
		No
53	Are these regulations applied in practice?	Yes
		No

		Don't know
54	Has your organization or department made provisions on the premises so that unauthorized persons cannot enter the room where you work?	Yes
		No
	In the organization or department where I work:	
55	It is more important to do things 'according to the book' than to finish things on time.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
56	You are evaluated mainly on the result of the work, not on the way you have achieved these results.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
57	It is often allowed to improvise in the interest of achieving results.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
58	Most colleagues put their own interest before that of the department or organization	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	

59	Most colleagues generally put the interest of their own department before that of the entire organization	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
60	You do not let down your colleagues, no matter what happens.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
61	It is almost impossible to follow 'on the shop floor' what direction the organization's or the department's management is taking.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
62	It is normal that close colleagues inform each other about work-related actions that will be taken or have already been taken.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
63	I am often confronted with different messages from different parts of the organization or department about the same subject.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	

64	Most colleagues only dare to criticize management with one another.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
65	Serious mistakes or omissions are generally tolerated.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
66	Mistakes made by higher placed functionaries are tolerated and covered up much more easily than for lower placed personnel.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
67	It is very important to phrase remarks and comments very carefully if you want to criticize something.	Agree
		Neither agree nor disagree
		Disagree
	In the organization or department where I work:	
68	Offering criticism seldom leads to adaptations or changes in work procedures.	Agree
		Neither agree nor disagree
		Disagree
69	What type of position do you have?	Managerial

		Non-managerial
70	What is the name of the organization, department, team, bureau etc. where you work?	

Annexes No 3

To the Methodology of corruption risks assessment in public institutions

**INTERPRETATION OF ANSWERS FROM THE MODEL PERSONNEL –
QUESTIONNAIRE**

Aspect	Eventual answers	Way of interpretation
Vulnerable actions (questions 1-4)	If the answer is ‘no’ to question 1, while it is known with certitude that there are vulnerable activities.	Insufficient alertness or awareness regarding vulnerable aspects of actions in function.
	The answers ‘no’ or ‘don’t know’ to questions 1b and the answer ‘no’ to 1c (and to a lesser degree to 1d).	Insufficient clarity about correct execution of vulnerable actions; Stimulus for acting according to the circumstances (on one’s own accord) with (too) much pressure on personal concept of integrity.
	The answer ‘no’ to questions 2 and 3	Solo actions with insufficient consultation and control.
	The answer ‘no’ to question 4	Insufficient knowledge and authorization with the (possible) result that vulnerable actions are not executed with sufficient care.
‘Grey area’ (questions 5-8)	The answer ‘no’ to question 5.	Insufficient knowledge about formal tasks and authorizations.
	The answer ‘no’ to questions 7 and 8.	Complete lack of control of lawfulness of actions or decisions, resulting in mistaken actions not being noticed or corrected.

	The answer 'sometimes' to questions 7 and 'yes' to question 8.	Arbitrary actions.
Consultation (questions 9-14)	The answer 'no' to question 9	Stimulus for acting according to the circumstances (on one's own accord) with (too) much pressure on personal concept of integrity.
	The answers 'no' to question 10 and 'yes, but less than once per month' to question 11 may	Solo actions and decreasing possibilities for hierarchical and collegiate control
	The answers 'not once', or 'less than once per month' to question 12.	Insufficient alertness or awareness concerning the requirement of integrity.
	The answer 'no' to questions 13 and 14.	Insufficient management, coaching, correction and control of actions; Insufficient recognition that integrity must play an important part in the actions, resulting in less alertness and awareness.

<p>External contacts (questions 15-17)</p>	<p>The answer 'no' to questions 16 and 17.</p>	<p>Insufficient control, resulting in lack of possibilities to recognize risky contacts; Solo actions.</p>
<p>Accountability and control (questions 18-19)</p>	<p>If a frequency is given for question 18, which is insufficient, according to the assessment group, given the nature of the organization and subdivision.</p>	<p>Insufficient control of vulnerable actions; Solo actions and acting according to the circumstances</p>
	<p>If the answer to question 19 is 'routine approval'</p>	<p>Insufficient depth of control.</p>

Interfacing of work and private life (questions 20-23)	The answers 'yes' to question 22 and 'no' to question 23	Insufficient recognition of (appearance) of conflict of interest, possibly resulting in loss of integrity.
Malafide external parties (questions 24-25)	The answers 'yes' to question 24 and 'no' to question 25	Insufficient sense of security of person in question; Insufficiently increased alertness of supervisor and close colleagues with respect to the external parties concerned.
Malafide functionary (questions 26-29)	The answers 'no' to question 26	Insufficient safeguard of consistent approach and correction of actions involving breaches of integrity.
	The answers 'don't know' to question 27 and/or to question 28	Insufficient awareness of the consequences of actions involving breaches of integrity; Arbitrary actions, acting according to the circumstances. .
	The answers 'no' or 'don't know' to question 29	Insufficient safeguard of consistent approach and correction of actions involving breaches of integrity; Insufficient awareness of the consequences of actions involving breaches of integrity; Arbitrary actions, acting

		according to the circumstances; Insufficient preventive effect of the approach and correction of actions involving breaches of integrity; .
--	--	---

Confidential information (questions 30-32)	The answers 'no' or 'don't know' to questions 30, 31A and/or 32	Threshold against information leaks is too low; Pressure on personal alertness and care regarding actions is too great.
Money and budgets (questions 33-35)	The answers 'no' or 'don't know' to questions 34, 34A and/or 35	Threshold against fraud with money is too low; Pressure on personal alertness and care regarding actions is too great.
Goods and services (questions 39-41)	The answers 'no' or 'don't know' to questions 40, 40A and/or 41	Threshold against fraud and conflicts of interest with procurement of goods and services is too low; Pressure on personal alertness and care regarding actions is too great.
Private use of goods and services (questions 42-44)	The answers 'no' or 'don't know' to questions 42 or 44 and 'no' to question 43	Threshold against improper appropriation of goods and services is too low; Pressure on personal alertness and care regarding actions is too great.
Gifts and hospitality (questions 45-47)	The answers 'no' or 'don't know' to questions	Threshold against conflicts of interest is too low;

	45 or 47 and 'no' to question 46	Pressure on personal alertness and care regarding actions is too great.
Moonlighting and additional income (questions 48-53)	The answers 'no' or 'don't know' to questions 48 or 50 and 'no' to question 49	Threshold against conflicts of interest is too low; Pressure on personal alertness and care regarding actions is too great.
	The answers 'no' or 'don't know' to questions 51 or 53 and 'no' to question 52	Threshold against conflicts of interest is too low; Pressure on personal alertness and care regarding actions is too great.

Physical security (question 54)	The answer 'no' to question 54	Insufficient sense of security (alertness and awareness) in the (management of the) organization; Threshold against breaches of integrity by external parties is too low.
Lawfulness versus efficiency (questions 55-57)	The answers 'agree' to question 55 and 'disagree' to questions 56 and 57, in combination, may indicate an emphasis on efficiency.	Excess of pressure on personal alertness and care regarding actions during the work procedures that form the basis for the result in question. More specifically, an emphasis on efficiency can be particularly risky if in addition, a negative answer has been recorded for one or more of the following items: vulnerable actions, 'grey area', external contacts and accountability and control. Organizational culture can then be an additional explanation for a (possible) negative answer to these questions.
Loyalty (questions 58-60)	The answers 'agree' to questions 58-60	Insufficient loyalty towards the (management of the) organization, or an overly loyal attitude towards the department

		<p>or the direct colleagues. Insufficient or exaggerated loyalty can be risky if in addition, a negative answer has been recorded for one or more of the following items: external contacts, interface of work and private life (questions 22-23), gifts and hospitality, or moonlighting and additional income.</p>
--	--	--

<p>Communication (questions 61-63)</p>	<p>The answers 'agree' to questions 61 and 63 and 'disagree' to question 62</p>	<p>Insufficient internal communication. Insufficient communication can be particularly risky if in addition, a negative answer has been recorded for one or more of the following items: 'grey area', consultation, external contacts, confidential information, money and budgets, goods and services, gifts and hospitality, or moonlighting and additional income.</p>
<p>Self-correction mechanisms (questions 64-68)</p>	<p>The answers 'agree' to questions 64-68</p>	<p>Insufficient mechanisms for self-correction. Insufficient mechanisms for self-correction can be particularly risky if in addition, a negative answer has been recorded for the item accountability and control.</p>